

28 Gondar Gardens  
London NW6 1HG

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Development Management  
London Borough of Camden  
London WC1H 9JE

12<sup>th</sup> December 2017

by e-mail to [planning@camden.gov.uk](mailto:planning@camden.gov.uk)

Dear Ms Walsh,

**Objection to planning application 2017/6045/P (Gondar Gardens reservoir)**

I am writing to object to planning application 2017/6045/P.

In addition to the objections from Gondar and Agamemnon Residents' Association (GARA), of which I am currently the Chair, I am objecting as an individual and a neighbour of the site.

I object to the planning application for the following reasons:

**A. The proposed development would contravene Camden's planning policies including:**

- a. Policy A1 Managing the impact of development
- b. Policy A2 Open space
- c. Policy A3 Biodiversity
- d. Policy A4 Noise and vibration
- e. Policy D1 Design
- f. Policy D2 Heritage
- g. Policy CC4 Air quality
- h. Policy T2 Parking and car-free development
- i. Policy T4 Sustainable movement of goods and materials
- j. Policy H4 Maximising the supply of affordable housing
- k. Policy H6 Housing choice and mix
- l. Policy H8 Housing for older people, homeless people and vulnerable
- m. CPG7 Transport
- n. DP17 Walking, cycling and public transport
- o. DP18 Parking standards and limiting the availability of car parking
- p. DP19 Managing the impact of parking
- q. Neighbourhood Plan Policy 17 Green/Open Space and description of site C2

Specific details of these policy contraventions are set out in GARA's main letter. Some underlying reasons for these failings in the proposed development are set out below.

The alignment of objections from local residents with policy failings is no accident: policy exists for a reason – to promote good development and prevent poor or damaging development. It is therefore an endorsement of the long and rigorous process of developing policy that this very objectionable proposal runs counter to policy.

## B. The proposed development would:

1. **Destroy the habitat of protected slow worms and red-listed birds including starlings and song thrushes** – the site is designated as SNCI for a reason, and the Applicant's own surveys demonstrate there is a "good" population of slow worms using the whole of the site. My personal observations include slow worms in my own garden (on the north side of the site) – given that the Applicant refers to the south-facing slopes as preferred habitat, these slow worms are highly likely to have traversed the reservoir roof to enter my garden.
2. **Destroy views across the site acknowledged as a public asset, and remove a vital green lung in a built-up area** – the site is designated as Open Space and Local Green Space – I can attest that the feeling of openness is real and palpable and the views into and across the reservoir site are of real benefit to my family and our multiple neighbours around the site, for whom this constitutes a public asset.

Views into and across the site from the street provide a feeling of openness to passersby including many children who use the footpath between Gondar Gardens and Sarre Road as a daily route to Hampstead School on Westbere Road.

The Neighbourhood Plan states about the site (ref C2) *"Due to the significant amount of open space the site provides, views across the site should be protected from significant damage or loss; of particular significance is the view to the east to Hampstead"*.

3. **Be of excessive bulk and height and represent unnecessary and unwanted over-development** – 82 luxury flats and 15 nursing beds in six-storey blocks, with a private swimming pool and catering and nursing facilities is simply too much. The proposed massive over-development of the site has generated more anger amongst local residents than anything I have known since Thames Water decommissioned the reservoir with the clear intention of developing it in c.2002.
4. **Directly impact my home and those of my neighbours** – the proposed six-storey blocks would directly obscure all views from all floors of houses facing the site along Gondar Gardens; and would block any winter sunshine from our houses and gardens.
5. **Be poorly designed, externally** – whilst some care has been taken over the street frontage, there are scarce details of how the scheme would look from the Gondar or Hillfield sides, and what we can tell from the sketches and plans and sections indicates that we would be presented with an uninspiring façade at best.
6. **Be poorly designed within the scheme** – a few examples demonstrate the point: (a) the internal courtyards appear poorly designed for elderly residents as there are only steps and internal lifts (no sloping ramps) for moving between levels; (b) poor internal routing and impossibly laid-out storage for mobility scooters in the basement; (c) narrow internal corridors in the nursing home section, with the following comment from the Applicant's 'Access Statement': *"The following items have been discussed with the design team and will be developed to maximise accessibility during subsequent design stages ... Provision of passing places of 1800mm width by 2000mm length at corridor junctions, to enable two wheelchair users to pass each other, these will be looked at on a case by case basis, however, discussions have already taken place whereby these will be accommodated by increasing the*

*corridor width and decreasing areas such as the library in order to accommodate this” - this implies the proposed facilities will be degraded to address shortcomings in the submitted design.*

7. **Not provide any affordable homes** – given that the previous ‘frontage’ scheme of 28 units could include 10 affordable homes (8 for social rent), it is not credible that the proposed 82 luxury flats and ancillary facilities cannot accommodate any affordable housing at all.
8. **Create an exclusive self-contained luxury enclave that isn’t part of our community** – Gondar Gardens and surrounding streets contain a mix of houses, flats and mansion blocks occupied through owner-occupation, renting and housing association schemes. The local population is surprisingly diverse, with a mix of ages, backgrounds and languages. The proposed development would not contribute at all to the diversity of our community – indeed, the images in the Design & Access Statement show just how lacking in diversity the Applicant expects their development to be.
9. **Create air, noise and light pollution in an unusually quiet and undisturbed space** – in particular the night-time darkness of the site is an acknowledged feature, having been commented on at previous Planning Inquiries. The current proposal completely fails to understand, address or protect the remaining area of SNCI or neighbours from light or noise pollution.
10. **Generate unacceptable levels of traffic and parking for visitors and servicing**, and inevitably lead to a call for extended CPZ hours. As set out in the main GARA letter, the Applicant’s transport assessments are flawed and misleading. The real impact would be significant and unacceptable, with the supposedly car-free development leading to both traffic and parking issues.
11. **Falsely, rely on previous mutually exclusive ‘centre’ and ‘frontage’ approvals as a precedent for a ‘combined’ scheme**; and then proposes a massively expanded combination that far exceeds anything that has been proposed to date.

The Applicant seeks to present the previous decisions as setting a precedent for a scheme that combines the footprints of the two earlier submissions. This is flawed as these were mutually exclusive and the current scheme is out of all proportion with consented schemes:

- The ‘frontage’ scheme preserved 93% of Open Space and SNCI, including vital habitat, all north-south views, and west-east view towards Hampstead.
- The ‘centre’ scheme preserved all views into and across the site and enjoyment of openness.
- The current proposed scheme would combine and exacerbate the failings of the previous schemes without any of their mitigations. It would destroy 31% of Open Space and SNCI (and 67% during construction), and destroy all views into and across the site. It would rise many metres (no datum is provided in the application) above the existing reservoir roof compared to 1.5m for the Centre scheme. It would be significantly larger in scale and height than the two previous applications (approved at appeal). As such, there is no precedent for development of this scale at the site.

Above all, I would plead with you to uphold Camden's planning policy, arrived at through a lengthy formal process including proper public consultation. Camden is lacking in open space, and this site provides a valuable green lung that benefits all those in the surrounding area and contributes to Camden's overall wellbeing.

Finally, I would like to receive a copy of the Officer's Report on this planning application; I would like to know the date of any relevant Planning Committee meeting; and I request that GARA be allowed to make representation on behalf of local residents at the Planning Committee.

Yours sincerely,

A solid black rectangular box used to redact the signature of David Yass.

David Yass