

**Ground A**

- 1) This appeal has substantial planning merit. It will provide a memorial for Dr Bhimrao Ramji Ambedkar. As will be set out on the appeal, Dr Ambedkar played a significant role in creating Modern India as we know it, not least because he was the principal architect of the Constitution of India and a founding father of the Republic. India's highest civilian award (The Bharat Ratna) was posthumously conferred upon him in 1990. Dr Ambedkar is followed and revered by over 260 million Dalits globally and is an inspiration to many more. Dr Ambedkar's time in London is well documented. He is commemorated by statuary at the London School of Economics, where he studied, at the High Commission of India, and by paintings of him in Gray's Inn. The appellant will demonstrate that there is overwhelming international political support for this memorial house.
- 2) This appeal will evidence that the memorial house has already received visits from many international visitors, including the Prime Minister of India, Mr Narendra Modi who visited on 14<sup>th</sup> November 2015, as well as from many from within the UK, including politicians and humanitarians. The appeal will demonstrate the importance of the memorial on a local, national and international scale.
- 3) Dr Ambedkar lived there while he studied at The London School of Economics. This represents a unique opportunity to protect and share his legacy by dedicating his house to the public as a memorial and educational resource for visitors. The Government of Maharashtra, India, has already spent approximately £1 million restoring and refurbishing the property which had previously been in a dilapidated condition. It will be the only such memorial of its kind outside of India. Fittings from the time have been obtained, the bedroom used by Dr Ambedkar identified and the memorial will also house books by, and related to Dr Ambedkar in one place. Films and documentaries related to Dr Ambedkar will also be available.
- 4) There are many examples of similar memorials to important individuals both in Camden and London as a whole. They almost exclusively relate to former dwellings, where the person in question spent large parts of their time. Examples of other "house" memorials in LB Camden include The Goldfinger Museum at 2 Willow Road, Hampstead, London NW3 1TH (former home of Erno Goldfinger) and The Freud Museum at 20 Maresfield Gardens London NW3 5SX (that of Sigmund Freud). LB Camden appear to support such developments in recognition of their cultural benefits.
- 5) The appeal will document that in relation to The Freud Museum at 20 Maresfield Gardens, LB Camden very recently allowed planning permission (LPA ref: 2018/2897/P) for the change of use a second floor flat (Class C3) to ancillary museum space (Class D1), having earlier granted permission for the loss of other residential floorspace there for museum purposes (LPA references 30842 & 8400022). In doing so, the LPA accepted that the cultural and tourism benefits of the museum would outweigh the loss of a residential unit. Indeed, the officer's delegated report concluded that the loss of one residential unit would still comply with policy H3 of the Local Plan. In this instance, the cultural and tourism benefits will be significantly greater, as the loss of housing is facilitating the creation of a new museum rather than merely contributing to an existing one.

- 6) There is clearly development plan policy support for such uses. LB Camden's Local Plan strongly welcomes community and cultural facilities through adopted policies C2 and C3. Those policies identify the enormous contribution such uses play to LB Camden's attractiveness as a place to live, work or study. The Council (in the conclusion of its report under ref 2018/0942/P) accepts that the provision of a memorial museum in this location accords with policy C3
- 7) In addition, Policy E3 of the Local Plan promotes tourism development and recognises the contribution that tourism makes to the character of Camden and the way that it is perceived by those living outside the borough. This memorial will attract visitors from all over the world.
- 8) The appeal site is located in a highly sustainable and accessible place, close to an underground station giving links to central London, and also directly to King's Cross, St Pancras, and Euston mainline stations. No objection has been raised on transport or amenity grounds, and the Council has acknowledged that the house has a good level of accessibility by public transport. It is also accepted by The Council that the memorial can operate satisfactorily without any undue harm on the amenity of adjoining occupiers (one of which is a commercial nursery).
- 9) With respect to the boundary treatment, including the installation of a disabled platform lift to access the upper ground floor, and addition of a small domestic style conservatory in line with the adjoining property, these elements are not given as reasons for issuing the notice or for refusing planning permission and do not form part of the enforcement notice (LPA ref: 2018/0942/P).
- 10) Nor has the Council suggested an adverse impact on the area or those in it as a reason for refusing permission or taking action. The Council's opposition is solely based on that part of its policy relating to loss of residential accommodation, but this cannot be considered in isolation. Creating a museum elsewhere would also self-evidently not be the same as the use of the house Dr Ambedkar lived in as a memorial museum for people to visit. It is submitted to be plainly appropriate having regard to the above matters that planning permission should be granted.