

2 Walham Court  
111 Haverstock Hill  
London NW3 4SD

March 9<sup>th</sup> 2015

West Area Team  
Regeneration and Planning  
6th Floor  
Camden Town Hall Extension  
Argyle Street  
London WC1H 8EQ

**FAO: Mr Olivier Nelson**

**Town and Country Planning Act 1990**  
**Application by CISCO Property Limited**  
**England's Lane Residence, England's Lane, London, NW3 4XY**

**Application Reference 2014/7803/P**

Dear Sir

I am writing to register my strongest possible objections to the proposed development of the Englands Lane Residence (ELR), as described in the above planning application.

I support all of the points made by Roger Birtles, of Simply Planning, in his letter of objection of February 20<sup>th</sup>, pointing out the many discrepancies between the proposals and national and local policies and guidance. Many objections and comments made by local residents raise matters ignored or skipped over by the planning application which still require clarification.

First I would like to review some matters of particular concern to myself.

## **Inadequate and Ineffectual Public Consultation**

### **Site Notices:**

The site notices which were intended to alert local residents and business people to the planning application were placed, or slipped, into locations where they would not be noticed by passers-by. (see photos below)

I had not seen the site notices locally and emailed the case officer to enquire. He replied with their exact locations, and I photographed them the next day, March 3<sup>rd</sup>. They are dated January 16, with 21 days to respond, meaning the response date was already three weeks overdue before I had even seen the site notices



Englands Lane  
18in from ground

Englands Lane – 2  
copies one post

Antrim Road – fallen to pavement level

### **Lack of Local Awareness**

An informal survey of local residents and business people on the afternoon and evening of Friday March 6th on Englands Lane and Antrim Road found that most people were not aware of the planning application. Almost all were willing to sign a petition requesting an extension or new start to the public consultation. Many said they could not use the internet sufficiently confidently to approach the Camden Planning website. Most said in any case they could not read plans.

### **Lack of Consultation with Property Owners**

The notices of the planning application sent by Camden to local residents dated 9/1, were addressed to Owner/Occupier. Occupants of Walham Court and Antrim Mansions are primarily tenants, unlikely to pass on the letter to a landlord they are unlikely to know, or to the rental agency which manages their tenancy.

I myself either did not receive such a letter, or discarded it as junk mail. Many people must have acted similarly. Head leaseholders, landlords and rental agencies are too various and dispersed to have been directly informed of the proposals. Those we found through Land Registry records knew nothing of the planning application.

The fact that there are only sixteen individual responses on the Camden website to a planning application which would affect the entire Belsize Park area and the lives and property of hundreds of local residents is evidence not of lack of public interest, but of a flawed public consultation exercise, one which does not reflect the huge change from owner/occupancy to investment/rentals over the last twenty or so years.

The property developers spent months in discussion with planners. Busy local residents have three weeks to get up to speed on the project and submit comments.

## Residents of Englands Lane Residence

The residents of the ELR received letters from your department, alongside questionnaires for them to complete. Not one comment or completed questionnaire from a resident of ELR has appeared on Camden's website. Apparently a meeting was held but few people attended and no one we spoke to could or would say what it was about.

An informal survey of about twenty five residents of ELR held on Saturday March 7<sup>th</sup> revealed that:

- Many of the residents of ELR do not have English as a first language.
- Most do not have adequate access to the internet to review planning documents.
- The primary concern of the residents we spoke to is to live somewhere adequate to their needs. Their only interest in ELR, even people who have been there four or five years, is to leave. Those who are aware of the planning application have not responded, for the reasons given above, or because they expect it to lead to their being rehoused elsewhere in Camden. This is contrary to what I understand from the planning documents and from correspondence with the case officer, to be the case.

According to a comment on the Camden website from a resident of Stanbury Court:-

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.**

### **Lack of Hostel Management Plan**

The arrangements for decanting perhaps thirty families, including many young children at a time, whilst others remain to live on a building site, seem ill thought out, and any questions as to the fate of ELRs families attract vague responses.

*"Will Camden continue to lease the rebuilt/refurbished rooms to house homeless families? As far as I am aware the extension to the original building is proposed to continue to rehouse people who use the hostel.*

*Are they expected to stay there while the work is carried out? It's a phase development in order to reduce as much disruption as possible.*

*The re-provision of the hostel rooms has been done in order to provide suitable accommodation for the existing homeless persons who use the site."*

**nb**

This is as far as I can get for now, and I am sending my unfinished comments. As I understand, further comments will be taken into account if received before March 19<sup>th</sup>.

Sincerely

Eve Grace

## **Daylight, Sunshine and Overshadowing**

### **Privacy and Overlooking**

DP 26 requires an assessment of visual privacy and overlooking, of which the proposal makes no mention. They would inevitably increase, with consequent damage to amenity for residents of surrounding buildings. Guidance in policy SD6 in the UDP has simply been ignored.

### **Outlook**

The plans make no reference to the effect of the proposed development on the outlook from the Walham Court flats, other flats on Haverstock Hill, and Antrim Mansions.

At present the view from the bedroom and kitchen windows of flat 2 is about three quarters brick wall and one quarter sky. The proposed extension will completely fill these windows, blocking any sight at all of the sky, so that the outlook is entirely of brick wall. A five storey extension, to barely eight metres from Walham Court, would have a devastating impact on the outlook from living rooms, bedrooms and balconies and communal space.

DP26 states that 'The council will protect the quality of life of occupiers and neighbours by only granting permission to development that does not cause harm to amenity'. Factors listed include the effects of the development on overshadowing and outlook, sunlight and daylight, which would severely harm amenity for surrounding residents.

### **Noise, Vibration, Traffic**

Another factor listed in DP26 but unmentioned in the planning application is noise and vibration. The proposal would cause, during a lengthy building process, including the digging of foundations, intolerable noise and vibration from building equipment, just a few yards from Walham Court and Antrim Mansions.

Throughout demolition and construction, heavy vehicles would enter and exit the courtyard of ELR, adding to the already congested traffic at the junctions of Englands Lane with Haverstock Hill and Antrim Road. No doubt there would be an application to close the bus stop, further harming amenity,

The increase in population density, in a building which is already noisy, especially in the summer, when the windows are open and loud music echoes through the courtyard, will yet further harm the amenity of surrounding residents.

### **Design and Access Statement**

On page 14, it is stated that "amenity of the surrounding occupiers in all aspects concerning amenity will be likely to be preserved." Is likely? The amenity of surrounding occupiers will clearly be damaged by such a huge development in a quiet conservation area. In the plans, the increased height and bulk and of the building overwhelm the scale of the houses and shops on Englands Lane, giving the impression of a barracks, or a prison.

No separate Access Statement has been submitted with this application, despite policies in both LBC's UDP and the London Plan. The Design and Access

Statement's only mention of accessibility states that wherever possible the units will meet Lifetime Homes standards, but does not say how they will not.

No reference is made to Building Regulations Approved Document M, Access to and Use of Buildings, which applies to extensions of all types of buildings. The class use of the ELR is sui generis, thus it is a non-domestic building. The Requirements of Part M state 'An extension to a non-domestic building should be treated in the same manner as a new building, as regards its own compliance with Part M.' Under the new Requirement M2 there must be suitable independent access to the extension where reasonably practical.

The plans for the new wing show a double door entrance, with no indication of whether it complies with Part M, although the Planning Statement says it is 'level'. There are three parking spaces for blue badge holders near to this entrance and some of the rooms in the new wing show turning circles, implying wheelchair accessibility, but there is no indication of non-vehicular access for wheelchairs. Currently the only step-free access to the proposed new wing is via the vehicle entrance on Antrim Road, and forty or fifty yards through the sloping courtyard. There is no lift or staircase in the new wing, so a resident living above the ground floor would need to open and pass through three doors into the original building to use the lift. The doors between the proposed new wing and the old building do not seem to meet Part M, and those in the old building are unlikely to, and may well constitute a fire hazard.

A separate Access Statement should be prepared and the proposal reviewed by the borough's Access Officer.

### **Use of Building**

No information is given in the application about the history of ELR. It was built as a nurses' home, with about a hundred and sixty self contained one person studio flats, each with a bathroom and kitchenette. The nurses were comfortably housed, and within walking distance of the Royal Free Hospital, which sold the building in the early nineties.

Throughout the application the impression is given that the ELR is still a nurses' home. No mention is made of the history of the building, including its lease to Camden Council since 2004, when it became legally a hostel in considerable secrecy and against local opposition, as a facility for homeless families, in one room, with minimal cooking facilities, a barely adequate bathroom and an expensive neighbourhood with no school or nursery places.

No information is given as to the future use of the building. Is Camden going to lease it for another ten years and another £30m? Is the car and bicycle parking for the use of homeless families? Or is the owner once again going to rent out bedsits at £250 a week?

The building can never reach Lifetime Homes standards, and the addition of 35 more below standard housing units, at such huge trouble and expense, requiring the entire building to be empty for months, seems perverse, though no doubt the developers have done their sums.

The most sensible use for the building would be to renovate as it is and return it to use as housing for key workers such as nurses, who are desperately needed at the Royal Free and elsewhere.

### **Planning statement**

I am still preparing comments concerning the Planning Statement, the Plans, Sustainability and the impact on the neighbourhood, which I will submit as soon as possible, and request that they be taken into consideration.

A particular concern is that no mention is made in the documents of any plans to refurbish other than fifteen units on the fourth floor. The entire building needs refurbishing. The crumbling and unpainted state of the sash windows makes plans for solar panels etc. quixotic.

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