Historic England

Via email to: listing.enquiries@HistoricEngland.org.uk

12th November 2020

Dear Madam/Sir

Re: Chester Road Hostel, 2 Chester Road, Highgate, N19 5BP

1. Background

1.1. This letter opposing the listing of 2 Chester Road Highgate N19 5BP is submitted by Anya Martin, Chris Worrall, John Myers and Samuel Watling, whose affiliations are described at the end of this letter. John Myers is a resident of the London Borough of Camden which contains the relevant site.

2. Introduction

- 2.1. On 10th September 2020 Planning Application 2020/3461/P was registered for the redevelopment of the Chester Road Hostel,2 Chester Road, Highgate, N19 5BP.
- 2.2. It proposed the demolition of the existing hostel building and the erection of a new hostel building to provide social housing for people in urgent need. The proposal is for three buildings of three and four storeys with two external stairwells arranged around a central courtyard.
- 2.3. The proposal comprises 50 new homes consisting of 30 studios, 16 one-bedroom flats, 2 two-bedroom flats and 2 one-bedroom wheelchair accessible flats providing accommodation for families with up to 162 bed spaces.
- 2.4. The building originally provided 19 single rooms, two of which were for people with physical disabilities, as well as 2 shared bedrooms each housing 3 people. An additional flat and two bedsits had been altered to create 6 x 1-bed wheelchair accessible units. In total the building provided 27 units providing accommodation for up to 31 bed spaces.
- 2.5. The Chester Road Hostel ranges in height from two to three storeys due to the sloping topography of the site.
- 2.6. On 14th September 2020 Historic England's response to the above application for planning permission offered no comments and no objection.
- 2.7. The Chester Road Hostel was constructed in 1979 and is neither listed locally, nor noted as a building making a positive contribution within the Conservation Area.

- 2.8. An application for the building to be listed was submitted by the Twentieth Century Society ("C20") weeks before the expected planning committee meeting to review the application.
- 2.9. We submit that the site falls far short of the standards required for listing such a recent building. We will be applying for a Certificate of Immunity from listing under the terms of section 6 of the Planning (Listed Buildings and Conservation Areas) Act 1990 Act to protect the proposed redevelopment for housing for those in need.

3. Previous Listing Reviews

- 3.1. The Director of C20, Catherine Croft, claimed in a social media post that there had been "no recent comprehensive survey for listing purposes of the department's work as a whole". However, a comprehensive survey for listing purposes was undertaken as recently as 2012.
- 3.2. In 2012 English Heritage undertook a <u>review</u> of Camden's heritage buildings and did not conclude that 2 Chester Road met the test for listing.
- 3.3. We do not believe anything significant has changed in that short period of eight years to alter the basis for that conclusion.
- 3.4. The Revised Principles of Selection 2018 state that careful selection is required from the period after 1945, with buildings less than 30 years old not normally considered. It is hard to envisage how 'careful selection' could result in the selection of this site for listing, given that it has very little historical or architectural interest.

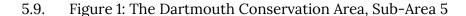
4. Historic Interest

- 4.1. Due to the date of the project it is a late addition within the wider modernist redevelopment of the area. It therefore does not warrant description as being of influential quality, when compared with earlier modernist structures as seen on nearby Winscombe Street.
- 4.2. The Chester Hostel is not an interesting example of late modernism as it lacks the complexity of form or innovation in terms of style to be of particular note.
- 4.3. We submit that the site has insufficient special historic interest under criteria required to be added to the statutory list.

5. Architectural Interest

5.1. Ordinarily corner plots within the Conservation Area contain taller buildings or buildings of a strong appearance or communal value. However, the modesty in scale and scope of the site limits the building as an adequate example of the scale and ambition of Sydney Cook's larger projects.

- 5.2. Cook's vision and interpretation of modernism lies in his department's provision of innovative social housing, specifically to approaches to public access, height, density and responsiveness to the terrace house form. The Chester Road Hostel does not reflect this vision given the significant amount of blank walls contributing to poor-quality low-lying elevations.
- 5.3. It is an object surrounded by space, rather than defining the space, which was the hallmark of buildings associated with the Camden Borough Architect's Department.
- 5.4. The construction of 2 Chester Road resulted in the loss of double-sided street frontage, which has reduced the coherence of the site in this context.
- 5.5. On the other hand the proposed new development is highly sympathetic to Cook's vision and interpretation of the area, while reinstating this historic double-sided frontage.
- 5.6. While the site may retain some small degree of architectural interest, we agree with Bidwell's Heritage Statement that it lacks the ambition of the Alexandra Estate or influence of Winscombe Street. The building is far below warranting Grade II listed status because it lacks the innovative quality and influence seen elsewhere in Camden.
- 5.7. The site does not respond to the clear hierarchy within the surroundings, or the rhythmic approach to massing; nor does it use high quality decorative details.
- 5.8. The terrace row and the site do not respond to each other, which creates an unfortunate emphasis on the late relative date of the site within the streetscape, creating an unresolved character to the surroundings. The Dartmouth Park Conservation Area Appraisal and Management Statement, adopted by the London Borough of Camden on 22 January 2009, omits 2 Chester Road entirely noting it neither for its positive or negative contribution to the Conservation Area.





- 5.10. Sites indicated green are for "positive" contributors. The Chester Road Hostel is marked by the red circle and was not considered to make a positive contribution.
- 5.11. We submit that the only respect in which the Appraisal might be incorrect is in the neglect of the dead frontage around much of the site, which means that there is little or no active surveillance and leads to an uncomfortable streetscape for pedestrians. Insofar as the site makes any significant contribution, that contribution is negative.
- 5.12. We believe redevelopment of the site, with a new hostel providing temporary accommodation for families of exemplary quality, in a three-sided perimeter block arranged around a communal garden, will have a substantial positive impact on its setting and on the wider public interest.
- 5.13. We believe that sympathetic redevelopment of the site should not be prevented through an unmerited Grade II listing, particularly where the current building makes a negative contribution to the area.

6. Equalities Impact

6.1. Development of new temporary accommodation facilities for homeless families in Camden has been prioritised as one of the most urgent development projects by the local authority. Covid-19 has further added to the urgency of providing temporary accommodation for those in desperate need living in Camden.

- 6.2. The site is intended to be used by Camden Council to provide urgently required housing for families in severe need. Housing affordability has disproportionate impact upon minority ethnic groups and upon other protected groups such as wheelchair users and people with problems of mental health and developmental disabilities who are in need of supported housing. Preventing that new enhanced use of the site will therefore have substantial and disproportionate impact on those protected groups. Any decision to list the site would have to be preceded by a full quantitative analysis of the negative impact of listing on those groups.
- 6.3. That impact is even more significant in the light of the disproportionate impact of Covid-19 upon BAME and other protected groups.
- 6.4. If this site is listed, more people will be homeless.

7. Environmental Impact

- 7.1. Listing the building would have a substantial negative impact upon the environment because the ultimate effect will be to cause a number of people to live in another area that is less well connected by public transport.
- 7.2. The site is only 9 minutes' walk from Archway Tube Station and is served by the 4, 134, 390 and C11 bus routes.
- 7.3. If the intended accommodation is not provided onsite, it will in turn have to be provided somewhere else, and the inevitable logical consequence is that the people who would have lived on that other site will end up living in a less well connected area.
- 7.4. Houses not connected to public transport tend to be larger. They will therefore have more embodied carbon, and the residents are likely to be dependent for their journeys on model after model of car, each with embodied carbon of its own.
- 7.5. Each additional new dwelling provided where active travel is possible is a step towards meeting the United Kingdom's goals of reaching net zero carbon emissions. Any decision to list the site must first consider the United Kingdom's treaty obligations and the potential impact of such a listing decision upon compliance with those environmental obligations.
- 7.6. In SAP2012 terms overall the redevelopment proposal includes a 52% carbon reduction with remaining emissions off-set with a payment to the local authority offset fund to meet a zero-carbon standard. The environmental impact of the building is to be reduced through sustainably sound redevelopment, as outlined in the Sustainability Statement accompanying the planning application.

8. Conclusion

- 8.1. We believe that 2 Chester Road does not begin to approach the historic or architectural interest necessary to merit the Grade II listing of such a recent building.
- 8.2. Furthermore, such a listing would cause substantial equalities and environmental damage, and be contrary to the wider public interest.
- 8.3. We will be applying for the site to be issued with a Certificate of Immunity to allow the vital redevelopment of the site and ensure 2 Chester Road is made more resilient, prosperous, vibrant and valued by local people.
- 8.4. This letter is submitted by the undersigned on behalf of the housing campaigns London YIMBY, PricedOut and YIMBY Alliance. We can be reached via email at contact@yimbyalliance.org and by telephone at [deleted].

Yours faithfully

Anya Martin Chris Worrall

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John Myers Sam Watling

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