



Subject:

2018/3672/P - Objection



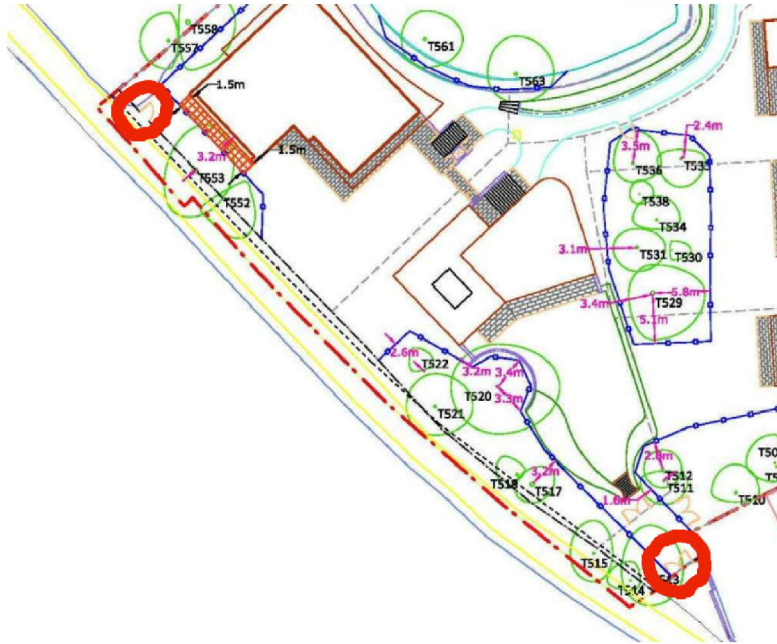
Dear Mr Thuaire,

I am writing in response to the Planning application 2018/3672/P. As the official consultation has ended, it is not possible to upload this objection via website. I can see that the evidence is still being added. Could you kindly register this **Objection** and make it visible on the website.

1. The Transport Statement (01 August 2018) is very useful in understanding the traffic impact on the nearby streets. The calculations of the Net Development trip generation (Table 4.1 page 12 of the Transport Statement) has concluded that the net increase of driving a car between 07.00 and 19.00 will be **3 car trips daily** on average. This, however, based on the assumption under 4.1.2: "The total person trip rates have therefore been extracted and **2011** Census data for the Method of **Travel to Work** for the local lower layer super output area Camden 001E". In addition to travelling to work by car, the residents from the new development might travel, for example, to schools outside Highgate Village. The sizes of the new properties (1x3 beds, 3x4beds and 1x5 beds) may appeal to the above average household size, with children. Additionally, an extra traffic will be generated by visitors, online deliveries, utilities, taxis etc. It is necessary to **review whether TRICS database 2011 assumptions** are valid as the best estimate for car trips generated to the new development **post-Covid 19**. In particular, TRICS has recognised the the changes in the society and suggested that the long-held view of "Predict and Provide" for the assessment and management of transport implications is now out of date. TRICS new guidance notes have been published in February 2021.

Merton Lane, Millfield Lane and Fitzroy park roundabout is easily congested during waste removal times or any infrastructure works, and vehicles reversing due to one-way system on Millfield Lane. Adding more households in that area may compromise access and safety of users of Hampstead Heath and the London Cycle Network, that have increased in numbers since Covid-19. Additionally, as guest parking is not provided at 55 Fitzroy park, the visitors to the new development would need to use parking bays on Merton and Millfield Lanes, that can otherwise be used for visitors of Hampstead Heath.

2. Can the Applicant please clarify if all the pedestrian and vehicular paths on the estate are included into the calculation of the proposed impervious area (i.e. artificial area) in the SuDS PROFORMA. In particular, **the purpose of the gates** shown on the picture below is not clear (screenshot from p7 of the Assessment of Drainage Proposals, January 2021), as the pathways (pedestrian or vehicular) leading from these gates to the new developments are not shown. The historic gates are visible on the wooden fencing from Millfield lane, and it would be useful to understand if/how they are going to be used by the new development.



Adding the additional paths would affect the **calculations of the impervious area**. I raise this since, although the 55 Fitzroy park address is considered at Low Risk from surface water flooding (Gov.uk), it is part of Critical Drainage Area 3_001 of Camden Surface water management plan (https://www.camden.gov.uk/documents/20142/1458280/SWMP_Halcrow_Report_for_Camden.pdf/2a8bf03-cbd7-e808-3bb4-e75b62756b0a). SuDS PROFORMA document provided states NO in response to “Is the site in a surface water flood risk catchment (ref. local Surface Water Management Plan)?”. Can Camden Council please check this inconsistency by referring to the relevant SWMP.

In addition to the intended use of these gates, could the Applicant please clarify their design. From the experience with the Water House gate upgrade, as the **visual look and use of these gates affects users of the Hampstead Heath**, this should be included in this or separate public consultation facilitated by Camden Council.

Kind regards,

Jelena Radzevica



