

**TOM HOLBROOK** BA(Hons), DipArch, PhD, ARB  
**FOR LONDON BOROUGH OF CAMDEN**

**APPEAL SITE**

Alpha House, 24-27 Regis Road, London, NW5 3ER ('the site')

**APPELLANT**

Big Yellow Self Storage Company Limited

**REBUTTAL NOTE**

COUNCIL REFERENCE:

2023/0093/P

PLANNING INSPECTORATE REFERENCE:

APP/X5210/W/24/3337347

### 1.1

This rebuttal note responds to information contained within Mr Scanlon's Proof, which introduces another 'masterplan', together with other new and revised material. I respond here to the design aspects.

### 1.2

While the amended and new masterplans do reduce the heights of residential buildings to comply with LBC policy, the fundamental flaws rehearsed in my Proof pertain: rather than the desired co-located and mixed environment, the masterplans establish a zoned approach to different uses across the GA. They locate housing to the west end of the site with a route dominated by industrial servicing between that and the amenities and infrastructure of the High Street. The masterplans also fail to address the continuity of existing businesses (such as UPS) on the site.

### 1.3

If anything, the evolution of the masterplans submitted leans towards separation of function, as opposed to the continuous mix of uses desired by the KTNP. This is reinforced by the division of housing and other uses by the position of the POS and the appellant's scheme, description as 'a gateway'(8.2).

### 1.4

Mr Scanlon makes a number of points (5.2-5.10; 7.7-7.10) in reference to the optimisation of height in the appellant's proposal. No daylight and sunlight analysis has been shared to substantiate his conclusions, but the effects of a building to the north of Mary Brancker House across a fairly wide street can be designed to address and ameliorate specific impacts: it is not just a function of extrusion of the ground plan to a certain height. The 5<sup>th</sup> Studio study made a judgement that it would be possible to justify 7-8-storey buildings with suitable modelling.

### 1.5

In section 7.7-7.10 Mr Scanlon claims that density can be achieved in two ways: by the plan area of the building and by increasing height. This illustrates the problem of a plan-based masterplan, which is not able to modulate building form in three dimensions to address particular impacts, for example, through set-backs or carefully designed deployment of massing.

### 1.6

In section 7.8 and 7.30 Mr Scanlon claims that the appeal scheme intensifies the industrial floor space compared to the existing site by 550%, and yet as Mr Deller's Proof confirms (4.16-17), the mezzanine floors are expressly excluded.

### 1.7

In 7.42 Mr Scanlon introduces a plan, included in Appendix 6, illustrating 'Active Frontage'. I take issue with Mr Scanlon's understanding of an 'active frontage', which seems to be all the edges of buildings. The National Model Design Code defines it as follows *"An active frontage means that buildings have ground (and sometimes upper) floors with windows and doors facing onto the street, creating interest and activity. Related uses might include shops, cafés, commercial premises or services but can also include residential uses."* As the appellant has chosen to place the main entrance to the proposed scheme on the flank, rather than the front of the building, this is not an 'active frontage'. Similarly, as my Proof addressed (6.16), ground floors of the housing blocks will need to accommodate 'back door' functions such as cycle storage, bins and other servicing, resulting in limited potential to operate as an active frontage.

### 1.8

In 7.46 Mr Scanlon quotes the KTPF as supporting the location of industrial uses to the East of the GA, and yet the strategy point referenced clearly illustrates a bespoke servicing route which removes industrial servicing from Regis Road, which is not achieved in any of the 'indicative masterplans'.