

Application No:	Consultees Name:	Consultees Addr:	Received:	Comment:	Response:
2014/5840/P	M Archer	Southampton Road	13/10/2014 15:15:43	OBJ	The design of this building, as per documents seen, is a Stalinist block completely out of character for this area. The building of it will entail continual equipment moving along two roads not suitable for this purpose, along with associated noise and exhaust pollution, in an area with many small children. With 112 residential units this means an extra 112 vehicles parking on Grafton Road, Maitland Park villas and nearby roads, which are already full of residential vehicles.

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2014/5840/P	Dominic Williams	Side House 18 Parkhill Road London NW3 2YN	15/10/2014 12:29:43	COMMNT	We and the other residents of No 14-22 Parkhill Road wish to object to the above planning application from LB Camden Housing and Adult Social Care department (HASC) insofar as it relates to the redevelopment of Aspen House and Maitland Park Gym. Our gardens are bounded by the rear wall of Maitland Park Gym. The proposed scheme would involve demolishing most of our garden wall and building a five storey block of flats within 5m of our boundary.

We would like to make it clear that we are not necessarily opposed to the principle of development on this site. Instead, our objection is that the proposed scheme is a poorly-designed over-development and is unacceptable in planning terms.

In particular:

- This application is for two developments not one and they should be the subject of separate applications.
- The developer's approach to viability is contrary to the National Planning Policy Framework.
- The development is a misuse of affordable housing contributions.
- The developer's desire to avoid paying CIL to its own planning department is not a valid ground for rushing through consent for a poorly designed scheme.
- The pre-application consultation was biased, unfair and in breach of LB Camden's own protocol.
- The proposed development represents a massive over-development of a severely constrained site.
- On the developer's own admission, the development has been designed with absolutely no consideration of the impact on the Parkhill and Upper Park Conservation Area and contravenes the council's own planning policies.
- The development fails to meet daylight and sunlight standards in the proposed Aspen Court (according to the developer's own consultants).
- The development threatens a number of mature trees in a conservation area, which, in the developer's architect's opinion, would need to be cut back to provide daylight to the new development. The developer's arboricultural survey completely fails to address this.

Two developments

This planning application purports to be for a single development. It is actually for two separate developments on two separate sites (which are not contiguous). When complete, they will be functionally independent and in separate occupation (as multiple dwellings). It is clear that the Grafton Terrace development will proceed first and can be completed and occupied, regardless of what happens on the Aspen House site. HASC would like the Grafton Terrace development to be completed first, in order to provide decanting space for Aspen House – but Aspen House residents could be accommodated elsewhere (and some of them will be). So this is a matter of convenience for HASC, not a valid planning consideration.

It is also clear from LB Camden Cabinet papers (December 2013) that HASC has no money to carry out the Aspen House development and no intention of doing so, at present. Its motivation for linking the two developments is apparently twofold. First, it wants to avoid paying Community Infrastructure Levy (see below). Secondly, the Grafton Terrace development does not include a policy-compliant 50% affordable housing element, whereas the two schemes taken together do. In fact, as we explain

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below, the Aspen House development provides 86 units in total but only five additional affordable units – something HASC is not keen to highlight.

So, HASC is arguing that it is necessary to consent Aspen House to allow Grafton Terrace to go ahead. In our view, this is a sham argument. Grafton Terrace can and will go ahead immediately. Aspen House will not go ahead, perhaps for years, if ever. The correct course, in planning terms, is for the local planning authority to refuse the combined application on the grounds that it is an overdevelopment of the Aspen House site and invite HASC to submit a fresh application for Grafton Terrace alone. The two developments do not need to be determined together and should not be.

Viability

It is a matter of record that for many years LB Camden has sought to maintain ownership of its social housing stock and refused to undertake any stock transfers. It still owns about a third of the total housing stock in the Borough. This is a perfectly legitimate aim in terms of housing policy. However, it put LB Camden at odds with the previous government and led to a shortage of funding. In turn, this has created an enormous maintenance backlog on its estate and capped the amount that it can borrow for new housing development. So, HASC has decided it would be better to demolish blocks instead of maintaining them properly.

The current government introduced legislation allowing rents for new affordable lettings to be increased to up to 80% of market rent. HASC has decided as a matter of policy not to implement this policy and to keep rents as low as possible by maintaining social rents as opposed to the new affordable rents. This has significantly reduced the viability of new council housing schemes. As a matter of housing policy HASC is entitled to adopt this approach. As a matter of planning policy it cannot use this as an excuse to justify over-development.

HASC originally set out to re-develop Maitland Park Gym to provide additional social housing using a combination of affordable housing payments from development elsewhere in the Borough and profits from developing homes for sale alongside the social housing. This would have been a perfectly sensible strategy.

However, HASC then decided to demolish Aspen House and re-house the 39 families occupying it in new accommodation. This decision was apparently made without any proper business case or value for money comparison with the previous scheme. The only rationale given by HASC was that “the tenants suggested it.” Why HASC should be so quick to adopt the tenants’ suggestion in the run up to a local election in a marginal ward is a matter for speculation. It may be that the prime reason is that HASC is so short of funds that it has been unable to maintain the block properly and is in breach of its duties as a landlord. However, whatever the true reason, “the tenants suggested it” is not an adequate justification for spending £27m of public money and we are asking the council’s auditor to investigate further.

The absence of a robust business case for demolishing Aspen House meant that, from the outset, this project was probably not going to be viable and acceptable in planning terms. The design brief for the architects is set out in the Design and Access Statement (Page 11 Para 3.2):

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“Our brief was set by EC Harris, working with LBC Housing Department. We were asked to provide the following to achieve a viable scheme that meets the needs of LBC Housing.”

The fact that the design brief was written by a firm of quantity surveyors explains a lot about the poor design of the scheme, in our view. The design brief was to achieve 50% affordable housing mix in compliance with LB Camden’s own (out of date) Core Strategy and it is clear that this has driven the over-development of the site. However, the key policy guidance is National Planning Policy framework Para 173, which takes precedence over LB Camden’s own policy in this respect. It says:

“Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.”

So, the correct approach would have been is to design a scheme that is acceptable in planning terms and then, if necessary, reduce the affordable housing element to ensure viability. Instead, HASC has set out to achieve a as high a level of affordable housing as possible and then simply increased the bulk of its scheme until its financial model stacked up. This is completely unacceptable in planning terms.

HASC has also added self-imposed obstacles to viability by deciding to demolish and re-provide the social housing in Aspen House and by insisting on new lettings at social rent levels instead of affordable rent levels. It would be wrong in planning terms (and irrational) to give consent to an over-development simply to enable the developer to achieve a series of self-imposed and abnormally onerous financial targets.

In passing, the Design Brief included requirements for design to meet Code for Sustainable Homes Level 4 and Lifetime Homes standards. The government has announced that from next year these standards will no longer apply (Housing Standards Review: Technical Consultation, DCLG, September 2014). So, there seems to be no valid reason to insist on gold-plating developments in this way, particularly as they reduce the viability of the scheme further.

Affordable Housing Contributions

The two developments, Grafton Terrace and Aspen House provide 62 new private units and 50 social rented units in total. The Aspen House scheme provides 45 private units and 41 affordable units. However, 36 of the affordable units are re-provision of the units in Aspen House. So, only 5 additional affordable units are being provided, in a development of 86 units. This is astonishing enough in itself.

Then, the only way HASC make afford to pay for the development (according to Cabinet papers) is to use commuted affordable housing contributions from elsewhere – in other words to spend money from

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developers elsewhere in the Borough who do not want affordable housing on their own sites. This approach might appear to be justified by NPPF Para 50:

“where they have identified that affordable housing is needed, set policies for meeting this need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified (for example to improve or make more effective use of the existing housing stock) and the agreed approach contributes to the objective of creating mixed and balanced communities.”

However, in our view, demolishing Aspen House and rebuilding it, in order to allow HASC to evade its maintenance liabilities as a landlord, does not amount to improving or making more effective use of the existing housing stock. We submit that this amounts to a misuse of funds, a point we will be putting to the council’s auditors. We will also be asking the government’s Chief Planner for clarification on the government’s interpretation of NPPF Para 50.

HASC may argue that the affordable housing contributions are only being applied to the five new affordable housing units. In that case, we would welcome sight of its proof. We have asked HASC for a copy of the viability assessment under FOIA, citing the decision in London Borough of Southwark v The Information Commissioner and Lend Lease (Elephant and Castle) Limited and Adrian Glasspool (EA/2013/0163). HASC has chosen to ignore this case and refused to release the information. Our appeal to the Central Information Team (and to the Information Commissioner if necessary) is underway.

We understand that this point may only be theoretical at present because the hoped-for off-site contributions have not materialised and HASC is unable to go ahead with the development even if it is consented.

CIL Liability

The HASC proposals were approved by Cabinet in December 2013 as part of the Community Investment Programme. Paragraph 32.10 of the Cabinet briefing paper gives one reason for bringing proposals forward as:

“Avoid CIL (Community Infrastructure Levy) liability (potentially due on Autumn 2014) which could threaten scheme viability.”

We were puzzled by this because the Mayor of London’s CIL is already in operation. The only CIL yet to be introduced is LB Camden’s own levy which the council can keep for itself. So, the only difference that would make is which department gets the money. Before introduction HASC would benefit; afterwards Environment would gain. Surely major investment decisions are not driven by petty inter-departmental budget squabbles?

At a meeting with HASC on 28 May, we asked about this. Officers and consultants from the Design Team vehemently denied that CIL was a consideration in the timing of any application. However, we then obtained minutes of Design Team internal meetings through an FOI request. The minutes showed

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					<p>that what the team members said to us was completely untrue. On the contrary, the minutes of meetings over several months of 2014 repeatedly emphasised that avoiding CIL was a key consideration.</p> <p>S 153 Localism Act 2011 does enable the local planning authority to have regard to a “local finance consideration” as a material consideration in determining a planning application. A local finance consideration includes “sums that a relevant authority has received, or will or could receive, in payment of Community Infrastructure Levy.”</p> <p>However, it would be irrational for a local planning authority to rush through an unacceptable development proposal in order to reduce the amount of CIL it received. So, this cannot be a reason for a local planning authority to wave through an unacceptable development.</p> <p>We do not understand why CIL should be such an important driver for the timing of the application or why the design team should be so determined not to admit the truth. In our view it is unacceptable conduct for officers and consultants to act in this way. Whatever the reason, it undermines the credibility of the Design Team as experts and the reliability of the Design and Access statement. Incidentally, it forms part of our maladministration complaint against HASC (described below). We are also minded to bring formal complaints of professional misconduct against the team members to their various professional bodies.</p> <p>Biased and Unfair Consultation</p> <p>The failure of the developer to consult fairly is one of our main objections to this application. It is the main subject of our separate maladministration complaint to the Local Government Ombudsman. However, in this objection, we address the issue purely in planning terms.</p> <p>In planning law and national policy, there is no statutory obligation to consult anyone prior to submitting a planning application, although it is encouraged. However, to quote the leading judgment from the Court of Appeal in "R v North and East Devon Health Authority (Ex Parte Pamela Coughlan)":</p> <p>"It is common ground that, whether or not consultation of interested parties and the public is a legal requirement, if it is embarked upon it must be carried out properly. To be proper, consultation must be undertaken at a time when proposals are still at a formative stage; it must include sufficient reasons for particular proposals to allow those consulted to give intelligent consideration and an intelligent response; adequate time must be given for this purpose; and the product of consultation must be conscientiously taken into account when the ultimate decision is taken."</p> <p>As the Design and Access Statement makes clear, HASC held ten formal consultation events about the design of the proposed development over a period of two years or more. We were only involved in the 10th and final meeting on 28 May 2014.</p> <p>The Design and Access Statement also makes clear that, in response to earlier consultations, extensive changes were made to the positioning, layout, height and general massing of the development to</p>

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address neighbouring residents' concerns. Even the 9th meeting in April 2014 resulted in reductions to the height of the Grafton Terrace development.

In contrast, as the Design and Access Statement makes clear, HASC told us at the meeting on 28 May that the massing of the development was fixed and they had no intention of making any changes other than cosmetic ones. As the Design and Access Statement puts it, they said:

“Given the level of consultation and feedback received to date from residents and the wider community, the massing and location of the proposed buildings was now fixed.”

In other words, everyone else was consulted and given the opportunity to change the massing and location of the buildings but we were told we could not make any changes.

In addition, officers admitted at the meeting that they had made no effort to involve us in earlier consultations because they only had a duty to council tenants.

HASC also argues that it was our own fault for not finding out about the proposed development earlier. In particular, they sent out 1,700 invitations to an exhibition (not a consultation) in February 2014 which we could have attended. The invitations were in unmarked plain envelopes addressed to “The Occupier” and delivered by a method that HASC has not yet disclosed. HASC argues that it was our hard luck, and not HASC’s responsibility, that half these invitations never arrived.

Common sense would say that if you are planning to knock down someone’s garden wall and replace it with a five storey block of flats, you should do more to inform them than send them an A4 flyer invitation to a public exhibition. We note, for example, that all the occupants of Aspen House were individually interviewed.

LB Camden Planning Department has its own protocol for pre-application consultation. For developments off over 21 dwellings (which this is) it recommends engagement via the Development Management Forum, the purpose of which is to:

- familiarise local people with proposals for major developments in the borough before a formal application is submitted
- enable local residents, businesses and organisations to comment on proposals at a time when developers are in the earliest position to consider them
- o our forum does not replace our formal consultation process on applications, but aims to raise local awareness of a scheme at an early stage
- ensure more meaningful public involvement on proposed schemes rather than awaiting the formal consultation stage of an application when it is harder to influence changes in the scheme

So, it is accepted by LB Camden that we are disadvantaged by being forced to rely on the formal consultation process in order to influence changes in the scheme. HASC has completely ignored Camden’s own planning protocols in this case.

This is in complete contrast to its conduct on other CIP developments such as Agar Grove where there was a DM Forum and extensive engagement with the surrounding community including detailed assessment of the impact of development on the neighbouring Conservation Area. It is further evidence that the consultation process was biased and unfair and that it did not meet LB Camden’s own standards.

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We have legitimate grounds for our maladministration complaint against HASC. However, separately, LB Camden as local planning authority has a duty to ensure fairness in the determination of planning applications, including in the conduct of the pre-consultation consultation, if there is one. No reasonable person could possibly conclude that the pre-consultation consultation was fair in this case and that alone is enough to refuse this application.

Poorly Designed Over-Development

We have shown how HASC abandoned its original modest development scheme in favour of demolishing Aspen House “because the residents suggested it”. The need to re-provide and pay for the 39 units in Aspen House led HASC to cram as many units for private sale on the site as it could, in order to meet a notional 50% social housing requirement but still have a viable development. The consultation events then influenced HASC to lower the height of buildings at the front of the scheme, in the face of objections to overlooking from estate residents. Finally, in order to appease objectors at Grafton Terrace, HASC reduced the height of development there. This gave it no room to make further reductions in mass on the Aspen House site if it was to meet its financial targets.

The effect is that HASC was forced to cram the development as close to the rear boundary of the site as possible and to make the rear block (Aspen Court) as bulky as possible. During the design review process, LB Camden Place Shaping made some sensible suggestions about reducing the impact of the development but the Design and Access Statement (Page 8) makes it clear that these were ruled out on grounds of financial viability:

“This would also result in a considerable loss of site area and fail to deliver sufficient units. “

“Gathered together, these points produce a smaller building area which would have made the scheme financially unviable.”

So the proposed Aspen Court has been located within 5m of the site boundary at the rear and much further back than the line established by Alder House and Oak House, the neighbouring blocks. These other blocks were not set back further because the difference in levels, coupled with the number of mature trees in the Conservation Area, would make the lower floors too dark and gloomy.

At the same time, to fit as much development on the site as possible, the rear block of Aspen Court has had to be angled, so that it receives at little sunlight as possible. As we show below, all but one of the habitable rooms in Aspen Court will not meet daylight standards.

The over-development of Aspen Court will also have a massive impact on the Conservation Area.
Impact on Conservation Area.

It is beyond dispute that the development proposals have absolutely no regard to the impact on the Parkhill and Upper Park Conservation Area. The Design and Access statement repeatedly says that the development is not within in the conservation area and that there is no need to consider the impact.

We submit that this approach is wrong in law. First, the rear wall of the gym marked as the boundary of

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the Conservation Area and hence forms part of it. Secondly, S73 Planning (Listed Buildings and Conservation Areas) Act 1990 says:

“ Where an application for planning permission for any development of land is made to a local planning authority and the development would, in the opinion of the authority, affect the character or appearance of a conservation area”

So it matters not whether a development is in a Conservation Area but whether it would affect the character or appearance of a conservation area. LB Camden’s own planning policies adopt this approach. In particular, Para 7.2 of the Parkhill and Upper Park CAA (Adopted 2011) says:

“The Camden Core Strategy and Development Policies documents contain adopted policies which seek to secure appropriate new development.

Development proposals should preserve or enhance the character or appearance of the Parkhill and Upper Park Conservation Area. This requirement applies equally to developments which are outside the Conservation Area but would affect its setting or views into or out of the area. High quality design and high quality execution will be required of all new development at all scales.”

The original drawings shown at all the consultation meetings purported to demonstrate that the development would look lower and less intrusive from the Conservation Area than the existing Aspen House (Design and Access Statement Page 54 is typical). However in our email of 2 May to Mr Barns of HASC, we pointed out that the new Aspen Court would be much closer to Parkhill Road than the old Aspen House block and hence appear much larger.

We produced a sketch drawing which the HASC architect has re-drawn to scale (Page 53). This shows that the new development will appear taller than Aspen House, not smaller. It will also appear taller (and is taller) than the existing blocks of Alder and Oak House. As the new block would be over three times wider than Aspen House, it will have a vastly bigger impact on the Conservation Area than any of the existing blocks.

In consequence, we submit that the adverse impact of the proposed development will have such a serious adverse impact on the Conservation Area that the application should be refused. As the developer has failed to provide any evidence to rebut our argument - or even considered the impact on the Conservation Area at all – the planning authority has no rational grounds for disagreeing with us.

Failure to Provide Adequate Light

On 2nd May 2014 we emailed Mr Barns of HASC with our concerns about the amount of light in the new development:

“The issue of fencing will also be critical to the provision of adequate daylight on the ground floor of the new development. Using your dimensions I have also sketched (attached) the impact according to your own planning guidance method. If there were no fence at all (impractical on safety grounds) , the daylight would be barely adequate. However, even with a 1m fence the daylight angle will be about 30 degrees and with a more realistic 2m fence the angle is 40 degrees compared with the maximum recommended 25 degrees. If my sketch is accurate, this means the ground floor rooms will not comply

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with your own planning guidance. They will be very gloomy and the gardens will get virtually no sun. It is even more critical because the unusual tapering design of the block facing our gardens means that none of the flats will have any windows facing within 90 degrees of south as your planning guidance recommends. Have you carried out a more detailed assessment and what assumptions were made about fence heights?"

At the meeting on 25 May, Mr Barns and his team assured us that detailed assessments of daylight in the new block had been carried out and that there was adequate light to the ground floor.

This statement turns out to be completely untrue. HASC has submitted a Sunlight and Daylight Report by GVA dated August 2014 (i.e. four months after HASC said the work had been completed).

The report concludes (Page 18 Para 44, first bullet):

“At Aspen Court all rooms apart from one bedroom did not meet the minimum ADF recommendations.”

Remarkably, the main Design and Access Statement (Para 4.1) fails to mention this point. It astonishes us that a local authority should attempt to inflict such a poor standard of design on its own tenants. In contrast, the bulk of the private housing is in the front block – Aspen Villas – and has a much better standard of lighting. It is the kind of cynical double standard we would expect from the most unscrupulous private developer, not from a local authority.

We submit that the application should be refused on the grounds that it fails to provide an adequate amount of day and sunlight for council tenants.

Threat to Mature Trees in the Conservation Area

We also object because of the inevitable impact of the development on mature trees in the Conservation Area. The trees are correctly shown at P13 of the Design and Access statement as being hard up against the boundary and overhanging the Gym. Their canopies will actually touch the windows of the new development (NB the drawing at P53, showing them at well away from the boundary is incorrect). In our email of 2 May we said:

“We take the point that, in the summer, we are largely shielded by the large trees at the end of our garden. So one question is what proposals you have for safeguarding the trees during and after the development and how that would be documented and enforced? Many of the mature trees are right up against the boundary and I assume their roots go down under the gym, so any excavation could damage them. Moreover, because they would block out light from the new flats, someone might be tempted to prune them. Have you carried out any assessment?"

At the meeting on 25 May, the architect admitted informally that the trees on our side of the boundary would need to be pruned to allow more light into the lower floors of Aspen Court. However, publicly HASC officers and their team assured us that a tree survey had been carried out and that there was no threat to any trees because the foundations of the Maitland Park Gym would remain in place.

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					<p>In support of the application, HASC has now submitted an arboricultural survey of the site. However, this makes absolutely no mention of the trees in our gardens. It does not consider them at all, even though their canopies now overhang the gym and they will need to be pruned to allow daylight into the proposed development.</p> <p>LB Camden's own Conservation Area policy (Para 7.7) says:</p> <p>“The unsympathetic pruning of trees would also be resisted and the pruning of trees which have developed a natural and attractive shape and form should be preserved and protected and any application to reduce these trees will be resisted.”</p> <p>We submit that the development cannot proceed without pruning of the mature trees in the Conservation Area, which would be unacceptable in planning terms and that the developer is well aware of this. The developer has provided no evidence to refute our objection. In fact the developer has not had any regard to the impact on the trees at all. As there is no evidence on this point other than our submission, the planning authority has no rational grounds for disagreeing with our evidence.</p>

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2014/5840/P	Julia Robson	60a Grafton Terrace NW54HY	14/10/2014 10:41:04	OBJ	<p>Loss of character in my community/context of home</p> <p>I currently own a maisonette (60a Grafton Terrace), which overlooks the garages belonging to a social housing estate; because of these low-rise garages for many years I have been able to enjoy a sweeping sky scape with lots of trees in the background.</p> <p>I can watch the change in seasons through this huge sky area and hear birdsong. The open space and light that floods in to my South Facing (front) flat I feel, sets the character of my flat.</p> <p>The proposed development is a towering, single long block, which will entirely cut this area off. The box-like units will block me in and change, not just the character of my flat but equally the quiet Victorian terraced street itself. Why was no attempt made to mirror the terrace in terms of families living in flats similar to they are on the side of the street I live in. The proposed flats do not in any way mirror the uniformity of the street, not in height or design.</p> <p>Currently I live in a flat, which borders on a social housing estate. With the new development my street effectively becomes a part of it. I believe this will forever change its character and the value of property in it. The proposed development will result in extra noise, more vandalism and crime; a build up of density in terms of people living here, which were not living here, traffic and noise and the value of my property and properties surrounding it will be compromised.</p> <p>External Appearance</p> <p>I object and disagree strongly to the developer's plans stating that the development 'repairs' Grafton Terrace. I do not feel the modern buildings are in 'rhythm' with a Victorian terrace.</p> <p>I believe the surrounding streets have taken the lowest priority in terms of being considered throughout this project. Indeed the residents of Maitland Park have been consulted for years. I sadly believe developers were manipulative in their desire to win over social housing residents and have conveniently ignored neighbouring residents who live in surrounding streets and will be just as, if not more affected by this development. I know there have been late attempts for talks between all parties but this was an afterthought helped and mediated by LibDem councillors. In hindsight the planning and man-management of this development and communication was very poor. This raises major concerns for the entire building and planning.</p> <p>The fact remains this street is a uniform Victorian terrace. The proposed houses (which have been reduced from 6 to 4 story's since vehement opposition from almost all the local residents, whose campaign is called "Save Grafton Terrace" for obvious reasons) remain one story higher than the uniformity of the terrace. They still appear to be in blocks and being so modern in design are not at all sympathetic to the rest of the hundred or so Victorian houses.</p> <p>The final block, which is proposed to replace the existing social hall, feels too high and too dense. This hall is opposite a Victorian almshouse, which is a focal point as you come up the street from the East.</p> <p>How the architects have seemingly ignored the design of this building and attempted to claim the new building is in sympathy with the turrets and gothic design of this building is beyond reason. I feel opposite the beautiful almshouse building this new building and the pub, this built-up block is not</p>

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remotely in keeping with a very pretty Victorian terrace.

The project needs more thought in terms of being in keeping with a terrace. As it stands this new development will spoil not add to this pretty 19th century street.

Design and layout/Loss of daylight/ sunlight and privacy

I live at 60a, which is directly opposite the garages that are proposed to be demolished and replaced with blocks of flats. Above these garages I presently look out onto areas of green trees and feel very much like I can see the 'park' of Maitland Park.

More importantly I look out onto a sweeping skyline, which is all sky. The proposed building will cut out.

The proposed buildings will entirely change this. I will be entirely cut off from the surroundings and green park that I have enjoyed until now. This will entirely change the characteristics of the street.

Overlook

When I attended the meetings at the Community Hall I was told balconies would not overlook my house. The flats ALL have street facing balconies that will look over bedrooms where my son and I sleep, and which are street facing and my living room, also street facing.

Noise/nuisance

I am concerned the balconies in the summer will have windows open and this will result in noise. Also I am concerned the Community Centre in its new size and capacity will not be soundproofed and in summer with doors open, and people smoking on the street. Will become even noisier than it is presently.

I am also concerned the proposed replacement TRA hall will not be manned. I think this will attract people hanging around and more crime.

Traffic and parking issues

Planners are being ostrich like about parking issues. There will be utter chaos. It is already impossible to park at weekends.

The corner of Grafton Terrace and Maitland Park swells by up to 150/200 cars when there is a party. This occurs almost every Friday and Saturday night from spring through summer. There are so many cars I can only think that many visitors are not local. It is impossible for residents to park at weekends currently.

With an added 112 flats, many of which will have cars and vans for their work, I don't see any parking areas. THERE WILL BE ADDED CARS AND VEHICLES and I feel it is foolish to claim that these will not be granted parking permits. At some point residents in the 112 flats presumably will be granted this necessity. What about the residents who need cars for work?

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Refuse issues

I currently live opposite three large black bins, which are used by residents of Maitland Park. There is a problem with dumping rubbish, not just black sacks but old chairs, mattresses, sinks, wood, carpets and general food refuses every day. I have informed the council about this because it does attract rats and foxes. If flats will be built in the area where this is the refuse area allocated and the bins allocated already do not contain refuse from the existing flats the 112 extra residents need an area for refuse which is much bigger.

SUMMARY

- I feel the project to build 112 residential units in an exceptionally small area, and put more units above a busy TRA hall, is way too ambitious in terms of scale and ill advised overall. It is sheer greed to attempt to get 112 units in this area. It will not work.
 - Attempting to cram so many box-like units into this space will ruin a quiet street, which borders on a social housing estate. With the new development this will effectively become a part of it.
 - I believe this is an ill advised ruse to make a large profit on land considered infill for private flats, using the claim you are creating more social housing. The units look very cramped from the inside.
 - The project will allow a pretty Victorian terrace to morph into a towering, ugly, box like development. This project is very unpopular with neighbouring residents and has been fought at every point. The fact it has been reduced from an appalling 6 story's to 5 story's shows the ambition and greed of developers.
 - This development will result in this quiet street becoming built-up and noisy.
 - There has been an ostrich-like attempt to manage traffic and parking especially with regard to the TRA hall which swells by several hundred during summer parties, which go on all weekend.
 - I also believe to build units on top of the community hall, which will have to be manned 24/7 to stop noise, vandalism, crime etc., is ill advised.
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Application No:	Consultees Name:	Consultees Addr:	Received:	Comment:	Response:
2014/5840/P	Claire Harris	54 Grafton Terrace London NW54HY	23/10/2014 15:08:50	OBJ	<p>This proposal represents a serious loss of amenity for residents of Grafton Terrace, particularly those living opposite the proposed new residential units.</p> <p>1. Balconies Having balconies (external habitable spaces) in the new development fronting Grafton Terrace built so that they face the existing houses opposite in Grafton Terrace is an invasion of privacy for the existing residents whose sleeping and living quarters will now be overlooked by such balconies and who will suffer consequent noise, disturbance and loss of visual amenity. Existing balconies on Grafton Terrace are ornamental only (and do not have French windows opening on to them). The balconies to be used as exterior space for the new developments should face south on to the Maitland Park Green space or, where that is not possible, East or West (for buildings at the end of the row).</p> <p>2. Noise The residential buildings already in existence in Grafton Terrace are Victorian and thus built with thick brick walls. Noise does not escape these buildings and the street is a quiet one. Modern buildings usually have much thinner walls built of materials which are more noise-permeable, thus internal noises are almost always more audible from outside. Given this, and given the large number of dwelling proposed, noise disturbance will therefore be problem for Grafton Terrace residents even without the issue of the front-facing balconies.</p> <p>3. Unsympathetic Use Of Site The proposed new buildings do not represent an efficient or site-sympathetic use of funds. A better approach would be to use all the land facing existing residential buildings on Grafton Terrace (i.e. up to the site opposite the small shop and pub) to build new houses for private ownership in keeping with the houses already in existence in the street. These could be sold for a good profit and the funds could be used to create public housing by renovating Aspen House (or indeed rebuilding Aspen House entirely) and building new residential units plus new facilities (e.g. TA hall) on the site opposite the shop and the pub.</p> <p>The new development, especially in the portion of it opposite residential buildings in Grafton Terrace, is still too tall, too ugly and too much massing in a Victorian residential street. A good, sympathetic development would create houses and opt for low density massing in keeping with the present environment on the Grafton Terrace site, and would create large volume public housing elsewhere (e.g. on the corner of Grafton Terrace and Maitland Park Villas, or elsewhere within Maitland Park).</p> <p>4. Style The architecture in Grafton Terrace is unique. Houses along the street are slowly being renovated - in many cases with great care and at great expense - as they become available for renovation. This represents an improvement in environment for all since even those locals who do not live in the street benefit from an improved street environment. Yet the new development proposes an architectural idiom which is, in its compromises, its high-density housing, and its cost-cutting utilitarianism, antithetical to this.</p>

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					<p>Two options seem to be better than the current proposal:</p> <p>a) To create houses (as was done in Busby Place a few years ago) which are entirely in keeping with local architecture. High density housing not the architectural idiom of Grafton Terrace and should not be imposed upon it. Houses such as those in Busby Place could be sold at great profit, and the large amount of money gained could be used to provide a very large amount of higher density social housing in a more appropriate context.</p> <p>b) To create something truly aspirational and architecturally attractive. To spend a great deal more money than has been currently allocated to create an iconic and entirely individual statement of a modern building - of the sort that attracts praise and creates excitement, (rather than, as is currently proposed, just an ordinary and somewhat unattractive development), funding this by making the project so wonderfully good that sales of the privately-allocated houses or flats will be at a high financial premium.</p> <p>5. Cars And Parking It is difficult to imagine being able to prevent residents from buying or renting a car. Therefore parking will almost certainly become an issue in due course. 112 new units means a colossal strain on local parking, again particularly affecting Grafton Terrace residents with resident permits, and possibly also affecting the paid parking availability locally.</p> <p>6. Waste Collection Services For Existing Residents of Grafton Terrace What will happen to the recycling bins currently usable by Grafton Terrace residents? Can the proposal include any measures for improving refuse collection and storage generally in Grafton Terrace?</p> <p>7. The Period During Building Works Building work is likely to be extended and extremely noisy. How will residents of Grafton Terrace (e.g. mothers with babies or small children at home all day and needing to sleep during the day), particularly those living directly opposite the proposed development, be expected to cope with this and/or be compensated for loss of amenity? What guarantee can be given that the vibrations caused by digging deep foundations will not affect houses on Grafton Terrace (particularly those opposite and adjacent)? And what recourse will residents have should there be any effects (e.g. cracks)?</p> <p>8. Traffic For Building Works Can there be an undertaking that lorries for the building works will not drive up and down Grafton Terrace but will enter and exit via Maitland Park Villas?</p>