



CROWN ESTATE PAVING COMMISSION

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16th June 2016

Attn: Kate Phillips
Development Management
Regeneration and Planning
London Borough of Camden
Judd Street
London WC1 8ND

Dear Ms Phillips

**Planning Applications 2016/1479/P and 2016/1776/L
Land at Chester Gate adjacent to 6-10 Cambridge Terrace, Regent's Park NW1**

The following comments are the Crown Estate Paving Commission's (CEPC's) response to the public consultation about the two planning applications mentioned above.

The CEPC is the statutory street manager for the residential roadways on Crown land in and around Regent's Park, London. The CEPC is responsible for the maintenance, lighting and cleansing of the roadways and their associated pavements. It issues licences for encroachment on its roadways and has a number of other regulatory functions including the control of residential parking. It was established in 1824 at the time that Regent's Park was being constructed and its role is defined in a number of specific statutes, the last dating from 1851. Chester Gate and the immediately adjacent roadways fall within the CEPC's jurisdiction.

As a statutory authority with detailed local knowledge, the CEPC is making this submission to Camden Borough Council to provide what it hopes will be some helpful context to a number of points that are being made as part of the application. These points may be relevant either to the Council's own decision making on this matter or to the discharge of the CEPC's statutory responsibilities. The submission is not intended to provide support or objection to the applicants' proposals.

A. HERITAGE VALUE

Regent's Park is a recognised Conservation Area and a remarkable survivor from the Regency period, being of both national and international significance. An important and well documented feature of John Nash's original design concept for Regent's Park was the punctuation of the residential terrace vistas by trees and gardens.

The CEPC commissioned a measured survey of its existing estate from Charles Mayhew in 1834-5, for the purposes of calculating its rates. This survey showed a garden in Chester Gate attached to 10 Cambridge Terrace, and gave its dimensions and an indication of its general layout. The CEPC's archive contains a copy of that survey, a copy of the property's lease showing the garden, and a copy of the surrender to the Crown Estate dated 4th April

1873 of the garden's area for subsequent road widening. On the basis of this available evidence and that of a historic photograph, also mentioned in the planning application, the CEPC believes that the original garden area did exist from quite early on in the development of Regent's Park and in a form similar to that being claimed in the application. The garden area existed for at least 38 years until its surrender.

The proposed development seeks to introduce a garden in a prominent position fronting the Outer Circle, a change that will have a significant impact on the park's current streetscape and a development demanding a very careful assessment in heritage terms. Such a reinstatement of a lost feature may well offer a unique and welcome opportunity for the park in terms of increased heritage value. The CEPC is not aware of any other lost features of a similar type and scale to this garden, so the proposals do not realistically form a precedent for the introduction of other private gardens on the park's roadways.

B. COMMENTS ON THE PROPOSED WALL AND RAILING DESIGN

The CEPC has provided the applicants with a historic stereoscopic photograph showing the extreme western end of the original Chester Gate garden taken a few years prior to its removal (and reproduced in the applicants' Chester Gate Landscape Report 622.01(RP)005). They show the railings along the Cambridge Terrace and Chester Gate frontages of the garden. The formation of the latter railings would appear to be of a different design to those on the Cambridge Terrace frontage. There would appear to be a masonry pillar at the north west corner of the garden and a low masonry wall extending along Chester Gate to form the plinth for the railings above. The designs of these features of Chester Gate in the photographs are similar to the walls and railings now remaining on some parts of the southern end of Chester Terrace, opposite the proposed garden.

The CEPC believes that the design of any reinstated garden's walls and railings should follow, as closely as possible, what is known about the original features and that the designs in the current application should be adjusted accordingly to maximise the gain in heritage value from the reinstatement.

C. IMPACT ON RESIDENTIAL PARKING

Parking in the residential roadways outside the Outer Circle at Regent's Park is regulated by the CEPC. Parking is managed primarily for the benefit of residents and requires a CEPC permit at all times and on all days of the week. No *Pay & Display* or unregulated parking is in operation within the CEPC controlled areas. It is not the responsibility of the CEPC to provide specified amounts of residential parking space, only to manage whatever space is available on its roadways. Possession of a CEPC permit does not guarantee a parking space at all times.

Parking regulation by the CEPC does not, of necessity, follow local authority practice and the CEPC wishes to clarify the changes in the availability of residential parking space that it would expect to occur if the garden reinstatement proposals were to be implemented.

The CEPC's parking arrangements have been developed over many years in a manner that it believes suit the specific road and residential conditions of Regent's Park. It should be noted that no significant changes in its parking regulations are currently envisaged such that would, for example, allow residents in one terrace of the estate to park freely in another terrace. This means that residents who are displaced from parking Chester Gate would not, under normal circumstances, be able to use unoccupied alternative parking space in other CEPC roadways.

Under the current arrangements, only the residents of properties in Chester Gate and Cambridge Terrace Mews are eligible to apply for permits to park in Chester Gate. There are 13 permits currently issued to these residents. The proposals envisage a reduction of the available parking space in Chester Gate from 12 spaces to approximately 4 spaces. When taking the points made below into account about easing large vehicle movements in the roadway, this number may need to be reduced further to 3 parking spaces, in order to retain viable access arrangements for larger vehicles through Chester Gate. Contrary to the statements in the application, a probable total loss of 9 residential parking spaces would be envisaged.

Over the last few months the CEPC has sought to investigate with the residents affected by the current proposals the availability of other possible parking arrangements, utilising private parking space or roadway parking under the management of the Royal Parks. From these discussions, it is understood that the applicants have offered 2 parking spaces sited on their private land for the use of the residents of Cambridge Terrace Mews. This would be a private arrangement outside of normal CEPC parking controls, but would have the potential to alleviate a portion of the impact of the proposals for as long as the arrangements existed, reducing the loss in residential parking to 7 spaces overall.

D. IMPACT ON TRAFFIC MOVEMENTS

The CEPC is concerned to ensure that its roadways are passable by those vehicles having legitimate business on its estate to serve the park and its residents. Regent's Park roadways were designed in the Regency period. They cannot and, in the CEPC's view, should not be required to accommodate the demands of all the large modern vehicles that may be common on other modern roads in London. There is a clear requirement, however, to accommodate moderately sized local authority refuse trucks and emergency vehicles. Furniture removal vans and scaffolding lorries may also need to be accommodated, although it is often reasonable to specify smaller, more manoeuvrable vehicles for these functions in the circumstances of this historic estate.

The CEPC has examined the applicants' swept path analyses for large vehicles. It notes that although they show the parking spaces on the roadway, they do not show the widths of the parked vehicles, an omission that rather limits the interpretations that can be made from the analyses.

The CEPC makes the following points based on its own swept path analyses for a 7.5t box van, a refuse truck of a size currently used by Camden's refuse contractor, and a long wheelbase fire tender.

- The two remaining parking spaces proposed on the north east side of Chester Gate (outside No. 3 Chester Terrace) effectively prevent large vehicle access to Chester Gate from Albany Street. A reduction from two parking spaces to one would allow sufficient room to safely manoeuvre these vehicles into Chester Gate. The removal of both spaces would remove the problem altogether but at the cost of losing further parking space and risking higher vehicle speeds through the roadway, unless speed reduction measures (e.g. speed humps) were to be installed.
- There may be scope to allow a second parking space at the north west end of Chester Gate, although this would accommodate only smaller cars and would need to be

positioned back sufficiently from the Outer Circle junction to maintain road safety for vehicles attempting to park.

- Any future reversal of the one-way traffic flow within Chester Gate from eastbound to westbound in response to future developments (e.g. CS11 or HS2) would be ruled out because larger vehicles would not have sufficient room to make the left turn from Chester Terrace into Chester Gate.

E. IMPACT ON TRAFFIC CONGESTION

The CEPC's examination of the applicants' modelling of traffic congestion within Chester Gate indicates that reasonable conclusions have been drawn for what is known about the current traffic demands placed on that roadway. As noted in the application, there are two significant schemes that might affect the traffic flows.

- Transport for London's Cycle Superhighway 11 proposals, if implemented in the current format, might be expected to reduce through-traffic flowing into the park since the most popular exit points will be closed-off for significant parts of the day. However, the size of the park and the complexity of the overall proposals would make forecasting the actual flows within Chester Gate quite difficult. Small adjustments to the proposed gate opening times might, for example, have a significant impact on these flows. Gate closures will also have the effect of concentrating the remaining flows through the gates remaining open, e.g. Chester Gate.
- The HS2 construction works are likely to cause temporary displacements of traffic into and around the park (if a 17 year period can be considered as temporary). Insufficient details about these traffic flows are currently available to the CEPC to judge how Chester Gate might be impacted, although flows through the park might reasonably be expected to be much higher in the first few years of the project due to congestion on the adjacent roads, such as Albany Street, caused by various parts of the construction work and its associated vehicle traffic.

SUMMARY

The CEPC wishes to draw Camden Council's attention to its analysis of the likely changes in the availability of residential parking that would result from the proposals and to the limitations that the restored garden would place on some vehicle movements in the adjacent roadways. The Council will need to balance these changes carefully against its consideration of any increase in heritage value arising from the restoration of an original and significant design feature of Regent's Park.

The CEPC would be very willing to clarify any of the information given in this submission or to provide further details required by the Council in order for it to arrive at an informed decision concerning this application.

Yours sincerely



Max Jack
Director