

I am writing on behalf of the Fortune Green and West Hampstead Neighbourhood Development Forum (NDF) to give comments on the consultation on the Planning Application 2013/7585/P, the proposed residential development on the Gondar Gardens reservoir site.

Background

1. This application is almost identical to a previous scheme for this site (Planning Application 2012/0521) which was refused after an appeal hearing (APP/X5210/A/12/2188091). We have therefore taken regard of the Appeal Inspector's comments on that scheme.

Demand for Housing

2. The NDF recognises that there is demand for housing in London and that the West Hampstead Growth Area is an important factor in Camden delivering new housing. However in the rest of the NDF Area there is already dense development, there are few open spaces and the NDF believes that the bulk of the Area's contribution to new housing should be in the Growth Area.

NDP Objectives

1. Housing

Development in Fortune Green & West Hampstead will provide a range of housing and housing types, including social and affordable housing, as well as housing suitable for families, old people and young people. The West Hampstead Growth Area will be the focus for new development and will provide new housing and accompanying additional infrastructure. Development outside the Growth Area will be on a smaller scale.

3. Since the previous refused application on the Gondar Gardens site there have been a number of planning applications and initial consultations for substantial residential developments in the NDF Area outside the Growth Area. Notably: around 100 housing units at Liddell Road; 35-40 units in 67 Broadhurst Gardens; Iverson Road, 159-161 with 19 housing units; and 160 Iverson Road with 36 units.
Work on the very large development at 187-199 West End Lane for 198 units has now started. We believe that the current intensity of development in this congested area should be considered in respect of new planning applications.

Design

4. The previous scheme was rejected by LB Camden and refused on appeal on the basis of design. Paragraph 20 of the appeal in particular states: *"...the building would be there for many years to come, negatively influencing the character and appearance of the area. The harm in the detailed design would not, therefore, be overcome by the significant benefits of the scheme. It would conflict with LP policy 7.6, CS policy CS14 and Camden Development Policies DP24 which seek to protect local character. These policies are consistent with paragraphs 58 and 60 of the Framework which aim to ensure development responds to local character including the promotion of local distinctiveness."*

5. In the view of the NDF there have been no changes in this scheme that represent any response to the Inspector's negative comments on lack of respect for the "distinct local identity". Paragraph 18 of the appeal decision reads *"However my main concern with the appeal scheme is in the detailed design. The proposed design seeks to repeat the proportions of houses and bay windows seen in the area, through a series of brick projections. However, the varying size of the projections, the large expanses of brickwork (seen particularly on the two large projections), the combination of geometric shapes and the four storey sections with a flat roof, only serve to distinguish all elements of its design from those in the surrounding area. There is no visible connection to the intricate shapes, decorative detailing (including red brick and white mouldings) or the strong emphasis seen in the surrounding houses which combine to determine the character of West Hampstead."*

6. The current design also suggests that no attention has been paid to local opinion as represented by the NDF. The NDF's position has been derived from two years of community consultation in meetings, surveys and on street discussion leading to the series of draft plans over the past two years, all available in the public domain. The current draft, No 6, is the penultimate before submission to LB Camden. Key points in the NDP are listed below.

7. NDP Objectives page 5
3.2.2 Design & Character
Development will be of high-quality design and will need to fit in with the existing styles of the Area, large parts of which are covered by Conservation Areas. The height of new buildings shall fit in with the rooflines of existing buildings in their immediate vicinity. In all development there shall be a presumption in favour of preserving the distinct character and appearance of the Area, as well as the views across it.

8. NDP page 4 Para 2.5
Recent development in the past decade has raised a number of concerns, particularly as the population of the Area grows, more new homes are built and the population density of the Area increases. For many residents the height of new buildings is a key issue. In an area largely made up of houses and buildings between two and five storeys high, new developments of six storeys or higher are likely to cause strong objections. While new buildings should not slavishly copy the style of buildings built in the late 19th century and early 20th century, there is a need for new development to fit in with existing development in the Area. This means buildings that are not starkly modern or out of place. Most buildings therefore should be predominately made of high quality red brick. Recent buildings made of grey brick have proved to be unpopular and are widely considered to be inappropriate for the Area, because of their impact on conservation areas and the overall character of the Area.

9. NDP Policies Page 6

*A2. The **NPPF** states as a core planning principle (article 17) that planning should “always seek to secure **high quality design and a good standard of amenity** for all existing and future occupants of land and buildings”. It also states (56) that “good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people”. The London Plan (Policy 7.6) says that “architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and designs appropriate to its context”. These policies shall be clearly and demonstrably applied in Fortune Green and West Hampstead.*

10. NDP Policies Page 6

A3 The NPPF (60) states that it is “proper to seek to promote or reinforce local distinctiveness” and says (58) that development shall “respond to local character and history, and reflect the identity of local surroundings and materials”. As outlined in 2.2, many parts of Fortune Green and West Hampstead have a clear architectural heritage – with an attractive character and a distinct local identity. These positive features need to be protected and preserved. New developments in such areas – particularly terraced streets – need to fit in rather than stand out. Larger developments, while reflecting new design, need to incorporate design features that reflect the character of existing development, using materials (such as red brick) which complement existing buildings. Innovation is not ruled out, however schemes incorporating appropriate innovation will need to make a persuasive case for such development and demonstrate widespread local support.

11. NDP Policies Page 7

A10. Infill developments: any replacement of a house or houses within an existing terrace should be to the same scale as the terrace, including the roofline. It should be similar in form, materials and details. Replication of particular exterior details is strongly recommended where such details are consistent in streets. Houses should be set back from the pavement and match or fit the building lines of existing properties, with front garden areas remaining unpaved. The same principles should apply to vacant sites in streets where there is already existing development.

12. In the opinion of the NDF this proposal does not preserve the character of the immediate area nor the NDF Area as a whole, nor is it high quality design in that it does not recognise its location and the local community. As such it does not meet NPPF core planning principles.

13. Specifically, this proposal matches adjacent building heights but ignores the roof style, having an extra storey above the roof soffit line of the neighbouring block. The NDF suggests that a mansard roof is the minimum necessary to mitigate the impact of the extra storey in the development, and

to make some gesture towards reflecting the existing roofline on the adjacent mansion blocks.

14. In addition, local opinion is in favour of red brick. Several recent local schemes in grey/white brick are strongly resented - whereas new developments primarily built using red brick, such as 1 Mill Lane, have received a favourable local response. In this proposal, the NDF believes that the off-white bricks, the structural glass and the opaque panels all contradict the local desire for red brick.
15. Overall the style and materials of the design do not "*incorporate the highest quality materials and designs appropriate to its context*" The London Plan (Policy 7.6)

Site Policy

16. The draft Neighbourhood Plan has specific reference to the Gondar Gardens site. Draft 6, published September 2013, page 16 states:

C2. Gondar Gardens:

Any development shall retain as much open space as possible and offer limited, managed public access consistent with maintaining suitable conditions for wildlife and maintaining security for neighbouring residents. Views across the site shall be preserved from all sides. Any development of the frontage on Gondar Gardens shall match the character of existing development.

The proposal does not meet the sentiments of either of the last two sentences.

Additional points

17. Given that this proposal's Basement Impact Assessment was undertaken in January 2012, does it still meet Camden Planning Guidance (CPG4)?

Summary

18. Notwithstanding the loss of views across West Hampstead, and the loss of green open space, the NDF considers the design of this scheme is entirely inappropriate for this location.

The NDF therefore strongly OBJECTS to this proposal and urges Camden Council to refuse to grant it planning permission.

James Earl
(Chair, Fortune Green & West Hampstead NDF)
www.ndpwesthampstead.org.uk

19 December 2013