

Elizabeth Smith
26 Winscombe Street
London
N19 5DG

David Fowler
Principal Planning Officer
London Borough of Camden: Planning Service

22 December 2016
By e-mail and hard copy to follow by mail

Dear Mr Fowler

Planning Application – 2016/6088/P
Highgate Newtown Community Centre (HNCC), Bertram Street, London,
N19 5DQ

Planning Objection by Elizabeth Smith 26 Winscombe Street N19 5DG

I am writing this **objection letter** as a local resident who lives immediately to the east of the HNCC site, as a Project Champion and as a supporter and user of the Highgate Newtown Community Centre. I have attended almost all Project Champion meetings in 2016, I have elicited and fed in views from Winscombe Street residents and have contributed positively to discussion with LBC's appointed architects.

I fully support the retention of HNCC and FYA activities on the Bertram Street site. HNCC/FYA is a valuable and valued community asset meeting social and community needs – it is the vibrant heart of the local area. I recognize that given resource cuts that LBC wishes to guarantee a sustainable future for a community facility on the site. I also support the ambition for sustainability and accept that this may include the need for residential development of the site.

But before approving a scheme to demolish and re-build, LBC 'must provide a full explanation of why existing facilities are not fit-for-purpose and the proposed new buildings are required' (LBC's Pre-App Response 28/04/16LBC). We have not yet seen the full detail of this explanation.

Having examined the design submitted by LBC for the redevelopment of the site **I reluctantly conclude that I cannot support the scheme in its current form.** The flaws in the design and the risk to the successful development of the site are so significant that the application as it stands should **be withdrawn and resubmitted once changes to address all these issues are made.**

There are aspects of the design that are good: these include the new public route through the site linking it to Croftdown Road and the ideas behind having central public space. Unfortunately these positive aspects are heavily outweighed by a significant number of design flaws.

It is particularly troubling is that many of these flaws are in direct contravention of national and London-wide planning policy and Camden's own local planning policy. For full details please refer to the Objection Letter sent to you on behalf of Pentad Housing Society dated 28th November.

If approved the scale of development and the infringement of planning policies will create a precedent and potential loophole for other developers. There is a significant risk that developers will take advantage of any precedent in future developments, putting in jeopardy Camden's character and attractiveness as a place to work and live.

Objections:

Overall the scheme is **over-developed and will not achieve its ambition:**

1. The scheme is unnecessarily large as a result of over development of the site. It is high, bulky and out of character with its Conservation Area backland setting.
2. The scheme is unnecessarily inefficient in terms of layouts and elevations. This results in a more costly scheme which in turn drives the **over development** of the site.
3. The ambition for the site to deliver an attractive public route connecting Bertram St and Croftdown Road is **thwarted by the design of the central space between the proposed buildings** (see paras 15 – 18 below).

The Community Centre is **inefficiently designed:**

4. While the **lettable floor area** of the Community Centre is larger than the existing, calculations also show that the area of circulation and internal walls **has increased by 48%**. The business model underpinning this design is not evident. However the increase in size results in a) a bigger community centre that needs more flats built to pay for it and b) higher running costs. This puts **additional pressure on the financial sustainability** of the community facilities.
5. **Noise** generated by the community hall, vented by 'wind-catchers' with no acoustic attenuation **will be beyond acceptable levels**. Significantly the Acoustic Report itself does not quantify the potential impact of amplified music.

The proposed blocks suffer from **overdevelopment** and:

6. **Are too bulky** - the layout of Building A (the west two blocks) could be lower if there was only one block. **This was raised in LBC own Pre-App report but not addressed in the final scheme.**
7. **Are far too close** - new flats in Block A and Block B are far too close to each other, 8m instead of 18m as required. Similarly the distance between the existing Mansion block in Croftdown Road and Block A is 8m.
8. **Will overshadow neighbouring gardens** to an unacceptable degree, flouting national standards in respect of daylight and sunlight.
9. **Do not consider the impact of the basements** planned for all buildings. **A Basement Impact Study was requested in LBCs own Pre-App response but is not provided.**

The proposed flats:

10. **Are too dark** - seven of the proposed kitchen/ living rooms fail to achieve the Average Daylight Factor standard.
11. **Are too small** - two ground floor flats have kitchen/ living rooms smaller than the London Housing Design standard (29sqm instead of 31sqm) and have no external space; neither do they have the two living spaces which are required.
12. **Are too stuffy** - a number of the flats are single aspect. Natural ventilation will be compromised potentially resulting in overheating and poor air quality. **This was raised in LBC own Pre-App report but not addressed in the final scheme.**
13. **Have no space for children's play** - as required by PBC's own planning policy, taking into consideration the child yield of the scheme.
14. **Have too little amenity space** - the quality and provision of amenity space is sub-standard. Some only have amenity space off bedrooms and without sunlight. **This was raised in LBC own Pre-App report but not addressed in the final scheme.**

Central Courtyard

15. **The courtyard as a shared-use space for HNCC/FYA users and residents is seriously compromised** as people and vehicles will inevitably come into conflict (regardless of plans to manage access to the courtyard by bollards controlled by access codes). It will not be possible in practice to fulfill the vision for this space as a shared amenity. The Servicing Management Plan's assertion that the proposed development

will result in a negligible increase in the number of servicing trips is not credible. This is because there will be 27 additional households on the site PLUS the drop offs / pick ups from the HNCC/ FYA with no longer any provision for vehicles to turn around (a car is likely to be parked in the one disabled parking bay on site).

16. This situation will very likely to lead to **increased congestion up and down Bertram Street, gridlock into Chester Road** and conflict with the C11 bus and other traffic.
17. The Courtyard **has too many bedrooms facing on to it**. To be a success this courtyard space needs as many living rooms as possible looking out over it.
18. The quality of light in the courtyard is **substandard** due to the bulk and height of the proposed scheme.

The Gospel Mission Hall

19. The proposed roof lights on to Winscombe Street **are contradictory to the Conversation Area guidelines**.

Please consider all these points in your report to the Planning Committee.

Yours sincerely

