



Mr McEllistrom,

Regeneration and Planning

6th Floor, Camden Town Hall Extension,

Argyle Street, London WC1H 8EQ

Dear Mr McEllistrom

Response to planning application for the development at Cartwright Gardens ref: 2013/1598/P&2013/1784/C.

I am a long term local resident, having resided in Sandwich House since the early 1990s, 

I have been actively involved with the local community as a member of Sandwich Street Residents Association, of the former Judd Street Residents Association which is now incorporated with the Marchmont Street Association, as a former director and chair of SST Ltd and SST Management Ltd which owns and manages the freehold of Sandwich House, and now as a local authority governor at Argyle Primary School.

I have worked for almost 35 years in education, 16 years within the university of London and I currently give my services as a specialist leader in education across London in the primary and secondary phases. I have working with the University of London on a project which involved setting up a university training school in central London. My entire working life has been in education and supporting education at all levels. I want to see a student population in the Gardens.

What I am not supportive of is this overdevelopment which is proposed for the Cartwright Gardens site. This development in my view does not have as its main driver student benefit. In the past student accommodation was designed with the aim of providing for the student. The main driver of this development as far as I can see is to provide a return for investment. The student is almost incidental.

The recent history of the site

Canterbury Hall was built in the thirties as a hostel for the Church of England and during the war it was used as a base for Canadian airmen and then given over to student accommodation. It was always thought of as better accommodation than the Halls either side because of the generous allocation of bathrooms- one to every two rooms in the York Building. Commonwealth Hall was added in the early sixties. Great care and several iterations of planning were gone through to ensure that the building was tiered back in such a way that it allowed for daylight and sunlight to hit basement level on the opposite side of Sandwich Street. These plans are still available for view at Camden Town Hall.

Hughes Parry Hall was a later addition in the early seventies. It replaced, on Sandwich Street a row of low artisans houses similar to those still in evidence in Thanet Street, and a pub. The town houses were 3 stories including basement and rose to a roof apex half way up the third floor level of the current York building of

Canterbury Hall. The height of these houses can still be evidenced on examining the outer wall of the York building which faces the current Hughes Parry car park.

On the letter of application authorising the redevelopment of this site dated 27 Jan 1967, the second condition reads as follows:

“(2) The whole of the car parking space shown on the drawings shall be provided and retained permanently for the accommodation of vehicles of the occupiers and users of the building and for no other purpose.”

This letter can be viewed at Camden Town Hall. It is referred to below in the current planning documentation.

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Hughes Parry Hall:

Outline planning permission for the erection of a building comprising basement and ground floor with part-three and part-fourteen floors for use as a University Hall of Residence was granted on 20 October 1964 (LPA Ref:AR/TP/2153/C); Permission was granted on agreement under Section 37 of the Town and County Planning Act 1962 that on the expiry of the lease in 1972 on The Plumber's Arms Public House, Hastings Street, that the building is demolished and site left open for use as amenity space of the Hall; and Planning Permission for the erection of a rear extension to be used as storage by the existing Hughes Parry Hall of Residence was granted on 18 July 1974 (LPA Ref: L14/20/A 18674).

This was a planning condition which has been in force for 40 years. The construction of the tower was subject to this condition. Like the revised design of Commonwealth Hall this decision respects the requirement for daylight and sunlight of the residents of Sandwich House. It also allows distance between student accommodation and residential accommodation. It acts as a buffer zone in much the same way that the gardens act as a buffer zone between the Halls and the crescent of Cartwright Gardens.

The Management of the Halls

Over the last fifteen to twenty years residents have suffered from a number of issues regarding the management of noise from the Halls and in particular Hughes Parry Hall. With regard to the management of noise and student behaviour I believe that the management team are dysfunctional.

Noise from plant

From the late 1990s for about 10 years residents were continually disturbed by the noise coming from a beer chiller in what was the students' bar at Hughes Parry Hall. This was moved after about 10 years of complaining by the residents. This made residents life a misery and disturbed sleeping patterns.

The kitchen extraction continually operates over ambient noise levels during the day. We are told that it is on a timer. However it is not always switched off and residents have to contact the desk at Hughes Parry at night to ask them to switch this off. There have been times when the expertise was not available to switch this off and we have had to suffer through the night.

For some time there was a whistle coming out of the Canterbury Hall basement ventilation. It took a while to resolve this.

Noise from students

There used to be student discos held monthly in the dining room of Hughes Parry Hall. The vibrations from these discos could be felt in Sandwich House. They had live bands – without having a music license and the noise from these was insufferable. Fortunately this has now stopped.

Musical instruments such as drums and other instruments can occasionally be heard. This can be pleasant so long as it stops before a certain hour.

Partying. This has been a recent problem. There has been a particular issue with the fourth floor common room in the tower. I believe there are currently 2 common rooms in the tower. People would congregate in the common room in the early evening prior to going out to a club. The noise coming from this room over a sustained period was unbearable. On one occasion at 9.00pm I went round to complain to the desk porter because the noise in the reception was so loud that he couldn't take my call. I arrived just as the party from the fourth floor were coming downstairs to congregate prior to going out. Noise levels were unbearable. My ears were still ringing the next day.

The hall management did restrict the window but this mechanism was forced open by students.

In the warmer weather residents suffer screaming and loud conversation which comes from residents of the tower.

Management of noise. The issue that residents have is that noise is not acted upon until a resident of Sandwich House complains. Effectively residents police noise for the university. Staff are located within the Hall where they are unable to experience noise levels in Sandwich Street. Senior members have rooms facing the gardens and the desk porter and night porter/security are also based away from Sandwich Street. I now understand that even the warden's accommodation has been moved to the tower facing Cartwright Gardens so there is now no effective control of the management of noise from the elevations facing Sandwich Street.

I feel sorry for those students who do want to work since they too must be disturbed.

Noise from deliveries

In spite of planning directions to the contrary, (please refer to the letter mentioned above regarding the loading), unloading and transfer of goods happens continually from the street,

“(4) Loading or unloading of goods, including fuel, into or from vehicles arriving or departing from the premises shall be carried out only within the curtilage of the building.”

Recently neighbours are being disturbed by a chef direct van which stops in Sandwich Street for considerable time, sometimes hours and continues to run its engine for the whole of the time it is parked. Environmental Health should have a file of residents' complaints. I was disturbed by this yesterday and have complained to environmental health and written to the University asking them to stop this disturbance.

Proposed student management

Do the University really believe that 2 security guards and 2 wardens are sufficient levels of staffing to police a large site with 1200 students and multiple entrances and exits? I think not. The current larger staffing levels are insufficient for dealing with student management and behaviour and there is a heavy reliance on local residents reporting to the University. It is not feasible that less staff will deal with more students in a more complex conglomeration of student accommodation.

What I would like to see

- **A well managed low rise modern student residence that is a positive contribution to the area.**

- **The university to share its business plan with us to ensure transparency of their longer term intentions for this project.**
- **A building that respects the quiet enjoyment of local residents including managed noise levels and no changes to daylight and sunlight levels.**

A well managed low rise modern student residence that is a positive contribution to the area.

I believe that there is no need for the scale and mass of building proposed. This is opposed by local interest groups such as the Marchmont Association and the Bloomsbury Association. Comparison with recent Camden student developments proves that this site is overdeveloped.

John Dodson House in Bidborough Street is one example. The student development in Midland Crescent is another. Neither of these developments has the level of amenity space that is proposed for Cartwright Gardens.

I am worried at the level of amenity space proposed and what its future use might be. The University are not clear on its purpose and refuse to let us see their business plan which may well explain the intended use of this space.

The University of London is a federal university and generally it is its constituent colleges and not the central administration that "teach". So there is no need for the level of "teaching" and "ancillary" space proposed for the university to carry out its core purposes in this instance of accommodating students. Students are provided with generous sized study rooms and there is little need for them to congregate and do group work. In fact, they are not housed in groups, but apply independently for accommodation in the Intercollegiate Halls of Residence.

Basement space has been provided for cycle storage. Again this adds to the bulk and size of the building. My suggestion would be to have low rise cycle storage on the existing car park of Hughes Parry Hall. This would respect initial planning considerations and would ensure daylight, sunlight to residents of Sandwich House. It would also ensure that residents would not be overlooked and continue to provide the buffer zone which is currently enjoyed.

Unnecessary amenity space facing in to Sandwich Street could easily accommodate the students from the townhouses thus enabling the car park to continue to be used as an amenity for the residents. There is little point in moving this amenity space from its existing location in the car park to within the new build.

This basement space vacated by the proposed cycle storage could be used for amenity space as it is at present used as a conference facility. Light levels are good here due to the generous light wells. In the new build they could continue to be used as this type of amenity space.

I do not believe that the jumble of accommodation proposed is any more manageable than what is there at present. The tower remains. It will not provide the up to date facilities such as en-suite ablutions and accommodation which the University says is the reason for demolishing existing buildings since the outline of the building remains as it is now. The town houses will be a nightmare to manage both with regard to security and noise because of their independence from the main block and because their communal accommodation of six communal rooms faces away from the main block and towards Sandwich House. Planning permission should be granted for a centrally managed student residence and not semi-independent town houses. Similarly with the dining rooms and common rooms on every floor of the tower facing Sandwich Street will be a nightmare to manage and will considerably increase current levels of disturbance.

The student management plan does not

The university to share its business plan with us to ensure transparency of their longer term intentions for this project.

There is a lack of transparency with regard to the university's long term business plans for these premises. Residents have asked to see these and were refused. Residents have speculated as to why these plans are not transparent.

- Are there plans to provide a conference venue within this development? This would certainly account for the increased size of the development and the large amount of amenity space.
- Why ask planning permission for townhouses? Is this something that could be sold off or leased off separately should long term student numbers fail to materialise, or to provide an increase in income?
- If student numbers drop, is there a possibility of using the premises as a hotel and conference centre?
- If there is a funding crisis, could the amenity space be converted thus increasing the number of students being housed?
- Student housing at present is a good investment for overseas investors. We believe that investors in China are investing in UPP. What happens if the returns from student rents suddenly drop and there is no finance to provide the returns on this investment? (See Financial Times "China buys into UK student housing" 27 Sept 2012, "UPP rolls out £5bn student property bond" 19Feb 2013).
- You may not think this feasible yet the British Library have researched future trends in student numbers in their catchment. In their discussion paper they suggest the following trends:

2020 Vision Project

Trends in Universities, Research and Higher Education

Internal discussion paper

February 2010

2.5 Globalisation

An increasing number of UK students are studying overseas and this will continue. At the same time, the UK's market share of overseas students is under threat and, by 2020, it will be difficult to maintain against the rise of BRIC universities and increase of courses taught in English in other European countries.

2.6 Demographics

The number of 18-20 year olds will decline between 2010 and 2020 – the age group that currently accounts for more than 70% of full-time undergraduates and almost half of all students. Migration patterns could affect these figures but the trend is already set.

3.1 The (Higher Education) Sector will become smaller

Mergers are most likely to be between smaller HEIs and possibly some post 1992 HEIs but are unlikely between Russell and 94 Group institutions unless they become financially unstable. The London HE sector with 42 HEIs is singled out as unsustainable and a candidate for rationalisation, though mergers are likely to be costly in terms of time and resources

3.3.1 Funding and Funding Models

Overseas student fees are seen as way of maintaining an income stream – some would see it as over-reliance. As pointed out by an interviewee: "Universities would be severely affected if income from overseas students dried up. Some now get more income from fees than from government largely because of overseas fee income". At the same time, "the dependence of universities on inherently less stable export markets will be one of the factors increasing risk and vulnerability".

3.3.2 Profile of students

Most sources and commentators are of the opinion that in future the 3 year, campus based, full-time, 18 year old student will be in the minority. The profile of the undergraduate population will be more mixed with more

older and part-time learners. Students will take longer to graduate part-time and will need to support themselves for longer. The reasons for this include the demographic changes noted in 1.5 above; the increasing cost of fees; the professionalisation of employment and growth of graduate professions, such as teaching and nursing, which has CPD implications; the recession which is forcing those made redundant to re-skill in order to change career; demand from business for new skills and CPD for career progression; school leavers who decide to enter HE at a later stage.

3.3.3 Learning Provision

There are increasing links between schools and FE and local businesses and community organisations, e.g. Camden Business Education Partnership (<http://webfronter.com/camden/ebp/>) – though not yet much link-up between HE and schools. The innovative thinking in Camden is around a campus of educational institutions including primary and secondary schools, FE and HE institutions, local businesses, and cultural institutions (such as the BL) with students being able to pick and mix across the whole.

3.4 More UK HE will be delivered overseas in partnership

In 2002 a handful of universities were offering education to students studying wholly abroad, such as Nottingham pioneering an overseas campus in Malaysia and the Open University offering correspondence courses. Last year, 111 out of 166 institutions, and broad mix of Russell Group, 1994 Group and newer universities, were offering some form of offshore provision to over 190,000 students, of which around 61,000 were postgraduates. This is a rapid area of expansion for UK HEIs, making UK HE accessible even to those who cannot afford to study here. ref from Geneva House, Postgraduate Education in the UK British Library and HEPI, 2010

Given that the University feel unable to share their business plan with us, we have to assume that they have knowledge of these trends and we have to question the sustainability of the project they are planning as a student residence on this scale.

A building that respects the quiet enjoyment of local residents including managed noise levels and no changes to daylight and sunlight levels.

We live within the Bloomsbury Conservation Area. Original streets and terraces were of a uniform height. Senate House was one of the first buildings to breach this height. Latterly other buildings such as the tower in Hughes Parry and many local authority blocks in the immediate area have breached this height and this has been compensated by amenity space such as car parking or garden being planned for around them in order to spread the density. More recently higher buildings have been built on arteries such as the Euston Road. The planning statement refers to these when trying to justify the proposed height of the new build and suggest that Cartwright Gardens is an artery. Well it is, but only for cyclists.

Much of the information in the planning documentation is misleading. They say that they have consulted SST residents for example. There has been no meeting. I am reminded that the Senate House building was the inspiration for George Orwell's Ministry of Truth. Indeed I would go so far as to suggest that some of the statements made in the planning documentation can be viewed as worthy of "orwellian newspeak" and should be thought of in this context in order to see through the veil of deception of a planning application which we I believe we have before us.

I am concerned at the large amount of plant including extraction that is proposed for the roof of the Sandwich Street elevation. There is no plant currently located here. Details of the proposed plant are limited so it is difficult to establish what the impact will be on local residents. All the plant is currently located in buildings on the Cartwright Gardens elevation. The gardens and the car park act as buffer zones to the surrounding residents.

In addition the acceptance of English Heritage support for this overdevelopment is difficult to understand unless you are aware that they are only supporting the emerging designs and that as Debbie Radcliffe points out in her letter of objection that "there is an uncomfortably close connection" with English Heritage and the University. I would go so far as to say that the planners must discount any input from English Heritage due to the conflict of interest pointed out by Debbie.

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6.17 An initial meeting and site visit was held with Richard Parish of English Heritage on 4th October 2012 to discuss the proposals for demolition with the Bloomsbury Conservation Area and present the initial scheme.

6.18 Following further scheme evolution, a second formal meeting was held with Michael Dunn and Richard Parish of English Heritage on 6th February 2013. In a subsequent email (13th February 2013) English Heritage set out:

"In general, we are supportive of the approach as presented. We believe that the emerging design for the new building facing Cartwright Gardens is an appropriate response to the surrounding urban context, and that the new building is of the right scale and has sufficient architectural gravitas to complete the eastern part of the square. We also considered the emerging designs for the buildings facing Sandwich Street to be acceptable in principle, although we understand that more work is to be done on matters of detail and materials etc.

Planning policy

In making their decisions on this application, I request that the planning committee take full account of current planning policy.

- London Plan policy 2.12 which seeks to protect and enhance predominantly residential neighbourhoods with the Central Activities Zone. The proposed development will not enhance its surrounds.
- Camden Core Strategy policy CS5 which seeks to protect the amenity of Camden's residents by amongst other things, ensuring that the impact of developments on occupiers and neighbours is fully considered.
- Policy CS6 which supports student housing development provided that it does not prejudice the quality of residential amenity and the character of the surrounding area and have a "cumulative effect of any structures do not have an overbearing and/or dominating effect that is detrimental to the enjoyment of their properties".
- Policy CS9 which seeks to support residential communities within Central London by protecting amenity.
- Policy CS14 which seeks to promote high quality places with the highest standard of design that respects local context.
- Development Policy DP26 which seeks to manage the impact of development on occupiers and neighbours, taking into consideration amongst other things, visual privacy and overlooking; overshadowing and outlook; sunlight, daylight and artificial light levels; and noise and vibration levels.
- DP 24 which seeks to secure high quality design.
- DP 20 which seeks to minimise disruption to local communities through the effective management of deliveries.

What I would like from the planners

My personal wish list is as follows:

- No multiple entrances. Just one main entrance for students and a second for deliveries, both located on Cartwright Gardens. Noise disturbance to local residents to be minimised.

- The Hughes Parry Car Park to continue to be used for amenity, that is, for cycle storage, and not be built on. This was the original intention of the planners so long as the tower remains.
- The new construction to be low rise in keeping with the original roof levels or as near to this as possible. This would be an architectural challenge, but I believe it could be done if the internal amenity space is kept limited.
- Plant to be located on the Cartwright Gardens elevation to ensure an adequate buffer zone for local residents.
- A limit in internal amenity space would ensure that the building would in future not be used for anything other than student accommodation, which is what the University are asking for and the planners deciding upon.
- It is important that alternative usage is designed out and that the building is designed in such a way as to minimise the impact of its use on local residents.
- In keeping with other stakeholders such as the Marchmont Association, the Bloomsbury Association and SST Residents Association I would be in favour of a return to the drawing board with a strict remit decided by the planning authority based on the bullet points directly above.

Yours sincerely,

