



Our Ref: A094395/FurtherRepresentation121015
Your Ref: 2015/5540/P

12th October 2015

Laura Hazelton

Planning Solutions Team
London Borough of Camden
2nd Floor, 5 Pancras Square
c/o Town Hall, Judd Street
London, WC1H 9JE
(by email and via the website)

Dear Mrs. Hazelton,

**FURTHER OBJECTION TO PLANNING APPLICATION REF. 2015/4470/P
BELSIZE PARK HOUSE, 59-60 BELSIZE PARK, LONDON, NW3 4EJ**

Further to our previous representation dated 16th September 2015, and in response to the latest revisions received by the Council, I am writing to you on behalf of our clients, which comprise 59-60 Belsize Park (Freehold) Limited (who have recently acquired the freehold to the existing flats within the building which the application site comprises) and the leaseholders of those flats.

The revisions neither address nor overcome the numerous fundamental flaws identified in our previous representation, and accordingly we reiterate our **objections** to current planning application ref. 2015/4470/P, relating to the existing building (Belsize Park House) at 59-60 Belsize Park, London, NW3 4EJ.

Firstly, the revisions neither address nor overcome the fact that neither of the bedrooms within the proposed flats benefit from a minimum room height of 2.3 metres over at least half of their floor area. Infact, approximately half of the floor area of both proposed bedrooms has a room height not exceeding 2 metres, with a small part of both bedrooms having a room height of under 1.5 metres.

Thus the room heights of both proposed fall substantially below the relevant standards set out within both local and regional planning guidance, thereby failing to provide an acceptable standard of accommodation.

In an attempt to address the objections of ourselves and other third parties relating to the provision of cycle parking and refuse and recycling storage, the agents now propose to create additional space within the existing refuse storage area (which they previously proposed for cycle parking and erroneously stated was unused), and propose storage for 12 bicycles in a storage shed within the communal rear garden.

Extremely limited detail of the proposed storage shed has been provided, with the only plan of that shed comprising a basic floor plans providing dimensions of 1.2 metres (width) by 5.00 metres (length), and no elevations nor details of the materials have been submitted. Given that on average an adult bicycle is 1.75 metres long and at least 0.6 metres wide, the proposed shed is simply not fit for purpose and will certainly not accommodate 12 bicycles.





Furthermore, given that the application site is within Belsize Conservation Area, it is imperative that full details of the proposed bicycle shed are submitted at this stage, so that the Council can make an informed assessment as to whether this element of the proposals preserve or enhances the character and appearance of this Conservation Area. In the absence of such details, it is impossible for the Council to make such an assessment.

In addition, the proposed bicycle shed is within the rear communal garden, which is can only be accessed by stairs, and therefore for any occupier with a bicycle whenever they go depart from/arrive at the site on their bicycle, they will have to take it through the basement and either up or down a flight of stairs.

Such an arrangement does not accord with the relevant standard set out within either the adopted Housing SPD of November 2012 or the Interim Housing SPG published by the Mayor in May 2015, as standard 3.4.2 requires individual or communal cycle storage outside the home to be secure, sheltered and adequately lit, with convenient access to the street, none of which the proposed bicycle shed will satisfy.

In respect of the proposed excavation of the existing refuse store to create additional space, again extremely limited information has been provided, with no sectional diagrams provided demonstrating that the proposed excavation and new internal step could be achieved and facilitate the storage of both the number and capacity (140 litres) of bins which the applicants claim.

Our clients also advise that some time ago they enquired about 140 litre wheelie bins being used for rubbish storage within the existing store, and after an inspection by a Council officer our clients were advised that this was not feasible due to the steepness of the ramp down to the bin store. This fact only raises further doubt about the accuracy of the claims of the applicants, and I must insist that the views of the Council's refuse/waste collection team are sought prior to any recommendation being made on the current application.

Finally, in respect of both the refuse storage and bicycle storage facilities which form part of the amended proposals, both of those elements would have to be undertaken on land that is entirely outside the control of the applicants, and for the avoidance of any doubt our clients (the freeholders of the land upon which the applicants wish to provide such facilities) wish to clarify that they will not agree to the provision of such facilities on their land.

Accordingly, the applicants are unable to provide any refuse storage or bicycle storage for the occupiers of the 2 flats proposed, and therefore the proposals remain wholly contrary to adopted Development Policies DP18, DP24 and DP26, policies 3.5 and 6.9 of the London Plan and Interim Housing SPD standards 3.4.1, 3.4.2, 3.5.1 and 3.5.2,

With regard to internal access to the proposed flats, whilst all of the existing flats across all floors of the existing building are served by both lifts and staircase access, the current application proposes that access to/egress from the proposed flats would only be by way of an internal staircase. Housing SPD standard 3.2.6 advises that all dwellings entered at 4th floor level (like those proposed by this application) should be served by at least 1 lift.

Whilst the applicants contend that the existing building is not wheelchair accessible due to the external stairs which serve the pedestrian entrance, no further explanation or justification has been offered as to why the existing internal lift cannot be extended to serve the additional floor proposed, and the absence of such lift provision reduces the choice of accommodation available to prospective occupiers.



Surprisingly, in submitting these revisions, the applicants have still omitted to provide any supporting information whatsoever as to how the proposed flats have been designed to achieve maximum energy efficiency, with no reference to such matters made within the Design and Access Statement, nor a standalone sustainability appraisal which one would expect to accompany an application of this nature.

In the continuing absence of such information, the applicants have failed to demonstrate that the proposals accord with Core Strategy policy CS13, Development Policies DP22 and DP23, London Plan policy 5.3 (Sustainable Design and Construction) and CPG 3 (Sustainability), and accordingly the application should be refused on the basis that the applicants have failed to demonstrate that sustainable design standards are integral to the proposals.

Conclusion

As set out both in our original representation dated 16th September 2015 and this subsequent representation, there are several important reasons why the proposals do not accord with the development plans applicable to the application site, nor are there any material planning considerations justifying a departure from both adopted planning policies and associated planning guidance.

In particular, the quality of the accommodation proposed is substandard and consequently harmful to residential amenity, insufficient detail has been provided in respect of the proposed bicycle and refuse storage (and such provision would be on land outside of the control of the applicants), the proposed design and appearance of the proposed development is both out of keeping with the existing building, harmful to the character and appearance of the Belsize Conservation Area within which it is located, and does not comprise sustainable development.

Accordingly, we trust that Camden Council will, having regard to these and other objections received, refuse this planning application based on its failure to comply with the adopted development plan.

Should you wish to discuss any aspect of this representation, please do not hesitate to contact me. As we act on behalf of the freehold owners to the existing flats within the building and the leaseholders of those flats please continue to keep us updated on the progress of this planning application.

Yours sincerely,



Adam Beamish MRTPI

Associate - London

For and on behalf of WYG Environment, Planning & Transport

c.c. 59-60 Belsize Park (Freehold) Limited