

Response to Planning Application 2020/3801/P

1. I am writing to oppose the proposal to build 10 houses at the back of Godwin Court on the Godwin and Crowndale Estate (planning application 2020/3801/P).
2. I am a local resident and live in Godwin Court on the Godwin and Crowndale Estate.

Summary of Position

3. I oppose the development. I ask the planning committee not to grant planning permission.
4. This development proposing to deprive the residents of an estate in central London of public space and public and communal amenities (namely trees, greenery and open public space). These public amenities will be replaced by private space (houses with individual back gardens). The overall character of the estate will be (negatively) affected.
5. It is not proportionate for the hundreds of residents on the estate to be deprived of these significant public and communal amenities to build 10 houses.
6. I have set out my objections to the development (and why it will negatively affect quality of life on the estate) at paragraphs 11 to 43 below.
7. If the planning committee is, nevertheless, minded to grant planning permission, the planning committee should not grant planning permission for the development in its current form. The design should be amended so as to avoid cutting down a particularly significant tree (referred to in the planning application and below as T25). Please see paragraphs 44 to 56 of this response below.
8. The developers should (at the very least) be asked to explain why it is necessary to cut down T25 and/or to explain why it is not possible to amend the design to avoid cutting down T25. The planning committee should not grant planning permission unless and until the developers have explained why it is necessary to cut T25 down and/or have explored alternatives.

Appendices

9. I attach a photograph of T25 (to demonstrate the significant amenity presented by this tree) as Appendix 1 to this response (see page 11 below).
10. I attach an email (dated 1 November 2020) to the relevant Development Consultant as Appendix 2 (see pages 12 to 13 below). In this email I sought to explore why it was necessary to cut down T25 and/or how this could be avoided. I have not yet received any response to this email. This email sets out the sorts of issues which ought to be explored (in relation to T25) before planning permission is granted.

Objections 1: Cutting down/Damaging Trees

11. I object to this planning application because it will necessitate cutting down and damaging trees. This will have a significant (negative) effect on both the character of the estate and on the residential amenity of those who live there.
12. The developers are proposing to cut down 4 trees - T25, T26, T27 and T22 (see table 3 on page 11 of the Arboricultural Report [page 14 of the PDF]).
13. The position of these 4 trees (in relation to both Godwin Court and the proposed new development) can be seen on the plan on page 32 of the Arboricultural Report ([page 35 of the PDF]).
14. The developers are also proposing to prune 7 trees and there are also 7 trees who could be damaged in the roots, stem or canopy (see table 3 on page 11 of the Arboricultural Report [page 14 of the PDF]).
15. T25 is the most significant tree to be removed. I have attached a picture of T25 (as Appendix 1) to demonstrate its significant amenity. T25 is a very large and very beautiful London plane tree. T25 is obviously an extremely old tree. It must have been present when the estate was first built. Godwin Court (when it was built) would have been built around T25. It is not sustainable to cut down these sorts of trees. They cannot be easily replaced.
16. The Arboricultural Report agrees T25 is a significant tree. The report says T25 is a Category A tree (the highest category for amenity). The tree is healthy. It has a long life ahead of it. The details of this tree appear at page 9 of the Report

[page 12 of the PDF] and the line of the Schedule relating to T25 (page 23 of the Report [page 26 of the PDF]).

17. The overall effect of cutting down these four trees (T25, T26, T27 and T22) will be significant. T26 and T27 are Category B trees which means they also offer significant amenity (see pages 23 to 24 of the Arboricultural Report [pages 26 to 26 of the PDF]). T25, T26 and T27 are positioned closely together. If all of these trees are cut down, it will significantly change the character of the estate.
18. If these trees are cut down, the estate will be less green, less sustainable and a less pleasant place to live. These trees are easily visible from the balconies and windows of Godwin Court and to those residents using the communal garden. The estate is in central London. This sort of greenery is extremely important. The trees currently define the character of the Godwin and Crowndale Estate.
19. Paragraph 6.56 of the Camden Local Plan notes that “*trees and plants improve air quality, absorb carbon dioxide and help regulate city temperatures.*” Under paragraph j of Policy A3 of the Camden Local Plan Camden should “*resist the loss of trees and vegetation of significant amenity, historic, cultural or ecological value including proposals which may threaten the continued wellbeing of such trees...*” The trees threatened by this development, in particular T25, is a tree of significant amenity and historic value.
20. I understand the proposal is to plant new replacement trees. Any replacement trees will necessarily be relatively new and young trees. New replacement trees cannot possibly replace the types of tree (due to be cut down) in any real sense in either the near future or (importantly) in the very medium-term future. I have attached a photograph of T25 as Appendix 1. It takes a long time for a tree to become as established (and significant) as T25.

Objection 2: Parking

21. The proposal is to build over the car park next to the ball court. The planning statement says that there are 18 spaces in this car park (planning statement para 5.24). The planning statement says 6 of these spaces will be re-located

on the estate including by converting two visitor parking spaces (see the planning statement para 5.26).

22. I object to this development as I object to the loss of these two visitor parking spaces. There are only nine visitor parking spaces at present (although there are hundreds of residents). Very often all of the visitor parking spaces are full.

23. The planning statement suggests that a survey of the surrounding streets suggests that parking is available to meet demand (see paragraph 5.29 of the planning statement). I have read the survey within the transport statement. The parking available in surrounding streets is parking on single yellow lines, 2 or 4 hours pay-by-phone bays and in resident's parking permit spaces. This is not a like-for-like replacement with on-site visitor's parking spaces.

24. This sort of parking presents real practical problems. For example I am a leaseholder in Godwin Court. It is going to be very difficult getting work done in my flat (unless the job is so short that 2 or 4 hour pay-by-phone will be sufficient). This is another example of this development proposing to remove communal amenities (eg. visitor parking spaces).

Objection 3: Ball court/Play area

25. I object to the developers building over the ball court/play area. It is not right to build over public amenities for children and teenagers.

26. My balcony overlooks this play area. In my experience it is used by children and teenagers (across a range of ages) to play football and basketball.

27. The planning statement refers to this play area as "*underused*" and "*poor quality*" (para 4.17). This is not my experience. I also note there has been a significant increase in use of this play area during the Coronavirus pandemic (when indoor activities have been less available). Current circumstances have underlined the importance of there being lots of easily accessible space for children and teenagers to spend time and take exercise outdoors.

28. The planning statement also suggests that the ball court is "*gated from the rest of the estate open space and accessed only by estate residents through liaison with the TMO*" (see paragraph 5.17). This is not correct. The ball court is within

the communal garden behind Godwin Court (and right next to the grass area within this communal garden). The ball court is not gated from the estate open place. Residents can and do walk from the grassed area onto the ball court. This can be seen from eg. the photograph on page 48 of the Design, Access and Landscaping Statement accompanying the planning application.

29. It is true that there is gate to enter the communal garden from the main car park between Godwin and Crowndale Court. This gate is sometimes opened and sometimes closed. However in practical terms no resident has any difficulty accessing this communal garden (and through it the ball court).
30. Firstly keys to the gate into the communal garden are available for all residents from the Estate Office.
31. Secondly residents can usually enter the communal garden (and through it the ball court) without going through this gate (from the main car park between the two blocks) at all. At present residents can usually access the communal garden (and through it the ball court) through the smaller car park (the car park which is due to be built on). There is an opening in the (low) wall that separates this smaller car park from the communal garden.
32. The communal garden space and ballcourt is not "*uninviting*" as the planning statement suggests (para 5.17) It provides children with an area to run around and play ball games close to home. It is not right to replace this public amenity with houses and private back gardens.

Objection 4: Density

33. I object to this development because it will mean that the estate is too densely populated. This will reduce the residential amenity of the estate.
34. The proposal is to build 10 houses. The houses are high (two-stories). The space is small. The estate will become much more densely populated.
35. At present Godwin Court backs onto grass and then more open space (the ball court and the car park). The estate feels spacious and green. If this development goes ahead the current communal garden (which currently feels

spacious and open) will become an enclosed courtyard hemmed in by tall housing on all sides.

36. I object to this increased density because:

- (i) The estate will look and feel unattractive. The estate will lose its current open, green and spacious feel. This will affect the residential amenity of residents in flats at the back of Godwin Court and residents using the communal garden;
- (ii) The estate will become noisier. The estate is currently very quiet (probably because of the large amounts of open space). The new houses will back onto Godwin Court. This will make the estate noisier for everyone;
- (iii) At present the flats and balconies in Godwin Court (and residents using the communal garden) look out onto green foliage and open space. If this development goes ahead they will look out onto a row of terrace houses.
- (iv) The row of houses is high. It will block sight of trees which are not being cut down (eg. currently residents at the back of Godwin Court and/or residents using the communal garden can see tree T1 (as marked on the plan on page 32 of the Arboricultural Report). T1 is a tree outside the estate on the corner of a nearby street. The view of T1 is likely to be blocked by the new houses);
- (v) This is another example of public amenities (here public open space) being replaced with houses and private gardens. It looks as if this development is going to extend onto the communal grass area behind Godwin Court. The plan on page 32 of the Arboricultural Report (page 32 of the report) shows that T25 will fall within the private back garden of one of the houses. T25 is currently on the grass between the car park and Godwin Court. This suggests that this communal grass space will also be encroached upon.

37. The Camden Local Plan notes the importance of protecting open space on housing estates (see paragraph b of Policy A2). As paragraph 6.32 of the Local

Plan notes these are “*a limited resource*” and “*highly valued by the community.*” The Local Plan notes that Camden wishes to protect public or communal space on housing estates (see paragraph 6.32). It cannot be said that the open space on the Godwin and Crowndale Estate is going to be replaced by “*equivalent or better*” open space or that the public value of maintaining the open space is “*outweighed by the benefits of the development for existing estate residents*” (as per paragraph b of Policy A2). Regardless of any landscaping this development will have a net negative impact on communal open space on the Godwin and Crowndale Estate and the experiences of existing residents. The estate will be less open, less spacious and less green.

Objection 5: Height and Overlooking

38. The proposed houses are high (two stories). There is a proposal for balconies/terraces on the first and second floors of these new houses looking back towards Godwin Court. There are also proposals for roof terraces on these new houses.
39. These balconies/terraces and roof terraces will look towards windows and balconies in Godwin Court. The planning application deals with overlooking into the School (on the other side of the development). It says nothing about overlooking residents in Godwin Court or into the communal garden below.
40. Regardless of whether any technical standards concerning overlooking are breached (and as I say the report simply does not address this) in real terms flats in Godwin Court and residents using the communal garden will be much more overlooked than they were before. At present flats and balconies in Godwin Court look out onto foliage and open space. If the development goes ahead they will be looking out onto (and in some cases on the same level as) people using terraces/balconies in a row of houses opposite. This will obviously affect residential amenity.

Objection 6: Design and Concept

41. I object to this development because of the design of these houses (and the concept of a terrace at all in this location).

42. Godwin Court will be on three sides of the communal garden (which will become a courtyard). The new terrace of houses will constitute the fourth side of this courtyard. Godwin Court is higher than these houses. Godwin Court is irregularly shaped. This terrace of houses (in this position) will look odd and incongruous.
43. The overall impression will be of a terrace of houses which has been “shoe-horned” in. This terrace of houses is not being built on (and can not be orientated against) a road. It will look out of place. The estate as a whole will appear (and be) cluttered.

Amending the Design/Seeking Further Information

44. My primary position is that planning permission should be refused. This is not an appropriate development and will impact significantly on residential amenity.
45. However if the planning committee is minded to grant planning permission to some sort of development at the back of Godwin Court, the planning committee should not grant planning permission to the development in this form.
46. In particular the design of this development should be amended so that it is not necessary to cut down T25. The Camden Local Plan states that new developments should “*respond to the natural assets of a site such as...trees and other vegetation*” (see paragraph 7.19 of the Camden Local Plan). Any development at the back of the Godwin Court should respond (by fitting in around) the natural asset of T25. Paragraph 7.21 of the Local Plan says “*the Council will resist development which fails to preserve or is likely to damage trees on a site which make a significant contribution to the character and amenity of an area.*” T25 does make a significant contribution to the character and amenity of the local area.
47. T25 is an extremely significant tree (see paragraphs 15 to 16 above). It has a prominent position at the back of Godwin Court. It can be seen prominently by anyone at the windows and balconies at the back of Godwin Court and to anyone using the communal garden. It should be emphasised that cutting down T25 (by itself) would significantly change the character of the estate. A picture of T25 is attached as Appendix 1.

48. T25 is not positioned on either the ball court or the car park (which are due to be built over). It is positioned on the grass area between the car park (which is due to be built over) and Godwin Court. The plan on page 32 of the Arboricultural Report [page 35 of the PDF] suggests that T25 is located where one of the gardens of one of the new houses will be. T25 is not located within the area where any building will actually take place.
49. The Arboricultural Report and planning statement do not say why T25 needs to be removed (ie. they don't say it is because of eg. foundations, access etc). It is not clear whether it is actually necessary to remove T25 or whether it is simply more convenient for the developers if T25 is removed.
50. It must in principle be possible to build on this site in a way that does not involve cutting down T25. This may require no (or only very minor) changes to the current plans (if for example cutting down T25 was convenient or not necessary – or if eg. T25 could be pruned as opposed to cut down). It might be possible , for example, to leave T25 in the private gardens of one of the houses (or simply change the design so one of the houses did not have a garden).
51. On the other hand keeping T25 might require the design to be changed. It might mean that the project was more expensive. It might mean that the developers had to build fewer houses. However at present we simply don't know what would be required to keep T25. This is because the planning application makes no reference at all to why T25 has to be removed.
52. The houses due to be built at the back of Godwin Court are largely constructed off-site. I understand that these sorts of houses typically have less deep foundations (than typical brick houses). It is not clear if this has been considered (and it is not clear if the relevant decision maker (who decided T25 needed to be removed) was aware of this. There is no mention of this, for example, in the Arboricultural Report.
53. I have tried to explore these issues with the developers. I attach (as Appendix 2) the email I sent to Mark Hopson (the relevant development consultant at Camden). I sent this email on 1 November 2020. I have not had any answer to this email. I suggest that the questions set out in my email dated 1 November

2020 ought to be explored with the developers before planning permission is granted.

54. If the planning committee is minded to grant planning permission for a development at the back of Godwin Court, they should only grant planning permission on the condition that T25 is not cut down.
55. If the planning committee is not prepared to go this far, the planning committee should – at the very least – require the developers to explain why T25 should be cut down. The planning committee should (at the very least) require the developers to explore alternative possibilities (which would avoid cutting down T25) and to explain what the consequences (if any) of these alternative possibilities would be.
56. If these alternative possibilities which avoid cutting down T25 come with (eg. additional costs), the planning committee can (at least) make an informed decision about whether (and on what basis) to grant planning permission.

MADLINE STANLEY
Date: 9 November 2020

APPENDIX 1 – TREE T25



APPENDIX 2 – MY EMAIL TO THE RELEVANT PLANNING CONSULTANT

1.11.2020

From: **Madeline Stanley** <[Email address removed]>
Date: Sun, Nov 1, 2020 at 7:46 PM
Subject: Questions about the proposed Godwin and Crowndale Development
To: Hopson, Mark <[Email address removed]>
Cc: lola soanes <[Email address removed]>

Dear Mark,

Many thanks for coming to the Godwin and Crowndale Estate to speak to us about the proposed new development. I very much appreciate you coming to speak to us at what is a very difficult time for everyone. My name is Madeline Stanley - I was one of the residents who attended.

You very kindly said that if we had any questions (technical or otherwise) about the development I could email you and you would get answers from the relevant individuals. I have spoken to Lola Soanes (Chair of the TMO) and we have agreed I would email you to ask some questions. Please see these questions below. I have copied Lola into this email.

I know that Lola has been speaking to you about the architect doing a visit on site, but it would be useful to have answers to the following questions in writing in the meantime. The deadline for observations to the planning committee is coming up and I am obviously keen to make sure I am commenting with a proper knowledge of the development.

A. You will remember that we spent some time discussing a tree (a plane tree) which is referred to in the Arboricultural Report as T25. T25 is positioned on the grass between the wall bordering the car park and the back of Godwin Court. The plan at the back of the Arboricultural report (page 32 of the report on page 35 of the PDF) suggests the site of this tree falls within the back garden of one of the proposed new houses.

1. This suggests that there will be some encroachment onto the communal grassed area behind the car park and ball court. Is that correct?
2. Assuming that is the case - how much of the communal grassed area will be taken away (by both the houses themselves and their back gardens). The plans are a little difficult for lay people to read so could you let me know how many metres of the communal garden (measuring from the edge of the car park) will be covered up?

B. The Arboricultural report says the proposed development will require T25 to be cut down (see table 3 on page 11 of the Arboricultural Report [page 14 of the PDF]).

3. Who makes the call as to which need to be cut down to build the new development? Is it the Arboriculturalist who (looking at the plans) advises on which trees need to be cut down?
4. Or does the Arboriculturalist just advise on the nature of the trees in question - once somebody else has advised that those trees need to be cut down?

5. If somebody else has advised on which trees need to be cut down - who was that? For clarity - I am trying to work out which expert makes the decision eg. is the architect, the arboriculturalist, some other professional etc. (I am not asking for the name of the relevant individual).

6. Why does T25 need to be cut down? Please explain what this tree needs to be cut down to facilitate this development (and not simply why it is sometimes necessary to cut down trees to facilitate developments). Please provide as much detail as possible.

7. I understand that the proposed new development is a due to be built largely off-site. I understand that such houses typically have much less deep foundations that typical brick houses.

(i) Do you agree?

(ii) Has this been taken into account when the relevant person advised that T25 needed to be cut down (I ask because there is nothing in the Arboriculturalist's report which suggests he has any knowledge of the spec of the houses/the foundations. I assume this is the relevant report. No other report advises on which trees should be cut down).

(iii) Does this (the nature of the houses and the foundations) affect the relevant person's view on whether T25 needs to be cut down? If not - why not?

8. As I say above the plan in the Arboricultural report (page 32 of the report on page 35 of the PDF) suggests the site of tree T25 falls within one of the private back gardens of one the proposed houses. The structure of the houses is not due to built over T25.

(i) In these circumstances why can't T25 be left to stand in a private garden?

(ii) Alternatively - could the design be changed so that one house does not have a back garden (in order to facilitate the retention of T25?)

9. If it is necessary to cut down T25 to facilitate the development (as per the current design):

(i) Have you consider what amendments could be made to the design which would faciliate the retention of T25?

(ii) If so, what would those amendments be?

(iii) Why have you decided not to amend the design in this way?

(iv) If you have not considered what amendments could be made to the design (to faciliate the retention of T25) - why not?

Thank you again for the opportunity to ask questions - and I look forward to hearing from you.

Many thanks and kind regards

Madeline Stanley

