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| 2023/3884/P | Janet Grauberg | 17/11/2023 22:00:21 | OBJ/NOT | <p>Objection from Janet Grauberg of West Hampstead Liberal Democrats to Planning Application 2023/3884/P - 339 Finchley Road NW3 6EP (Change of use of the upper ground floor from retail use (Use Class E) to a place of worship (Use Class F1)).</p> <p>A large number of people have been in touch with West Hampstead Liberal Democrats to voice their concerns about the above planning application, and this objection summarises the concerns raised.</p> <p>A key point in understanding the objections is that the Design & Access and Planning Statement says that 'The premises would be regularly used all day and evening, attracting congregations up to 150 people.' The building is intended to be open 8am -> 11pm Monday -> Saturday and 8am -> 6pm on Sunday. Thus this is not a proposal for a church that will only be busy for two services on a Sunday, but instead the expectation is for large numbers all day, every day.</p> <p>Parking. There is no Travel or Transport Plan -> instead the application simply asserts that the majority of users of the building will arrive by public transport. There was a church on this site 20 years ago and the experience of residents was that many visitors came by car, and sought to park on nearby streets, including Alvanley Gardens and the Lymington Road estate. Residents on the Lymington Road estate, many of whom are elderly and have mobility issues, have said that they already find it difficult to park near their homes, or for visitors to find a space to visit them. Even a small number of extra cars will make this situation worse.</p> <p>Traffic. Residents who recall the previous church have told me that there was serious traffic congestion immediately after services as the congregation dispersed. The previous church had volunteer marshals who stopped the traffic on Lymington Road to allow those cars which had parked illegally on the Lymington Road estate to leave, restricting the flow of traffic for other road users. Since the previous church was open, South Hampstead School has begun to use part of the cricket field on Lymington Road as playing fields/tennis courts, and school buses now drop students there at various times during the week. This already leads to congestion and traffic backing-up along Lymington Road, which would be worsened if it coincided with the start or finish of services.</p> <p>Pedestrian impact on Finchley Road. If, as is stated, significant numbers of visitors arrive by public transport, this will lead to increased congestion on the pavements on Finchley Road. The section between Finchley Road Tube Station and the entrance to the O2 shopping centre is already seriously congested due to passengers, often with large items of luggage, waiting for National Express coaches to Luton and Stansted Airports. Pedestrians already frequently have to walk in the road because the pavements are blocked. The arrival of 100+ pedestrians, all leaving the building at the same time as the service finished, would lead to dangerous congestion on this stretch.</p> <p>Congestion and Noise on the pavements outside 339 Finchley Road. The Noise Assessment (para 6.3) makes a number of statements for which no evidence is given -> that a high percentage of attendees will be local; that they will not arrive in large groups; that they will engage in in low-level conversation. The experience of those who lived in the area when there was a previous church on this site is that this is not the case. Members of the congregation left at the same time after the services finished; they hung around on the pavement outside saying goodbye, and, on some occasions, continued singing outside the building. This is a particular concern to residents in the Pulse Apartments above the site, as their balconies, and the main entrance, are very close to the proposed entrance for the church. With the proposed opening times of 8am -11pm Monday -> Saturday, this could cause disruption late into the evening.</p> <p>Noise to the flats in the Pulse Apartments. The Noise Assessment suggests that there will be very limited break out noise from the amplification in the proposed place of worship. However, para 5.3 does indicate that there will be some noise breakout through the glazed façade and through the doors. The Assessment makes a number of recommendations to mitigate this noise - but there is no indication from the applicant that they intend to adopt these recommendations. Residents of the Pulse Apartments above the site have noted that,</p> |

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| | | | | <p>even if the noise assessment is correct, there is potential for disturbance from vibration, given that they share the same building fabric. There are children who live in the Pulse Apartments - even some noise breakout would be disruptive to them, given that the opening hours will be until 11pm every night except Sunday.</p> <p>Absence of Deliveries/Refuse/Service Plan. There is no detail provided about how refuse, servicing or deliveries are to be managed. If the building is to be occupied seven days a week, there will need to be frequent deliveries and refuse collection. The building is on a busy corner, with double yellow lines throughout, and loading and unloading could be dangerous. The Council should request more detail on these plans.</p> <p>Lack of consultation. It is not clear whether the Council has discharged its statutory responsibilities to consult immediate neighbours, given residents in the flats above were not made aware of the planning application by the Council. In any case, the lack of engagement by the applicant with the local community is disappointing, given the proximity of the site to long-established residential properties.</p> <p>Conclusion: This application should be rejected. The applicant has provided no travel plan, no servicing plan, and not undertaken the type of community engagement that would be expected for a significant development. They have not indicated that they are willing to adopt any of the noise mitigation measures recommended by the acoustic consultant.</p> <p>Janet Grauberg West Hampstead Liberal Democrats [REDACTED]</p> |

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| 2023/3884/P | Fortune Green and West Hampstead NDF | 18/11/2023 11:49:40 | OBJ | <p>The Fortune Green and West Hampstead NDF wishes to object to this application on the grounds that the application is incomplete.</p> <p>A similar use on this site some years ago, before the construction of the present building, caused significant problems of noise, parking and other disturbances to local amenity in the area because so many worshippers arrived by car and/or congregated round the place of worship. In view of this history and the risk that this pattern will be repeated, we consider that the applicant should have submitted a Transport Assessment including a Travel Plan.</p> <p>Camdenis own Camdenis Local Area Requirements for Planning Applications specifically require a Transport Assessment to be submitted for 'changes of use or extensions to places of worship, educational buildings and community facilities'.</p> <p>Furthermore, previous experience of a similar use of this site makes us doubt the accuracy of the following statement in the Noise Impact Assessment Report: "Furthermore, users of the place of worship would be considered peaceful people who would not use raised voice upon entry or exit from the premises. It is likely that users would not be arriving in large groups and would be expected to be individuals or small groups. Even considering a worst-case scenario of this group of people having a low-level conversation upon entry to the place of worship, it would not be significant enough as to cause disturbance to the neighbouring properties. Furthermore, it is understood that conversation does not involve multiple people talking at once, and as such generally one person would be talking at a time at a normal speech level i.e. not raised voice or shouting." We do not believe that this is consistent with congregations of up to 150 people arriving at and leaving the premises.</p> <p>Paragraph 4.39 of Camdenis Local Plan states: The Council welcomes investment by faith communities to develop new space to meet or worship, subject to other policies in the Local Plan. The Council will also encourage faith communities to consider sharing facilities where one community has spare capacity and another has a need for space. Where new spaces are provided, the Council will expect applicants to submit an Equality Impact Assessment examining the balance between maintaining Camdenis unique diversity and community cohesion. No such Equality Impact Assessment has been provided.</p> <p>In the absence of two key components of this application, which make it impossible to assess it according to the usual criteria, and our concerns about the Noise Impact Assessment Report, we formally object to this application.</p> |

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| 2023/3884/P | The Pulse (Finchley Road) Management Limited | 18/11/2023 08:55:20 | OBJ | <p>PLANNING APPLICATION 2023/3884/P - 339 FINCHLEY ROAD, LONDON NW3 6EP</p> <p>1. Identify of the person making the submission</p> <p>1.1 This submission is made on behalf of The Pulse (Finchley Road) Management Limited, which is the management committee for the leaseholders of Pulse Apartments.</p> <p>1.2 Pulse Apartments is the residential block in which the retail unit which is the subject of the planning application is located. Pulse Apartments and its leaseholders and residents are therefore most directly affected by the proposed change of use.</p> <p>2. No notification, approach, or consultation</p> <p>2.1 No formal or informal notification of the application for change of use has been given to the Management Company, leaseholders or residents of the Pulse, either by the current leaseholder of the retail unit or applicant, The Liberty Church. As far as we are aware, no notices have been put up on the outside of the retail unit or on any lampposts in the neighbourhood.</p> <p>2.2 Whilst we understand that Camden Council no longer give notice to affected stakeholders, given that the retail unit is an integral part of Pulse Apartments, at the very least any reasonable applicant would have been expected, even as a matter of courtesy, to give direct written notification to the leaseholders and residents, and provide an opportunity to meet and consult.</p> <p>2.3 The applicant only reached out to the Management Company reactively this week (13th Nov 2023, 5 days before the deadline for comments) after becoming aware that the Management Company had contacted leaseholders to notify them that it had become aware of the change of use application.</p> <p>2.4 A phone call involving, representatives of applicant, the current leaseholder and the Management Company took place on 15th Nov 2023 in which we were told that the intention was to reach out to the Management Company, leaseholders or residents of the Pulse after the planning consent had been granted. In that call the applicant did offer to have further meetings with the Management Company and leaseholders/residents in order to establish a good working relationship going forward, but that offer comes too late to be of any practical use for the Management Company or leaseholders/residents in making submissions prior to the deadlines for comments on 18th November 2023.</p> <p>2.5 Leaseholders and residents can only assume that the lack of notification and contact was intentional and an attempt to railroad through the application without the key affected stakeholders being aware of the application and having the ability to consider the issues and make submissions. In the view of the Management Company this is an entirely inappropriate modus operandi.</p> <p>3. Permitted use under the lease for the retail premises</p> <p>3.1 Pulse Apartments was constructed in 2003/4 as a residential block with a retail unit in part of the building fronting Finchley Road. The lease of the retail unit specifies the permitted use as being:</p> |

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'11.8 Not to use the Premises except as for a use within Classes A1, A2 or B1 of the Town and Country Planning (Use Classes) Order 1987 as originally enacted or for any other use under Class A3 of the said order provided that such use does not contravene any Legal Obligation and that the Necessary Consents have been obtained for such use.' [A copy of the lease is attached to the email version of this submission]

3.2 Whilst the planning categories have been updated and the current planning use for the retail unit is Class E, (1) the permitted use under the lease remains restricted to the classes under the original Town and Country Planning (Use Classes) Order 1987, and (2) the permitted use does not extend to places of religious worship (Class F1) or for example to gymnasiums (which although within the new Class E were not within Classes A1, A2, B1 or A3 of the Town and Country Planning (Use Classes) Order 1987 as originally enacted, and were within Class D2: Assembly and Leisure).

3.3 Importantly, the permitted use in the lease is an absolute covenant and the lease does not contemplate that consent may be requested by the leaseholder for a change of use. This reflects the intention at the time that the retail unit in the building would not be changed without a variation of the lease (requiring the agreement of both the Freeholder and the Management Company, which agreement could be granted or withheld in the absolute discretion of those parties).

3.4 This also reflected the intention at the outset that the type of occupant of the retail unit was a paramount consideration when the building was constructed and for owners at that time and on an ongoing basis. All owners of residential units in Pulse Apartments have made significant investments in acquiring their apartments in full reliance of the parameters of the permitted use for the retail unit and the requirement that any change would need their agreement through the Management Company as a party to the lease, and any change to that permitted use may, depending on the use, adversely affect the value of their interests.

3.5 The owner of the retail unit will also have acquired its leasehold interest in the retail unit in full knowledge of the restrictions on the permitted use in the lease.

3.6 Whilst the permitted use under the lease is acknowledged to be a matter separate from the status of the unit for the purposes of the Council's planning permissions, the Management Committee consider that the appropriate chronology would be for a request to vary the lease of the retail unit to change the permitted use be made first, and only if and after that had been agreed by all necessary parties should an application be made, considered or granted for a change of planning use.

4. Impact of the change of use should not be restricted to looking at the applicants particular circumstances

4.1 Whilst the application for change to Class F1 has been made by The Liberty Church for its own intended occupation of the premises, the change of use will apply to all future owners/occupiers of the retail unit. Therefore, consideration of the issues (e.g. noise, traffic carparking etc) should not be limited to the particular circumstances of The Liberty Church.

4.2 For example, one of the contentions of The Liberty Church is that their congregation is young and mobile, and therefore more likely to take public transport to the premises or park at the nearby O2 Centre. However, this may or may not apply to future owners/occupiers of the premises and so should be disregarded in considering what would be a permanent change of use to Class F1.

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5. Noise

5.1 Pulse Apartments is a residential building. The retail unit was constructed to be a retail unit and not to be used for assembly, music, singing, leisure activities or a place of worship. Any use of the retail unit. The Council will have the benefit of seeing many submissions from residents of Pulse Apartments concerned about the potential for noise transfer and nuisance and we will not repeat those concerns here although they are concerns that the Management Company equally have on behalf of residents of the building.

5.2 The lease of the retail unit contains the provision:

'11.2. Not to do anything on the Premises which is a nuisance or which is an annoyance or cause damage to the Landlord the Management Company or any neighbouring owners or occupiers.'

5.3 The applicant has submitted a Noise Impact Assessment Report and which, whilst not wishing to express a view of the professionalism and integrity of the consultant carrying out the survey and producing the report, has been produced for the purposes of supporting the application and inevitably will present its results as being favourable to the application. On the other hand it should be noted that as a result of the lack of notification or consultation with the Management Company and the leaseholders/residents there has not been an opportunity for the Management Company and leaseholders/residents to instruct an acoustic consultant to provide a report on their behalf challenging the conclusions set out in the report supporting the application.

5.4 Whilst the Noise Impact Assessment Report suggests that the noise transfer from the activities of the applicant will be within acceptable levels, the report uses the words 'unlikely to cause noise nuisance to the residential occupiers above', which is significantly different from 'will not' or 'highly unlikely'. In reality the noise transfer will affect residential occupiers of the building in a way which use as a retail unit will not, and in a way which will breach the terms of the lease. Granting the application for change of use will put the burden on residents of the building to take action to prevent the noise transfer in a way which is materially different from the current position.

5.5 The Noise Impact Assessment Report also refers to 'Noise Breakout to the First Floor Windows from Place of Worship' through the front entrance of the retail unit which current is glazed windows and doors, and suggests that after the inspection by the acoustic consultants they consider that this can adequately be dealt with by minor mitigation proposals.

5.6 Our understanding is that the only internal inspection carried out by the acoustic consultants was obtained through appropriating the Concierge on duty at the time without notice to the Management Company or its managing property agents, and without informing the Concierge of the purpose of the visit.

5.7 Moreover, our understanding is that visit only had access to the first floor hallway inside Pulse Apartments, and that the acoustic consultant did not have access to the residential units fronting Finchley Road above the retail unit. Therefore we do not think that the results of the Noise Impact Assessment Report can be relied on as an accurate assessment of the possible noise transfer to the residential units fronting Finchley Road above the retail unit. Those residential units also have balconies, and they have not been considered at all in the Noise Impact Assessment Report.

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5.8 Further, the Noise Impact Assessment Report refers to increased noise levels due to vehicular access being unlikely due to the fact that a high percentage of the attendees coming from the local community. Our understanding is that none, or almost none, of the current congregation of the applicant come from the local community, so that statement cannot be relied upon.

5.9 The Noise Impact Assessment Report also contains recommendations to mitigate noise from patrons gathering outside the place of worship by asking them to refrain from gathering in large groups, by dispersing quickly, by keeping conversations low. These are admirable recommendations but in practice highly impractical and cannot be adequately policed, and there is significant likelihood that the noise will in practice be noticeable and intrusive.

6. Carparking

6.1 Non-resident carparking around Pulse Apartments is severely limited, with only 3 spaces on Lymington Road near the building and additional spaces on Alvanley Gardens.

6.2 The 3 spaces on Lymington Road are constantly used (all day and all night) by residents of Dresden Close and visitors to the nursery on Dresden Close and to the JW3. The spaces on Alvanley Gardens are fully utilised used weekdays and weekends by visitors to The JW3 and The Cumberland Lawn Tennis Club and at weekends also by Hampstead Cricket Club. Even now the available non-resident carparking is insufficient, and cars frequently park on yellow lines and curbs. Enforcement is sporadic in the area and does not prevent this unlawful parking.

6.3 Carparking for visitors to Pulse Apartments struggle to find anywhere to park even at the moment, and even an increased amount of vehicular traffic will make that even more impossible. The drop-off point outside Pulse Apartments is also constantly used by delivery companies, workmens vehicles and public utility vehicles which causes congestion near the traffic lights and holds up traffic turning right off Finchley Road into Lymington Road which would be exacerbated by even just a few more vehicles dropping off patrons attending events at the applicants premises.

6.4 The applicant mentioned to us in a one call with them that their patrons would be willing to park at the 02 Centre and walk to the premises. That in itself increases the carparking and traffic pressures around The 02 Centre as well as only providing a temporary partial solution as the planning proposals for The 02 Centre site envisage a reduction in carparking and a car-free area in line with the Councils policies.

6.5 In summary, the proposed change of use for the retail premises will exacerbate the carparking issues in the area for residents and guests of the building as well as our exiting neighbours.

7. Increased traffic congestion

7.1 The Council will have seen the many other submissions concerned about increased traffic congestion as a result of the change of use for the retail unit. We echo all those concerns and consider that the change of use will cause intolerable traffic congestion.

7.2 There will be no drop-off point for patrons of the applicant outside the premises as that is on Red Route

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as well as being by traffic lights. Drop-off is therefore likely to be around the corner on Lymington Road directly in front of the entrance to Pulse Apartments, causing congestion and annoyance to residents of the building, preventing pick-up or drop-off of elderly residents or access by the ambulance and emergency services. The area is already congested from pick-up and drop-offs from the JW3 for their day nursey and events.

8. Operating Hours

8.1 The proposed operating hours of the applicant set out in the application are much longer than the operation of a normal retail unit as originally intended. Whilst the applicant contends that the main hours of operation will be Sunday morning services, and that patronage will be far less during the weekday and with only the occasional evening weekday event, we are highly sceptical that this will in fact be the case.

8.2 Whether the applicant purchases the premises or leases them, it will be making a significant investment, and it is only common sense that they will seek to make use of their investment by maximising its usage over time. Therefore the issues around noise, gatherings, carparking and traffic will not be limited to Sunday mornings, but will impact leaseholder/residents of Pulse Apartments on a constant basis.

9. Conclusion

9.1 The retail unit was from the outset intended to have a use restricted to that of a retail unit in keeping with the residential nature of the location. The permitted use set out in the original terms of the lease cannot be varied without consent of the Management Company and leaseholders of Pulse Apartments. Leaseholders have invested on the basis of the original terms of the lease, and our consultations with leaseholders to-date have indicated that leaseholders will not agree to vary to the terms of the lease to permit a change of use as proposed.

9.2 The Management Company, leaseholders and residents of Pulse Apartments all have significant concerns over the increased problems of noise, carparking and traffic congestion that the change of use will bring.

9.3 No notification of the application to the Management Company or leaseholders/residents of Pulse Apartments which, given the importance of the proposal to them as key stakeholders is extremely concerning. That lack of notification and consultation has, for example, not enabled the Management Company and leaseholders/residents to fully consider the matter; it has not enabled them to speak to other local affected parties; it has not given them the opportunity to instruct an acoustic consultant or traffic consultants to produce reports challenging some of the issues put forward by the applicant in support of its application; and it has not given time for all leaseholders/residents to submit comments prior to the deadline.

9.4 Whilst we sympathise with the current owner of the retail unit predicament not being able to relet the retail unit to another retail business in the current market, that does not justify a change of use that will, on a permanent basis, adversely impact on the use and enjoyment of the residential units at Pulse Apartments and will potentially also have material adverse effect on the marketability and value of their apartments.

9.5 In view of the lease for the retail unit requiring a variation of the lease which requires the agreement of the Management Company, we consider it inappropriate for an application for change of use to be made before a request has been made to vary the lease and has been agreed or declined.

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| | | | | 9.6 On behalf of the leaseholders and the residents of Pulse Apartments, the Management Company objects to the application for change of use of the retail premises. |
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| 2023/3884/P | Ricardo Cumerlato | 17/11/2023 10:17:01 | OBJ | <p>We agree in full to the comments submitted by Keith and Veronica Hollender, see below. In particular, we are disturbed by the fact that there has been no engagement whatsoever with the local community before submitting this application. Also, the claims that "the premises would promote a strong and vibrant town centre" and that the site will be "car free" are deceptive at best, disingenuous at worst.</p> <p>More information and a proper engagement with the local community is required before an application for such venue can be considered.</p> <p>Comments submitted by Mr and Mrs Hollender, which we support in full:</p> <p>We object on the following grounds:</p> <p>This is not an application for a 'place of worship' in the normal understanding of that description. 'The Liberty Church' is part of a global evangelical organisation which runs 24/7 events using multi media/ live bands / conferences etc.</p> <p>The application indicates activities running from 8.00am- 11.00pm Monday to Saturday and 8.00am-6.00pm Sunday.</p> <p>The application references Camden Policies TC4, implying, erroneously, that the location of the property is 'town centre' and will not harm the 'the local area or the amenity of neighbours'. It claims it will only 'attract congregations of up to 150 persons' who will use public transport. The absence of any certified data on where the 'congregation' is normally resident calls this bold assertion into question.</p> <p>Furthermore, the application states that 'the increase in comings and goings from the premises would promote a strong and vibrant town centre, enhancing the character of the town centre' HOWEVER, the area, whilst being bounded by Finchley Rd, a red route, is almost totally residential in character and is not a town centre.</p> <p>The main exceptions to residential in the immediate locality are 'JW3', the 'Cumberland LTC', and 'Hampstead Cricket Club', all of which are well bedded into the community and have taken pains to ensure that is the case.</p> <p>The application also cynically states that although there will be noise breakout it will be mitigated by the 'high levels of noise associated with this very busy road'. Presumably Finchley Road, but the site also borders Lymington Road and a considerable residential community.</p> <p>A glance through the 'events' page on the Liberty Church website should raise many questions in the minds of Councillors as to the reality of the application and its impact on the neighbourhood.</p> <p>Hours of operation, are those of a commercial organisation based in a commercial/ industrial environment. It would suggest that there would be many sessions taking place during the course of a day and evening with many arrivals and departures of the 150 persons that could be accommodated at each.</p> <p>Highway matters</p> |

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The absence of any study on mode of travel to the venue and the absence of any research on availability of on-street car parking should raise red flags.

The reality of the presence of a similar Evangelical organisation (Victory Church) on the site of the Pulse prior to its redevelopment in its current form, is well known to local residents. Chaos ensued with the area being in complete lockdown whenever the Church was in session.

The site is described as 'car free'. To suggest that the 'car free' designation automatically removes the reality that many of those travelling to the site will do so by car is naive. The proposed extended opening hours means that transport in the evening would be by private car. The parking provision on surrounding streets is already barely sufficient for residents.

Presently, the controlled parking zone works well for residents and for visitors to CLTC/ HCC and JW3. There are currently, evenings when there is pressure and local residents struggle to find a parking space returning home after 6.00 pm. However, the addition of a venue, whose operations are designed to attract large audiences, would make the current arrangements untenable.

To protect the amenity for local residents, controlled parking would need to be extended from the existing restriction, Monday to Saturday 8.30 to 6.30, to 8.30am to 10.30 pm, and on Sunday, when there is currently no restriction, from 8.30 am to 6.00 pm.

This would be to the detriment of the CLTC/ HCC and JW3 which are well integrated locally.

In short, a building, designed as a stylish, high-end retail space, with corner return windows is completely unsuitable as a place of worship for significant numbers of people, singing to live bands. The resultant noise will not be contained behind non acoustically designed large, plate glass windows and non sound proofed ceilings.

The ingress and egress of large groups arriving and leaving more or less simultaneously will severely impact the amenity of neighbours.

This is not a 'community' initiative, there has been zero contact with the local community. In addition, sadly, a scheme which could severely impact the enjoyment of the local community in their environment, has only been flagged up to local residents by the Planners posting standard planning notifications devoid of any detailed information on lamp-posts.

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| 2023/3884/P | Olga Arsenova | 17/11/2023 09:22:04 | OBJ | <p>Dear all,</p> <p>I am an owner and resident of a flat in Pulse Apartment building where I live with my family which includes a small 7 year old child and my partner.</p> <p>I would like to strongly object the application for the change in use of commercial property unit (part of the Pulse building) into a place of worship.</p> <p>My objection is made on the following grounds:</p> <ol style="list-style-type: none"> 1. Anticipated increase in noise for residents of the building and surrounded areas during unreasonable operating hours. The application states that the applicant has conducted a noise assessment which further indicates no significant additional noise above or outside the building. The focus should be placed on the fact that there will be increase in noise which is defined by the applicant as 'not significant'. I would like to emphasize that most of the residents of the Pulse building are families with young kids and retired people who will be very sensitive to ANY smallest increase in noise. Pulse Apartments is first and foremost residential building and residents' right for peaceful and undisturbed rest should be respected at all times. I am also somewhat puzzled about the conducted noise assessment on the property, the scope of it and methods used. <p>My understanding of the Liberty Church activities is that they would be running many events and the events timing cannot be regulated. My personal family situation is that we allocate early evening time (from 4pm onwards) and full weekend time for relaxation, work and studies and I anticipate a material increase in noise associated with late evening + weekend events for a congregation of 150 (+) people.</p> <p>Therefore, on the basis of the fact that the noise and disturbance levels will deteriorate for the residents of the Pulse buildings as the results of the Church activities in addition to the proposed extremely long operating hours (including the weekend), I would like to object this application.</p> <ol style="list-style-type: none"> 2. Lack of parking and heavy congestion of the pedestrian (pavement) path/area on the stretch from the Pulse Apartment buildings to Finchley road tube station. <p>The application states that it would be careless development which by itself cannot prevent people from driving in their cars and occupying the car parking spaces in the area. The additional inflow of people comes on top of all the developments that are in the process of being completed and being planned for the area (e.g. O2 development). This will inevitably congest the area even further and increase the level of noise and pollution.</p> <p>In addition to that, my biggest concern is that even in case of public transport use the large crowds of people attending the Church will significantly add to already overly congested pedestrian walking path / pavement area on the stretch from the Pulse building to Finchley road tube station.</p> <p>For example, I take a walk along Finchley road almost every day to work and back home. There is always a huge congestion around bus stops in front of Roche Bobois and Finchley and Frognal station with all the people waiting for the bus/getting off from the bus or smoking outside (and there is another development being build just on top of the station there). Every day I see parents with buggies that cannot move and get</p> |

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stuck in one place. That pushes many people who are in a rush for work (and that includes me) to try to overtake this congestion by walking on the side of the bus lane and that causes serious risk to life. I often see people doing exactly that as they get stuck in certain places. There are many other areas on Finchley road that are congested (around the stop(s) for coaches where people accumulate in huge numbers with suitcases waiting or loading to a bus, tube station with all the fruit stalls, walking area along the wood fence bit, etc). These areas lack any protection (appropriate pavement protections, trees, etc) for pedestrians which includes many kids walking to schools and nurseries from a very busy and dangerous Finchley road.

Therefore, on the ground of a heavy pedestrian and traffic congestion along the Finchley road which represents a danger to life I would like to strongly object this application.

3. Religious insensitivity to the residents of Pulse Apartment and surrounding area

I would like to emphasize that residents of the Pulse Apartments are of multiple faiths. This is a hugely sensitive area for many of the residents and this needs to be taken in to account. In addition, we have JW3 center across the road which has to at all time manage and maintain appropriate security protections. While the activities of the Church have a peaceful intent and nature, I cannot exclude some other communities not sharing similar beliefs and practices which puts security aspect for residents of the building into question. Furthermore, I understand that the Liberty Church plans to buy the leasehold which opens the door for potential further on-sale of the premises to some other religious organisations which might be less peaceful, more controversial, etc.

Therefore, on the grounds of the security concerns resulting from the anticipated religious nature of activities I would like to strongly object this application.

4. Other concerns

I understand that the Church will be operating events and possibly a café and I am concerned about the management and space for food deliveries, etc.

I like to understand if the Church has considered the suitability of the building utility facilities (waste, water, etc) to serve 150 people. The Pulse building has been suffering with water leaks for years now and hasn't sorted this problem yet on the residential side. For example, Thames water pipes serving the building often get blocked which results in continuous water works that often interrupt water supplies for the residents of Pulse apartment.

Thank you for considering my objection.

| Application No: | Consultees Name: | Received: | Comment: | Response: |
|-----------------|------------------|---------------------|----------|---|
| 2023/3884/P | Tash | 17/11/2023 12:42:54 | OBJ | <p>I appose this planning permission for the following reasons:</p> <ol style="list-style-type: none"> 1) Cars are constantly being parked on double yellow lines on Lymington road & Dresden close by visitors attending JW3. The new place of worship will add double the traffic on Lymington road and double the parking violation. 2) Residents living in Pulse apartments will have their safety put at risk by visitors of the new place of worship tailgating into the Pulse building and using the lobby for their own use. 3) The noise after 8pm will be disturbing to the residents of Pulse apartments. |
| 2023/3884/P | Tash | 17/11/2023 12:42:57 | OBJ | <p>I appose this planning permission for the following reasons:</p> <ol style="list-style-type: none"> 1) Cars are constantly being parked on double yellow lines on Lymington road & Dresden close by visitors attending JW3. The new place of worship will add double the traffic on Lymington road and double the parking violation. 2) Residents living in Pulse apartments will have their safety put at risk by visitors of the new place of worship tailgating into the Pulse building and using the lobby for their own use. 3) The noise after 8pm will be disturbing to the residents of Pulse apartments. |

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| Application No: | Consultees Name: | Received: | Comment: | Response: |
|-----------------|------------------|---------------------|----------|---|
| 2023/3884/P | Margaret Willmer | 17/11/2023 15:39:16 | OBJ | <p>I join others in objecting on the following grounds:</p> <p>This is not an application for a 'place of worship' in the normal understanding of that description. 'The Liberty Church' is part of a global evangelical organisation which runs 24/7 events using multi media/ live bands / conferences etc.</p> <p>The application indicates activities running from 8.00am- 11.00pm Monday to Saturday and 8.00am-6.00pm Sunday.</p> <p>The application references Camden Policies TC4, implying, erroneously, that the location of the property is 'town centre' and will not harm the 'the local area or the amenity of neighbours'. It claims it will only 'attract congregations of up to 150 persons' who will use public transport. The absence of any certified data on where the 'congregation' is normally resident calls this bold assertion into question.</p> <p>Furthermore, the application states that 'the increase in comings and goings from the premises would promote a strong and vibrant town centre, enhancing the character of the town centre' HOWEVER, the area, whilst being bounded by Finchley Rd, a red route, is almost totally residential in character and is not a town centre.</p> <p>The main exceptions to residential in the immediate locality are 'JW3', the 'Cumberland LTC', and 'Hampstead Cricket Club', all of which are well bedded into the community and have taken pains to ensure that is the case.</p> <p>The application also cynically states that although there will be noise breakout it will be mitigated by the 'high levels of noise associated with this very busy road'. Presumably Finchley Road, but the site also borders Lymington Road and a considerable residential community.</p> <p>A glance through the 'events' page on the Liberty Church website should raise many questions in the minds of Councillors as to the reality of the application and its impact on the neighbourhood.</p> <p>Hours of operation, are those of a commercial organisation based in a commercial/ industrial environment. It would suggest that there would be many sessions taking place during the course of a day and evening with many arrivals and departures of the 150 persons that could be accommodated at each.</p> <p>Highway matters</p> <p>The absence of any study on mode of travel to the venue and the absence of any research on availability of on-street car parking should raise red flags.</p> <p>The reality of the presence of a similar Evangelical organisation (Victory Church) on the site of the Pulse prior to its redevelopment in its current form, is well known to local residents. Chaos ensued with the area being in complete lockdown whenever the Church was in session.</p> <p>The site is described as 'car free'. To suggest that the 'car free' designation automatically removes the reality that many of those travelling to the site will do so by car is naive. The proposed extended opening hours</p> |

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| | | | | <p>means that transport in the evening would be by private car. The parking provision on surrounding streets is already barely sufficient for residents.</p> <p>Presently, the controlled parking zone works well for residents and for visitors to CLTC/ HCC and JW3. There are currently, evenings when there is pressure and local residents struggle to find a parking space returning home after 6.00 pm. However, the addition of a venue, whose operations are designed to attract large audiences, would make the current arrangements untenable.</p> <p>To protect the amenity for local residents ,controlled parking would need to be extended from the existing restriction, Monday to Saturday 8.30 to 6.30, to 8.30am to 10.30 pm ,and on Sunday, when there is currently no restriction, from 8.30 am to 6.00 pm.</p> <p>This would be to the detriment of the CLTC/ HCC and JW3 which are well integrated locally.</p> <p>In short, a building ,designed as a stylish, high-end retail space, with corner return windows is completely unsuitable as a place of worship for significant numbers of people, singing to live bands. The resultant noise will not be contained behind non acoustically designed large, plate glass windows and non sound proofed ceilings.</p> <p>The ingress and egress of large groups arriving and leaving more or less simultaneously will severely impact the amenity of neighbours.</p> <p>This is not a 'community' initiative, there has been zero contact with the local community.</p> <p>In addition, sadly, a scheme which could severely impact the enjoyment of the local community in their environment, has only been flagged up to local residents by the Planners posting standard planning notifications devoid of any detailed information on lamp-posts.</p> |
