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Dear Brian

Further to the meeting on the draft Camden Local Plan, please find comments from the Church Row and Perrins Walk Neighbourhood Forum.

Planning and Air Quality

In the year 2000 Camden Council declared the whole borough an Air Quality Management Area (AQMA) and fifteen years on, and despite various Action Plans, pollution levels for NO₂ still breach the relevant UK and EU standards. Planning directly impacts transport needs, and traffic is the major source of pollution. There are numerous sections of Camden Council's Planning documentation that seek to address the issue. However, residents perceive a need for an overall Strategic Objective "for the borough to be in compliance with UK and EU air quality standards", that bring together the various sections, and provides direction for further policy initiatives in this area.

Over concentration of Schools in NW3

There are currently 55 schools in NW3 with more than 11,500 pupils¹, of which some 4,500 are at schools on or very close to Arkwright Road and Fitzjohn's Avenue. The population of Hampstead Town Ward is just 10,616, of which less than 1,200 are of school age². The number of pupil places is a multiple of the number of local pupils. Whilst London needs more schools they must be in the right place.

Camden Council's 2010 traffic survey³ showed that local schools are responsible for thousands of extra car journeys. In 2007 the NO₂ levels⁴ were between 40 and 60 µg/m³. Whilst for London as a whole, pollution levels have remained relatively flat⁵, in Hampstead the position has grown significantly worse. For 2009 to 2013 NO₂ levels averages⁶ were between 58 and 73 µg/m³. Individual days are higher. National and European guidelines state that the figures should not exceed 40 µg/m³. A recent parliamentary report⁷ highlights that air pollution is an invisible killer, costing the lives of 29,000 per year.

The over concentration of schools in NW3 is responsible for serious congestion just before and after school. The extra cars are adding to NO₂ pollution. There are at least two planning applications currently under consideration to increase pupil numbers still further. Is there a way to strengthen Camden Council's planning policy wording, beyond DP16, to further discourage applications for additional pupil expansion in NW3? The key policy statement beyond the requirement for balanced land use is currently DP16 "...it is unlikely that the Council will grant planning permission for education facilities that are likely to exacerbate the problem [of traffic congestion]"

¹ Figures derived from Ofsted and ISI school inspection reports for NW3.

² Camden Council 2001 census profile for Hampstead Town

³ Data produced by K & M Traffic Surveys for Camden Council for vehicles travelling northbound and south bound on Fitzjohns Avenue for weeks commencing the 7th and 14th of June 2010 (169,802 cars) and the holiday periods of 19th and 26th of July 2010 (145,286 cars) i.e. the impact of the schools on Fitzjohns Avenue in June 2010 was more than 1,200 cars per day.

⁴ Source: Submission dated 12 June 2007 to the Culture & Environment Scrutiny Committee "Review of School Run Policy and the Issue of Dispensation Permits".

⁵ Professor Alistair Lewis of the National Centre for Atmospheric Science, and Dr Ian Mudway of King's College as per the Sixth Report of Session of the House of Commons Environmental Audit Committee and printed 26 November 2014.

⁶ Source 2013 Air Quality Progress Report to the London Bough of Camden dated 10 July 2013

⁷ Sixth Report of Session of the House of Commons Environmental Audit Committee and printed 26 November 2014.

Developers Neglect

When refused planning permission, a number of developers deliberately neglect buildings so that they fall apart. For example, both 22 Frognal Way and 20 Perrins Walk reside with the Hampstead Conservation Area, and plans to demolish and redevelop were submitted and rejected by Camden Council and the Planning Appeal Inspectorate. The developer's response has been to leave the properties empty for more than five years and to constructively neglect them. Both now have temporary and unsatisfactory roofs, and 22 Frognal Way's interior has been entirely stripped so that there's not even a floor stand on. Despite protestations to the contrary, the buildings are being successfully run into the ground. Camden Council is monitoring the two buildings in question, but the current rules appear to provide limited avenues for enforcement. Can planning rules be strengthened to prevent such abuses? For example if a developer has over a period of five years made a building uninhabitable (i.e. it's no longer C3) can this be made an explicit breach of Camden Council's planning policy?

Maintenance of Green Space

The proposed approach to the provision and enhancement of open space is noted and appreciated. Residents are concerned about the creeping loss of green garden space in conservation areas. Garden vegetation and trees are important for the maintenance of the environment, and combatting pollution. Despite the additional protections granted by conservation area status, the imperatives to increase housing stock and maximise the utilisation of land is enabling developers to seek permission to develop green garden space. "Roof gardens" often feature in such schemes, but they are out of keeping, difficult to maintain, and can't support the substantive vegetation and fauna of a proper garden. Residents view such developments as inappropriate and would like to see more stringent restrictions introduced to prevent the loss of green garden space.

Access and Traffic Management Plans

Residents perceive a need for increased scrutiny of building development access plans. Large developments are required to have traffic management plans. However, the project doesn't need to be of "HS2" magnitude for HGV trucks to damage: streets, buildings, trees and the environment as a whole. By way of an example, Holly Walk's six-foot width restriction and near ninety-degree bend, makes it wholly inappropriate for both large and long vehicles. A recent development to a modest cottage was approved and planning permission was granted, but unbeknownst to the Council, the design required a tower crane and cement mixers.... Despite the obvious road access issues the architect and builder ploughed on and repeatedly attempted to have the "required" loads delivered. On contacting Camden Council, the planning officers explained that this was a transport issue, and the transport officers stated it was a planning issue... Developments where there are known access issues should have to explain how the site is to be accessed.

Development and Underground Rivers

Hampstead has numerous wells, springs and underground rivers, and Well Walk was famously built so that Georgian residents could benefit from such waters. What is less well appreciated is the extent and strength of these rivers. For example, despite being near the top of the hill, some Church Row houses require pumps to keep the water levels at bay.

Planning applications are required to demonstrate that the proposals take account of such underground water movements, but with the advance of science the presumption is that if enough money is thrown at a project, consultancy reports will be produced showing how any hydrological issue can be resolved. Local experience is that neither consultants nor developers understand the extent of the local phenomena. As a result, developments are often either sub standard, or adversely impact adjacent buildings. For example, a newly constructed basement development in Holly Walk with state of the art tanking is dealing with some eighty leaks! Where there are known hydrology issues (e.g. most of the Hampstead Conservation area) planning application requirements should place a higher burden of proof on consultants and developers.

Should you need any additional evidence for the above points, please do not hesitate to write.

Yours sincerely



David Milne
cc Phil Jones, Nicola Tulley, John Sheehy