

Hostel Redevelopment Objection
10/10/2020

Dear Charlotte,

I live directly next to the Camden Road Temporary Accommodation Hostel with my family. I have a number of objections and concerns in response to the proposed plans for the hostel on 248-250 Camden Road, not just from being a resident of 246 Camden Road for 13 years, directly neighbouring the site, but also in my professional capacity as a Clinical Psychologist working for Camden & Islington Mental Health NHS Trust providing mental health consultation and training to Camden Council Neighbourhood Housing Teams.

Before setting out my concerns and objections, I would like to state clearly that I share Camden's commitment to provide safe and secure housing in the borough for families, and I support the change for 248-250 Camden Road to become temporary accommodation for families. As both a resident of Camden for over half my life, and from my professional experience, I understand the complexity of the circumstances and personal histories of the families that mean rehousing into temporary accommodation is required, particularly with the housing shortage that Camden faces.

I object to the proposed plans based on the design features, on the following grounds:

Height:

The proposal to increase the height up to 6 floors is far higher than any of the residential properties on either side of the hostel along Camden Road. There is no precedent for buildings to be of such a height. The hostel is within a conservation area and the maximum height of buildings in the conservation area is 4 stories. Additionally, the height of the homes on Camden Mews are at 2 stories.

The plans and documents, (on pg 63 of Design statement 5), compare the proposed height of the hostel to the height of homes in North Villas, however this does not take into account the natural hill that rises behind. It therefore does not make sense to draw this comparison of roof heights and is misleading. Point 4.3 in the Camden Square Conservation Area Appraisal and Management Strategy document references the slope as part of the topography of the conservation area, which contributes to the character of the area: "all streets are gently rising and falling across the contours accommodated within subtle adjustments in the gardens, steps and roofscapes." The height of the hostel, as proposed at 6 stories, is not remotely subtle and would detract from the character of the area. It is, in no way, in keeping with other nearby properties. I do not believe the proposed design makes an appropriate contribution to the area. Camden Council's Local Plan 2017 states that development should be appropriate to its location. In line with the council's own views within The Camden Local Plan, the hostel redevelopment should be 4 stories and no higher.

To the rear, the proposed height would block the view we enjoy of the sky and trees, and would negatively impact on our access to nature and the open space and natural environment, creating a sense of enclosure and being 'hemmed in'. As a clinical psychologist working in Camden and Islington for over ten years I know this is detrimental to the health and wellbeing of our family and other local residents. Please see the photos I have included below, following my next area of objection.

Footprint and design of rear leading to overlooking and lack of privacy:

The proposed footprint of the hostel building itself comes back further than it does currently. We already have a view of the side and rear windows of the hostel depending on where we are within the interior or exterior of our property. I object to the footprint of the building coming any further back, as this would not protect amenity as it should be protected in line with the Camden Local Plan. Additionally, and even more objectionable, is the proposed walkways, balconies and stairway structure which extend out significantly further still, increasing the true footprint of the building to an extremely unacceptable size.

The balconies have been designed with the purpose of residents not just accessing their front doors, but also being able to use these for a social space, for sitting on and overseeing family members who may use the back garden of the hostel. Given the proposed height, overlooking would be increased and so there should technically be greater than 18m distance between the balconies, stair tower and the properties on Camden Mews.

As direct next door neighbours to the hostel, our right to privacy in our family garden and rear rooms would be affected in a significantly negative way. There would be clear sight lines from the walkway/balconies and stair tower into our garden and rear living spaces (our kitchen and children's bedrooms) which would intrude on our right to privacy (Human Rights Act Article 8). This is also not compliant with The Camden Local Plan, as the proposal goes against the Council's own recommendation to protect amenity, and should "avoid harmful effects on amenity of existing and future occupiers and nearby properties". Our interior and exterior spaces would be overlooked and lack privacy due to the height and extension of the footprint, by the balconies and stair tower, which would affect the quality of life of our family. Any development should be designed to protect the privacy of occupants of both new and existing dwellings.

As you have declined to conduct a site visit, in order for you to have the best possible appreciation of the impact of the height and footprint of the proposed design, I have included some photos as requested. To help provide you with some context, our garden is made up of 3 different levels, due to the height change in the hill slope going from Camden Road towards Camden Mews. Please give particular regard to the impact of the proposed design on our garden, in accordance with pg 22 of the Design and Access Statement, which states: "Particular regard will also need to be given to the gardens of the adjacent properties".

This first photo is of our current view from our kitchen window:



We would be overlooked from the balconies and stair tower. The building would extend out higher and further than at present, and the walkway/balcony and stair tower would extend out even further beyond that, meaning that we would lose light and the natural view of sky and green trees, and our right to privacy would be ignored.

Here is the view from our kitchen back door onto the garden:



Much of the view and light would be obstructed by the proposed structure of the building, and the balcony walkways and stair tower would be further substantially detrimental to our use and enjoyment of our external environment, impacting negatively on our physical and mental health and right to privacy within our rear garden area.

The following two photos give the view from the top end of our garden:



The proposed design of the main building, balcony/walkways and stair tower would come beyond the end of our garden, (where the fern is in the right corner behind the red roses). We would be overlooked and our right to privacy would be ignored. The light and view of the trees straight ahead (from our garden through to Camden Park Road) and on the right would be completely gone.



Middle Level View:



This shows you how far out and how high the present hostel building comes. If the proposed design is agreed the whole of our view would be of the side of the hostel and the balcony walkways and stairway towering over us. We would lose the light and view of the sky and trees. This in no way protects amenity, and will detrimentally affect our quality of life, our mental and physical wellbeing.

These next photos give the view from the lowest level of our garden and the windows of our childrens bedrooms:



The proposed larger footprint of the hostel would deny us the view of the sky or trees at this level and give us a sense of enclosure.



These last two picture shows the loss of sky from my daughter's bedroom:



Unfortunately the camera is unable to fully capture in one photo the experience of the current full height of the hostel (hence our request for a site visit). From our lower ground floor level in the garden and from the bedrooms (windows of which can be seen on the left hand side), the current height of the hostel is already substantial. Adding two further floors is not in keeping with any other buildings in the area, and would not positively (or even neutrally) contribute to the conservation area. The footprint would come out past our back fence, meaning we would only see a small patch of sky just above the Camden Mews property on the top right. I strongly object to the height and extended footprint of the proposed design.



View from lower ground rear child's bedroom:



The proposed design would block out much of the light and view of the sky and trees. My child's right to privacy would be ignored if the proposed plans were accepted. My eldest child has written an objection to the proposed design from her own perspective.

Noise Pollution:

The proposed rear access to the entrance doors of the accommodation means that use of these balconies and stair tower would lead to a noticeable increase in noise levels across the currently peaceful space between Camden Mews and Camden Road residences, and even more so with the proposal that the walkway/balconies be used as social spaces. The location of the entrances to 39 front doors over multiple stories to the rear of the building significantly impacts on our health and wellbeing. An increase in noise would increase stress for all occupants in the area (hostel residents and present occupiers).

We experience high levels of noise from the front of Camden Road, and currently much lower levels in the open green space to the rear, which provides some legitimate and very welcome respite, benefiting the physical and mental wellbeing of our family. Our children's bedrooms are at the rear of the property - we have deliberately chosen this due to the quieter nature of the rear of our home. Locating the entrance of multiple front doors over multiple stories at the rear would increase the risk of making it difficult to sleep at night and would have a detrimental impact on the health and wellbeing of us all. To deliberately design a plan that increases the noise levels at the rear of the buildings is unacceptable, not in accordance with Camden's own guidance in The Camden Local Plan, and I object to this rear design in the strongest terms.

From my work with Camden Council Neighbourhood Housing Officers, I know that much of their work is linked to complaints about noise nuisance, antisocial behaviour and neighbour disputes. Such complaints are more likely where accommodation is cramped and overcrowded - which is unfortunately how the flats appear to have been designed. It is very concerning that the proposed plan has not attempted to 'design out' these issues wherever possible. I would welcome further information on whether professional input was sought by, or provided to, the design company regarding the wellbeing and respite and recovery needs of the client group when drawing up their proposed plans.

The proposal locates the bedrooms within the hostel at the front of the building. As a resident who has a bedroom on the Camden Road side, and as a clinical psychologist who consults on the links between housing issues and mental health, I object to this aspect of the design. The proposed layout of bedrooms on Camden Road would be problematic for families residing there - not just due to traffic noise, but also from a psychological and trauma-informed perspective. There have been countless occasions when we have heard shouting of obscene and threatening language outside the hostel directed towards female residents currently living there. Most recently, I was woken by hearing a man on Camden Road screaming abusive and threatening words at someone in the hostel just after 6am on Wednesday 7th October 2020. As antisocial as this behaviour is for me to experience, this would be highly re-traumatising and distressing for family members who are fleeing violent relationships and other situations where they are at risk of harm from others. The families who would be living in this hostel require safe spaces - not only for them to be physically safe, but also psychologically safe - for them to be able to find respite and recovery from the threats and violence they have experienced. Residents would be much more likely to sleep better, and feel the benefits associated with this

for their physical and emotional/mental wellbeing, if the bedrooms were located at the quiet rear side of the property.

Security:

The nature of the hostel means that residents are vulnerable to high risk offences (please see MET Police planning response). Whilst I am supportive of the change of use to make temporary housing available to families, I am concerned about safeguarding and stigmatisation of those living at the hostel and those of us adjacent. As a clinical psychologist working with Camden Neighbourhood Housing Teams, I know that some, if not all, of the families in need of housing would be vulnerable and probably already experiencing stigmatisation and social exclusion. I therefore have profound concerns about the effectiveness and aesthetic nature of the security which is not sufficiently outlined in the planning documentation.

It is likely that there would have to be a high standard of physical security around the boundary to the hostel and grounds. Our property is already accessed by intruders from time to time and this proposed design increases the likelihood of intruders on our property as access is designed to the rear. Those of us with properties on the boundary of the hostel site would be at risk of intrusion and feel imprisoned and stigmatised by necessary fortifications. There is a lack of planning presented in this regard.

The access to the doors of the accommodation being located on the external rear of the building is a design flaw that means there would be an increase in security risk to both vulnerable tenants of the hostel, and also my family and other local residents. There would be the increased likelihood of individuals attempting to climb over from our side alley and front garden wall if they knew they might be able to climb the balconies and stair tower. It would be better safeguarding and security management to locate the entrance doors within the building itself.

I note in the MET Police Planning Response that there is reference to security measures being put in place for staff working in the hostel. I am employed by Camden and Islington Mental Health NHS Trust as a clinical psychologist and work in the capacity of Psychologist to the Housing Landlord Services of Camden Council. I advise Neighbourhood Housing Officers and Managers about residents who experience mental health difficulties, which can include residents who are experiencing significant vulnerabilities and safeguarding concerns that necessitate a move into temporary accommodation. It is possible that I may have professional contact with some residents and families who are placed within the hostel. Is there a need for my professional and personal position to also be considered within the security assessment and measures?

The Camden Local Plan acknowledges that there “have been problems in the past where supported housing facilities such as homeless hostels have been too large or have been clustered together, becoming a focus of antisocial behaviour. A concentration of people who have high support needs can unbalance the social mix in an area, create noise and disturbance and damage the amenity and quality of life for other local residents and visitors.”

The proposed design would mean that there would be over 100 people residing in the hostel. This is a significant increase in the number of residents compared to the current hostel. Given that we already experience antisocial behaviour associated with the hostel, I expect that this would only increase substantially with a greater number of residents.

Over the years of living next door to the current hostel, we have made good neighbourly links with staff at the hostel, who have kindly come and tidied up belongings thrown out of windows, cleared up drug paraphernalia from our front garden and side alley and arranged for an additional fence to be placed on the boundary between our properties to try and deter intrusion (unfortunately not always successfully). We have continued to have occasional drug-taking activity in our front garden, and incidents such as the one I described above, of individuals shouting obscene words and threats at residents. With the proposed design, this sort of behaviour is highly likely to increase in frequency due to the sheer number of residents that would be living in the accommodation. In my professional opinion, the prospective residents would have a safer, healthier and more supportive experience if they were living in a hostel with a smaller number of other families.

We are aware of a fairly recent change in plans for the Chester Road hostel redevelopment which was made smaller than the originally proposed redesign. Shortly afterwards, the original plans (summer of 2019) for the Camden Road hostel rebuild were withdrawn and replaced by these larger and taller plans. I respectfully suggest that slight changes in multiple locations is a much better, safer and more compassionate solution than vastly increasing one site. I urge the council to endeavour to identify a further site and spread the capacity out in order to retain and protect community amenity. The current proposal overcrowds a larger number of residents into one space and also alienates neighbours, damages community and radically alters the design aesthetic of the area.

Light Pollution:

The walkway/balcony access and stair tower structure would have continuous lighting during hours of darkness. There is no evidence that this has been considered and detail on this is not given in the proposal. This would be a substantial change to the area and would have a negative impact by significantly increasing the light pollution at the rear of the building into homes that surround the hostel. The design of the new hostel is out of keeping with other properties in the conservation area - in nearly all cases, bedrooms are to the rear (as is the case for our family) - light pollution would affect the tranquility of the rear gardens and affect the bedrooms of our property. This goes against The Camden Local Plan. Both my children have bedrooms at the rear of our property, and would be negatively affected by light pollution from the walkway balconies and stair tower. Please see a photo of current light levels from our back door, which at the moment are tolerable:



Access to Daylight and Sunlight:

There is non-compliance with BRE standards in respect of 21 windows and 2 gardens due to the excessive height and footprint of the proposed development. This includes windows on the top floor of 246 Camden Road. There are many more windows which fall into 'borderline' compliance i.e. they only just pass these BRE standards. This is a design failure, which should be rectified. The Camden Local Plan states: "...should not proceed where the development is unable to create an acceptable level of residential amenity e.g. inadequate daylight and sunlight". Please refer again to the photos attached, to give you a sense of the impact the design has on our personal access to daylight and sunlight. I understand that other neighbouring properties may be even worse off than us.

Impact on Conservation Area:

As a member of the Camden Square Conservation Area, I concur with the Camden Square Conservation Area Appraisal and Management Strategy document which states: "The green spaces and the private gardens are important as they make this a green and leafy area - an attractive yet urban place with an underlying mature landscape." (from: Camden Square

Conservation Area Appraisal and Management Strategy). 5.2 of this document states: “An aerial photograph of the area shows how green it is when taking the private gardens into view. ...trees and shrubs appear and give a green and important break between buildings. These are vulnerable places as development may reduce these green gaps and erode the views across the gardens.” Additionally, point 5.8 states: “Private rear gardens quietly add to the quality and biodiversity of the area. The gardens are almost all hidden from the street, glimpses to green space hidden behind and between buildings are precious and add to the quality of the area.”

I encourage you to look again at the photos attached of our back garden which is precious to us, and enhances our quality of life, particularly so during the covid-19 pandemic, and it greatly adds to the conservation area and supports biodiversity. The proposed design greatly damages these qualities and ignores the vulnerability of these precious spaces and substantially diminishes the power that our garden space has to restore and benefit our wellbeing.

From the Camden Square Conservation Area Appraisal and Management Strategy, section ‘3.3a Camden Road’ states: “the south east side remains substantially intact as laid out by the Camden Estate”. The proposed hostel design will undermine the fact that the South East side of Camden Road has remained intact. Again, this document states “The best example of post-1945 work is the block of flats on the south corner of Camden Park Road”. This is Ashton Court - a recent neighbouring 4 storey building which was sponsored and endorsed by Camden Council. There are much fewer overlooking / privacy issues with Ashton Court, no rear access to front doors, and the height is in keeping with the surrounding area. Under the Camden Local Plan, the council is obliged to ensure that development enhances rather than damages the conservation area. The hostel in its current form is judged to have a ‘neutral impact’ and a redevelopment could be an opportunity for enhancement and positive contribution. The proposed development would have a significantly negative impact on the conservation area and so is not compliant with the local plan.

Health and wellbeing Impact:

The Health Impact Assessment report identifies that young people are within a priority group - I have two children aged 7yrs and 10yrs whose health and wellbeing would be impacted by living next to the development in its proposed form. While my children welcome the presence of families and children at the hostel playing in the hostel back garden, the height and larger footprint design of the balcony walkways and stair tower would impinge on their sense of freedom to play, their enjoyment and use of our own family outside space, due to my children being overlooked and their right to privacy being ignored. There are numerous ways indicated throughout this feedback response in which the proposed design would negatively affect the physical and emotional wellbeing of my family.

In summary:

I agree with the Camden Local Plan where it states that “we will support development of a variety of housing aimed at meeting the specific needs of...vulnerable people *provided that the development...does not cause harm to nearby residential amenity.*”

Unfortunately, the current proposed development is unable to create an acceptable level of residential amenity and would actually *cause* unacceptable harm to residential amenity.

I would deeply encourage Camden Council *not* to sacrifice the quality of the conservation area, the external green and garden spaces, the internal spaces of the homes currently occupied, residents' privacy, the relatively pollution-free (from light and noise) rear gardens and daylight access in order to maximise the number of temporary accommodation flats available. The Camden Local Plan clearly demonstrates acknowledgement of all these qualities affecting physical and mental health, and influencing life chances of both current residents and prospective hostel residents.

Many thanks for your consideration.

Gemma Mitchell