



## COUNCIL OF LUTHERAN CHURCHES

Registered office: 30 Thanet Street, London WC1H 9QH, United Kingdom  
Registered charity 232042; Company limited by guarantee no. 557552

Mr R McEllistrum  
Planning Department, London Borough of Camden  
Camden Town Hall Extension  
Argyle Street  
London WC1H 8NJ

21 June 2013

Dear Mr McEllistrum

**RE: CARTWRIGHT GARDENS REDEVELOPMENT**  
**Planning Application Ref: 2013/1598/P**

I understand that there are still discussions ongoing about the planned development of Cartwright Gardens (including Hughes Parry, Commonwealth, and Canterbury Halls). I apologise that this response is coming late in the day, but hope that you can still bear it in mind. I am General Secretary of the Council of Lutheran Churches, which includes St Mary le Savoy German Lutheran Church on Sandwich St, and owns residential accommodation at 4 Sandwich Street, and the International Lutheran Student Centre (ILSC) with entrances on Thanet St and Sandwich St, and of which I am Director. We have an interest in the development as we directly face these halls across Sandwich Street, as linked to the Sandwich St Residents Association, and out of concern for our neighbours – the local residents and, importantly, the students and users of the University halls in question. We have a significant history on the site, and have seen it and the area develop, so while we are not opposed to development per se, we would like to give our views to ensure it is positive development. In addition, we believe that, as an operator of a successful hall of residence which is always full and is a positive contributor to the community, we have something to contribute. We have set out some comments in this letter, would like to note that we concur with many of the concerns outlined by Elizabeth Paul and Peter Weatherhead in his letter of 31 May 2013, and are seeking legal advice regarding the impact on our property and the ILSC.

### **STUDENT COMMUNITY**

The new design will be impersonal and difficult to manage, contributing to anti-social behaviour and losing touch with students from a pastoral perspective. As owners of a student residence nearby which we designed and built bespoke, we have much experience of what works, and what does not work, in terms of design of student accommodation for the best student community. Our building was built in the 1970s, and has stood the test of time, since it is still popular and fully-occupied, with constant positive feedback as to the warm cohesive community, and we conduct regular surveys to ensure that what we offer is what is required. What we have found, and what we have noticed most new developments returning to, is that the best format is clusters of around ten study-bedrooms sharing a kitchen and facilities where students can look out for each other and form mutually supportive communities, and a warden in charge of 100-300 students whom s/he can get to know personally and support. This contrasts with the Cartwright Gardens design of impersonal corridors of 60 study-bedrooms without common spaces, shared facilities few and far between, and (as we understand from the plans) just one resident warden responsible for the safety, security and community of all 1200 students. This will contribute to alienation and loneliness, students more likely to "fall between the gaps", a lack of care and accountability on the part of residence staff, and a likely rise in anti-social behaviour, violence, vandalism, and drug- and alcohol-fuelled crime. It need hardly be pointed out that these are unpleasant for the student community, the surrounding resident community, and the Police and Council who will have to deal with the fall-out. The resident community, and our students and staff, should not be used, as the Student Management Plan implies, to manage or police the new Halls.



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### **NOISE**

In tight-knit, physically close residential areas like Camden and the streets around Cartwright Gardens with relatively few private outdoor spaces, the community is sensitive to noise interfering in our personal spaces. Furthermore, our post-graduate students at the ILSC, most of whom have come from developing countries (and if not developing countries, then they are international students paying high fees to study in London), have come committed to study. The increased noise that can be envisaged in the current design will disturb them, cause nuisance to our community, and upset our quiet enjoyment of our property.

The new Cartwright Gardens design looks like it will contribute to increased noise and nuisance levels from various sources. During construction there will be disturbance but that can be foreseen and planned for, and is for a limited time only. Thereafter however traffic will continue in Sandwich Street, just metres from our Church, flats and student residence, since the only access for deliveries to the new student halls will be via a gate on Sandwich Street. Delivery trucks will sit, often with engines idling in particular to maintain refrigeration, before working hours at 7am, waiting for the gate to be opened, every day since each week, as we understand, there will be 6 waste collections (almost daily), 51 general deliveries, and other ancillary deliveries for maintenance etc – over 10 per working day, all of which are to be done in antisocial hours between 6pm and 7am when our students may be doing their own research and studies.

The student residents will also contribute extra noise. I have heard about recent incidents of noise from the students being heard as far as Judd Street. With more students, there is likely to be more noise. Furthermore, the design of the building at the moment will transmit the noise into the quiet residential streets around Sandwich St – due to the many common rooms on ground floor, which can be opened up by folding walls into a few enormous rooms; kitchens/lounges in the tower facing Sandwich st; and flat roofs and balconies which will be accessed by students. One response from the University has been that such outdoor spaces will be closed; however, students will find a way to access them, and with so few wardens or responsible adults or even small self-regulating peer community groups, there will be no way for the University reasonably to monitor or restrain this. It is better to design out the problem while we can (ie now, before it is built) than try to implement a management solution later. For example, common rooms facing the empty spaces of Cartwright Gardens or the Halls' own internal courtyards would be far less intrusive, and sloping roofs would not be accessible in the same way as flat roofs. Perhaps the University could even be encouraged to consider a sloping green roof, for greater ecological benefit and better insulation.

Finally, conferences and short summer schools will bring large numbers of extra, temporary residents for a few days or weeks during University holidays. These will treat the Halls as a hotel rather than a home or community, and the communal spaces and conference halls (some created by folding back the walls in otherwise smaller lounges) will be used for specific times, all opening and closing at the same time. This will create noise from the people while they are in the rooms, while leaving the conferences, and terms of increased traffic to bring them and take them away at the beginning and end of their stay and for off-site trips.

### **ANTI-SOCIAL BEHAVIOUR**

Concentrations of certain communities often create tensions between social groups, and "town-gown" relations are sources of tension in many cities. Mercifully, this has not traditionally been a general problem in this area of Camden, as we have good relations with our residential neighbours, and with most of the other student halls nearby. However, there have in the past been some issues with certain gangs of youths in the neighbourhood, and with drug dealing which we have reported to the police on numerous occasions. The gangs and undergraduate students are more likely to wind each other up when groups of them can



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come across the others – as is likely in the proposed design, which has common rooms on the ground floors (rather than student bedrooms or offices), and so students are likely to congregate there, make noise, and (as in the past) antagonise the local youths (and vice versa) through the windows. Worse, the proposed student townhouses on Sandwich St have many, unsupervised entrances – an invitation to local gangs to try to break in, and also to drug dealers to approach and peddle their wares. This proposed development, as currently designed, will increase the incidences of drug-dealing, violence and other anti-social behaviour.

### **TRAFFIC**

As mentioned above, not only construction traffic for the next 2-3 years will clog up these small residential streets but also delivery traffic once the Halls are reopened, and conference traffic (buses, deliveries, etc) particularly in the summer months (when the air is still and the windows open), emitting noise and fumes and blocking the roads. Cartwright Gardens can be widened (rather than narrowed, giving over some pavement space to vehicles), and access provided on that side of the development, rather than on the side which disturbs residents.

### **BULK**

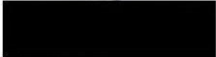
We understand that any property owner in central London wishes to maximise the use of the property, so is likely to try to build up and “fill in the gaps”. However there is no denying that this, especially in the case of these new University Halls, will create bigger, more imposing buildings which are more likely to create issues of light and overlooking neighbouring properties, and in the case of the proposed design, the massive new building is very plain and boring, with little architectural merit or interesting design. Even more important is the use of space within the building: for the increased size of building, the student accommodation is not increased as much as one might expect, and is not designed for community (see above); but rather there are large areas given over to “common use”, or “university or office use”, all concentrated in a small proportion of the area on the lower floors. This is evidently for increased conference use which brings its own issues as outlined above.

### **CONCLUSION**

I would like to note the objections put forward by the Sandwich Street residents’ association, and in particular the letter by Peter Weatherhead Planning, which articulates many of our concerns well and in more technical format, relating to specific regulations, London and Camden policies and development plans. I hope that you will take that into account, and also consider our views as set out in this letter, perhaps less formally expressed but no less intensely felt!

We ask the council to reject this planning application which would create many foreseeable problems that could last for decades. There are some straightforward solutions proposed, which would obviate many of the issues (such as by distributing common rooms/lounges throughout the property, positioning larger common rooms and entrances (including for deliveries) on the non-residential sides facing inwards or to Cartwright Gardens, reducing the number of entrances on Sandwich St, and making roofs and balconies inaccessible, sloping etc). The university should use this unique opportunity to create a splendid building that enhances the neighbourhood and that students and residents can be proud of and enjoy.

Yours sincerely,



James Laing  
General Secretary