

Lymington Road Residents' Association
LRRRA Hall
1 Dresden Close
West Hampstead
London NW6 1XP

Josleen Chug
London Borough of Camden
Development Management
London WC1H 8ND

4th January 2016

Lymington Road Residents' Association – Comments on Planning Application 2015/6455/P, regarding 156 West End Lane, London NW6 1SD

Dear Ms Chug,

We are writing to you on behalf of the Lymington Road Residents' Association regarding Planning Application 2015/6455/P relating to the publicly owned land at 156 West End Lane, London NW6 1SD.

1. The LRRRA represents the interests of residents of Lymington Road and the Lymington Road Estate, of which both groups will be severely negatively impacted by the proposed development. Our comments and objections have been compiled by the LRRRA Committee on behalf of the hundreds of residents we represent.
2. The Lymington Road Residents' Association (LRRRA) strongly objects to the proposals for the site at 156 West End Lane. Furthermore, we believe that the contraventions of planning policy and the negative impacts of the proposed development on Lymington Road residents and the wider West Hampstead community are, on balance, unacceptable and the Application should be rejected.
3. The Applicant has completely ignored the requirements outlined in Camden Council's Site Allocations document for 156 West End Lane. The Site Allocations document clearly states that any development should transition in height and mass both to the South and East of the Site. The failure to incorporate such transitions would result in unacceptable consequences on the amenity of residents and irreversibly damaging effects on the one open space and play area in the immediate vicinity of the site, meaning that the Application should be rejected.

4. Camden council has correctly identified West Hampstead as being “deficient” in open space in Camden planning documents, including “Shaping the Future of the Wider West Hampstead Area”. The one open space that exists in the immediate vicinity of the Site is the open space, children’s play area and MUGA in Crown Close. The proposed development would forever blight the open space, play area and MUGA and eradicate the residential amenity and health benefits of this valuable and heavily used shared space through unacceptable levels of overlooking and overshadowing.
5. A principal concern raised by residents is the manner in which the overdominant bulk, mass and height of the development will negatively impact the amenity of residents’ homes in Lymington Road, Crown Close and the shared spaces such as the Crown Close open space, and the Multi-Use Games Area (MUGA).
6. We understand that the Applicant has contributed to a redesign of the MUGA. However, the Applicant has not consulted the LRRRA or local residents. Irrespective of the Applicant’s lack of consultation, no possible redesign could possibly balance the irreparable harm that would be done to the MUGA, play area and open space by the immense levels of overshadowing and overlooking that would be caused by the proposed development. This is contrary to policy CS10, item F, which aims to “support the retention and enhancement of existing community, leisure and cultural facilities” and CS15, “Protecting and improving our parks and open spaces and encouraging biodiversity”.
7. The proposed development would condemn the valuable Crown Close designated open space and play areas into deep afternoon shadow for most – if not all – of the year. Children returning home from school in the afternoons and workers returning home in the evenings would no longer be able to enjoy the green and open space and the daylight and sunlight that is currently enjoyed all year round. We note also that the Applicant originally included the MUGA and designated open space in their “within development” report and claimed 100% compliance with BRE guidelines with two hours of sunlight on 21st March. The corrected and updated report revealed that, despite this claimed 100% compliance, no sunlight would be available to the MUGA and open space in the afternoons and evenings.
8. We remind the council that, at the recent 100 Avenue Road appeal hearing, Camden’s own legal team argued that, “the BRE guidance refers to the ‘two hours of sunlight’ analysis as a ‘check’ not a definitive test. Further analysis is required for critical areas such as public open spaces (3.3.12). That further analysis cannot be limited to merely plotting the shadows – the effect of overshadowing has to be considered.” and, further, “that a qualitative approach is required”. In the case of the MUGA and designated open space, term-time after-school use is crucial.
9. Camden’s own Planning Guidance on Building Design, section 2.10, states that, “Good design should... ensure buildings do not significantly overshadow existing/proposed outdoor spaces (especially designated open spaces), amenity areas... (A shadowing exercise may be required for tall buildings or where they are

near open spaces);” The proposed development clearly fails Camden’s requirements for good design and lacks the “shadowing exercise” with regard to the Crown Close designated open space and should therefore be refused.

10. Camden defines tall buildings as “those which are substantially taller than their neighbours and/or which significantly change the skyline”. The Applicant has chosen not to include the necessary overshadowing diagrams required for tall buildings that would allow us to assess the full hourly daylight and sunlight impact of the proposal on the MUGA, open space and play area, or the homes on Lymington Road. We reserve the right to comment further and raise additional objections if and when overshadowing information is provided.
11. The proposed development claims to offer “improvements” to Potteries Path, a Public Right of Way heavily used by Lymington Road Estate residents. However, the proposals would result in an unacceptably narrower path reduced to two-thirds of its current width and further narrowed by proposed planting along the southern wall. Currently the perfectly serviceable public right of way as it exists can be used by pedestrians, cyclists and wheelchair users alike. The proposed development would reduce this path in size to a point where, by the Applicant’s own projections, it could only be used by pedestrians and dismounted cyclists, thereby negatively impacting the permeability of the area and making cycling a less viable option. Forcing cyclists to dismount for approximately half of the length of Potteries Path is in direct contravention of the Site Allocations document requirement to, “Provide a legible and improved pedestrian / cycle link from West End Lane towards Crown Close through new landscaping and good design.”
12. We strongly object to any notions or intent to sell the Public Right of Way that is Potteries Path. Potteries Path exists outside of the Site boundary of the 156 West End Lane Site and, as such, should be beyond the reach of the Applicant to do with as they please in a bid to make the proposed development more appealing to potential occupants of the units closest to the railway lines.
13. The Crown Close open space, children’s play area and MUGA have been carefully designed to ensure that these spaces are quiet, tranquil, secured and protected from pedestrian and bicycle traffic. The proposed development jeopardises the safety, security and tranquility of young and vulnerable users of this space and should be refused.
14. A significant portion of Lymington Road is located within the West End Green Conservation Area. The back garden walls of homes numbered 2-30 Lymington Road form the Southern perimeter of the Conservation Area. The Council’s Core Strategy document states that the Council will, “make sure that development conserves or enhances the special character and appearance of West Hampstead by applying the guidance in the conservation area statements for the area.” The proposed development will eradicate views in and out of the Conservation Area to and from the Lymington Road homes which fall within this heritage area, and also

many views from within the homes and streets of the wider Conservation Area including roads running parallel and perpendicular to Lymington Road such as Crediton Hill, Fawley Road, Honeybourne Road and the northernmost end of West End Lane. Views into the Conservation Area from the south will be entirely obliterated. The whole view into the Conservation Area can be seen from street level along West End Lane, the entrance to Potteries Path, and both underground and overground trains and is the only remaining view into the Conservation Area from the South.

15. The Applicant claims that its design incorporates “modern mansion blocks”, but fails to note that there are no seven storey mansion blocks anywhere within the adjoining Conservation Area where all mansion blocks are no more than five storeys in height. Views of the proposed development from both the North and East of the site and inside the Conservation Area will not be of the “mansion block” facade proposed for the south-facing aspects of the development but will instead be a mish-mash of flat, blocky rooflines of varying heights, littered with balconies and a variety of incongruous finishing materials, all of which are entirely out of keeping with the heights, designs and materials of Conservation Area homes above which the proposed development would tower.
16. The Applicant has also failed to make provision to incorporate Travis Perkins into the proposal, a stable and viable company that has employed West Hampstead residents, including residents of Lymington Road and neighbouring streets, for over 30 years. Camden’s own planning policies require that floorspace is re-provided to an ongoing, viable business as part of any development. The proposed development fails to comply with this requirement – indeed the Applicant misleads significantly about the amount of floorspace currently existing on the site – and the Application should be rejected. Given that Travis Perkins supplies countless local business who in turn employ additional staff, the knock-on consequences of not including Travis Perkins in any proposed redevelopment would result in greater job losses beyond those on-site. We do not wish to see a repeat of the Liddell Road fiasco where over 100 jobs were lost.
17. We have grave concerns regarding the proposed new service road leading in and out of the proposed development. The current entrance to the builders’ yard is wide with clear visibility onto West End Lane for traffic and with clear visibility for pedestrians and vehicular traffic. The Applicant’s suggestion of a new, narrow road through a brick archway with limited visibility on a dangerous acute bend on an already busy and congested thoroughfare is ludicrous, and little more than a series of pedestrian and motor accidents waiting to happen that the Council can prevent by refusing this application.
18. The Applicant’s own Swept Path Analysis for the proposed new road clearly shows service vehicles emerging from the Site needing to utilise both Northbound and Southbound lanes in order to emerge onto West End Lane at an already congested point just metres away from the junctions of Sumatra Road and Lymington Road,

thereby adding to heavy traffic congestion. On the grounds of pedestrian, cyclist and traffic safety, this application should be refused.

19. We fully understand and appreciate the need for genuinely affordable housing in the area to help maintain the diverse mix of populations that form part of the character of West Hampstead. However, we note that Camden has repeatedly derogated from its stated policy responsibilities to require 50% “affordable” housing on a number of recent developments, including at Liddell Road, and so is now insisting on 50% “affordable” as a condition of sale at 156 West End Lane. The knock-on effect of the council’s failure to ensure its requirements were met at previous sites is that the Applicant is moved to propose an overly-intensive over-development on a small, narrow site to which serious and significant constraints apply.
20. We are deeply concerned that the so-called “affordable rented” units are proposed on the Western end of the site, sited in a six storey block above shops and fronting the busy, noisy and polluted West End Lane. This is the least suitable location for “affordable rented” family units.
21. The proposal includes no ground floor homes with gardens as part of the “affordable rented” family units, preferring instead to save garden spaces for the private, gated part of the proposed development where any garden or outdoor space would be completely overshadowed and deprived of light by the development itself. This is a cunning, cynical proposal and the Application should be rejected.
22. No council housing has been built in West Hampstead for a number of years, nor is any scheduled to be built in the foreseeable future. 156 West End Lane is the last remaining piece of public land in the area and we object to the sale of public land for the sole purpose of funding the town hall, as has been outlined in Camden’s own consultation documents. The former council Housing and Social Services office at 156 West End Lane provided many much needed services to local residents. If development of the site is to occur, we believe the council should build council homes on public land to replace the countless council homes that have been lost under the Right to Buy scheme. The last thing the council should be contemplating is the imposition of a gated, private development on what would become private land offering unsuitable family units of dubious affordability to most people.
23. We object to the proposed segregated, gated private scheme and the lack of a truly mixed development. West Hampstead has always been a diverse area where residents of varying means have lived side by side. The proposed development presents a private, gated development into which inequality and segregation of people according to their means is built by design. Gated developments should have no place on public land like that at 156 West End Lane and any proposals for such should be categorically rejected here and on any other developments in the borough.
24. We find utterly shocking and beyond reproach that 100% of the two-bedroom four-person units in the “affordable” allocation fail to meet Camden’s own minimum

floor space requirements and would impose needlessly cramped conditions on poorer residents in dire need of suitable accommodation equipped with sufficient space in which to raise their families.

25. We note that the development exceeds the maximum density guidelines recommended in the London Plan. We believe this represents incontrovertible proof of the over-intensive over-development proposed for the Site and that the Application should be rejected on the basis that the amenity of all residents, both within and without the proposed development, would be seriously negatively impacted by this overly dense proposal.
26. With around 800 units already built or under construction in the area, we are seriously concerned that the council is failing in its duty to manage development in the area in an incremental way that mitigates damaging impacts on amenity. Consequently, the cumulative impact on local services such as GPs, school places and general residential amenity is nowhere near being fully understood while simultaneously set to be irrevocably damaged as existing units begin to be populated by many hundreds of new residents. We would like to remind the council that the London Plan target date for 800 new homes is 2031, yet that target has almost been achieved some 15 years ahead of the target date.
27. We call on our elected local councillors to ensure that the rights of residents and the children of Lymington Road to continue to enjoy their play areas and the designated open space in Crown Close is guaranteed and, furthermore, that no development at 156 West End Lane is permitted to blight the light, use, enjoyment and amenity of these valuable spaces. We call on our elected councillors to reject this application at the Development Control Committee for the reasons outlined above.

I would request that you inform the LRRRA of any updates to this application. We also wish to be advised of the date of the Development Control Committee meeting relating to this application.

Yours sincerely,

Mona Seebaran, Chair
Lymington Road Residents' Association