

## Hillfield and Aldred Roads Residents' Association

Dear Jennifer,

I am chair of the Hillfield and Aldred Residents Association, which is adjacent to the proposed development, and writing to express my concerns about LCR's proposals to redevelop the Gondar Gardens reservoir. We concur with the objections of our GARA neighbours but rather than just repeat them have concerns of our own as we have a slightly different perspective and experience.

### **1+ 1 ≠ 3**

I am surprised that LCR seem to think they can combine the previous two mutually exclusive proposals. The 'pit' scheme, 2011/0395, which had ten houses, which kept development low and the frontage scheme, 2013/7585, with 28 flats, which retained 93% of the open space. Somehow they attempt to merge these into a new scheme that proposes 82 flats and builds on the open space (which the previous schemes had maintained).

I also am puzzled that as part of the application, the Morgan Tucker report it refers to the past planning applications; 2011/5896 (withdrawn), 2011/0395 (16 houses), 2012/0521 (28 flats - scheme 1), 2013/7585 (28 flats scheme 2). It however, then refers to 2015/0555 (80 dwellings) and says that an environmental statement was required but this *planning permission was granted*. As far as I am aware ***no permission for this scheme was granted***.

### **No affordable housing?**

I'm genuinely puzzled as to how when each of those schemes had included a £6.8 million affordable housing contribution the new scheme which is about double the size of the two other schemes combined can't afford any affordable housing contribution!

I looked into this for West Hampstead Life - and would like to include this in our objection.

<http://westhampsteadlife.com/2017/12/08/luxury-retirement-development-cant-afford-to-pay-for-affordable-housing/20906>

### **Community 'consultation'**

It is difficult for residents of Hillfield Road to comment on the scheme as we didn't appear to be informed of the most recent public consultation in June. I never received a flyer for the event and



when I checked with other members of the Hillfield residents association they hadn't either. I

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copied you in an email at the time. If you would like proof of this please check your emails (and if you can't find it please contact me, although I confess I can't find the email at the moment). LCR have been through the motions of engagement.

We have quite a strong sense of community in Hillfield Road, so I asked Amanda Reynolds of AR Urbanism who was organising the public consultation if we could borrow the plans and a model of the scheme to show at our Big Lunch last June (picture above), but she declined our request. If LCR had really wanted to engage with the neighbours this would have been a great opportunity, but as I say they declined.

As with all these applications it is huge so trying to get a handle it, is very difficult. However, to help us judge I would have expected from visualisations from the gardens in Hillfield Road (and from Gondar Gardens) but I haven't been able to find any.

### Transport statement

There are a couple of significant flaws in the transport statement.

Firstly, LifeCare's transport statement says that they calculated the level of expected (desired) car ownership of the potential residents from car ownership of households in age range 55 to 85 and over. However, this is across ALL income brackets in Camden. LCR is targetting the retirement flats at those that are homeowners who are downsizing from large family homes.

I don't know the exact figures but car ownership among owner-occupiers in that age group must be far higher?

*6.10 Car ownership for this development has been derived from 2011 Census data for Car or Van ownership per household for the age range 55 to 85 and over within the Borough of Camden, this data is based on the response of 212,443 households within the borough.*

From their figures they (under) estimate ownership of 14% of that age group with 1 car, 14% with 2 cars (= 28 cars), so 42 cars overall. From this they assume that one car club vehicle replaces 11 cars so estimate a required pool of 4 cars.

I'm a bit sceptical about one car club replacing 11 cars, but perhaps you have the evidence. Recent experience of developments in the area (e.g West Hampstead Square where there is constantly illegal parking on site) and Regal Homes and others on Iverson Road (again all supposedly car-free) but where significant extra demand on parking has been generated.

### Transport statement - parking

The transport consultants for LCR undertook a parking beat survey on Thursday 9th and Friday 10th March. They took an overall assessment of the parking situation and said that on average there was 73% parking stress suggesting that there was none and there is spare parking capacity in the area.

That there is plenty of spare parking capacity will come as news to the residents of Hillfield (and Gondar Gardens and all the surrounding streets). As you know there are parking restrictions between 10 and 12, however, once the clock hits 12 there is a steady flow of cars that come up and park on Hillfield Road. Many of these are builders that go by the end of the day and are replaced by residents returning home for the evening. The parking pressure then builds during the evening and is at its worst at 11pm. The average parking figure is of little use as a measure.

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I undertook a parking beat survey and counted higher levels of parking than LCR's transport consultants. I'm puzzled as to why? I would concede, however, that parking at this peak time appears to be no worse than it was a few years ago when I last surveyed it.

As you know there are only currently parking restrictions between 10 and 12 there is nothing to stop visitors to the proposed new development parking outside those hours. Or shift workers doing the evening shift?

Similarly, as the residents of the scheme will be by definition elderly some of them will be entitled to a blue badge. The application may prevent residents from having a blue badge but is it possible to prevent them from applying for a blue badge.

However, despite all this there does appear to be some parking capacity on the stretch of Gondar Gardens outside the proposed development. This is - as it were the pressure valve - for the residential part of Gondar Gardens and Hillfield Road (and the surround Greek Streets). At the moment the parking stress along the Greek Streets bumps along and releases on the stretch of Gondar Gardens in question. If there were to disappear the stress would increase geometrically. In other words at the moment the proverbial parking frog is in a pot where the water is warm but still OK. It won't take much of an increase to take us over the edge. And we are much closer to the threshold than LCR's transport consultants would lead us to believe. I urge the planning department to pay close attention to this - I think it will probably be OK but you need to be sure.

### **Floor to ceiling windows**

Overall despite the some reservations about the scheme (e.g. the lack of affordable housing) there is one design flaw with the scheme, but it is not one that I think Camden will bother to correct. It is something of a personal crusade of mine but for the moment accept, with reluctance that I am on the wrong side, although I think in 10 to 20 years will probably be seen to have been on the right side as one of the planning mistakes of past.

The concern I have is that this scheme uses floor to ceiling windows, particularly on the frontage facing Gondar Gardens. Previous frontage scheme also had floor to ceiling windows (as well as winter gardens). The previous planning inspector rejected an appeal by the developers, on that

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basis that the design was poor and not in keeping with the area. This application, in my opinion



makes similar mistakes.

This is a selection of nearby buildings - the first four on Gondar Gardens and the fifth on Mill Lane. As you can see any of the large windows are covered up with curtains to give the residents privacy as they do not want to be looked in upon. Probably the worst example of this locally is the Pulse on the Finchley, which also have floor to ceiling windows, and which is are also - except on the very highest floors completely covered - permanently - by curtains or blinds. And yet Camden continues to grant planning permission for inappropriate fenestration. Normal people who live on busyish streets (and I would include Gondar Gardens) don't want to be looked in on - architects are



the except to this rule.

In my opinion any potential residents of the proposed development of Gondar Gardens would be happy with large windows correctly positioned but not floor-to-ceiling. Large but not floor-to-ceiling windows are a feature of other buildings in the neighbour (indeed cited by the architects in their design inspiration) so why they propose floor to ceiling windows is beyond me.

### Potential drainage issue

Finally, again this is an issue that I have raised in past applications. Since LCR are proposing to build in the pit of the reservoir this again is a potential issue. They have checked with the Environment Agency and based on a desktop survey have been given generic rainfall figures that they have modelled. The trouble with this is that past experience is rather different.

As I am sure you are aware Hillfield Road has experience surface flooding in both 1975 and 2002 the two great storms that caused flooding in recent memory. On 7th August 2002 there was a thunderstorm with 60mm of rain in an hour was recorded at around 6pm at Hampstead Heath. Further back in 1975 there was a similar storm on the 14th August at about the same time of day when 15cm of rain fell over three and half hours.

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Previous applications were more detailed in their modelling than this one, so it is difficult to tell if LCR have modelled rainfall events of this magnitude, not mention with a 40% climate change increase. I would strongly recommend that Camden request that LCR model rainfall events of these two magnitudes to check if the the proposed development will not get flooded. Not forgetting that it will trap not just rainfall that lands on it, but also beyond due to the landscaping which slopes inwards. If it were to flood would the water be trapped on site or would it flow down hill to the houses on Hillfield Road?

The report is accessible here:

<http://cfps.org.uk.surface3.vm.bytemark.co.uk/domains/cfps.org.uk/local/media/library/854.pdf>

### **Conclusion**

We the residents of Hillfield at least (GARA might disagree) have accepted that at some stage something will get built on this site. Having been told by Linden homes that if their third scheme was accepted it would be built we are shocked and to be honest a little exhausted to now be facing a fifth scheme. And one that is nearly twice as big at the other two combined.

LCR have made it clear that they need their scheme to be of a sufficient size to make it viable and I'm afraid this one is too big.

If Camden were to give permission for this scheme there is a huge amount of planning gain some of which we would expect to go towards an affordable housing contribution. The previous two schemes contributed £6.3 million towards affordable housing (on or offsite) and yet these scheme proposes no affordable housing contribution. Seriously?

We have concerns about their transport strategy both in calculating their expected parking demand, the degree of existing parking stress and the overall impact. In all honesty it is probably OK but needs very careful examination.

I hope this will help you weigh up your decision - and help you with evidence where needed. If you have any questions please do not hesitate to email or contact me.

Yours sincerely,

Mark Stonebanks  
Chair, HARRA.

**Gentet, Matthias**

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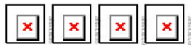
**From:** Walsh, Jennifer  
**Sent:** 20 December 2017 09:57  
**To:** Planning  
**Subject:** FW: Objection to Gondar Garden 2017/6045/P  
**Attachments:** HARRA Gondar objection letter.docx

Please could you log this and the attachment on the website and M3.

Thank you

Jennifer Walsh  
Principal Planner

Telephone: 0207 974 3500



**From:** Mark S [mailto: [REDACTED]]  
**Sent:** 13 December 2017 16:05  
**To:** Walsh, Jennifer <Jennifer.Walsh@Camden.gov.uk>  
**Subject:** Objection to Gondar Garden

Dear Jennifer,

As per my email on the planning website I am attaching my letter of objection to the application to redevelop the Gondar Gardens reservoir. I am trying to send this as a Word document. If you cannot open it, please let me know.

I would also like to include in my object the article I wrote for West Hampstead Life on the lack of *any* affordable housing contribution. Given then the viability report was redacted I had to make some education guesses about the inputs but I think they are reasonably accurate. I think the LCR stand to make a huge amount of money out these scheme and to claim that they cannot afford any housing contribution (I accept it would be off-site).

I would be particularly interested to have an indication of what their benchmark value is - given that they paid £11 million from Linden Homes.

<http://westhampsteadlife.com/2017/12/08/luxury-retirement-development-cant-afford-to-pay-for-affordable-housing/20906>

Yours sincerely,

Mark Stonebanks  
Chair, HARRA