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Dear Mr Peres da Costa,

1 TRITON SQUARE AND ST ANNE'S CHURCH (ref. 2016/6069/p) – RESPONSE TO CONSULTATION LETTERS

We write to you on behalf of our client, British Land Property Management Limited, in relation to the outstanding planning application for 1 Triton Square and St Anne's Church (ref. 2016/6069/P). This letter responds to points raised by two letters recently submitted to the London Borough of Camden, one from Abune Muse (Archbishop of the Ethiopian Orthodox Tewahedo Church dated 30/3/2017) and one from Russell-Cooke Solicitors (dated 13th April 2017) acting on behalf of the Debre Genet Holy Trinity Ethiopian Orthodox Church (DGHTEOC). This response will deal with each letter in turn.

Abune Muse Letter

This letter deals with some history around the DGHTEOC as a religious organisation alongside some commentary on St Anne's Church the building. There appears to be repeated confusion between the two with discussion of "the Church" meaning both the building and the organisation interchangeably. As such, in parts it is not clear exactly what is being referred to.

In addition, there are some statements that appear to be misleading. For instance, the third paragraph states that Abune Muse consecrated the Church 'over ten years ago'. If this is in relation to St Anne's Church this is incorrect as the occupants have only been in residence for four years. The paragraph goes on to state that the Church gives services to 'tens of thousands of people'. The capacity of St Anne's Church is approximately 350 seated so clearly this cannot be in relation to the church building. The third paragraph of the second page refers to the strong support from the Regent Street neighbourhood which also appears to be a mistake. The same paragraph also notes that many of the congregation live in Camden. However, the most recent petition issued to Camden by the DGHTEOC contains only 4.5% of respondents with addresses in Camden. The fifth paragraph of the second page also suggests British Land can construct houses virtually anywhere. We would respond that significant work has been undertaken to explore where else residential uses could be provided with the conclusion being that the St Anne's Church building is the only suitable location (further detail is provided in the Housing Study submitted with the planning application).

Lastly with regards to the Abune Muse letter, there appears to be an assumption that the DGHTEOC occupies St Anne's Church with little or no impact on the amenity of local residents. We do not believe this to be true. British Land have been working closely with the local community for over 30 years and enjoy good relationships with local residents and community groups. They have received a number of complaints since DGHTEOC moved in four years ago from local groups and residents, made both anecdotally to British Land and formally submitted to



LB Camden, that strongly object to the impacts on their amenity from DGHTEOC's operation of the church.

Russell-Cooke Letter

The letter from Russell-Cooke Solicitors (Russell-Cooke letter) focuses predominantly on questions over the schemes accordance with Camden Policy DP15 in relation to Community uses. Our client has taken the position that the planning application departs from this policy and a reconsultation exercise was undertaken by Camden Council on this basis. It is our opinion that the benefits of the scheme, including 22 affordable housing units, the community and affordable workspace, the significant increase in jobs and the public realm improvements including a new public garden, outweigh the departure from Policy DP15.

The appeal cases referred to focus on whether there has been compliance with various local policies which require the retention of community facilities unless certain tests are met. The Inspectors in the three cases concluded that the proposals did not comply with policy, and given that private residential development was proposed in all cases, they did not identify any material considerations which outweighed the non-compliance. Clearly, the benefits of the British Land proposals to the community are much more significant and we would expect them to be given greater weight accordingly.

As with the Abune Muse letter, this letter also blurs the line between the DGHTEOC as a religious organisation as opposed to the St Anne's Church building.

The Russell-Cooke letter also includes further detailed information over the use of St Anne's Church. This is the first time we have been presented with this information which is surprising given the efforts we have gone to in order to secure the DGHTEOC new premises over the course of the last 6 months. It is also curious to note that the suggested use of the St Anne's Church building as detailed by Russell-Cooke seems to deviate significantly from that set out by the DGHTEOC in correspondence with St Mary Magdalene Church (the related correspondence was issued to Camden Council on 21st February 2016 by the DGHTEOC as an appendices to "Response to British Land misleading claims" - page 175 onwards). We would also note that British Land's experience of the use of St Anne's Church, observed as a neighbour, does not reflect that suggested in the Russell-Cooke letter and in any event the building is not suitable for gatherings of 1,000-plus people, particularly in light of residents' concerns about impacts on amenity.

Conclusion

In conclusion, we remain committed to helping the DGHTEOC in finding a new home for their congregation and thus securing their future beyond the expiry of the current lease in September of this year. We continue to share potential new premises with the DGHTEOC as they are identified and we continue to provide additional professional support such as property agency and building surveying to help in the search. We are disappointed that the DGHTEOC are focussing their attention on this planning process rather than locating a new building but we remain hopeful that we will be able to identify an alternative location to everyone's benefit.

Should you need any further information on the contents of this letter, please contact Tom Horne or Dan Fyall of this office.

Yours sincerely,

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