

**10 Bertram Street
London N19 5DQ**

David Fowler
Principal Planning Officer
London Borough of Camden
5 Pancras Square
London N1C 4AG

14th December 2018

Dear Mr Fowler

Planning Application 2018/5774/P

Highgate Newtown Community Centre Unit A, B, C, D & E 25 Bertram Street
London N19 5DQ - **Formal Objection**

I am writing to object to the proposed planning application for Highgate Newtown Community Centre.

The abandoning of the scheme agreed by the Planning Committee in 2016 was entirely predictable. The size, complexity and cost of the design were repeatedly raised as concerns by local residents seeking a simpler more cost-effective solution to improving HNCC/FYA accommodation. However, local residents' views were ignored and we have now been provided with a revised scheme with variations and removal of conditions.

This revised scheme does not address the fundamental concerns of local residents and in some respects worsens the impact. The scheme remains unacceptable for a number of reasons.

Density

There is no mention of the proposed population density in the papers published to support this scheme. This is a serious omission and reflects the Developer's lack of concern as to its impact.

The number of flats has increased again, this time by 30%, to 41 flats overall. Rather than addressing community concerns about the serious overdevelopment and over-massing of buildings, the Developer is now proposing to exacerbate the problem.

In the officer report to the Planning Committee in 2016, this site was deemed a 'suburban' setting according to the London Plan Density Matrix, which recommends a maximum density of 250 hr/ha. The agreed scheme had a density of 622 hr/ha and despite a last minute re-classification at the Planning Committee for the site to be considered an 'urban' setting, the site density was still 38% higher than the London Plan maximum levels of 450 hr/ha for an urban setting.

The council's proposal to provide 41 units in what is clearly a small backyard suburban setting will make the situation even worse. In consideration of its context, the site should

appropriately be classified as a suburban setting and the proposed density of near 700 hr/ha should be refused in any event.

Impact on Neighbouring Properties

The revised plans will have a major negative impact on neighbouring properties. The scale and massing of the main housing block is inappropriate in such a small backyard setting. The height and massing are compared to the adjacent Brookfield Estate. This is an inappropriate comparison as the Brookfield Estate fronts onto Croftdown/Chester Roads and is set back within its own grounds.

These proposals will have a serious 'over-bearing' effect on local residents with significant overlooking and loss of rights to light to neighbouring properties.

People's Mission Gospel Hall

This proposal sits with a Conservation Area and any application should pay special attention to preserving the character of the area. It is also incumbent on the Developer to consider any Heritage Assets in its proposals. It is therefore shocking that no consideration is given to the unique (non-designated) heritage asset that is the People's Mission Gospel Hall. The proposal is for it to be replaced with two town houses. There is no cognisance given to its history and contribution to community life in this part of Camden

The hall has been a fixture of the neighbourhood since it was built in 1892 and used for religious congregations, social gatherings, meeting of the Holloway Temperance Association, neighbourhood film screenings and youth club activities. During the First World War the St Pancras Hospital's School for Mothers opened a branch in the hall holding twice weekly consultations for mothers with infants. It is also highly prized for its unique acoustic properties, ideal for musical recitals and stage performances.

Camden's own Local Plan Policy C2 Part G requires 'a replacement facility of similar nature to be re-provided on site that meets the needs of the local population or its current or intended users'. The draft Dartmouth Park Neighbourhood Plan also requires replacement of community facilities.

Within the papers provided there is an assertion that works to the non-designated heritage asset People's Mission Gospel Hall would be 'beneficial'. I would strongly challenge this assertion. To whose benefit? Clearly not the community's, which has benefited from the unique contribution of the hall for over 100 years. The loss of its unique properties and facilities is not recognised or addressed and, crucially, they are not being replicated within this development. If the Council is minded to agree the variations in this application, it should reject that aspect of the application which relates to the People's Mission Gospel Hall.

Public Open Spaces and the Courtyard

There is no analysis provided in the plans on the loss of public open space. There is a significant loss proposed taking into account the rear allotments and gardens. These have significant benefit and potential and were proposed for further development as an external seating area from the café before the introduction of the planning blight resulting from the council's demolition proposals. There is no potential to continue the local allotment scheme or to provide suitable playspace for children, particularly those under five as was previously provided. The only public open space will be a small courtyard.

The agreed plans for the courtyard remain seriously flawed containing an incompatible mixture of functions including a social seating area, vehicle turning circle; large goods drop-off; pedestrian and cycle through route. The proposed through route is replacing the current public right of way. I do not believe that the current public right of way allows cyclists and question why the proposed replacement through route has to include cycles. Serious concerns have been raised about the potential impact of mopeds utilising this route and if the Council proceeds with these plans, it needs to specifically design out that potential problem.

The revised plans will also result in the courtyard being surrounded by higher buildings than previously planned with consequent overshadowing and poor light, which is deterioration in facility.

Traffic, Servicing, Parking and Deliveries

The council's evidence used during the planning process is seriously flawed in relation to traffic and servicing. It states that scheme would generate a similar number of car journeys, ignoring the fact that the centre plans to increase usage overall and also generate significant additional revenue through increased lettings. The proposals both underestimate the current situation and the planned increase in usage of the community centre programme.

At present, we have significant traffic and servicing problems, even taking into account the HNCC car park. The car park will be removed and there is no provision for a small turning capacity at the end of Bertram Street. The density of traffic at busy times is such that cars, minibuses and refuse vehicles have to either reverse into or out of Bertram Street. This is not safe or acceptable practice as Chester Road is both a bus route and busy through route particularly during the rush hour.

As you will be aware, the number of household deliveries per unit has increased substantially in recent years through delivery of goods, food etc. This is already a problem within Bertram Street, which has about 40-45 housing units, with vehicles 'backing up' trying to get in and out.

The 41 new flats will double that problem at a stroke. I understand that new residents will not be able to apply for residents' parking permits but will have the right to apply for visitor permits providing further pressure on traffic and parking in Bertram Street and neighbouring streets.

Further, when the centre has a popular activity on offer, the vehicle situation is often chaotic. I attach photographic evidence of this during a Sunday activity in October this year showing 12 cars double-parked in the small car park; 3 cars trying to get into the car park; and 5 cars reversing or otherwise trying to leave Bertram Street due to the chaotic situation:
<http://hncc.co.uk/wp/wp-content/uploads/2019/01/HNCC-Objection-1218-photoscaptions-TM.pdf>.

The Council should not be 'designing in' an increase in traffic, parking, servicing and delivery problems. It is, therefore, astounding that the Developer has proposed the removal of the condition requiring a 'Parking Management Plan' on the basis that the single disabled parking bay is now not being provided on site. This illustrates the complete lack of awareness of the impact of doubling the number of housing units in Bertram Street along with the anticipated increase in visitors to HNCC and a lack of concern about the impact on safety. The proposals in the revised plan will compound current problems and are unacceptable.

Financial Viability

The information on financial viability starkly illustrates the wasteful overall approach taken by the Council as Developer in this whole process with expenditure of £2.2m on consultants' fees alone which now need to be recouped from this revised scheme. This has a knock-on effect on the number of flats proposed, a social cost which the community will be paying for in perpetuity.

Included in the financial analysis is a £18m sum for construction costs, which would properly include sums for contingency. Overall, the scheme is showing a 'profit' of £5.4m. This considerable sum should be used to reduce the number of flats proposed and cover the income 'lost' from the sale of the two town houses to replace the People's Mission Gospel Hall.

The Provision of Community Services

I am concerned that despite the fact that services for children under five and their parents/carers is a priority for HNCC, no dedicated space is being re-provided on site. HNCC had, until very recently, a dedicated under fives provision with access to outdoor play. There is considerable need in the community for such facilities and it is essential that these are provided as an integrated part of the overall community centre offer on site to extend the range of support offered to families and maximise its effectiveness.

This entire development is predicated on ensuring the long-term viability of HNCC. I believe that this viability hinges predominantly on the Council's on-going financial relationship with HNCC i.e. whether it provides any grant aid for activity and what rent or other charges are to be made. The building costs are an important factor but not, in my view, the determining factor.

The Developer states that there is not sufficient funding for the maintenance and upgrade of existing facilities to secure the long-term future of the community facilities. There is no doubt that the building would need investment over the coming years and the provision of a long lease at a peppercorn rent would provide HNCC with a firm basis on which to address this without the need for demolition and construction of a reduced community space and sharing of the site with over 40 housing units.

The maintenance of this site for community use is important as we are in danger of responding to the current negative financial climate and punishing government funding regime for public services by 'selling off land and facilities' to the private sector in order to fund current projects. Each project needs to be considered on its merits and in relation to the HNCC site; the proposals will result in a site, which has been in community use since its inception being largely and permanently lost to private housing. The long-term potential for continued full community use and increased community benefit will be lost for all future generations.

Community benefit has to be considered in the short and long term and I believe that the benefits of the current proposals are far outweighed by the disbenefits as set out above. I hope the above points will be taken into account

Yours sincerely, Thanos Morphitis

Cc Cllrs Sian Berry; Anna Wright; Oliver Lewis
HNCC: Robert Aitken; John Carrier; Andrew Sanalidro