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**Application Number** 2020/3461/P

**Application Type** Full Planning Permission

Addresse Chester Road Hostel , 2 Chester Road, London, N19 5BP

Whilst some would focus on resisting demolition and some disagree with that so far as I am aware no one has taken exception to what follows.

The reality of this application is that it is mainly concerned with what the Architects refer to as the Council 'maximising its assets' ie building high and to the site boundaries. The over-development in what is proposed simply cannot be reconciled with the Council's duty to preserve and enhance the heritage asset represented by the Conservation Area in general and the generally three story Victorian buildings listed as 'positive' opposite and to the West in Chester Road and the two story above ground civic award winning houses along Dartmouth Park Hill in particular.

The only possible legal basis on which it could be allowed is on the basis of a substantial public benefit sufficient to override the Council's duty to preserve and enhance the heritage assets involved. It is for the applicant to establish that an overriding public benefit exists and no such case has been attempted by the applicant. This requires the applicant to go a lot further than establishing the proposed use is desirable, which we think the community, for the most part, accepts it is.

The photographs, indicative mock ups, elevations, etc provided studiously avoid showing what is proposed in context. This is so notwithstanding that the CLP is replete with pertinent references to central importance of context:

The Council will seek to secure high quality design in development. The Council will require that development:

- a. respects local context and character;
- b. preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;....
- e. comprises details and materials that are of high quality and complement the local character;
- f. integrates well with the surrounding streets ...and contributes positively to the street frontage;...
- i. responds to natural features and preserves gardens and other open space;
- j. incorporates high quality landscape ...and maximises opportunities for greening for example through planting of trees and other soft landscaping,...
- I. preserves strategic and local views;

The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

All of Camden is considered sensitive to the development of tall buildings. Tall buildings in Camden will be assessed against the design criteria set out above and we will also give particular attention to:

- p. how the building relates to its surroundings, both in terms of how the base of the building fits in with the streetscape and how the top of a tall building affects the skyline;
- q. the historic context of the building's surroundings;
- r. the relationship between the building and hills and views;

Local context and character

The Council will require all developments, ... to be of the highest standard of design and will expect developments to consider:

- character, setting, context and the form and scale of neighbouring buildings;
- the character and proportions of the existing building, ...
- the prevailing pattern, density and scale of surrounding development;
- the impact on existing rhythms, symmetries and uniformities in the townscape;
- the composition of elevations;...
- · its contribution to public realm and its impact on views and vistas; and

Good design takes account of its surroundings and preserves what is distinctive and valued about the local area. Careful consideration of the characteristics of a site, features of local distinctiveness and the wider context is needed in order to achieve high quality development which integrates into its surroundings. Character is about people and communities as well as the physical components

... Planning applications should include a Design and Access Statement which assesses how the development has been informed by and responds to local context and character.

Design should respond creatively to its site and its context including the pattern of built form and urban grain, open spaces, gardens and streets in the surrounding area. Where townscape is particularly uniform attention should be paid to responding closely to the prevailing scale, form and proportions and materials.

Responding to natural features and preserving gardens and open space

New developments should respond to the natural assets of a site and its surroundings, such as slopes and height differences, trees and other vegetation. ...

The Council will resist development which fails to preserve or is likely to damage trees on a site which make a significant contribution to the character and amenity of an area. Where appropriate the Council will seek to ensure that developments make adequate provision for the planting and growth to maturity of large trees....

The Council will also seek to protect locally important views that contribute to the interest and character of the borough. These include: ...

views into and from conservation areas; and

Tall buildings

For this policy tall buildings are considered to be those which are substantially

taller than their neighbours or which significantly change the skyline. While tall buildings offer the opportunity for intensive use, their siting and design should be carefully considered in order not to detract from the nature of surrounding places and the quality of life for living and working around them. ....

We have prepared conservation area statements, appraisals and management strategies that provide further guidance on the character of these areas. We will take these documents into account as material considerations when we assess applications for planning permission in these areas.

The Council places great importance on preserving the historic environment.

Under the Planning (Listed Buildings and Conservation Areas) Act the Council ... must pay special attention to preserving or enhancing the character or appearance of conservation areas. The National Planning Policy Framework states that in decision making local authorities should give great weight to conservation of designated heritage assets in a manner appropriate to their significance. The Council expects that development not only conserves, but also takes opportunities to enhance, or better reveal the significance of heritage assets and their settings.

The Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, ...

Designed heritage assets include conservation areas .... The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas ... unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss...

The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.

Conservation areas are designated heritage assets ... In order to maintain the character of Camden's conservation areas, the Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas.

## The Council will:

- a. require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;.......
- d. preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which provide a setting for Camden's architectural heritage.

The existing Bill Forrester designed building is, by contrast, very respectful character of the neighbouring buildings (he was also one of the architects responsible for designing the houses/flats alongside on Dartmouth Park Hill). The part of the building across the corner of Dartmouth Park Hill and Chester Road itself is a narrow (because it is set well back from Chester Road) low two story structure which extends only a short distance along Dartmouth Park Hill before being stepped into the site to a substantial gap before aligning to the building and roof lines of the Dartmouth Park Hill houses/flats. This is currently a stark white but could equally be a, for example, living plant wall. There are also white perimeter walls which aren't part of the building and are unfortunate. The building takes advantage of the slope to increase the building to three stories which results, again after a gap, in an alignment with the neighbouring houses in Chester Road. The nearest the building here gets to Chester Road is well set back to the original building line of the houses (which have significant front gardens) but curves further from Chester Road obviating any cliff façade. The substantial setting back of the building from Chester Road means that it does not intrude into the important sweeping view down into and across the Conservation Area to the Highgate Hills.

By contrast the proposed building hugs the boundaries with a cliff frontage on a wider corner in both Chester Road and Dartmouth Park Hill and is better than twice as high. In consequence the building isn't aligned with either the building lor roof lines in either Chester Road. In addition to being utterly incompatible with the buildings around it in the Conservation Area it would be very intrusive and obstruct the vista down Chester Road.

We will provide superimposed images certainly in time for the consideration of this matter by the Planning Committee but meanwhile attach some photographs which underline the points made in this submission.



## Chester Road / Proposal

CGI View from Dartmouth Park Hill







CGI View from Chester Road

