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2020/3461/P	Susan Fleming	09/10/2020 18:29:55	OBJ

## Response:

I am a very long-standing LB Islington resident and have lived in Bickerton Road with my family for over 30 years.

I support the idea of providing temporary accommodation to homeless families within LB Camden, but believe the current proposals need further consideration with regard to location, size, appearance, scale, density and Covid-19 provision.

Building - Size and Scale:

1. The proposed solid 4 storey building on Dartmouth Park Hill is in LB Camden's Dartmouth Park Conservation Area and directly adjacent to LB Islington's St John's Grove Conservation Area. It has no precedent close by in height and volume. It is larger and higher than any of the buildings around it. It would double the height of the existing building, which is 2 storeys.

There are no neighbouring buildings with 4 storeys above ground level, on either Chester Road or Dartmouth Park Hill. These buildings only have 2 or (in just a few cases) 3 storeys from ground level. If there is a 4th storey, it is at basement level, below ground. The original consultation document was wrong/misleading in this respect. The buildings directly opposite, on Dartmouth Park Hill, are only 2 storeys high and the surrounding Dartmouth Park Hill buildings have only 2 storeys with a 3rd storey gable.

It is particularly disappointing and inappropriate that the Dartmouth Park Hill elevation is proposed to be 4 storeys high. There are simply no buildings beside, or opposite, this elevation on Dartmouth Park Hill which are even a full 3 storeys. This will represent an oppressive urbanisation of what is, currently, a pleasant stretch of road.

The size and scale of the building will dominate the area and obstruct existing views to the wooded Highgate ridge. This is surely not something that local people will look forward to with eager anticipation.

The building is therefore not in keeping with the "residential" "semi rural" nature of the Dartmouth Park conservation area (Dartmouth Park Conservation Area Management Plan paragraphs 4.2 and 4.3)

The proposed building would seriously overshadow Colva Walk. The walkway there would become dark and liable to attract anti-social behaviour. The walkway is used by small children going to Brookfield Primary School and already has significant fly-tipping and drug dealing problems. Making the walkway darker would contribute to these issues. It should be kept in the present format, but adding some landscaping and, of course, retaining the very important mature trees that together form a very pleasing green aspect as you approach from Bickerton Road. Your proposal will confront anyone approaching from Bickerton Road in the future with a huge, unrelenting wall reminiscent of the back end of a depot. Not an aspiration that a progressive local authority like LB Camden should be pursuing for a green future.

The building would exclude afternoon daylight to the Islington side of Dartmouth Park, particularly to the ground floor flats at 74 – 78 Dartmouth Park Hill.

By contrast, the current building is unobtrusive and is set in attractive mature shrub and tree surroundings.

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As such, the 4 storey building would cause substantial harm to heritage assets, contrary to Camden's Local Plan, Policy D2 Heritage (see extracts below).

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

This large, dense development cannot be permitted under Camden's Local Plan.

Indeed, the Camden Local Plan also forbids "bulky buildings" even outside conservation areas, where these can be seen from conservation areas:

"Local Plan - 7.48 Due to the largely dense urban nature of Camden, the character or appearance of our conservation areas can also be affected by development which is outside of conservation areas, but visible from within them. This includes high or bulky buildings, which can have an impact on areas some distance away, as well as adjacent premises. The Council will therefore not permit development in locations outside conservation areas that it considers would cause harm to the character, appearance or setting of such an area".

The Dartmouth Park Conservation Area Management Plan recognises that buildings which dominate views damage the conservation area.

# **Building Appearance:**

It would not be appropriate to use bright green tiling for the exterior of the proposed building. It would accentuate the disproportionate building size and would be out of character with all the buildings on the same side of Chester Road (including the new Chester Balmore development which has used beige brick). The building is in an LB Camden conservation area and beside an LB Islington conservation area, the predominant characteristic of which is 1850-1890 yellow London stock brick Victorian terraces. The building should positively contribute to the Conservation area, but in this instance it patently won't.

### Overdevelopment:

This is the very definition of overdevelopment. The Chester Balmore block - a much larger area - has 53 dwellings - this proposes almost the same number on a smaller site.

It appears that Camden considers that about 150 additional people will be accommodated on this site.

It is inevitable that there will be a significant increase in pressure on schools, medical facilities and parking. The LB Camden schools in the area are already heavily oversubscribed. This will add an extra burden onto already under-funded services.

There will be a significant concentration of families requiring additional support in an area which already has a high concentration of social housing. This needs to be carefully managed, as social engineering like this runs the risk of altering forever the demographics of a neighbourhood. It could change from a diverse mix to

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something more one-dimensional, which will not be welcomed by anyone.

The statement that the development will be "car free" is disingenuous. Parking restrictions apply only at certain times. Chester Road and Bickerton Road could not absorb any further influx of vehicles. There is little/no parking available on Dartmouth Park Hill.

Summary:

The proposals should be reduced in height, to a maximum of 2 storeys with a 3rd storey gable or 3 stories above ground.

Other local residents are required to comply with height/storey restrictions when altering their premises - it would be extremely unfair if LB Camden was subject to different rules. Imagine if a resident submitted restoration plans to LB Camden involving an increase in size and height of their property that also encompassed loss of sunlight/view, overlooking issues, mature tree-felling with a street-facing facade of lurid green tiles - I suspect you would, quite rightly, reject the application.

Contrary to Camden Council planning policy, current proposals damage heritage assets in the conservation area by overshadowing and dominating all the surrounding housing.

The building density should be reduced, for the benefit of the proposed residents.

Key Extracts from Relevant Binding Policies and Plans:

LB Camden Local Plan: Policy D2 Heritage

"Designed heritage assets include conservation areas and listed buildings. 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, or all of the following apply:

a. the nature of the heritage asset prevents all reasonable uses of the site; b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; c. conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and, the harm or loss is outweighed by the benefit of bringing the site back into use. 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 and this section should be read in conjunction with the section above headed '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:

e. require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area; preserve trees and garden spaces which contribute to the character and

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appearance of a conservation area or which provide a setting for Camden's architectural heritage.

7.48 Due to the largely dense urban nature of Camden, the character or appearance of our conservation areas can also be affected by development which is outside of conservation areas, but visible from within them. This includes high or bulky buildings, which can have an impact on areas some distance away, as well as adjacent premises. The Council will therefore not permit development in locations outside conservation areas that it considers would cause harm to the character, appearance or setting of such an area.

LB Islington's St John's Grove Conservation Area Design Guidelines:

28.1 The Council will operate special policies in the St John's Grove Conservation Area in order to preserve and enhance the special character and appearance of the area.

28.3 The Council will operate its land use policies so as to enhance the character and vitality of the area. Planning permission will not be granted to change, expand or intensify uses which would harm the character of the conservation area.

28.4 The predominant character of the St John's Grove Conservation Area is residential, although permission will not be granted for the over intensification of residential use in conversion schemes.

Islington Local Plan - Chapter 3 Strategic Policy 3.1 Heritage and Urban Design

Policy CS 9

Protecting and enhancing Islington's built and historic environment

High quality architecture and urban design are key to enhancing and protecting Islington's built environment, making it safer and more inclusive.

A. The borough's unique character will be protected by preserving the historic urban fabric ... The aim is for new buildings to be sympathetic in scale and appearance and to be complementary to the local identity.

B. The historic significance of Islington's unique heritage assets and historic environment will be conserved and enhanced whether designated or not. These assets in Islington include individual buildings and monuments, parks and gardens, conservation areas, views, public spaces and archaeology.

D. All development will need to be based on coherent street frontages and new buildings need to fit into the existing context of facades."

Finally, all the aforementioned points need to be considered within the context of the current Covid-19 pandemic. Matters of social distancing, total number of residents and, of course, location all need to be looked at again in these new circumstances. With work patterns changing and people being encouraged not to return to their workplaces, there may be opportunities to repurpose existing, unused, premises for hostel use, without opposition.

Thank you for reading and taking into consideration my comments on the proposed hostel.