

Damin Whittle  
Flat 2 Stanbury Court  
99 Haverstock Hill, London  
NW3 4RP

Date: 30 January 2015

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Application Reference: 2014/7803/P

Attention: Olivier Nelson

**Proposed Work: England's Lane Residence - Four storey rear development and change of use to eastern "wing" from hostel to 9 residential flats**

I object to the proposed development.

I have the following comments regarding the proposed development:

- It seems clear that the ultimate intention of the developer is to increase the size of the building at England's Lane Residence, under the guise of maintaining existing levels of hostel accommodation, so that it can ultimately be converted into additional private apartments. The infrastructure in England's Lane and the surrounding area is already significantly stretched and no rationale has been given as to why such development is necessary given the significant impact it will have on the area.
- Reference is made in the Planning Statement at para 5.16 that there may actually be an oversupply of such hostel accommodation in Camden. It is stated that:  
*.. the 2014 pre-application response goes on to state that "at present, the Council is reviewing their future needs". It is our understanding, from discussions with Bonny Stevens, that the Council's research may prove that there is in fact an over-supply of hostel accommodation for homeless people. However, as this research has not been completed or published yet, our application continues to propose the replacement of all of the hostel rooms, in line with current policy.*  
If there is found to be an oversupply, it must seriously call into question the need for the extension. **Therefore, any decision regarding this application must wait until that report is finalised and issued.**
- If there is a need for such levels of hostel accommodation to be maintained, where are those people displaced by this development going to live while the substantial works are undertaken (it is stated that 30 rooms will be unavailable during the development)? There is no consideration given to that in the Planning Statement and associated materials.
- The England's Lane Residence building already occupies the majority of available land. The proposed development would result in increased intensification of the use of the site and would be completely out of scale with the size of the site and the character of the neighbourhood. In that regard, I reject the statement at paragraph 5.14 of the Planning Statement that there will be no intensification of use – the development will result in more people being accommodated into an even smaller area. How is that achieving any social purpose?
- There is little by way of green or outside space at England's Lane Residence and this development would have further negative impact on that. In fact, the only limited green

space is on the edge of the property facing Haverstock Hill and that will become the exclusive area for the private apartment residents.

- I reject the statement at paragraph 5.25 of the Planning Statement that the hostel accommodation has “been operating without complaints or adverse amenity issues”. That is simply not true. I am personally aware of numerous complaints being made about (a) aesthetic issues including - clothing being hung out the windows and even a satellite dish being installed outside a window with no consent to do so; (b) trespassing by hostel residents at Stanbury Court (across the road from the Hostel); and (c) littering. The majority of these issues are caused by cramming a large number of people in a very small space, with no outside or green space provided. This development will exacerbate these issues and cause further problems for local residents.
- It is not clear how a new footpath entrance from Haverstock Hill to the property can be achieved without causing damage to the existing established tree fronting that road. That tree and its root system seem to cross the proposed entrance footpath. Has that impact been adequately considered?
- The development will result in the loss of 15 car spaces. England’s Lane and the surrounding roads are already stretched to capacity regarding car spaces. This will be further exacerbated if the proposed HS2 development proceeds as it is intended that England’s Lane would become a major transport link due to the long-term closure of parts of Adelaide Road. The proposal is that parking is closed on one side of the road for England’s Lane.
- It is further noted that no survey of travel habits of hostel residents has been conducted to support the planning application (refer paragraph 2.12 of the Transport Statement from TTP Consulting Ltd). Instead survey data relating to unrelated properties conducted in 2005 and 2009 are used as a point of reference (refer Appendix E of the Transport Statement). Therefore, query the value of the Transport Statement, especially the conclusions reached in paragraph 3 of that report. There are also bold assumptions made with no factual basis whatsoever. For example, at paragraph 3.14 it is stated that “most residents would have few possessions and typically not require the use of vehicles”. What factual basis do they have to make that assertion?. From my own personal observations, there are a number of cars parked on England’s Lane that seem to be used by residents or guests of England’s Lane Residence. Camden Council should be able to verify how many car permits have been granted to residents.
- It is stated that the Antrim Road entrance to the Hostel will be closed during construction and that residents will have to use the England’s Lane entrance (response to question 9 on page 4 of the Construction Management Plan). I query whether that creates a fire risk for the hostel residents. Has a fire risk assessment been carried out in this regard?
- It is stated that vehicle movement will occur on the weekends between 8am and 1pm (response to question 16 on page 7 of the Construction Management Plan). Given this is a residential area and the majority of the vehicle movement will occur on Antrim Road, which is an extremely narrow residential street, it is considered that an 8am start time is not appropriate. If this development is to proceed, it should be 9:30am as per the weekdays.
- In the BREEAM report, it is stated that the development is not expected to achieve minimum daylighting levels. Is that acceptable?

### Comments Form

Name..... RSTHAK KLAG.....  
Address..... FLAT 56 STANBURY CRT, 99 HAVINGSTON HILL NW3 4.....  
Email address..... [REDACTED].....  
Telephone number..... [REDACTED].....  
Planning application number..... 2014/7803/P.....  
Planning application address..... ANGLAS WAY RESIDENCE ANGLAS WAY  
LONDON NW3 4TQ.....  
I support the application (please state reasons below).....   
I object to the application (please state reasons below).....

#### Your comments

DEAR SIR/MS,  
I STRONGLY OBJECT, AS I HAVE TO PAST APPLICATIONS,  
IN MY OPINION - MY OBJECTIONS ARE BASED ON  
THIS, IN THE MAIN:  
THIS APPLICATION WILL HAVE MAJOR NEGATIVE  
IMPACT ON MANY RESIDENTIAL & ENVIRONMENTAL  
FACTORS AMONG OTHERS:  
- TRAFFIC  
- PARKING  
- INHUMAN DENSITY OF RESIDENTS  
- GREEN SPACE & CAUSING DAMAGE  
- LITTERING, DIRT & AIR POLLUTION  
- NATURE OF BUILDING & LOCAL AREA  
FURTHERMORE, CURRENT PROBLEMS CAUSED BY  
THE ABOVE WILL BE GRAVELY EXACERBATED

Please continue on extra sheets if you wish