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2020/3461/P	Robert Dolata	27/01/2021 11:14:24	OBJNOT	

Summary of Resident's Planning Representations and Objections for Camden Council Planning Committee prepared by Robert and Suzana Dolata

The community support Camden Council's commitment to housing the homeless. However, residents are not persuaded of the merits of Planning Application for 2 Chester Road 2020/3461/P and urge REFUSAL based on the following summarised comments and objections:

#### Site and Setting

The building is not appropriate to the corner site which is an important, prominent and significant transition between Chester Road and Dartmouth Park Hill. The design does not complement the buildings around it. It is out of scale to the street scape of both Dartmouth Park Hill and Chester Road.

#### Demolition and Sustainability

The case is not made for demolishing the existing building to replace it three blocks on a site which is far too small to adequately house up to 200 people in 50 new dwellings. Health, social and community costs mean it is not a land use that delivers needs of present and future generations sustainably.

#### Bulk and Volume

Height, bulk, scale, mass and colour of the building dominate. Better materials, proportions, features and colour would mitigate. For example: reduce horizontal bands between floors and below the roof, divide the horizontal elevations vertically into 4 panels, thereby replicating the rhythm of houses opposite.

#### Materials and Appearance

Materials, proportions, features and colour are not designed to complement the surrounding street. It should take far more from the buildings around it. The industrial palette of materials is not represented in the area – green tiles, grey brick in stacked bond, perforated metal enclosures for stairs. It is poor design and that appears intended for somewhere else.

#### Design Detail

The terraced houses opposite have repetitive ground floor bays and front doors, roof lines and chimney stacks which define them as individual houses – a much richer mixture of elements and scale. The individual definition of the houses creates a visual rhythm on the street. None of these features are picked up by the current design.

#### Local Planning and Conservation

Density, intensification of use, scale and appearance and harm mean it is not in accordance with the adopted and up to date Camden and Islington statutory development plans, the recently approved neighbourhood development plan or conservation statements. There are no compensating benefits.

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Covid 19

Advice on Covid-19 transmission recommends social distancing, safe circulation and isolation. Sunlight and fresh air are vital. The proposed dwellings are seriously under sized with fixed windows. External space is cramped and shaded. The development is devoid of crucial features for social distancing, safe ventilation, circulation and self-isolation. Covid-19 went pandemic in March 2020. The planning application was launched in September 2020, but the applicant, Camden Council, did not engage the joint Islington & Camden Director of Public Health.

Safety

Stair cores are wrong in material and bulky in appearance. They provide hiding places within the building. CCTV is no deterrent - an attack is over in seconds. Refuse store and exterior access doors are opportunity for incursions; however 'smart' the locks, they can never be wholly secure. Evacuation: bedrooms ∩ kitchen ∩ balconies ∩ stairs ∩ internal open courtyard ∩ enclosed lobby ∩ street is especially unsafe considering residents' vulnerability. Alarms at the existing building are frequent.

Alternative Plans

Reasonable options for the site and homeless service were not presented. For example, refurbish the existing hostel which has architectural merit, convert (Covid redundant) office space in Camden into homeless persons' accommodation, employment, work and training space.

Consultation

Most residents were not aware of public consultations about the planning application and were not adequately informed about the scale, impact and loss caused. Comments made were not conscientiously taken into account.

Both consultation stages offered misleading information, images and drawings. Loss of benefits such as daylight was not explained. Consultation documents were unduly long and complicated. The impression given was that the Council must deliver homeless persons' accommodation on this site which it owns and would not make meaningful change.

The applicant's Statement of Community Involvement dismissed objections at pre-planning consultation thus: "Notwithstanding the concerns raised, there is support amongst the local community and their representatives for the proposal to redevelop the current hostel at 2 Chester Road." Pre-planning objections were based on policy, genuine concern about impact and complaints about misleading drawings and images, manipulative and missing consultation. The dismissal is unfair. It confirms bias and pre-determination.

87 representations on the planning application were uploaded on Camden's web page and 12 were sent to the project manager at pre-planning consultation and copied to us. They covered planning considerations such as:

Representations by category:	Plg appln stage	Pre plg appln stage
Design, Size & Height of New Buildings or Extensions	62	4

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Use intensification, Impact on social & physical infrastructure	39	3
Loss of Light, Privacy of Neighbours for example overlooking through overlooking	24	3
Disabled Access	2	1
Noise arising from New Uses	11	
Traffic, Parking, Road Safety	12	1
Policy – not in accordance with development plan	46	1
Covid-19 implications of the development	6	

This information is set out in full in documents to be emailed:

- 2CR plg app representations – in writers’ alphabetical order
- 2CR pre-plg app comments – date order.

The following amplifies concerns about consultation, design weakness and decision making.

The project is on the borough boundary, it affects Islington residents. The Planning Committee must give all concerns, including hostel residents’ dignity, safety and wellbeing serious consideration and eliminate unlawful discrimination.

Residents expect the same scrutiny as for any private developer. Should the Council ignore representations that quoted development plans and conservation statements then consultation inputs, obliged by law, is obviously not valued. Intensification of use and impact mean the proposal is a substantial departure from development plan.

The Planning Committee mandate must set aside pre-determined opinions and examine the project afresh with unbiased mind, informed by an impartial professional report that corrects misleading information, measures consistency with the development plan, weighs up harm and impact against benefits. Councillors should permit the development only if it good enough to approve, not just because it is a Council development that is not quite bad enough to refuse.

Examples of the gap between the application and residents comments are given below.  
Planning Application Information is followed by Residents’ Comments

**Height**

Height reduced following pre-planning consultation responded to community concerns.

A manipulative change was made to justify excessive development. No change to bulk, design, inappropriate materials and colour.

**Density**

[the site] in its current form is woefully underutilised. Intensification in site from 28 single rooms to 50 family dwellings is justified on London Plan land use efficiency & access grounds. Pressure on social infrastructure is considered acceptable because – “children will travel to their existing schools”.

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Planning is not just about site use, it also regulates development sensitivity to its local context, the efficient economic and sustainable provision of infrastructure to support users and making good community relationships.

The proposal is an insensitive overdevelopment of the site - 50 homeless families in excessively small units, and often for lengthy periods, with an almost total absence of on-site social, leisure or support facilities. Hostel residents - children, are being denied rights of normal community life, local schooling and making friends.

Dwelling size

Descriptions of the replacement hostel and its dwellings spaces argue design qualities and living space. "In summary, the proposed housing mix is based on extensive evidence of need and research into the allocation of homes to families. The layout of each unit is designed to mirror traditional homes as far as possible. The design is exemplary, in terms of its offer to vulnerable families, who will have their own secure home and privacy."

The woefully under sized dwellings are justified on temporary accommodation grounds, but they are not proper homes; just a bedroom, kitchen, WC/shower; no lounge.

Temporary may last for years. Living with children, in undersized space with no respite or facilities is a test of mental endurance. Cramming homeless people together in a hostel with inferior living space disrespects human dignity and rights to equal fair treatment. It amounts to indirect discrimination.

"the building has been designed so...changes could be made to enable it to be converted to traditional residential (C3) use: "Two homes could be merged to provide a single new unit which meets nationally prescribed space standards."

This admits that proposed dwellings are half the size they should be under national dwelling space standards. If they are capable of conversion, why not built regular housing to national standards from the start?

Covid-19

Features such as fixed windows, controlled ventilation and underfloor heating are presented as energy saving benefits. But ..."Sunlight to proposed courtyard areas would be below the BRE guideline." The building has a single controlled access point and narrow reception lobby.

Advice on Covid-19 transmission recommends distancing, safe circulation and isolation. Sunlight (Vitamin D), fresh air and ventilation are vital. A Covid-19 design assessment is essential. There is no provision to dry laundry. Damp, stuffy, under heated environments are unhealthy. Putting vulnerable homeless people together in a cramped unhealthy hostel risks an explosion of disease. Vaccines alone won't provide protection until immunity is widespread, which is doubtful in a vulnerable community .

Social cohesion

..."Camden's Temporary Homes Team, who have confirmed that the provision of 50 new temporary family

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homes on this site can be suitably managed and staffed to ensure the safety of residents and protect against any potential negative effects upon the local community.”

“For many years there have been incidents in and around the [existing] hostel including-anti social behaviour, begging, fighting, drugs, drunken arguments, litter, discarded needles, fires on a weekly basis etc.”  
DM representation

Architectural Interest

When compared to other welfare buildings, it [existing building] “lacks the complexity of form or innovation in terms of style to be of particular note”. As such, the current building is deemed to be of Low Significance with respect to aesthetic value, evidential value and historic value.

Two eminent Architects and the 20th Century Society made representations stating precisely the opposite regarding the architectural interest and merits of the existing building. Application for Listing is being considered by Historic England.

Views

policy D1: Any development would be expected to conform to the prevailing pattern of the housing and streetscape and not to intrude into the view of the greenery of Highgate Cemetery and Highgate Hill.....the setting of the Victorian Terraces and greenery is likely to be enhanced, through virtue of the building’s prominent green terracotta cladding and setback. The setback of the building is of a comparative height with Chester Balmore and as such the view of the spire of St. Michael’s church, Highgate will also be retained.

The design is an unpleasant intrusion in mass height, bulk, bad design and inappropriate materials. The building will shade Chester Road, and Dartmouth Park Hill. The building will obstruct views which include Highgate Cemeteries, woodland, Waterlow Park, the spire of St Michael’s church, historic hospital buildings and the green domes of St Joseph’s Highgate Hill. Together these form a unified composition. Height and bulk will also interrupt pleasant views from Islington of the Chester Road roof-scapes.

Changes

If the Planning Committee is determined to approve this application in the face of policy and objections then local residents would wish to put forward amendments and planning conditions to mitigate its worst aspects, and reduce or offset the harm caused.