

Application No:	Consultees Name:	Received:	Comment:	Response:
2024/5383/P	T. Dillon	21/12/2024 18:40:03	OBJ	<p>1. I strongly object to the proposal to build high-rise towers on this site. In likely violation of Camden's planning policies, the towers will interfere with the protected view from Parliament Hill.</p> <p>2. In addition, the whole idea of using high-rise blocks is unacceptable - surely we have learned enough over the last 60 years to know the problems these bring in terms of isolation, crime and antisocial behaviour (which according to the Met Police submission are already a problem)? The area contains some dilapidated houses, but they are fundamentally attractive 19C. dwellings, the equal of Fitzrovia or the like, which can be upgraded. New building should be consistent with this approach. The proposed towers are another 1960s Council planning failure in the making.</p> <p>3. The large number of dwellings will surely increase demand on necessary social services. If the development is to go ahead over community objections, a very thorough analysis of the needs of the community in terms of educational, medical, dental and social services should be undertaken, with a view to imposing substantial s.106 obligations on the developer.</p>
2024/5383/P	Isabel Molina	22/12/2024 11:01:17	COMMNT	<p>I fully endorse the detailed response from Queens Crescent Neighbourhood Forum (emerging) of which I am an active member.</p> <p>Unacceptable density No community facilities Unacceptable height of proposed towers, 26 storeys that will result in unprecedented overshadowing and wind tunnel effects as well as being unsuitable for families. No reference is made to the Gospel Oak and Haverstock Community Vision. The site is classified as brownfield which is purposely misleading and not factual. Unacceptable number of exclusions of very significant items from the scope of the EIA</p>
2024/5383/P	Alex More	28/12/2024 19:17:24	OBJ	<p>Absolute madness! Non sensical development Camden Council cannot maintain the current estates, where anti social behaviour is constantly not addressed. Imagine the hell these estates are going to become! Social residents interpret Camden non action against their anti social behaviour as a tacit endorsement</p>
2024/5383/P	Desvages	22/12/2024 07:52:24	COMMNT	<p>Let's protect Queens Crescent. Ask creative people to come up with a plan which doesn't involve building a tower. We all know now how awful there are. Also can the people accountable for this project be extremely rigorous and make sure they are dealing with honest companies who have integrity.</p>
2024/5383/P	W.F.bromwich	20/12/2024 09:46:52	OBJ	<p>file:///C:/Users/User/Desktop/DOWNLOADS/Bacton%20EIA_draft%20for%20comment.pdf</p>

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2024/5383/P	Sumaya Partner	22/12/2024 23:45:36	OBJ	I object to the scale of the buildings proposed. While we need more residential housing, affordable and social rental, there are better ways of providing it. Camden already put forward a more sustainable low rise proposal a few years back. The new buildings around Kiln Place are a good example of housing that works for our community. High rise, at the level now proposed and with the increased population proposed, is not in keeping with the area, it damages social cohesion, it will cause congestion - people and traffic - and will harm the views from Hampstead Heath, which is one of London's great treasures and is protected. Bacton tower is already an anomaly but as a one-off was forgivable. Building more high rise - and even taller - housing beside it would be an unforgivable act of barbarism. The proposal does not take into account the real people who live and work and shop in the area. It should not go ahead in this form. A new, lower rise solution can be found.
2024/5383/P	Patrick Haymann	23/12/2024 20:17:03	OBJ	I object to the current proposal and the attempt to remove the assessment of critical factors such as the environment, biodiversity, climate change and the impact on the infrastructure from the contractor's obligation. Further I object to the proposal in its current form as it goes against professed targets of 50% affordable housing set by the London Plan as well as the 2022 adopted Gospel Oak and Haverstock Community Vision. The Vision document sets out a desire to address pressing housing needs in the neighbourhood. The towers will not be affordable for most local residents therefore will not be alleviating the issues identified. Negative impacts of towers in terms of wind speeds, overshadowing, social isolation etc are well documented. This scheme which is only providing minimal public space and no further public amenities will only put pressure on the surrounding areas without contributing in a positive sense. Further, whilst technically respecting protected views from the heath the proposal is positioning a large 23-26 story clump of tall buildings in very close proximity to the heath and sets a dangerous precedence for the future development of the area. I would like to request to return to the original consulted and approved scheme of Karakusevic Carson which is in keeping with the mass of buildings found in the surrounding areas.
2024/5383/P	Lara Khoo	31/12/2024 15:42:38	OBJ	I am strongly against this proposal for 26 storey towers to be built on the Bacton Low Rise Estate. This is completely different to the original proposal designed by Architect Karakusevic Carson in phase 2 which were maximum 8 storey buildings and more in keeping with the area and 'low rise' estate name.  I live on Grafton Road and my living room and terrace face South-West. These towers would be an eyesore and would block sunlight which is incredibly important for mine and my family's mental health as well as loss of solar gain in the colder months. The towers will also be an eyesore from all over the area including the view from Hampstead Heath which is not in keeping with the green nature of this area.  The building of towers encourages residents isolation, where a sense of community is lost and antisocial behaviour increases. Numerous papers show that people living in high rise buildings suffer from higher levels of mental health problems, higher fear of crime, fewer positive social interactions and more difficulties in raising children. Queen's Crescent and the immediate area's infrastructure would struggle to cope with the number of flat's proposed. I appreciate the need for more affordable housing however Camden and its developers must look into creative and flexible ways to create higher density housing without using tower blocks.

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2024/5383/P	Keiran Proffer	20/12/2024 10:30:33	INT	<p>The design of Bacton low rise has been completely changed, without consulting the local residents. The original design was quite satisfactory. The sudden increase from 247 flats to 447 is going to place an intolerable strain on the local infrastructure. Already we are hard-pressed for schools, doctors, parking and all other facilities. The open space and play areas in the new scheme are utterly inadequate for the proposed number of people.</p> <p>In the original plan, 36% of the homes were for council rent. In the new scheme the percentage of social homes is reduced to 29%.</p> <p>The proposed 23 storey blocks are too tall for the surroundings. They will block the light from a number of buildings including several council homes, a school, and St Martin's church. They will also impact the view from the Heath.</p> <p>High-rise blocks are not suitable for families with young children. The children cannot be told to go out and play in any area where their parents can keep an eye on them.</p> <p>The design needs to be completely re-thought, in consultation with the local residents. The Council's objective should be to build homes - that is where people can be happy to live. This design is simply an attempt to cram as many people into as small a space as possible.</p>

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2024/5383/P	TOM YOUNG	20/12/2024 20:19:24	OBJ	<p><b>GENERAL</b></p> <p>The EIA is a poor document which gives the impression that it was assigned to an unsupervised junior. It contains basic errors</p> <p>Quod leave out key local development sites from the report section on cumulative impacts e.g Regis Rd, WKTE &amp; Wendling.</p> <p>They don't acknowledge planning documents e.g the local SPG Haverstock &amp; Gospel Oak Community Vision and the Tall Buildings Study</p> <p>The proposed omission of socio-economic matters is misguided. Here are reasons for that view</p> <p><b>RESIDENTIAL TOWERS</b></p> <p>The Mount Anvil proposal is a big commitment to residential tall buildings. That commitment deserves a full socio-economic evaluation as the most consequential aspect of the scheme as it is presented to the community. There is no justification for the scale of the Mount Anvil Towers in the Tall Buildings Study or the Site Allocations Study</p> <p>Concerns about high rise towers are widely held. Peter Rees, the planner associated with Kings Cross, was quoted by Building Design (May 2019) saying: "If future refurbishment cycles cannot be funded by the apartment owners, their investments will become unsellable long before the expiry of their 125-year lease".</p> <p>Rees does not think residential towers are a sensible suburban building type: "Where land is scarce and public transport plentiful, high-rise buildings can offer an opportunity to increase office or residential accommodation. However, suburbs are, by definition, less urban. Implanted blocks of flats disrupt the character of a suburb and do nothing to strengthen the community. I know from personal experience that residents of towers interact less with neighbours and tend to be more transient in their habitation."</p> <p>The GLA planning committee backs Rees' views: "Evidence has shown that tall buildings tend to result in large monocultures of a single tenure or particular demographic, and that the creation of mixed sustainable communities is more challenging"</p> <p>Mark Swenarton's review of Neave Brown's commitment to low-rise housing (exemplified by the Fleet Rd estate a few blocks away from BLR2) records: "At the heart of Brown's manifesto was the rejection of the forms of housing conceived in the 1920s and 1930s by the modern masters, especially Le Corbusier. In the 1950s the Smithsons had criticised modernist urbanism of the 1920s and 1930s reductively functionalist and ignoring the 'hierarchy of human associations' on which a community, and a city, should be built". Swenarton goes on: "According to Brown, what Le Corbusier and the others had lost was a 'proper recognition of the needs of continuity, cultural and physical'</p> <p>In other words, what's special about the kind of housing advanced by the best Camden architects of "The Golden Age" is the rejection of tower blocks and the focus on continuity of settings and ordinary space. It is very clear that the Mount Anvil proposals contradict those principles.</p> <p><b>BUILDING MANAGEMENT AND OPERATION</b></p>

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Rees perspective on maintenance of tall buildings is reinforced by the 2023 study: "What is the future of high rise housing: examining the long term social and financial impacts of residential towers" part authored by an adviser (Andrew Beharrel) to PTE, Mount Anvil's architects at BLR2

The study tells us "As buildings become taller, it is harder and more complex to access their facades for maintenance, and exposure to higher wind pressures necessitates more specialised fabric. Internally there are stages at which more lifts are required, water supplies need to be pumped to upper floors and fire escape provisions become more demanding."

The GLA planning committee has stated: "Energy use is higher in tall buildings with electricity use twice as high due to increased solar gain, as well as other conditions prevalent at higher altitudes, including more wind and colder temperatures. The taller the building, the higher the amount of embodied energy required per useable square metre as low-carbon materials such as timber are not viable. Tall buildings also suffer more from heat losses for the same amount of insulation as lower buildings because of the higher wind speeds"

The cost of ownership is a fraught as a result. "For the sake of clarity, the developer should provide a breakdown of the principal structure, fabric and services, giving the anticipated life of components and the cost of replacement at current pricing"

The maintenance challenge and the cost implication (service charges) put the decision to pursue development based on tall buildings in doubt for socio-economic reasons. The Beharrel study points out "It is rare for the lease to be prescriptive or to require specific information to be provided to leaseholders as to how the sinking fund is to be calculated".

The GLA planning committee averred in 2021: "The Committee would also like to see issues to do with maintenance and services charges considered under 'Future Proofing' as this is particularly pertinent to towers. Servicing tall buildings can be costly and this often results in high service charges to residents. While the standards set this out in general, this issue is particularly pertinent in the tower typology and therefore should be included in assessing the typology's performance"

"While there is much in the press around the rising costs of purchasing or renting a home, particularly in London, and the need to address affordability for first time buyers and the young, little is said about the rising management costs and the knock-on cost of service charges that impact equally on affordability. Yet, for example, service charges at the new Nine Elms Point, where densities are in excess of 350 dph are averaging between £2,250 per annum (studio) to £4,600 per annum (3B) in 20144 - a considerable monthly payment on top of a mortgage"

The implication is that high rise development is exclusive - only appropriate for the securely rich since there is often no "guarantee that leaseholders will not be expected to fund shortfalls where sinking funds are exhausted or insufficient to cover essential or unexpected works".

Mount Anvil are essentially building executive homes in the sky that will tower over adjacent council housing in a way recalling Peter Rees' warnings against towers in suburbs.

After the profits from property sales have been collected, Mount Anvil may try to sell their interest in the site. They should clarify their expectation about responsibility for long-term building maintenance.

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Beharrel et al demand: "Planning applicants for high-rise residential developments should be required to state the intended life of their project and to demonstrate that they have analysed the lifecycle costs and can show that the building will be sustainable over that timescale"

These issues relate to the longevity and condition of residential structures in a neighbourhood setting. They are quite as socio-economic as Camden's own issues to do with the upkeep and repair of its own housing stock.

#### OPEN SPACE

There is no overarching neighbourhood plan to justify the abrupt switch from a mid-rise scheme of 8-storeys at most for BLR2 to one consisting of three high buildings ranging between 26 and 15 storeys.

In Beharrel et al's words about North Acton "Development has been brought forward incrementally by land-owners and without the benefit of an overarching masterplan"

The quantum of open space shown in the Mount Anvil plans is about the same as the 2012 scheme provided although it has 200 more homes.

Beharrel et al state roof-gardens and balconies etc "are not a substitute for street-level public open space"

The additional strain on existing green open spaces resulting from a sharp increase in population, unmediated by a masterplan or any evidence gathering about the local situation - e.g. usage, local sociability - is a clear social issue.

#### ACCOMMODATION

The GLA's planning committee's 2021 response to the guidance "Good Quality Homes for All Londoners" deals with tall residential buildings

It includes this statement: "Tall buildings tend to contain a majority of mainly studios and one- beds, and a proportion of two-bedroom flats, therefore resulting in a lack of family sized housing and poor use of space, due to the duplication of kitchen, bathroom and circulation space. High density housing can be achieved by approaches that are more suitable for families, are more in keeping with London's traditional form, and are less intrusive on the skyline"

It remains unexplained why developers and local town planners persist in the view that home-buyers aren't interested in starting families in inner suburbs like Gospel Oak.

#### WORKSPACE

The neighbourhood has lost almost all of its small scale workspace. There is now much wider acceptance that neighbourhoods shouldn't be mere dormitories and should recover at least some of the productivity that they used to have. Michael Porter wrote about this topic in the 90s (Harvard Business Review May 1995) and stated: "Inner cities are located in what should be economically valuable areas. They sit near congested high-rent areas, major business centers, and transportation and communications nodes. As a result, inner cities can offer a competitive edge to companies that benefit from proximity to downtown business districts, logistical infrastructure, entertainment or tourist centers, and concentrations of companies.

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Phase 1 of the BLR development entailed the demolition of 14 workshops, 2500 sqm of office space and related parking or yard space.

A comparative advantage of areas like Gospel Oak which enjoy a high concentration of council housing and proximity to central London is hosting SMEs affordably, something that used to be quite obvious before real estate became so powerful in our local politics. The presence of SMEs strengthens the culture of neighbourhoods particularly deprived ones as Porter stresses.

The EIA for Mount Anvil is silent about workspace either lost or planned - another indication of the utterly slapdash nature of Quod's work. The subject of workspace is evidently socio-economic in character.

#### CONSTRUCTION WORKFORCE

Based on the Construction Management Plan presented for the 2012 scheme, there may be 300 to 400 people working on site at "the peak". The EIA makes glancing reference to providing for the workforce and suggests that it will benefit nearby businesses. This is a misrepresentation of what's much more likely - namely that the contractor will provide on-site welfare including food and drink. This should be stated clearly and its implications explored.

#### LOCAL SERVICES

Quod make the claim that the impacts of the residential intensification at BLR2 on local services will not be significant but doesn't adduce evidence or a clear argument

It is lazy not to make any effort to research the area's general residential intensification and provision of services - e.g. health, education, transport, social

Service provision and demand is an obvious socio-economic matter.

The Mount Anvil proposal falls into the GLA's superdense category of housing development

#### ENVIRONMENTAL VALUE

Gospel Oak has an international reputation as the site of three outstanding housing projects from Camden's "Golden Age" - the Benson & Forsyth schemes on Lambie St and Mansfield Rd and the Fleet Road Estate by Neave Brown. Complementary schemes e.g. Celia Scott's Bassett St housing and McManus's Ludham and Waxham buildings play a part too.

It is well-known that Brown and his colleagues pioneered high density low-rise housing models. Their efforts in resisting high rise models marked an important cultural moment internationally and locally.

Three recent schemes by Camden at Cherry Court (BLR1), Kiln Place and Maitland Park show that the low-or-mid rise tradition is not dead

Gospel Oak's economic value is associated with the exceptional quality of the three best housing projects in the area. Mount Anvil's proposals are a direct contradiction of what those schemes stand for which is humane Modernist housing. As such they devalue the area and undermine a key economic value.

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2024/5383/P	Alice Brown	21/12/2024 11:26:28	COMMNT	<ul style="list-style-type: none"><li>- The proposed scheme is far beyond possible compliance with planning policy. For example, the application proposes buildings up to 80m high when Camden's own guidance suggests that up to 40m high may be acceptable. It brings into question the Council's intentions for the development of the borough as a whole, what it believes to be effective ways of addressing the housing crisis and how it thinks development should be carried out when we are facing a climate and ecological crisis.</li><li>- The proposals for the Environmental Impact Assessment are inadequate. They betray the developer's lack of knowledge of the area and care in researching it. For example, when reviewing neighbouring developments which will have a cumulative effect on the neighbouring areas within a 1 km radius, it omits the estate regeneration schemes at West Kentish Town and Wendling, and the redevelopment of the Regis Road Industrial Area. Along with the Murphy's Yard development, which is mentioned, there are 3,078 new homes already planned for this area, providing homes for around 10,000 people. These unfortunately will be mostly expensive private homes for sale, many of which will be bought by investors to rent out at very high rents, a trend we see all over London. As the Bacton Low rise estate is public land, its development should prioritise the provision of affordable homes, but only 25% are classed as such.</li><li>- The applicant seeks to avoid scrutiny under the Environmental Impact Assessment Regulations, by 'scoping out' critical areas such as Climate Change and Greenhouse Gases, Air Quality, Socio-Economics and Biodiversity. Under Socio-Economics for example, the developer should be considering the additional social infrastructure required for an additional 1,000 people, but merely says that the impact will not be significant enough to require consideration. This is unacceptable.</li></ul>

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2024/5383/P	Robert Lewenstein	23/12/2024 23:38:34	OBJ	<p>The plan for Bacton Low Rise Phases 2 as proposed by Mount Anvil is an over development of a site that borders on to residential housing estates of Wendling and St Stevens Court, Gospel Oak 7&amp;8, Bacton tower, Cherry Court and in addition St Martin's church (grade 2 listed), Wellesley care home and existing green areas. The development will be detrimental to these immediate neighbors and to the wider area around Queens Crescent and indeed have an impact over the whole of Camden.</p> <p>The density of the proposal is far too high and represents a Hyper Density level of over 500 dwellings per hectare, unprecedented in north Camden and should be viewed as totally unsuitable for this area. The consultation conducted by Mount Anvil is also misrepresenting this proposal by talking of three towers of 23, 15 and 12 storeys but in this application of 26, 26 and 12 storeys a dramatic increase on an already bloated plan. Going by the the plans as put forward in the public consultation 447 dwellings on 0.9 hectare = 496.66 dph and considering this application has towers that are even higher, the density will exceed this. This represents a shocking increase on the original estate of 99 low rise dwellings and the original planned redevelopment of 247 dwellings, and now in this current plan to over 447 dwellings proposed on this site. Camden needs to protect its heritage of low rise developments that have been praised around the world and of recent low rise developments in this area that have addressed housing needs and which have also been sensitive to their location.</p> <p>This application ignores the Gospel Oak and Haverstock Community Vision and the original redevelopment proposal for this site which was developed in conjunction with the community and would have offered an increase to the number dwellings over the original estate to a total 247 dwelling.</p> <p>Issues with this planning proposal;</p> <p>The proportion of social housing in this scheme is insufficient and represents less than a quarter of the total dwellings and should be 50% of social housing on public owned land in Camden.</p> <p>Listed views will be affected from Hampstead Heath by the proposed towers and the sky line dominated in this part of Camden.</p> <p>Natural light will be blocked by the development to the adjacent buildings and within the site itself. Wind turbulence caused by the height of the building will also be problem</p> <p>The allocated outdoor spaces within this development are insufficient considering the increase of density and will be affected by lack of light and wind turbulence.</p> <p>Stress and strain will be put on services and infrastructure in an already deprived area and the Mount Anvil plans seem to ignore this.</p> <p>The impact of building this will be enormous and far greater than the original plans for the redevelopment of this site and this disruption will continue for longer because of the extreme scale of buildings proposed. The environmental issues during the building phase of dust, noise, pollution and road closures, will endanger everyone's health and wellbeing around this constricted site.</p> <p>This application should be seen in terms of other planned developments such as Wendling and West Kentish</p>

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Town and the total impact of all of these put together, the increase in population, environmental impacts, and the total strain on services and infrastructure. This development cannot and should not be seen in isolation.

I am deeply concerned by the number of proposed issues to be excluded by the developer and shows a weakness in their plans and does not show due care or understanding of the impacts of this development by them.

While I totally understand private developers are entitled to make a profit, this should not be to the detriment of those living around the site. It needs to be recognised that by over building on any site a developer can increase their profit margins, but if this over development goes against all previous Camden plans, visions and norms for this area it is essential to hold any proposal up to the highest scrutiny and look at all the impacts and consequences of this increase in dwelling density and especially when these are unprecedented in this part of north Camden.

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