

7 January 2016

London Borough of Camden
Development Management
London, WC1H HND

Dear Sirs

Application No 2015/6455/P – 156 West End Lane, NW6 1SD

I have been a resident of Fawley Road, in the West End Green Conservation Area in West Hampstead for over 30 years. I enjoy living in this area and am a regular user of its excellent transport facilities. Whilst I recognise the need for more housing in London, in my view the disadvantages of the over-intensive nature of the proposed development at 156 WEL clearly outweigh any benefits, particularly when set in the context of the other ongoing developments in the area.

I have three principal objections to this proposal which I have set out below, although I would agree with many of the points raised by others. These include issues such as the unacceptable overlooking and overshadowing of the houses and children's play area in Lymington Road, the impact on existing local employment through the eviction of local businesses by this proposed development and the one on Liddell Road, and the unacceptability of the proposed new access road to the development which would severely exacerbate existing traffic congestion problems on West End Lane. I also have concerns about how the works to demolish the existing buildings and construct new ones would impact on the general amenity of the area, including movements of heavy goods vehicles and pedestrian use of the pavement on the east side of West End Lane.

Lack of impact assessment/master plan

1. The 'West Hampstead Interchange area' has been identified as an 'area for intensification' in the Mayor's London Plan 2015 and as a 'Growth Area' in Camden's Core Strategy of 2010. Astonishingly, however, there is no master plan setting out how this should be achieved and over what timeframe, other than that 'at least 800 new homes' should be provided by 2031. At the current rate that number is likely to be achieved well before 2020, and yet no consideration appears to have been given to the additional services that need to be provided in order to ensure the area is developed incrementally and sustainably – these include, but are not limited to, water supply and sewerage services, appropriate GP provision, and school places.
2. Nor has any regard been paid to how the transport interchange should be managed to cater for the inevitable increase in numbers. This increase stems not only from the various building projects now underway and planned, but also from the increasing numbers of passengers commuting from outside and within London and changing lines at West Hampstead, causing severe congestion at street level and station entrances during peak travel hours.

3. The issue was recognised in 2004 when Chiltern Railways/Network Rail put forward a West Hampstead Interchange proposal to link the three stations with subterranean walkways on the east side of West End Lane, possibly also providing new platforms for the Chiltern Main Line and Metropolitan line. This would have helped to relieve the pressure on West End Lane and future-proof the interchange, but in order to fund this development fairly large-scale blocks, including commercial premises, were proposed. West Hampstead residents were concerned that these plans were out of keeping with the village feel of the area and its largely low-rise buildings, although there was a great deal of interest in the forward-looking plans for the transport interchange. Those plans were put on hold in 2007.
4. Fewer than 10 years later the tower blocks are now being built, but without the essential infrastructure improvements that would make the transport interchange truly viable and relieve the increasingly dangerous congestion on West End Lane.
5. The Mayor of London's London Plan describes the 'West Hampstead Interchange Area' as 'a significant inner London transport interchange with potential to improve connections between rail, underground and bus and to secure an uplift in development capacity through intensification'. The Camden Council Place Plan for West Hampstead (March 2012) includes among its objectives the need to continue to improve how people move around the area and between the three stations. It states that 'individual development schemes in the growth area will be expected to contribute to interchange improvements'.
6. I understand that the 'West End Square' site is to make a contribution to upgrading and improving access to the London Overground station in both monetary and spatial terms. However it is not clear how the proposed scheme at 156 WEL will contribute to the interchange, nor what contribution the existing developments at Blackburn Road, Liddell Road, Iverson Road and Maygrove Road have made or will make other than exacerbating the problem of congestion.
7. The London Plan Policy 6.3 states that development proposals 'should ensure that impacts on transport capacity and the transport network ... are fully assessed'. Camden Development Policies DP16 states that 'The Council will seek to ensure that development is properly integrated with the transport network and is supported by adequate walking, cycling and public transport'.
8. The cumulative impact of the new developments currently being constructed, and those proposed such as 156 WEL and yet to be proposed on the east side of West End Lane, such as the O2 car park, has not been assessed. This is unacceptable. The Council should put further decisions on the development of the centre of West Hampstead on hold, including the one relating to 156 WEL, until an appropriate impact assessment, including projected future transport user numbers, has been undertaken, considered and duly taken into account. This would ensure that the future development of the area is truly sustainable by providing the essential infrastructure and additional services that will be required. The possibility of linking the train stations below street level should not be ruled out prematurely by allowing further construction such as that proposed at 156 WEL to take place in the area before the issue has been properly considered and discussed.

9. My personal view is that development of the type proposed at 156 WEL would be more appropriately catered for on a site such as the O2 car park which, like the Ballymore development, is situated between 2 sets of railway lines and at a greater distance from existing buildings. There would be more room on that site to allow for appropriate spacing between buildings and moderating the overall height. In addition, as good quality access roads to the O2 site have already been provided, access to the site for construction purposes, deliveries and refuse collection would be far less disruptive than would undoubtedly be the case with any site opening onto West End Lane. This relatively narrow road is already heavily congested with traffic, made more hazardous by the numerous small roads leading into it in close proximity to each other, and the large delivery vehicles frequently parked outside Tesco which disrupt the flow of traffic as well as presenting a clear hazard to cyclists. Developing the O2 site might have less impact on the West Hampstead interchange, as there is a good chance that at least some residents would access the Finchley Road tube and rail stations instead.
10. I welcome the consideration being given to providing accommodation for disabled people but more thought should be devoted to their needs, over and above the provision of disabled parking spaces. There is no mention, for example, of the fact that West Hampstead tube station currently has no step-free access. Nor is there any discussion of the suitability of the narrow pavements on the east side of West End Lane over the railway bridge and leading to the tube station which are dangerously congested during morning and evening rush hours, or any proposals to remedy this. Again, the O2 car park would appear to be a better option in terms of overall accessibility.

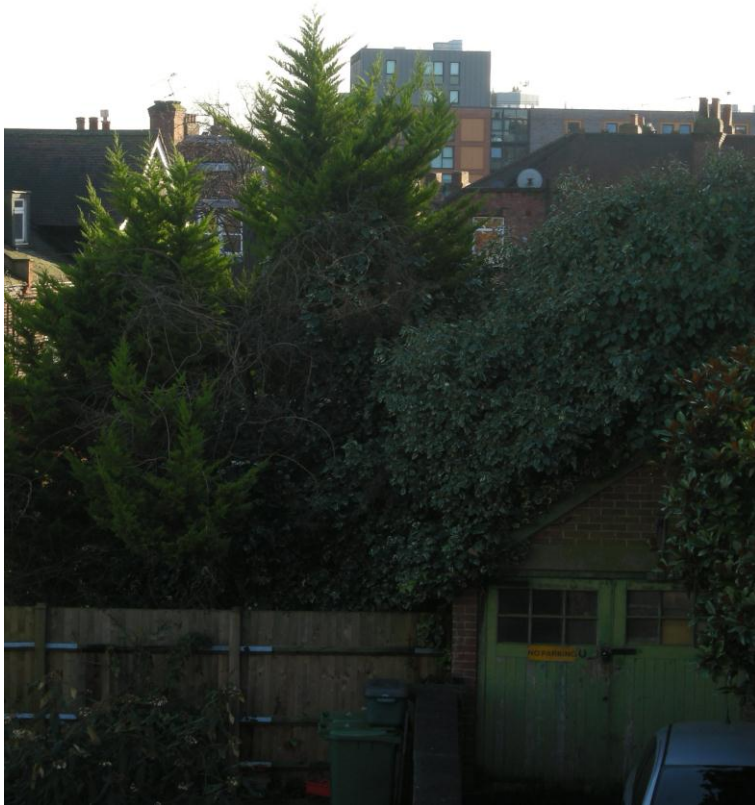
Lack of open spaces and impact on conservation area

11. Camden Council has identified West Hampstead in its planning documents as being deficient in open space, and yet over-intensive developments such as the one proposed at 156 WEL will do little to rectify this problem. The proposed development would pack a narrow site with unattractive blocks of up to 7 storey height, stretching back from an imposing frontage at street level to loom over and severely impact upon the established conservation area to its immediate north. What open space there is in this proposal is akin to an enclosed courtyard, so is likely to be used more by occupiers of the development itself than members of the general public. Moreover, the developers state at point 3.4 of their Planning Statement that 'the proposed development will incorporate high quality landscaping and a range of amenity spaces *accessible to residents* ... and private winter gardens ...'. To make matters worse, it is clear that the development as currently proposed would impact severely on public enjoyment of the existing open space adjacent to Crown Close.
12. Unfortunately the proposal does not provide for a transition from 'high street' to 'side street' as the other side streets leading off West End Lane do. Not only does this give it an unattractively bulky appearance, it effectively closes off views both into and out of the immediately adjacent conservation area. An example of good recent development/planning practice is the provision of the space outside the new Thameslink station which now hosts a very popular farmers market on Saturday mornings and has added much to the general amenity and outlook of the area. The National Planning Policy Framework requires local authorities to 'balance the harm with the degree of public benefits provided by the scheme'. Surely every new development

should include some aspects that actually add value to the area as a whole rather than detracting from it?

13. The Ballymore development at West End Square admittedly consists of tower blocks, some of which are higher than those proposed at 156 WEL. This is not ideal, but the development does provide some open public space and the blocks are set well back from the main road, they increase in height gradually with spaces between them, and are bordered on both sides by railway tracks so that the impact on neighbouring properties is minimised. There is an obvious difference between that site and the one at 156 WEL which is immediately adjacent to a very attractive and desirable conservation area.
14. The Blackburn Road student block, which the Planning Statement acknowledges already impacts on the West End Green Conservation Area, is 9 floors high at its tallest point. The ugliest part of the building, the grey tower that has been added at one end (presumably to cater for the lift mechanism), is particularly visible from my first floor south-facing flat in Fawley Road.





15. Unfortunately I was not aware that the student block would be so tall, the design so unattractive, and the extension so unfortunately positioned. It would not have been so bad had that grey extension not been added. Arguably the effects of any development on the skyline, and its appearance from all sides (and not just that fronting the high street) should be taken into account when determining its impacts, particularly those relating to an established conservation area.
16. From the Lymington Road perspective, the proposed development at 156 WEL is particularly unappealing in terms of the mix of heights and design details, in stark contrast to the uniformity of the proposed façade on the West End Lane side. And it is clearly contrary to the findings and principles outlined in the West End Green Conservation Area Appraisal and Management Strategy (Feb 2011), including that any new work or buildings in the area 'should reflect the materials, colour palette, scale and character of the area' and that new development 'must preserve or enhance the character or appearance' of the Conservation Area.
17. It is important to note that the baseline point for the Blackburn Road development was somewhat lower in terms of street level than that of the site at 156 WEL. This means that 5-storey buildings at 156 WEL (let alone 7-storey ones) would undoubtedly obliterate views to the south for residents of the conservation area in Lymington Road, Crediton Hill and Fawley Road. I understand that the original application for the student block was turned down, but the developers won on appeal despite the impact of the building on this conservation area. However, just because one unattractive building has been allowed to intrude upon the general

amenity of a conservation area does not mean a whole series of them should be permitted at much greater proximity to that conservation area.

18. The size and scale of the proposed development at the 156 West End Lane site is quite simply the wrong scheme in the wrong place at the wrong time. The fact that the land belongs to Camden does not entitle the Council to override the normal planning considerations and principles that apply to development proposals, in particular those pertaining to a conservation area.

For the reasons cited above, and others put forward by the Residents Associations of Lymington Road, Crediton Hill and the chair of the West End Green Conservation Area Advisory Committee, with which I concur, I would urge local councillors to reject this application at the Development Control Committee and to rethink the use of this site of central importance to West Hampstead while there is still an opportunity to do so.

Yours faithfully

Barbara Anning