

ARKWRIGHT MANSIONS RESIDENTS' ASSOCIATION

7 July 2016

18 Arkwright Mansions
206 Finchley Road
London NW3 6DE

Ms Seonaid Carr, Development Management
London Borough of Camden
2nd Floor, 5 Pancras Square
c/o Town Hall, Judd Street
London WC1H 9JE

Dear Ms Carr,

Objection to Planning Application Ref: 2016/2910/P, 317 Finchley Road, NW3 6EP

I am writing on behalf of the residents of Arkwright Mansions to object to the above planning application. The proposed development at 317 Finchley Road lies opposite Arkwright Mansions, a block of 27 flats, whose residents would be directly affected by this development. The main grounds for our objection are as follows:

1. Building design

In respect of its height, ***** and *** the proposed development does not comply with the guidance set out in Camden Planning Guidance CPG1, which states (in Para. 2.6) that "Camden ... will not approve design which is inappropriate to its context or fails to improve the character of an area". More specifically, it does not meet the following requirements:

Height effects on skyline

The proposed height of the building remains at 7-10 storeys above street level, in spite of the numerous objections raised by those attending the Management Development Forum on 16/3/16. This height exceeds that of neighbouring buildings by five or six storeys – the late Victorian terraced housing to the South being only four storeys and the new housing developments to the north five storeys. Of the buildings opposite, our own Mansions block is also five storeys and shares a common roof line with other new and historic terraced housing to the south.

The proposed height is also contrary to Fortune Green & West Hampstead Neighbourhood Plan (FGWHNP) which requires that "new development shall respect, and be sensitive to, the height of existing buildings in their vicinity and setting".

It should be noted that Planning Application 2014/5208/P, about which our residents were not consulted, proposed a six-storey building for this site that was subsequently approved. The LBC Officers' Report on this application (Para. 6.22) stated that "the buildings to the south are 4 storeys and to the north and east 4 and

5 storeys in height [so the] proposal for a five storey plus set back 6th floor building would not be out of keeping within the surrounding context." Unfortunately, the key drawings submitted (Pages 253-5), which do not reproduce the sky lines of these adjacent buildings on the same page, do not support this notion. The Officers in question have clearly confused the height of the end parapet of the neighbouring building terrace, which is level with the flat roofs of that terrace, with that of the height of the chimney stacks rising above those roofs. This basic error can be clearly seen from anyone viewing this roofline from the street, particularly as the chimney stacks have since been demolished as part of some other development.

It follows that in relation to the actual height of existing neighbouring buildings the proposed 7-10 storey building would tower an unacceptably three to six storeys above them.

Design effects on heritage

The area surrounding the site is marked by, not only the late Victorian terraces to the south and east, but also by the Camden Arts Centre, and Arkwright Mansions, one of a number of imposing mansions blocks that form a distinguishing part of the heritage of the Finchley Road and the Redington and Froggnal Conservation Area. CPG1 states (in Para. 3.7) that Camden "will only permit development ... affecting the setting of conservation areas ... that preserves and enhances the character and appearance of the area". Although the 317 Finchley Road development lies on the opposite side of this Conservation Area (and Arkwright Mansions which lies within it), it is clearly a part of its "setting" and the views into and out of it.

It is difficult to see how the solid mass of a 7-10 storey stone building can possibly achieve anything but stick out like a sore thumb amongst the light decorative vernacular features of its historic neighbours. (This obviously excludes the more recently approved mish-mash of monstrosities sited to the north of the proposed site, culminating in the ugly 10-storey tower block at JW3 (Jewish Cultural Centre), which the developers have inappropriately taken as their height benchmark for 317 Finchley Road.) The development proposed is primarily for residential use and not some grand public or private use, such a town hall or bank, where excessive height and mass *might* perhaps be justified, and it is difficult to see how any tinkering with the design of the façade can possibly reduce its overbearing physical presence.

The impact of the proposed design could only further damage the character of the locality and Conservation Area.

2 Commercial deliveries

The proposed development includes a retail food store (for Marks & Spencer) which according to the statement prepared by the Transport Planning Association (TPA) "could require a number of deliveries each day" for this store. TPA envisage "that deliveries will be limited to outside of the peak hours ... predominantly in the morning".

While unlimited parking is permitted on the Finchley Road within the town centre (which includes 317 Finchley Road) from 7 p.m. and 7 a.m, parking spaces are very limited and only allow 20 minutes for loading/unloading between the 10 a.m. and 4.00 p.m. from Mondays to Saturdays. No parking at all is permitted on these days between 7 a.m. and 10 a.m. and 4 p.m. and 7 p.m. It follows that, unless store delivery vehicles can find a parking space between 10 a.m. and 4 p.m. and do their loading/unloading in less than 20 minutes, they will be forced to ignore these parking restrictions, park at the bus stop, or park before 7.00 a.m.

Both sides of the section of the Finchley Road near 317 are highly residential, whose occupants' sleep would invariably be disturbed by "a source of disruption and ... noise nuisance particularly when undertaken at night" (Camden Draft Local Plan (CDLP), Para. 6.116), when – as our residents experience - otherwise busy and noisy roads such as the Finchley Road are comparatively quiet. This noise disturbance is accentuated if, as is likely, the delivery vehicles concerned have noisy refrigeration/air conditioning units or require the engines to be kept running. Understandably, the CDLP proposes to impose conditions on such "deliveries, collections and loading and unloading of goods and refuse to take place between the hours of 08.00 to 20.00". Unfortunately, these are almost the very same hours when they will *not* be able to park.

There is clearly no effective way of resolving this issue other than to refuse planning consent for such a large food store that will invariably require frequent commercial deliveries with its unavoidable consequences.

3. Community Infrastructure Levy (CIL)

Our residents are deeply suspicious of the influence of this financial incentivisation of the planning process, having witnessed the consequences of Camden's participation in a profit-sharing scheme with the developer for The Pulse site to the north of 317 Finchley Road. It resulted in Camden ignoring the height restrictions of an existing site development plan and permitting the construction of a segregated development, comprising two separate blocks each with separate entrances, for 50:50 affordable and private housing, contrary to government planning guidance at the time. (It's not too difficult for passers-by to guess which of the two blocks is which!)

The availability of the large sums of CIL money hanging on this project should be of concern to anyone expecting a council's planning decisions to be based solely on the merits of non-financial considerations.

On behalf of the residents of Arkwright Mansions, I strongly recommend the Council's rejection of this application.

Yours sincerely,

Bill Granger (AMRA Chair)