

Your Ref: 2022/5320/P
Our ref: MB1063

Kristina Smith
Development Management
The London Borough of Camden
5 Pancras Square
London
N1C 4AG

BY EMAIL

28 March 2024

Dear Kristina

**PLANNING OBJECTION - REF: 2022/5320/P
FORMER MANSFIELD BOWLING CLUB, CROFTON ROAD, LONDON, NW5 1EP**

I write further to our recent correspondence to further **object** to planning application 2022/5320/P on behalf of the owners and residents of 12 properties located on Laurier Road and bordering the site from 32-48 (even numbered houses).

We previously wrote to the Council in March 2023 setting out objections to the scheme based on overdevelopment, impact on the conservation area, impact on surrounding residential amenity and insufficient submission information. Whilst the objections raised in that letter remain, having considered further information received and the Local Plan policies this letter raised a further objection in respect to need and affordability of this luxury care home proposal.

Policy H8 relates to housing for older people, homeless and vulnerable people. Para. 3.204 confirms that this includes care home accommodation, including that proposed within the application scheme.

Part (a) of the policy requires such development to evidence that the accommodation is needed to meet a demonstrable need within the borough **and** will be targeted at borough residents.

Para. 3.208 provides details of the current themes within the borough and confirms that the Council's approach is to provide support and adaptations that enable people to remain in their own homes or to live as independently as possible in more suitable homes. This is further supported by Para. 3.212 which states that the Council want to support older people to live independently in their own homes for as long as possible. The Council anticipates that most needs will be met by providing support for people to live in suitable homes in the general housing stock rather than in homes designed to meet particular needs, such as the application proposal. The proposal is therefore at odds with this approach and Council strategy.

Furthermore, the type and nature of the accommodation and care provided and its operator does not support the fact that the proposal will be provided at a cost affordable and accessible to local borough residents.

The type of care proposed is primarily residential in nature, rather than providing nursing or complex residential care. Given the Camden approach of supporting residents stay within their own homes, and seeking to address needs through general housing stock, the provision of the proposed type of accommodation would not deliver a form of accommodation requiring a purpose built accommodation. The type of accommodation is therefore not in line with the overall approach of the Council and is not supported by the Local Plan. Furthermore, as this type of residential older person accommodation will not provide local authority for residents, it will likely

be reliant on self-funders and restrict its accessibility and affordability, and lead to higher proportions of residents who are not from within the borough.

Other similar accommodation to this in the borough, including Hampstead Court, has experience significant under occupation and difficulties in securing admissions, and has the potential to negatively impact on Camden's current provider network in terms of price and surplus capacity.

The proposed operator of the scheme is the Care Concern Group (<https://jobs.careconcerngroup.com/>). Their website refers to their operation of "a portfolio of luxury care homes" and states that "we thoroughly research the local area to determine that the demographic will support and sustain a luxury care home for the elderly". The proposed operator as delivering and operating luxury care homes does not suggest that this will be an accessible and affordable facility for all Camden residents, whilst the accommodation and care is clearly targeted to those who can afford and sustain a luxury lifestyle. As such it is evident that the proposal does not meet the requirement of being targeted at borough residents overall and meeting the need for care across the borough.

From the information submitted to date it does not appear that the proposed accommodation either provides an appropriate type and level of care that fulfils the requirements of Camden's approach and policy on older people's accommodation, whilst the potential cost would not be affordable or sustainable to meet the needs of residents across the borough. At the potential price points proposed the accommodation will not address Camden's need and fails to address policy H8.

Policy H12 of the London Plan, which applies to a care home accommodation, states that schemes should be providing options within the accommodation offer for the diversity of London's population, including disabled Londoners within a wider inclusive community setting. The requirements of this policy, together with H8(a) have not been demonstrated to be addressed by the proposed scheme.

The application scheme as currently proposed is contrary to the requirements of Policy H8 of the Local Plan and Policy H12 of the London Plan, and we respectfully request that the application is refused on this basis.

Yours sincerely

Matt Brewer
URBANSPACE Planning Ltd

For and on behalf of the 12 houses bordering the site from 32-48 Laurier Road (evens).