

8th January 2016

Ms. Josleen Chug  
Planning Solutions Team  
London Borough of Camden  
2nd Floor  
5 Pancras Square c/o Town Hall  
Judd Street London WC1H 9JE

**Re: Application Number 2015/6455/P – 156 West End Lane, NW6 1SD**

Dear Ms. Chug,

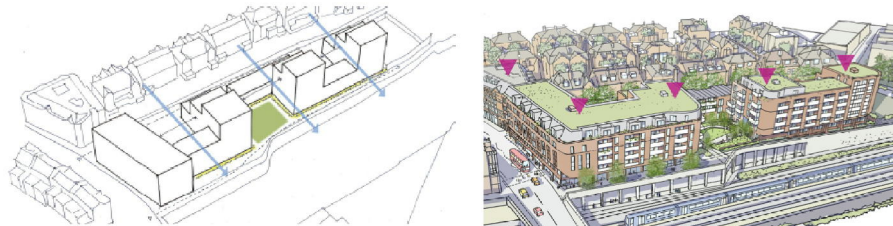
I am writing to voice my strong objections to the planning application submitted for the redevelopment of the property at 156 West End Lane.

It is my firm view that the application contravenes a wide range of Planning Policies, their guiding principles, the Neighbourhood Plan, and is even at odds with the Mayor's London Plan. Consequently, the application should therefore be rejected.

**SCALE**

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For a start, the scale of the development, which exceeds the maximum density targets outlined in the Mayor's London Plan, is simply too great for the site. It is intriguing that throughout the course of the consultation process, the scale of the final design has remained virtually unchanged from the initial suggested drawings. Despite cosmetic changes to the High Street facade and some raising and lowering of the highest points, with **notable** thickening up the middle, it remains as first conceived. This is evident in the side by side here:



The twofold agenda of maximum profits for developers and for Camden, alongside the (suddenly) rigid demand for so called affordable housing have led to a design that is well out of proportion with what is appropriate in the centre of West Hampstead and adjoining the Conservation Area.

Please take note of this section of the Neighbourhood Plan, Section B7:

*The site shall provide an improved design relationship to the adjoining Canterbury Mansions and West End Green Conservation Area, to protect and enhance the character and appearance of the area. Therefore, **the height of any new development should ensure the overall design and transition in massing achieves an appropriate relationship with neighbouring properties** - and it can be demonstrated that no harm is caused to the character and appearance of the Conservation Area, its setting.*

Indeed, this section, specifically about the site at 156 West End Lane suggests what is evident to all those who live in West Hampstead. The building heights and architecture on the High Street, also named the Town Centre, are distinct from those on the side streets. A site that neighbours both High Street and Side Street, as the property at 156 West End Lane does, will require a transition in massing to achieve this **appropriate relationship to both**. Consequently, this is not one homogenous site. In Camden's own Site Allocation Plan, we find this description, which very clearly denotes the expectations for the site and intimates a division in land use:

- *Provide appropriate town centre uses along the frontage with residential including affordable housing above and to the rear of site*

The proposed development takes no account of this, and even boasts the continuous elevation of the entire site west to east as a plus. It is clear that on the site of the existing Camden Council offices, a High Street Development is appropriate, which extends the entire Western edge of the property and extends eastward to roughly the end of the existing five-storey building. Behind this, where unsurprisingly the existing development drops substantially in height, you will have a residential site. Where and how this transition occurs may be a matter of discussion, but to proceed as though the entire Southern frontage on Potteries Path is a High Street is to completely misunderstand what such a thing is.

I attach a selection of views of neighbouring roads that clearly show what the accepted transition from High Street to side street looks like. One should note that on all the other side streets in and around West Hampstead the homes are three storeys high. You may find the odd exception, stretching skyward to four storeys, but by and large the acceptable height of homes on the residential roads of West Hampstead is pretty well fixed.





Buildings on the High Street are afforded considerably more height than those on the side streets. Once we move a few steps from West End Lane (the High Street) we can see residential structures are 3 storeys high.



This final view above could not be more illustrative of what is permitted in West Hampstead. The photo was taken directly across the street from the proposed development site. On the right, an imposing (yet elegant) High Street building, behind it on a footpath (not Potteries path but a footpath along the rail line) a NEWER development has been built. **Note the height of the NEWER white building on the left.** There could not be a more precise duplication of the circumstances at 156 West End Lane. It is mere steps away from the site and bears the identical relationship to the High Street, the rail-side path and residential neighbours to the north. It is unconscionable that the development proposes **seven** stories where **three** has been clearly shown as normative. Note also the

busy pavements, still surprisingly crowded in the morning, even after rush hour and the school run, when this photo was taken.

Where Camden Site Allocations Plan suggests that there should be “an appropriate transition in massing towards the south and east of the site” A2Domnion have clearly missed the mark. They have made NO transition whatsoever to the east, and instead propose a virtually unchanging profile across the south edge of the site. Here is the full text:

*“If redeveloped the existing relationship of new development immediately adjoining Canterbury Mansions to the north should be considerably more sympathetic in terms of scale, height and design with an appropriate transition in massing towards the south and east of the site.”*

In other words: a new development should look nicer next to Canterbury Mansions and be less imposing than what is currently there, and should change heights and bulk to a more suitable smaller size once you move back from the High Street. We see no such transition below:



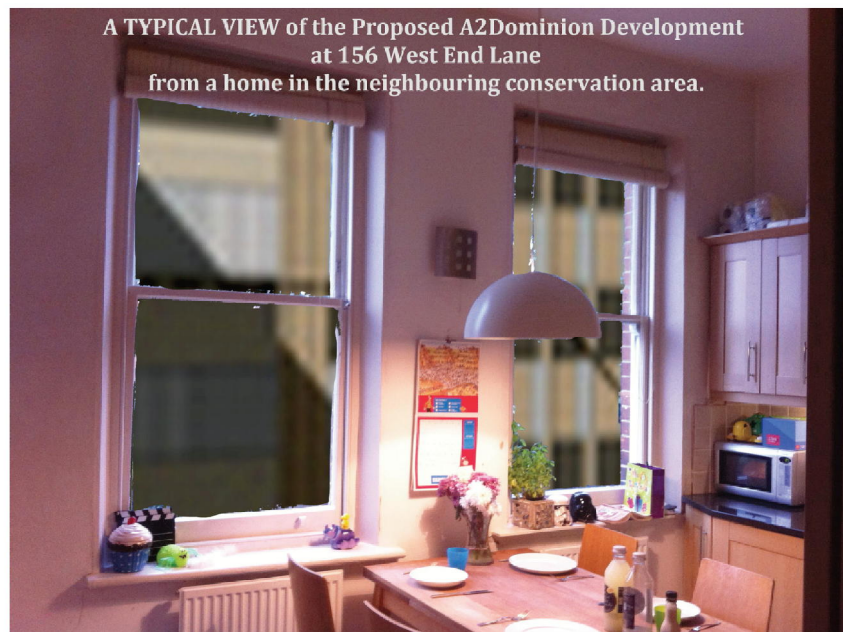
As proposed, the development also ignores changes in topography entirely, which serve to elevate the buildings as you move eastward. The above view from the south conceals the fact that the development looms nearly two storeys higher over the neighbouring houses to the east as it does over the high street.

### **OVERSHADOWING AND OVERLOOKING**

The Camden Site Allocations Plan goes on to say that a new development will be expected to “ensure an acceptable relationship to the adjacent residential properties on Lymington Road”. The unwelcome construction of a looming block of flats is not the foundation of an acceptable relationship. A seven-storey block dwarfing a three-storey building is not an acceptable relationship.

Any new structure anywhere on the east of the site that exceeds the conventional rooflines of West Hampstead homes (three storeys) will serve to obliterate the views from Lymington Road and overshadow the existing homes completely. This is clearly not ***“an appropriate relationship with neighbouring properties.”***

I include a photo here of an impression of a typical view from an existing first floor window out toward the proposed new development:



While damning in its own right, I view the developer's Daylight and Sunlight report with considerable skepticism and noted a number of areas which it is incomplete. I think it is vital that Camden should seek an independent assessment of the overshadowing impact before any application is approved.

It is patently clear nevertheless that a significant number of homes and gardens on Lymington Road will suffer tremendous loss of amenity through overshadowing. Based on the report's own questionable findings, I note that my own kitchen will see its winter light reduced below BRE guidelines, and our flat is at the furthest edge of the development. Some two out of every five windows which face the development will see their light cut to below BRE guidelines. The proposal fails the 25° guideline for virtually every ground (and first floor!) window the entire length of Lymington road.

The development will also diminish the amenity of its neighbours through significant overlooking and loss of privacy as well. There are numerous places where windows and balconies on the proposed development are within 18m of neighbouring buildings, and considerably closer to gardens. Wherever possible, the proposal attempts to obfuscate this fact. Make no mistake, a majority of the proposed 168 new units will have clear views into the homes and gardens of the existing residents of Lymington Road. Those same residents will in turn suffer a virtually complete loss of outlook. This is a twin strike against the enjoyment of their properties.

The proposal will also diminish views in a wider context as well. The view out of the Conservation Area and other views from within it will also be blighted by this

massive development. I attach an unobstructed impression of the visual impact of the development, followed by A2Dominion's own version of a very similar view, looking south down Crediton Hill. (Note the diminishing effect of A2's wide-angle lens and the placement of the tree in front of the proposed new structure.)



Of note in Camden's Document "Shaping the Future of the Wider West Hampstead Area" is the conclusion that:

*"...whilst there are a number of open spaces within the area, including award winning Maygrove Peace Park, Iverson Road and **Crown Close open spaces, West Hampstead as a whole has been identified in Camden Planning documents as an area deficient in open space.**"*

It is consequently reprehensible that this proposal will submerge one of these rare open spaces in the shadow of an overblown development. **The proposed structure will cast the MUGA at Crown Close into shadow each day after school for nine months of the year.** It will be in shadow on every single day that shade is unwelcome and likely none of the days it *might* be seen as a mercy. It is galling also that at the recent round of "presentations" A2Dominion had the cheek to suggest that the shade was a benefit to parents in protecting their children from the sun. No parent needs a seven-storey blight of private luxury flats to help them with their parenting, thank you.

Here is a composite of what the site might look like from the Crown Close open space. The seven-storey Private sale block which towers above will cast the MUGA and playground into shade after school every day for nine months of the year.





A2Dominion's own image of the park is clearly intended to mislead the viewer about the extent to which the Crown Close Open Space will be overshadowed and overlooked. There will be a total loss of privacy for parents, carers and children using the MUGA as they will be overlooked by dozens of windows and balconies. The park will also endure substantial loss of sunlight during the hours of most use. This will certainly diminish the enjoyment to be had from use of the space.

#### **ACCESS AND HIGHWAYS**

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The scale of the proposed development and the specifics of the design will each have negative impact on the amenity of the neighbourhood as well as pose a significant potential danger to the public.

The sheer number of new residents, added to those of unoccupied further developments in the West Hampstead area, which would total nearly 800 homes will have a sizeable negative impact on the pavements and pedestrian movement on West End Lane.

A2Dominions Design & Access statement does not take into account the bottleneck that occurs at the bridge that borders the site at 156 West End Lane. On page 85 it claims:

*A pedestrian count was undertaken on West End Lane during a 12 hour period. An assesment(sic) of the data agianst(sic) TfL capacity criteria show that, by TfL's definition, **the pedestrian environment is very comfortable** with*



***“plenty of space for people to walk at the speed and the route that they choose”.***

No one who has ever walked the journey along West End Lane either to or from any of the stations at West Hampstead either morning or evening would agree with this assessment. They have surveyed only the wider portions of pavement on West End Lane to reach this spurious conclusion. I would suggest that, short of visiting the area oneself at peak times, one can easily see the volume of congestion in the following video:

<https://www.youtube.com/watch?v=dNISgf0THKg>

Adding a further 600-800 new residents entering the pavement steps before the narrowest point in the entire neighbourhood will surely increase the risk of accident considerably.

It is noteworthy that all journeys by residents will be pedestrian of course, given that the proposed development is car-free. This also means that there will be need for service vehicles and deliveries to gain access to the development at regular intervals. The proposed roadway into the development is atrociously conceived and is sure to cause massive inconvenience and likely injury as well. The single lane entrance, over the pavement, through an arch offers little visibility to cars emerging from the site. Further, the lack of adequate provision for turning around is farcical. Let's be real: dozens of vehicles a day making a multipoint turn to exit is plainly absurd on a site of this footprint with a development as supersized as this. The net result will surely be vehicles entering the site to discover that there is already a vehicle within, and being forced to **reverse** through the aforementioned low-visibility arch before travelling across the pavement. It is only a matter of time before someone is knocked down in such a scenario.

The design of the access road will also cause a great deal of congestion to the pavements as well. Where currently the driveway to the Travis Perkins yard allows pedestrians to pass behind vehicles emerging from the site, this new design will force pedestrians to wait for vehicles to make their turns onto busy West End Lane. At peak times, we see tailbacks of a dozen or more cars on the sidestreets looking to make this type of turn. The net effect will be literally blocked pavements for long periods when the footways are most crowded. This is an inevitable outcome of this ill-conceived road and beyond mere inconvenience, will force pedestrians dangerously into the road to avoid these blockages.

Finally, the width of the road and the arch also mean that larger vehicles turning left (south) will need to swing out into the oncoming northbound lane. Again, for anyone who has seen the congestion at peak times (7:45-9:30, 3:45-6:30), this is wholly impractical and will further tax an already overburdened road.

## **SOCIAL FACILITIES and INFRASTRUCTURE**

As no master plan exists for this area of Camden, there can be no accurate assessment of the impact of this development (taken in conjunction with the half dozen others underway or very recently completed in the immediate vicinity), on the social facilities and infrastructure of the area. It is therefore irresponsible to entertain this application, and earmark the spending of the revenue elsewhere, without a wider view of the impact on the local area.

We know already that places at GP surgeries are at a premium locally. Equally that despite the expansion of Kingsgate Primary, there are still insufficient quality primary school places in the neighbourhood and the local baby boom continues. Secondary school is another matter altogether, as much of the borough is underserved in this regard, forcing parents to make expensive alternative choices.

We have touched on the infrastructure of pavements, but not the impact on West Hampstead tube station, which will be the peak-time destination for a majority of new residents. Currently, entrances and platforms are already crowded to the point of risk. An additional few thousand total new residents is sure to worsen the situation.

It has been brought to my attention that Thames Water does not believe they can offer adequate service of supply and drainage to this proposed development either. This is very telling, having witnessed significant Thames Water infrastructure works along West End Lane first-hand over the past decade. That they are caught out by the scope of new developments in West Hampstead points to a sizeable planning failure and inspires no confidence whatsoever that these matters can be, or will be, properly addressed if these proposals are approved and occupied.

## **EMPLOYMENT**

The proposed scheme fails to meet planning policy in terms of employment space. The ouster of the Travis Perkins builder's yard represents a significant loss to the local community and the wider building trade across London. Having spoken first-hand to the staff and management at Travis Perkins, as well as their customers, it is clear that this is a rare facility within London and serves the building trade across much of West London. It is also clear that it has become enshrined in the working trade of its thousands of customers and been home to many employees since their working careers began.

What use is the proposed retail space to Ray, the forklift driver who lives locally, is nine years from retirement and who has worked in the yard since his teens? What extra burden will be placed on Blackburn Road and West End Lane traffic with the swell of business to the Builders Depot? With a proposed opportunity for only 47 full time employees if fully occupied, the commercial and office space in the plan only reshuffles the employment deck while removing a much needed and successful business. Looking at the turnover of retail and the vacant office

space already available in West Hampstead, it seems likely that none of these proposed spaces will be significant or steady long-term employers in the neighbourhood. Meanwhile, there will be job losses at Travis Perkins and a sizeable gap in the market for their unique offering.

I am disappointed that, while Camden Planning officers compelled Travis Perkins to reinstate the business at their redeveloped site in St Pancras, no effort has been made to include Travis Perkins in this new proposal. Finally, the development being proposed is not of genuinely mixed-use, and must therefore be rejected for failing to adhere to planning policy on this matter.

### **HISTORY**

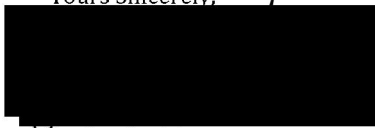
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Despite being designated as an area of Archaeological priority, no meaningful effort will be expended to determine what exists on the site. The eastern portion of the site has never been excavated. The developer has chosen to accept the assumption that there is nothing of archaeological value beneath the builders yard. A rush to bring in the JCBs will undoubtedly obliterate anything of historical value that may be present.

In conclusion, there are a great many grave concerns with the proposal as it stands which can point to no other decision than to deny the planning application. I would expect that each of these points be genuinely considered and fully addressed should any subsequent plans be drawn up. It is my strong impression that the community feels powerless and bewildered by the pace and scope of the changes already underway in West Hampstead and a failure to properly consider these objections will reinforce this sentiment. Furthermore, to not address the significant liability associated with the dangerous aspects of the development proposal, as well as the impact on residents legal Right to Light, would surely leave the Planning Committee shouldering blame in the event of injury or litigation.

I trust you will proceed with customary diligence and I thank you for the opportunity to make my objections known.

Yours Sincerely,

A large black rectangular redaction box covers the signature area.

Jordan Cushing

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