

Charles Thuaire
Development Management
Camden Council
5 Pancras Square London
N1C 4AG

London
Holmes House
4 Pear Place
London SE1 8BT

nexusplanning.co.uk

Via email: Charles.Thuaire@camden.gov.uk

02 December 2019

Dear Mr Thuaire,

Representations on behalf of the City of London Corporation in relation to Application No. 2019/5226/P as it relates to The Water House, Millfield Lane, London N6 6HQ

Nexus Planning is acting on behalf of the City of London Corporation (the "City Corporation") and makes the following representations in relation to the above application, which seeks planning permission for alterations to the vehicular and pedestrian entrance gates on Millfield Lane.

Whilst the City Corporation understands the need to make the property fully accessible the applicant's proposal present safety implications for Millfield Lane and therefore to visitors to Hampstead Heath, as a result of the relocated vehicle gates. Furthermore, the City Corporation would like to secure appropriate conditioning to ensure the proposed works are sympathetic to the surrounding area, and will not impact on the character of Millfield Lane and the Heath.

City of London Corporation

Hampstead Heath is a 275 hectare Open Space. The City Corporation became the custodian of Hampstead Heath in 1989, following the abolition of the Greater London Council in 1986. The Heath is a registered charity and comprises of a mosaic of habitats including woodland, grassland, scrub and open water. Close to the centre of London, it is one of the most important areas for nature conservation and recreation in the capital.

Application Site Context

The Water House site consists of a detached dwelling and outbuilding in very close proximity to Hampstead Heath (Figure 1 below). The site has pedestrian access from Fitzroy Park, but the main frontage and vehicle access is via Millfield Lane. Millfield Lane adjoins the eastern boundary of Hampstead Heath and is partly owned

London

Birmingham

Manchester

Reading

by the City Corporation. The site is situated within the Highgate Conservation Area and is also designated within an area of Private Open Space.



Figure 1: Site Location - The Water House

Proposal

The current application seeks planning permission for alterations to the existing vehicular and pedestrian gates on Millfield Lane. From our review of the application materials submitted, it is understood that the applicant proposes to relocate the existing fence and gates on Millfield Lane approximately 1m towards the existing carriageway. Furthermore, it is understood that the applicant proposes to install two new pedestrian gates and a bi-fold vehicle gate, as well as installing a new electronic interface at the entrance, and increasing the hard-standing area within the property.

Key Issues

The City Corporation would like to raise two key issues with respect to this application proposal, being the safety of Millfield Lane for all users, as well as preserving the distinct character of the surrounding area. These issues are discussed in turn below.

Safety of Millfield Lane

Chapter 6 of the London Plan emphasises the importance of ensuring the safety of the transport network. This overarching objective is supported by Policy 6.2 which stipulates that at a strategic level, the London Plan seeks to ensure the Transport Network is as safe and secure as reasonably possible. Policy 6.3 provides further support, prescribing that "Development should not adversely affect safety on the transport network."

Policy T1 of the Camden Local Plan (2017) sets out the LPA's intention to promote walking, cycling and public transport usage. Through Policy T1, the Council emphasises the importance of ensuring the transport network remains safe for pedestrians and cyclists.

Millfield Lane provides a key access route to Hampstead Heath and specifically the Kenwood Ladies' Bathing Pond. However, given that Millfield Lane has no demarcated footway, it is understood pedestrians typically walk along the northern side of the road to allow vehicles to pass when encountered.

The proposed alteration to the gates at The Water House will relocate the existing fence and gates on Millfield Lane approximately 1m towards the existing carriageway. As a result, there will be a reduction in the pedestrian inter-visibility splay on the western side. Specifically, in line with technical gate review prepared by WSP on behalf of the Kenwood Ladies' Pond Association, the pedestrian inter-visibility splay reduction will be from 2.4m x 1.2m to 1.15m x 0.6m.

In their Technical Review, WSP notes that typical, recommended and best practice, inter-visibility splay for a vehicular entrance crossing a footway or other pedestrian route would be 2 x 2m, and therefore, in this instance the existing inter-visibility splay would already be considered substandard.

The proposals therefore further reduce the inter-visibility and provide a much more limited distance for pedestrians approaching to be able to see a vehicle exiting the property. Additionally, there is a limited distance for a vehicle exiting the property to see and therefore avoid a conflict with a passing pedestrian. As such, the proposals in their current state present an increased risk to pedestrians walking along Millfield Lane.

On this basis, it is felt that the proposals conflict with Chapter 6 of the London Plan (2016), and specifically Policies 6.2 and 6.3. Furthermore, the proposal is contradictory to Policy T1 of the Camden Local Plan (2017) as it would adversely affect pedestrian safety, and actively discourage pedestrian use.

Accordingly, the City Corporation respectfully requests that the applicant's current proposals are revisited to address and provide an equivalent, or where possible, improved inter-visibility to the existing configuration in accordance with best practice. This is particularly important as the owners of the Water House only have a right of vehicular access along Millfield Lane up to their boundary.

Character and Appearance

Policy 7.4 of the London Plan (2016) sets out that development should provide a high quality design response, which contributes to a positive relationship between the urban structure and natural landscape features. Furthermore, Policy 7.4 emphasises that development should make a *"positive contribution to the character of a local place"*.

This policy position is supported by Policy D1 of the Camden Local Plan (2017), which sets out that the Council will require development to *"respect the local context and character"* and comprise *"details and materials that are of high quality and complement the local character"*.

The area surrounding Hampstead Heath, including the Highgate Conservation Area, has a distinctive character, which the City Corporation considers ought to be preserved and enhanced.

The proposal plans submitted indicate that the proposed gates will be constructed of reclaimed oak. It is considered that reclaimed oak is likely to be sympathetic to the character of Millfield Lane and could be acceptable in the context of the surrounding area. To ensure the use of high quality, complementary materials

in the construction of the gates, it is respectfully requested that the use of this material, or a similar, comparable material, be secured by an appropriately worded condition, should the Council be minded to grant permission.

The inclusion of such a condition would ensure the application proposal remains consistent with Policy 7.4 of the London Plan (2016) and Policy D1 of the Camden Local Plan (2017).

Conclusions

The City Corporation is seeking to ensure that any development that occurs has minimal impacts on the adjoining Hampstead Heath, and takes account of the safety of visitors cycling or walking along Millfield Lane.

Concern is raised regarding the safety implications of the proposal, and specifically, the impacts on visibility to Millfield Lane caused by the relocation of the entrance gates to the Water House. It is respectfully requested that the Council consider these concerns carefully in the assessment of this application.

The City Corporation strongly requests that should the Council be minded to grant permission for the development, a condition is attached to the decision notice ensuring that the materials used on the proposed gates match the existing, so as to preserve the existing character of Millfield Lane.

We trust that the matters set out within the representations are clear. However, please do not hesitate to contact Heidi Duncan of Nexus Planning on 0207 261 4240 or via email should you wish to discuss any aspect of this letter further.

Yours sincerely,

Heidi Duncan

Principal Planner
Nexus Planning