

Regent's Park Estate Tenants and Residents Association (TRA). Planning Application No. **2020/5473/P** 17-37 William Road NW1.

We object to this application for the following reasons.

1. Insufficient Consultation.

On responses and on length of time given to respond, this consultation was insufficient, regardless of any COVID 19 restrictions in place at the time.

- **Unreadable leaflets. A response rate of less than half of one percent.**

The applicant states that of 2423 households consulted by post they received 12 responses (a response rate of less than a half percent). They use these 12 responses to create an array of statistics to show various things. For example, 58% support the provision of student homes. That is all of 7 people, the other 5 did not support student homes.

The leaflet sent out on 24th Sep was illegible (the font was too small at 6pt). We complained both to Camden and Kanda Consulting and a repeat flyer was sent out 12th of October in a larger format (11pt). The consultation ended on 29th October meaning that actual consultation lasted for 16 days.

Of note is the recent Controlled Parking Zone changes for this area CA-G that Camden did in March/April 2020. Leafleting over 2000 households they got a response of 10%, when COVID 19 restrictions were more severe. Camden have decided to re-do this consultation because of an insufficient response rate. The applicant should also re-do the consultation.

- **Alternative consultation methods during COVID 19 restrictions inadequate.**

After our complaint we were emailed and invited to organise an online TRA meeting. This was an impossible request as most of our members were shielding and very few have experience of online conferencing (two of us). We assumed that Kanda Consulting would be able to carry out sufficient consultation with the resources at their disposal. This clearly has not happened.

There was no visible use of street notices. Large posters around the area could have been used but weren't. A simple picture of the proposal could have been shown on the posted leaflets, but wasn't.

I note video conferencing was offered, and taken up by the adjacent residents of William Road, which is welcome. No offer was made to the residents of Winchester Apartments. In contrast a video conference with The Drummond Street

Neighbourhood Forum was held. Drummond street is not within the immediate local area.

2. The development does not relate properly to the local area.

The applicant cites the new Local Plan in support of their development. This is not the plan currently adopted.

- **Little relation to the adjacent built environment.**

The applicant says tall buildings are appropriate for this site. The site is within the Central Activity Zone (CAZ) but right on the boundary. It is not in an opportunity area, or area of intensification, and is not a town centre. This should be a material consideration in deciding the height and scale of this development.

William Road forms the northern boundary of the CAZ. The north side is not in the CAZ and is characterised by low height buildings, mostly set well back from the road. The building height ranges from two storey commercial properties to 4 storey terraces. Winchester apartments directly opposite the site is 8 floors (inc Ground Floor).

The south side is within the CAZ and has a more uniform frontage onto the road, mostly offices with residential apartments above, not set back but no more than 6 storeys high. On the Stanhope Street side of the development the building heights are no more than 4 storeys.

There must be a gradual change of height and scale across this CAZ boundary, and not a 'cliff face', to maintain a proper townscape.

- **73m is too high.**

The applicant declares a delivery of a 15-storey building extending to 73 metres (para 6.32 of the Planning Statement). This is 3 times higher than Winchester apartments and over three times higher than the existing buildings on the site.

The height and massing of the development should complement the Winchester apartments directly opposite. Winchester apartments is 8 stories high (25 metres) and is part of the wider Netley development. It was designed as an end piece or 'terminus' to that development and a focal point for navigating the local streetscape (Planning Statement for the Netley development, para 7.4 - 2012/2089/P).

The applicant mentions that there are already two existing residential tower blocks nearby on the Regent's Park Estate, Bucklebury and The Combe. Both are 19 floors high but both are only 50 metres high (an average floor height of 2.7 metres. Both are also part of a set piece of a wider urban development that has an overall coherent design.

The William Road proposal at 73 metres suggests a floor height of almost 5 metres. Something is not quite right here.

Para 5.4 of the Townscape report claims the proposed tower at 15 floors would “remain below the height of the existing towers in the Regent’s Park Estate”. It continues by claiming that therefore “views from the west within the LBC Regent’s Park Conservation Area, it (*their building*) would appear lower than the existing post-war tall buildings”.

How can this be?

This development will only serve to reduce the legibility of the area. A tall building can be a civic emphasis but that was the job of Winchester Apartments. With Bucklebury, The Combe, and the two new resident blocks at Regent Place/Triton Square, another tower claiming to be a focal point will only serve to create a forest of towers.

- **Winchester Apartments Loss of light.**

The proposed tower will impact negatively on the residents of Winchester Apartments. These residents have already had to endure being relocated from the blocks at the north end of Stanhope Street which were demolished last year to make way for HS2. They were not told that their south facing living rooms and balconies will be in the shadow of a tall 15 storey block of student flats.

- **Comparison with existing blocks of flats is not appropriate**

The applicant again mentions that there are already two existing residential tower blocks nearby on the Regent’s Park Estate, Bucklebury and The Combe, which are 19 floors high.

Both, however, are set back 50m or more from any residential property that would otherwise be in their shadow. This development does not provide such courtesy for Winchester Apartment Residents.

- **Assessment of daylight loss by Central Activity Zone (CAZ) standards is not appropriate.**

Winchester Apartments is not within the CAZ so cannot have its daylight and sunlight standards assessed as if it were. The developer’s daylight and sunlight report accepts there will be a noticeable loss of Vertical Sky Component (VSC) for 43 out of 76 Winchester apartment windows. That’s over half.

The applicant cannot then say this loss falls to less than a handful if the balconies are removed because;

- That would mean Winchester apartments can be subject to CAZ policies and guidelines.

- To assess the VSC based on removing the balconies is absurd. The balconies are an integral part of the building and cannot be removed.

The residents of Winchester apartments are mostly council tenants recently relocated from blocks that have since been demolished to make way for the High Speed Two railway (HS2).

It is unfortunate to now take away so much daylight from their main rooms. This will have a number of negative impacts.

- A reduction in daylight leads to a number of health issues, including a lack of vitamin D, depression and anxiety.
- A reduction in daylight into rooms leads to having to put the lights on more often and having to heat the rooms more often, especially during the winter months. This will hinder Camden in trying to meet its carbon neutral targets. It also cost the residents in higher utility bills.

- **Overlooking.**

There is a serious risk of overlooking and consequent loss of privacy by having the Winchester Apartments and the proposed building facing each other head on. This is not in keeping with the way buildings on the Regent's Park Estate have been designed and laid out.

3. No consideration for heritage.

- **No concern for adjacent Grade 2 listed buildings.**

The ground floor design is overpowering and detrimental to the Grade 2 listed terraced housing next door, (no.s 48-52 Stanhope Street). More can be done to better compliment the terrace.

- **Little concern for national viewing corridors.**

A 73 metre high building is in conflict with the Landmark Viewing Corridor 2A.2 where buildings should not exceed 70-75m in height. It is also in conflict with LVC 5.A.2 where the maximum height limit is 53.5m.

The applicant claims that the new tower at Regent's Place already breaches corridor 2A.2 so they should be allowed to breach to too (Townscape Report para 5.3). To have planning sanctioned as breached like this brings the planning system into disrepute, and is a recipe for overdevelopment and a loss of amenity for the local community.

4. There is no housing provision.

The developer has stated that there is no intention to provide any much-needed housing for the local community or anyone else.

This is not acceptable. We have already lost 11 housing units that were going to be built at the nearby Stephenson House, on the corner of Drummond Street and Hampstead Road. The recent amendment to that planning application changed 11 of the 17 proposed housing units to overnight rooms for parents/carers of cancer patients at the University College Hospital (2020/5851/P).

Why can't the William Road developer offer affordable housing units?

I wonder if there is a loophole in the CAZ planning guidance that is being taken advantage of here.

Finally

The development should be limited to take account of the surrounding buildings and townscape. The Stanhope Street façade at the ground and lower levels should enhance and complement the graded 2 listed terraced housing next door (no.s 48-52 Stanhope Street).

The height of the development should be limited to keeping reductions in VSC for rooms in the Winchester Apartments opposite to no more than 17%. A level deemed not significant by the BRE guidelines supported by the Local Plan.

The removal of balconies in assessing VSC should be disregarded as an absurdity. The developer is not proposing to remove the balconies of any of the Winchester Apartment properties.

The massing and bulk of the development should be reduced to reflect the wider streetscape of William Road and Stanhope Street. In any case the building should not dwarf Winchester apartments or the adjacent Grade 2 listed terrace in Stanhope Street.

There should be some affordable housing provision.

Steven Christofi

Regent's Park Estate TRA.