

From: Louise Morton <lm@quadranttownplanning.com>
Sent: 20 December 2016 16:15
To: development.control@camden.gov.uk
Cc: Peres Da Costa, David
Subject: RE: 2016/6069/P: 1 Triton Square: Comments from Westminster Kingsway College

Importance: High

Follow Up Flag: Follow up
Flag Status: Completed

I should be grateful if David Peres Da Costa could please respond to the points raised below on behalf of Westminster Kingsway College and confirm that the applicant is addressing the issues, specifically providing an update to the submitted Daylight and Sunlight report.

I look forward to hearing from you.

Louise Morton

From: Louise Morton [mailto:lm@quadranttownplanning.com]
Sent: 25 November 2016 15:54
To: development.control@camden.gov.uk
Subject: 2016/6069/P: 1 Triton Square: Comments from Westminster Kingsway College

FAO: David Peres Da Costa

We act on behalf of Westminster Kingsway College, which owns the Regents Park Centre on Longford Street, located adjacent to St Anne's Church and directly opposite 1 Triton Square.

The Regents Park Centre is one of the College's main centres within London providing some 3,300 sq m of academic, training and support services for the College over four floors. For example, the centre provides general teaching classrooms for ESOL (English for Speakers of Other Languages), employability programmes and classroom based apprenticeship provision, together with staff offices for adult pathways, health and social care, and support functions, including HR and finance.

In addition, there is a nursery which provides childcare for students, staff and the local community, based on the ground floor and which utilises a dedicated garden area to the west of the building to provide outside space for the children.

Following the merger of Westminster Kingsway College with City and Islington College in August 2016, the Regent's Park Centre has undergone significant refurbishment works in order to accommodate the WKCIC Group Head Office apprenticeship delivery team, employer engagement and work based learning.

We have reviewed the planning application submission and wish to raise the following concerns:

1. Impact on privacy and overlooking of the College grounds, specifically the external nursery area:

The proposed 6 to 9 storey residential block on the site of St Anne's Church will result in significant overlooking of the external nursery area due to the presence of windows and balconies on the east elevation. In particular, the large balcony proposed at the first floor

level will provide a direct view into the garden area. This will lead to a loss of privacy and raise significant safeguarding issues with regard the statutory requirement for children in the Early Years Foundation Stage (EYFS), which stipulates that 'providers must provide access to an outdoor play area or ensure that outdoor activities are planned and taken on a daily basis.'

2. Loss of daylight and sunlight:

It is noted that the Daylight and Sunlight study prepared by GIA does not consider the impact of the proposals on the College (annotated as The Central Institute in the report), advising that it is a commercial property and therefore falls outside the BRE's parameters. However, the site is an operational Further Education College, falling within Use Class D1, and for the purposes of daylight and sunlight analysis should be considered as a relevant '*non-domestic building where the occupants have a reasonable expectation of daylight*'. Good daylight levels are required within classrooms to ensure effective delivery of the curriculum and it is important to the College that these are not reduced.

We are concerned that the increase in the height of 1 Triton Square by an additional 3 storeys to 45m, would reduce daylight and sunlight to the College due to its location due south of the Regents Park Centre; and the proposed 6 to 9 storey building on St Anne's Church, located to the west of the Regents Park Centre, would have a similar effect.

We therefore request that the GIA report be extended to include an analysis of the potential impact of the proposed development on daylight levels within the College's building.

3. Overshadowing:

The Overshadowing Study prepared by GIA indicates that the College's landscaped grounds will be significantly overshadowed as a result of the proposed development. The study indicates that on the relevant date – 21st March – the amount of area receiving more than 2 hours of sunlight would reduce from 81.5% to 5.4%. This huge reduction will result in a significant overshadowing of the site and will undermine the outlook from the property. Students work best in light and airy spaces, with good levels of natural daylight and sunlight; not in buildings with a gloomy, overshadowed outlook.

The report's conclusion that the area will not be overshadowed in the height of summer, just as the College is entering the exam period and summer holidays, does not alleviate our concern, that for the most part of the year, the area will be completely overshadowed.

I should be grateful for your consideration of these matters and look forward to hearing from you.

Regards

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