

From: James Earl [REDACTED]
Sent: 16 September 2016 1:31 PM
To: Planning; Cassidy, Michael
Cc: Rosenberg, Phil (Councillor); Yarde, James (Councillor); Pober, Angela (Councillor)
Subject: 153-163 Broadhurst Gardens | objection from West Hampstead NDF

Dear Camden Council,

I am writing from the Fortune Green & West Hampstead Neighbourhood Development Forum (NDF) to **object** to the planning application for 153-163 Broadhurst Gardens - reference [2016/3930/P](#). Our comments mainly relate to the policies in the Fortune Green & West Hampstead Neighbourhood Plan, which forms part of the adopted planning policy for this site.

1. We note that we were consulted on **initial proposals** for this site in 2012/3 by the developer. At that time, our main objections related to height, proposed brick colour, and design. We are pleased that the submitted proposals have addressed some of these issues - including use of red brick and a more traditional (rather than contemporary) design. However, having assessed the details of the application - particularly the content of the Design & Access Statement and Covering Letter - we have a number of significant concerns about this proposal, which lead to us objecting for the reasons set out below.
2. We believe the proposed new building to be **too large, too bulky and too high** - and in clear breach of *Neighbourhood Plan Policies 2 & 3*. The existing building on the site is 3 storeys; some buildings on the other side of the road, including loft/roof accommodation, are 4 storeys. In order to preserve the local character of this part of Broadhurst Gardens - as well as its setting in the South Hampstead Conservation Area - we are opposed to the plans for a 5 storey development and require that the height of any new building on this site is restricted to a maximum of 4 storeys.
3. We are very concerned that, despite 30 new units being proposed, there is no **affordable housing** in this development. This is a clear breach of *Neighbourhood Plan Policy 1* and *Camden Core Strategy Policy CS6*. We believe this is a serious omission and, as a result, the application should proceed no further. We further note that despite the accompanying documents promising to provide an 'affordable housing statement' and a 'viability report', neither of these vitally important documents has been made available to the public.
4. The developer originally proposed that all the units would be for **rent** - however it is not clear from the submitted documents whether or not this is still the case. We have no objection to rented accommodation, but - again - we would require that a significant number of the units are classified for affordable rent. We also have concerns about the density of the units proposed -

such as whether there is adequate space for waste/recycling; whether the units have enough storage space; whether there are safe and large enough emergency exits; whether the development meets all the Council's building control standards; and where delivery vehicles for the many residents will be able to park.

5. While we support keeping the ground floor of the development in **commercial use** - we are concerned about the plans for two large commercial units. We note that this section of Broadhurst Gardens - which is also in the West Hampstead Town Centre - has a number of well liked and supported small businesses. In order to conform with *Neighbourhood Plan Policies 12 & 13*, we would prefer a number of small units - including some at affordable rents. If plans for two large units are approved, we require that a legal agreement prevents them being merged into one large unit at a future date. We also request that the design for the frontage of the retail units is revised - as an all-glass frontage is not in keeping with the local area and its distinct character - and that the new development maintains the existing building line at the front of the property, allowing for a pavement that is both safe and as wide as possible (see *Neighbourhood Plan Policy 9*).

6. Given the site's proximity to excellent public transport links, we support plans for a car-free development - but are concerned about access to the site for both **deliveries** and during the **construction phase**. Any development will need to conform to *Neighbourhood Plan Policy 7* - particularly point vi, in relation to deliveries. In addition - given that access to the site is restricted by its location on a narrow one way street - we are very concerned about how the developer will manage access to the site for both the planned demolition phase and the following lengthy construction phase. Therefore a detailed construction management plan - drawn up with the input of local residents and ward councillors - will need to set out how this can be achieved. In addition, as such works may at times block the road, details will need to be provided as to how the developer will maintain access and a through-route for pedestrians and cyclists - as well as satisfying TfL that there will be no disruption to the C11 bus route.

7. We object to the proposal to remove a **tree** protected with a TPO from the site. Such a move, without any apparent plans for a replacement, is in breach of *Neighbourhood Plan Policy 18*.

8. In the event of planning permission being approved for this site, we require that funds raised for the **Community Infrastructure Levy** (including both the neighbourhood and borough-wide part of this scheme) are allocated to contribute to an urgently needed upgrade of West Hampstead Underground station - to both expand capacity and to ensure full accessibility, including a lift.

Assessing the application as whole, for the reasons set out above - especially the lack of any commitment to affordable housing - we require that this application is either withdrawn by the applicant or refused by the Council.

Yours sincerely,

James Earl
(Chair, Fortune Green & West Hampstead NDF)
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