

From: CORDEIRO, Francesca (IMPERIAL COLLEGE HEALTHCARE NHS TRUST)
Sent: 10 August 2023 17:45
To: Planning Planning
Subject: FW: Planning Application References 2023/0282/P & 2023/0650/L
Attachments: Letter CTRA to Camden Aug 2023.pdf

Please redact personal details

Sent from [Mail](#) for Windows

Subject: RE: Planning Application References 2023/0282/P & 2023/0650/L

Dear Charlotte

I was shocked to discover at the recent meeting of the RPCAAC that the CEPC had submitted 3 new drawings and a further re-consultation process had begun.

There are still no notifications visibly posted on lampposts on Chester Terrace.

Furthermore, in your last correspondence with me below, you DID NOT MAKE ME AWARE OF THE RECONSULTATION! Perhaps you can explain the timings?

But more importantly I would demand an explanation as to why you have not made this reconsultation process common knowledge to ALL the people who had previously objected.

Furthermore, I have previously requested that as Chair of the CTRA, I was a stakeholder that needed official recognition in any advisory/stakeholder application.

I would like to formally object once more to the planning application above as attached.

But, I would like to make a Freedom of Information request regarding all correspondence that has occurred between Camden Planning and CEPC over this planning application.

Many thanks

Professor Cordeiro
CTRA Chair

Sent from [Mail](#) for Windows

Subject: RE: Planning Application References 2023/0282/P & 2023/0650/L

Dear Francesca,

Thank you for your email and I do apologise for not responding sooner.

The applications are currently still under consideration. I am awaiting additional information from the agent, and any new information received will be uploaded to the application once received.

Kind regards,

Charlotte Meynell
Senior Planning Officer



Subject: RE: Planning Application References 2023/0282/P & 2023/0650/L

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Dear Charlotte

I write again to enquire as to the above planning applications. Do you have any update please on the Members Briefing Panel?

Yours sincerely
Professor Francesca Cordeiro
Chair, Chester Terrace Residents Association

Subject: RE: Planning Application References 2023/0282/P & 2023/0650/L

Dear Charlotte

Regarding the above CEPC planning applications, we had expected a referral to the Members Briefing Panel. Can you please let me know what is the status of this application?

Yours sincerely
Professor Francesca Cordeiro
Chair, Chester Terrace Residents Association

Sent from [Mail](#) for Windows

Subject: Planning Application References 2023/0282/P & 2023/0650/L

Dear Charlotte Meynell

1. We have been in touch with Sadiq Khan, the London Mayor, regarding the above two planning applications and the authority being sought by the CEPC to, needlessly, and without justification, cut down over 20 mature trees and mature shrubs, at any time, in Chester Terrace Gardens.
2. We draw Camden's attention that the Mayor's office has informed us that he is committed to increasing the tree canopy cover in London, and has set a target in his London Environment Strategy of increasing the area of London covered by trees by ten per cent of current levels by 2050.
3. To support this goal, the Mayor has already funded the planting of over 440,000 trees since 2016.
4. He has further stated that protection of London's existing trees is an important part of maintaining and increasing valuable canopy cover.
5. The Mayor has strengthened protections for trees and woodlands in his new March 2021 London Plan, The Spatial Development Strategy For Greater London. Policy G7 Trees and Woodlands states that "Development proposals should ensure that, wherever possible, existing trees of value are retained."

https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf

6. The office of the Mayor has also drawn our attention to the work they do in partnership with many other organisations in London to help protect, maintain and expand London's urban forest, in the London Urban Forest Plan.

This is explained further on this link www.london.gov.uk/what-we-do/environment/parks-green-spaces-and-biodiversity/london-urban-forest-partnership

7. Additionally it should be noted that the London Tree Officer Association have information about valuing existing trees using their CAVAT method. This important issue has already been drawn to the attention of Camden by my colleague Michael Webber on March 31st.

The above information provides Camden with further reasoning and grounds as to why the Planning Applications, 2023/0282/P & 2023/0650/L, should be rejected and I hope the views of the London Mayor will be taken into consideration.

Yours sincerely
Professor Francesca Cordeiro
Chair, Chester Terrace Residents Association

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**CHESTER TERRACE RESIDENT'S ASSOCIATION
CHESTER TERRACE, REGENT'S PARK, NW1 4ND**



Charlotte Meynell
Senior Planning Officer

10th August 2023

Dear Ms Meynell

**Objection to Planning Application No 2023/0282/P and 2023/0650/L
Chester Terrace Gardens
Application type: Full Planning Permission**

I am writing to you as Chair of Chester Terrace Residents Association. We represent the majority of households on the Terrace, and are deeply concerned with the above application, and strongly urge Camden Planning Committee to OBJECT.

Below is a summary of why the planned application is flawed, unnecessary and destructive.

1. Background

Chester Terrace is a Nash Terrace in Regent's Park characterised by Corinthian arches and the longest façade and gardens in the Outer Circle. The buildings are owned by the Crown Estate, and are leased to individual house owners.

An integral part of the Chester Terrace are the gardens, with its handsome old trees – some dating back to the mid-19th century. Their beauty is captured in the image above, showing the trees lining the Terrace.

These trees have added considerable character, natural beauty and substance to the Terrace, and are an important contributor to the local macro and micro-environments.

The Crown Estate Paving Commission are now proposing to cut down over 20 trees and shrubs in the gardens under the pretext of repairing the foundations for the garden's balustrade.

We believe that the CEPC is using the repair of the foundations for the balustrade as a Trojan Horse in order to remove the beautiful trees and shrubs in Chester Terrace Gardens.

2. The Unnecessary Destruction of 20 Historic and Established Trees

In 2017, the CEPC commissioned a report entitled 'A Total Work of Architectural and Landscape Art' A Vision for Regent's Park' by Longstaffe-Gowan and David Lambert. The core of that report was the flawed assertion that the existence of mature trees and shrubs in the gardens was at conflict with the original "vision" of Nash. The report unrealistically, wants to return the gardens to the times of the early 1800s with the materially misleading pictures shown in the early part of the nineteenth century. It should be noted that, at the date of the pictures, the trees & shrubs had just been planted in the gardens (Chester Terrace was built in 1825) so understandably they had not yet become mature trees & mature shrubs. It should be further noted that at that time there were only horse drawn carriages - no cars, coaches, lorries, motor bikes etc. Regent's Park itself has significantly changed in the last 200 years and the characteristics of life in London in 2023 are fundamentally different from the early 1800s plus the socio-economic conditions existing, the way of life of its residents & their composition differs dramatically from 200 years ago.

Please note that the references to Nash's vision in Longstaffe-Gowan and David Lambert's document are inaccurate & are not supported by the documentary evidence. We would refer the Committee to: Elmes, Metropolitan improvements (1827) pages 28-29; Nathan Cole, The royal parks and gardens of London, their history and mode of establishment (1877) page 36; and Tyack, John Nash, architect of the Picturesque (2013) page 85.

Following this report, in 2019 the CEPC produced a Tree Management Strategy document. When we were first given this report, the CTRA commissioned an Arboricultural Report (see SJ Stephens Assoc Letter attached).

As you will see, there is a real difference in the categorisation of the trees by CEPC compared to SJ Stephens. This is especially based on the age of the trees which it appears CEPC have mistakenly identified as Category C - ie low quality, not of significant age As The Stephens report says – the CEPC's report has " little discussion of the many benefits trees provide apart from through their landscape impact, in particular, through

- reducing air pollution
- combatting heat islands
- increasing biodiversity
- reducing flood risk
- improving health and well being
- fixing CO2.

All these benefits are related to tree canopy size. In general, large canopy trees contribute a disproportionately high part of the environmental services provided. There

are limited opportunities where large canopy trees can be accommodated within cities and, wherever possible, they should be maximised.”

3. Sustainability

Following from above, the proposed actions by the CEPC regarding cutting down the mature trees & shrubs also goes against the guidelines of in the Mayor of London’s proposals to improve air quality in London.

<https://www.london.gov.uk/programmes-strategies/environment-and-climate-change/pollution-and-air-quality>

The WHO additionally recommend reducing particulate matter, ozone, nitrogen dioxide and sulphur dioxide.

https://www.who.int/health-topics/air-pollution#tab=tab_1 + https://apps.who.int/iris/bitstream/handle/10665/69477/WHO_SDE_PHE_OEH_06.02_eng.pdf;jsessionid=1495963CFF7019D08443E7994A9C1356?sequence=1

The quality of air in NW1 4ND is already poor. Below is the data from

<https://londonair.org.uk/map-maker/>

1. NO2 is 44 µg/m³ exceeding the WHO limit of 40 µg/m³
2. PM10 is 24 µg/m³ exceeding the WHO limit of 20 µg/m³
3. PM2.5 is 15 µg/m³ exceeding the WHO limit of 10 µg/m³

DEFRA states “Air pollution can cause both short term and long term effects on health and many people are concerned about pollution in the air that they breathe.” The schedule below, also from DEFRA, shows the health effects of the pollutants listed.

Pollutant	Health effects at very high levels
Nitrogen Dioxide, Sulphur Dioxide, Ozone	These gases irritate the airways of the lungs, increasing the symptoms of those suffering from lung diseases
Particles	Fine particles can be carried deep into the lungs where they can cause inflammation and a worsening of heart and lung diseases
Carbon Monoxide	This gas prevents the uptake of oxygen by the blood. This can lead to a significant reduction in the supply of oxygen to the heart, particularly in people suffering from heart disease

4. Controversial Balustrade & Foundation Work

The CEPC have over the years commissioned a number of reports on the Chester Terrace Balustrade. The CTRA have commissioned an independent review of all these reports and their conclusion by Marek Glowinski BSc CEng MStructE FConsE of TZG Partnership, Engineering Consultants. (see Chester Terrace Gardens Architectural Report attached)

Please note the following extract:

a. The structural reports all uniformly identify various defects. However, there is a wide difference in conclusions for recommended remedial works.

b. The earliest report (BNP’s one of 11.7.17) provides various options for works to the balustrade but does not identify any need for remedial works to the retaining wall. Alan Baxter Associates’ review (22.7.21) has similar

recommendations to BNP with regard the balustrade. It does also state that movement to the retaining wall is likely to continue and probably adversely affect the balustrade. ABA do point out that the retaining wall "...might be manageable within the ongoing maintenance cycle" which could thus "...avoid heavy and costly solutions...". They go on to note that "...we have found that similar structures have responded well to this approach in the past."

c. HPM and Ramboll both identify the possibility of such a low intervention approach, but HPM appear to take the view that this 200 year old structure should be expected to conform to modern design standards.

d. HMP and Ramboll cite BS6180:2011 which provides guidance for barriers "...in and around buildings." BS6180 considers the requirements for barriers that prevent falls into lower areas. The code suggest that barriers should be provided when there is a drop of 380mm or more. I noted during my visit that the drop between the road over the majority of the wall is less than 380mm and for significant lengths, less than 150mm. It is only in the localised indented areas that the drop is of the order of 800mm: the wall is barely a retaining wall at all.

e. Both BNP and ABA appear to recognise that there is nothing inherently unsatisfactory with a wall that moves a little. From my inspection and my review of the photographs I consider that, considering the age of the wall, the amount of distortion is very slight indeed and not significant enough to warrant its wholesale replacement and removal of trees. Certainly, there are areas that could do with repair but not to the extent that necessitates a new completely rigid structure. Replacement, on the face of it, is not an approach that might be considered sustainable.

f. I would point out that when the wall was first constructed it is likely that the notion of a garden wall that didn't move would not have even existed.

g. HPM and Ramboll both consider keeping the wall as one of their various options. HPM appear not to favour this approach mainly due to the wall not complying with BS6180. I do not consider this requirement to be strictly applicable – certainly for the major part of the wall. Ramboll do not put forward a strict requirement for the existing wall to comply with BS6180 but do state that "cosmetic repairs" could "...allow wall failure if left unchecked". Considering that the wall, over the vast majority of its length, has deflected 40/50 millimetres in two hundred years it seems unlikely that wholesale failure is likely in the foreseeable future. Ramboll, in fact, recommend that a "...targeted, tailored approach is adopted for the wall." They state (correctly, in my opinion) that replacement would result in "loss of authenticity of wall – not aligned with principles of conservation".

Conclusion on the Recommendations

It would appear that BNP, ABA, HPM and Ramboll all consider (to varying degrees) that the existing wall could be kept.

This is in keeping with the Institute of Structural Engineers Code of conduct, Guidance Note 7 that states: "...members should consider the effects of their design and the impact of that design on the environment by considering the whole life cycle of the building through design, construction, use, re-use and

demolition such that it reduces unnecessary consumption of resources and minimises waste.”

The final choice of the proposed scheme is at odds with the above statement.

The above conclusions of the TZG Partnership report clearly challenges the basis of the CEPC applications for planning permission. Please note, the CEPC planning applications are also at odds with the Institute of Structural Engineers Code of Conduct, Guidance Note 7 & BS 6180.

5. Unnecessary and Inappropriate Balustrade & Foundation Proposed Plan of Works

The CTRA would also like to highlight the inappropriate CEPC works which have been by summarised again by Marek Glowinski BSc CEng MStructE FConsE of TZG Partnership, Engineering Consultants, in below extract. (see Chester Terrace Gardens Architectural Report attached):

- a. On the basis that the retaining wall is to be replaced, I would concur that its design should conform to BS6180 and that foundations should extend down to the London Clay stratum. In that case the concept of a piled reinforced concrete retaining would appear to be the best option.*
- b. However, HPM's drawings and Method Statement show that numerous trees need to be removed (Tim Moya Associates' Arboricultural Report states: "1.4 The Proposed Development requires the removal of 20 No. trees..."). From this I take it that these trees could be retained should one of the other options be implemented.*
- c. HPM's Method Statement shows a 21 Tonne Excavator being required to install the piles. For reference (see Image 1) which shows a typical 21 Tonne Excavator. I do not consider such a machine is necessary to install piles or excavate the foundation. Piles may be installed using much smaller machinery – some proprietary piling systems can be installed by hand (see Image 2). Using much smaller hand-installed systems would enable the piles to be installed around trees and their roots.*

In conclusion, the CTRA believe therefore that the proposed works are unnecessary & that Camden should reasonably deny planning permission.

I will of course be happy to answer any arising questions regarding this letter and to attend any meeting to discuss the contents.

Francesca Cordeiro

Professor M Francesca Cordeiro PhD MRCP FRCOphth
Chairman Chester Terrace Residents Association

Chair of Ophthalmology, Imperial College, London
Hon Con Ophthalmologist and Director ICORG Clinical Trial Unit, Western Eye Hospital

