Regeneration and Planning London Borough of Camden Town Hall Judd Street London WC1H 9JE David.Fowler@camden.gov.uk

Javier Encinas 120 D Croftdown Road NW5 1HB

Date: 1st December 2016

Dear Mr Fowler,

Planning Application - 2016/6088/P Highgate Newtown Community Centre Unit A, B, C, D & E - 25 Bertram Street London N19 5DQ Planning Objection

In response to the Planning Application referred to above, my comments and objections are as shown below:

I am writing to express my deep concerns and object to Camden's current proposal for the demolition and reconstruction of the Highgate Newton Community Centre (HNCC) and Fresh Youth Academy (FYA), which includes the construction of 31 private flats to fund it. The proposed scheme is critically flawed in design terms and the concept of the scheme has driven a building form which is out of scale for its context, for a backland site in a Conservation Area, expensive and complex to build, results in substandard residential homes and has a harmful impact on the character and quality of the Conservation Area.

The detailed concerns I am listing here below have been raised by a lot of people on numerous occasions (including at 2 consultations and various Project Champions meetings) with Camden and its architects RCKa, but unfortunately these have not been addressed by the current proposals.

I, as the vast majority of neighbours and users of the HNCC, request that Camden withdraws its current proposal and works with the Community on a smaller, better designed housing, HNCC & FYA development that 1) provides high quality services to the community, 2) preserves and enhances the character of the conservation area and 3) respects the privacy, views and light of surrounding streets, homes and gardens.

My main concerns are as follows:

- X There are no robust and comprehensive studies justifying why existing facilities are not fitfor-purpose and the proposed new buildings are required.
- There is no robust business plan to support the proposed increased community facilities and the construction of 31 private dwellings to pay for these, and no demonstrated business plan and accompanying financial model that demonstrates the long term viability of the proposed scheme.
- X HNCC doesn't pay rent at the moment and already raises over £150,000 per year for the benefit of the community. They can only meet the new £100,000 rent requested by Camden by renting out space, which could compromise the purpose of having a Community Centre. This, the profit expected and the complicated design has led to a much bigger building development than is needed (cf below).
- The proposed development is over-scaled and too large for the site, replacing two and three storey buildings with four and five storey buildings (plus basement). The development will appear out-of place and alien to the character of the area. The scale of the development means it will have a harmful impact on adjacent homes.
- X The proposed layout of the flats and positioning of recessed balconies and roof terraces will result in severe overlooking and removal of privacy to surrounding streets, homes and gardens. The overlooking will be extreme particularly to the shared gardens, Mansion Blocks and houses on Croftdown Road. Despite assurances that the majority of the living spaces and balconies had been 'flipped' on plan in these western-most buildings to face the courtyard, the scheme shows 13 balconies and terraces directly overlooking the adjacent gardens of the Mansion Blocks of Croftdown Road with 4 amenity spaces on lower ground level.
- X In addition to negatively impacting the privacy of the existing gardens of adjacent neighbours, the proposed design significantly compromises the use of the new shared space as 'quiet' bedroom spaces (often with closed curtains) overlook the courtyard, rather than active 'living rooms', so there will be little passive surveillance which would ensure the space is safe. Conflicts are likely to arise between residents either wanting to sleep themselves or with children sleeping in bedrooms and the needs of HNCC / FYA, who will want to hold community events in the public space. This seems an obvious and avoidable design flaw in the proposals.
- X The separation distances between windows serving habitable rooms is too narrow, so the closeness of the development to surrounding gardens and homes will also cause harmful noise intrusion. The buildings are built up to the boundary on three sides and within 1m of the public path on the west side. If the scheme was approved it would set a dangerous precedent for developers to exploit on other sites in Camden.
- X The development will significantly reduce sunlight and daylight to rear gardens and a number of adjacent homes to an unacceptable level.
- X The development, due to its excessive height and bulk will have a harmful impact on the character and quality of the Conservation Area; the scale of the development is inappropriately large for this back-land site.

- X The new community hall is at basement level and is not connected to the outdoor public space. The Fresh Youth Academy spaces are below ground and have poor access to the public space.
- X The new through-route connecting Bertram Street and Croftdown Road will be used by moppets / scooters / motorcycles causing noise and anti-social behaviour to the local residents, as well as further compromising the use of the courtyard. The through route could also undermine existing right of way and make this less used/more prone to anti-social behaviour.
- The whimsical architectural style feels inappropriate and out of place given its setting within the Conservation Area.
- More generally, the demolition of the existing HNCC and FYA buildings will expose local school children and residents to hazardous substances such as asbestos, chemicals, lead, respirable crystalline silica (RCS), etc, causing a serious health threat.
- ★ The proposed works will last for at least 2 years, causing noise, dust and traffic to an area of Dartmouth Park surrounded by 3 schools and 2 nurseries: Brookfield, La Sainte Union, William Ellis, Konstam nursery and York Rise nursery.
- During the construction period, the services currently provided at the HNCC and FYA will have to find a new home and it is not sure that they will survive the 2 year move and come back once the new Centre is finished.
- Inadequate thought has been given to the long-term- impact that 31 new flats will have on permanent increased traffic, pollution and demand on health services, schools, and parking in Dartmouth Park.
- We are deeply concerned about the security and health issues that a permanent substation, to be placed to the side of 118 Croftdown Road, where there is currently a garden, could impose on local residents. We were advised that the structure will be roughly 12 ft high and will be within 1 ft of 118's external wall and we would like to know the impact of electromagnetic radiation, risk of fire and the levels of noise omitted from the planned substation as research shows there are links between substations and serious health effects.
- ★ Camden have previously had difficulties in successfully delivering complex projects such as this – e.g. Chester Balmore development – and we are not confident about their capacity to deliver this project on time and budget, and with the quality standards that they are proposing.

All of the above points have been raised before by the Friends of HNCC (formerly HNCC Project Champions), the HNCC & FYA users and the Residents of Bertram Street, Bramshill Gardens, Croftdown Road, Chester Road and Winscombe Street. We want to emphasise that we are particularly worried about a) the height, massing and density of the proposed development, b) the positioning of the recessed balconies and roof terraces of the housing developments that will severely overlook and negatively affect the privacy, sunlight and daylight of the homes and gardens on Croftdown Road, c) the lack of rigorous studies on the short term impact on school children and residents during the demolition and construction phase, and d) the long-term impact on the community during the operation of the proposed housing development and HNCC & FYA facilities.

We therefore request that Camden withdraws the current planning application and works with the community to: :

- reduce the size, height and density of the proposed housing, HNCC and FYA development;
- share with us the revised Business Plan and Financial Model that support the proposed increased community facilities and the construction of private new flats to pay for this;
- redesign the flats layout and positioning of recessed balconies/ loggias, terraces and all other amenity spaces to avoid any overlooking of surrounding homes and gardens. It is currently being proposed that most "loggias" or "recessed balconies" of the residential buildings will overlook the homes and communal gardens of surrounding streets. As mentioned above, the overlooking will be extreme particularly to the Mansion Blocks and houses on Croftdown Road. Although external private amenity space needs to be provided for each new home through standards in the London Plan and LHDG, it would make much more sense for the recessed balconies to be located with the living rooms along the east facing facade of the proposed western residential building. In this way, active spaces overlook the central public courtyard and route and quieter, more private functions (such as bedrooms) can be located to the back (along the west facing facade). This would avoid the substantial concern of overlooking of gardens and property on Croftdown Road and would, at the same time, ensure the new courtyard and route is more active, overlooked and safe.
- share with us studies on impact on local school children and residents during demolition (in
  particular exposure to hazardous substances) and construction of the proposed development
  and measures taken by Camden to minimise this impact.
- share with us the studies on long-term impact that new flats and increased community
  facilities could have on permanent increased traffic, pollution and demand on health services,
  schools, and parking in Dartmouth Park.

We are convinced that a rigorous revision of the business plan and financial assumptions combined with a better design will make it possible to have a much smaller housing, HNCC and FYA development that preserves and enhances the character of the local area. This involves:

- A smaller better designed "like-for-like floor space" HNCC and FYA development that provides high quality services to the community;
- ✓ A lower rise no taller than the existing HNCC building and lower density far fewer flats housing development respectful of the privacy of surrounding areas, so no loggias, balconies or roof terraces overlooking surrounding streets, homes and gardens.

## A smaller development also means:

- Faster delivery, which will allow the new HNCC & FYA to re-provide their services to the local community earlier:
- Cheaper construction, operation & maintenance, which will make the whole development more affordable and less dependent on the sale of many flats;
- Less disruption, noise and traffic for the local community, schools and services; and
- More respect of the privacy, views and light of the neighbouring residents.
- ▼ Better Preservation of the Dartmouth Park conservation area character.

In sum, we want a smaller, better designed housing, HNCC & FYA development that 1) provides high quality services to the community, 2) preserves and enhances the character of the conservation area and 3) respects the privacy, views and light of surrounding streets, homes and gardens.

Many thanks in advance for ensuring that our voices are heard and that the plans for the site meet the needs of the neighbourhood.

Best regards,

Javier Encinas 120 Croftdown Road, NW5 1HB