

[REDACTED]

Subject:

Planning application reference number 2022/2452/P

[REDACTED]

[REDACTED] I am particularly worried about the proposal to reduce access to an accessible toilet.

I completely agree with all the points being submitted by KLPA. I feel that the City of London is gradually destroying what was the wonderful Women's Pond atmosphere and certainly demoralising the users with the effect that many of the older swimmers and those with some health or financial difficulties no longer visit.

It is also clear to me that City of London are both disrespectful & dishonest to KLPA and the users, by not consulting re the Rear Gate & Fence and so, once again, following their own agenda in whichever way it suits them - and in the process destroying the great history and heritage of the Women's Pond.

Valerie Forsyth

General Comment

· There is no Equality Impact Assessment included in a planning application which is allegedly about improving accessibility to the Hampstead Heath bathing ponds. The planning application 2022/2452/P in respect of the Ladies' Pond focuses on "security" and infrastructure used to enforce payment by swimmers but much of the accompanying documentation still appears to highlight improved accessibility. This is misleading.

Changing Rooms and Accessibility

· The Ladies' Pond buildings went up in 2016 with planning permission from Camden Council, but they were non-compliant for disability access. The City of London ignored feedback from users and lifeguards at the time. A report commissioned by the City of London in 2018 confirmed the non-compliance and recommended building a new section to house compliant WC and shower facilities. The City of London is instead going for the cheaper ad hoc option, again, of carving out an accessible WC-shower room in the existing building's spaces.

· The City of London is planning to make adaptations to the changing room buildings before addressing the underlying damp and drainage issues. This will be self-defeating as any adaptations are likely to fail if these problems are not resolved first. The buildings are likely to remain non-compliant if these adaptations fail. This appears to breach the aims of the Camden Local Plan in respect of accessibility.

· Fundamental problems with drainage and damp still need to be addressed properly, and currently put both staff and swimmers at risk e.g. through the presence of black mould. Camden's environmental health services should inspect.

- It looks like the proposed new WC-shower room will still not comply with Changing Spaces standards. The plans submitted with the application are ambiguous about any measurements.
- The combined WC-shower will reduce availability of an accessible toilet when in use as a shower and changing room. The City of London is planning to put grab rails in one of the existing cubicles of the main toilet block which will be of limited use, and will not meet accessibility standards.

Overall, the failure to address accessibility in a logical manner appears to be a breach of the requirements of the Camden Local Plan in respect of planning applications.

- A test of relevance was not produced before any consultation with user groups, about adaptations to the building. Then no test of relevance or Equality Impact Assessment is included with the planning application 2022/2452/P, despite a claiming that a significant part of the works across the Heath being to improve disability access.

Stewards' Hut

- When the Hampstead Heath, Highgate Woods and Queen's Park Management Committee took the decision to enforce charges in March 2020 this expressly excluded the option of a gate entry system. The City of London is now proposing to erect a permanent stewards' hut near the entrance area, at very least breaching the spirit of the decision made by their own Management Committee in March 2020.

- The proposed Stewards' Hut is referred to in the Ladies' Pond Proposed Drawings, but is called a storage shed in the covering letter. This is misleading and the City of London needs to clarify this point.

- The proposed permanent stewards' hut will harm the natural aspect of the Heath which the City of London is obliged to maintain under the 1871 Hampstead Heath Act, and it will create an ugly approach to the Ladies' Pond.

- The permanent stewards' hut will further enforce social and financial exclusion at the Ladies' Pond which should be of concern to Camden Council. Access to the bathing ponds on the common land of Hampstead Heath was entirely free until 2005 and based on voluntary charges until 2020. The Heath is being monetised increasingly and this creates exclusion in the borough. This appears to contravene the aims of the Camden Local Plan.

- The City of London did not consult the user group, the KLPA, about the erection of a stewards' hut, and only admitted to it reluctantly when details were seen in committee papers by KLPA members. This appears to breach Camden's policy on pre-application consultation.

Rear Fence and Gate

- The City of London did not consult the user group, the KLPA, about the rebuilding of the rear fence and gate, which has only been made explicit in the planning application registered on 11 July 2022. This appears to breach Camden's policy on pre-application consultation.

- The proposed new fence and gate will have a significant visual impact facing onto the main body of Hampstead Heath, giving a fortified appearance. This goes against the requirements of the 1871 Hampstead Heath Act to preserve the natural aspect of the Heath. Such a fence will be ugly and intrusive.