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Dear Alex Johnson,

www.camden.gov.uk/planning

Re: The Towers, 39 Dartmouth Park Avenue, NW5 1JP

1. Proposal

Installation of railings and external lighting around perimeter of site, replacement doors on building, new bin store, and creation of 4 parking spaces and turning circle.

2. Site description

The Towers is a 4 storey residential development from the 1950's. It is of brown brick construction with pitched roof. The entire ground floor of the application block comprises a distinctive undercroft/communal area with stores with the building above constructed on distinctive concrete pillars.

The application building is not listed but is located in the Dartmouth Park Conservation Area. It is not identified as either a positive or negative contributor to the conservation area. The application site is also located in the Dartmouth Park Neighbourhood Plan area.

3. Relevant planning history

2019/4651/P – Installation of steel doors and panels with windows to internalise the ground floor – **Refused 5/11/20**

Reason for refusal: The proposed enclosing of the ground floor open undercroft areas, by virtue of the siting and design of the enclosing structures, would represent an incongruous and prominent addition that would undermine the architectural significance of the building and be harmful to the character and appearance of the host building and the Dartmouth Park Conservation Area, contrary to policies D1 (Design) and D2 (Heritage) of the Camden Local Plan 2017 and policies DC1 (Enhancing the sense of space), DC2 (Heritage assets) and DC3 (Requirement for good design) of the Dartmouth Park Neighbourhood Plan 2020

4. Relevant policies and guidance

- National Planning Policy Framework (2021)
- London Plan (2021)

- **Camden Local Plan (2017)**

Policy G1 Delivery and location of growth

Policy A1 Managing the impact of development

Policy A3 Biodiversity

Policy D1 Design

Policy D2 Heritage

Policy CC5 Waste

Policy T1 Prioritising walking, cycling and public transport

Policy T2 Parking and car-free development

- **Supplementary Guidance**

- CPG Design (2021)
- CPG Home improvements (2021)
- CPG Amenity (2021)
- CPG Transport (2021)

- **Dartmouth Park conservation area appraisal and management strategy (2009)**

- **Dartmouth Park Neighbourhood Plan (2020)**

- Policy DC1 Enhancing the sense of place
- Policy DC2 Heritage assets
- Policy DC3: Requirement for good design
- Policy ES1: Green and open spaces
- Policy ES2: Trees
- Policy TS1 Safety and accessibility for pedestrians and cyclists
- Policy TS3 Traffic reduction

5. Assessment

The proposals at this stage are to establish the principles of development and as such the response will focus on the following areas:

- Design and impact on townscape
- Impact on neighbour amenity
- Transport
- Designing out Crime

6. Design

In accordance with Policy G1, the Council supports growth by securing high quality development and promoting the most efficient use of land. The policy goes on to list how it will achieve this. Coupled with this, Policy D1 seeks to achieve the highest standard of design in all developments. It is expected that development will be of the highest architectural and urban design quality which improves the function, appearance and character of the area; and Policy D2 states that the Council will preserve, and where appropriate, enhance Camden's rich and diverse heritage assets

and their settings, including conservation areas and listed buildings. Policies DC1 and DC2 of the Neighbourhood Plan align with policies D1 and D2 of the Local Plan in seeking high quality design and need to be given equal weight as the Local Plan in the assessment of the application.

Policy ES1 of the Neighbourhood Plan states that fencing or other boundary treatments that would obscure views of houses or gardens (including views between properties to back gardens) or disrupt the existing streetscape will be resisted.

CPG Home Improvements states within gardens that:

‘you should consider maximising the soft landscaping areas and provision of permeable surfaces, to allow water to runoff, grasses to grow and generally support a more biodiverse and resilient soil’

This site is within Dartmouth Park conservation area, located on the north side of Dartmouth Park Avenue at the junction with Dartmouth Park Hill. Dartmouth Park Avenue is a residential street lined by mid-to-late 19th century villas with infill 20th century blocks. The visual character of the street is defined by the linear presence of the houses but more especially the back-of-pavement front garden boundaries, street trees and front garden vegetation. This sense of enclosure breaks down at the north end of the road, at the application site, due in part to the weak boundary treatment around The Towers. At the junction the visual character of Dartmouth Park Hill is more open, principally due to the presence of the reservoir on the east side of the road.

The proposal is for the installation of 1.8m high steel railings and external lighting around the site perimeter. It is noted that the site is current enclosed by low unsympathetic metal railings on top of a brick wall. The rest of the street is characterised by higher front boundaries in a mix of detailed designs and finishes. There is no objection to the principle of railings of this height in this location as they will still allow for views into the host property and greenery of the site and preserve the streetscene. However, it is advised that the final detailed design should be thought through to have a more ‘domestic’ rather than ‘defensive’ appearance to reflect the residential character of the area and ensure that it preserves the character and appearance of the streetscape and conservation area.

The proposal will also create four parking spaces and turning circle. To facilitate this soft landscaping will be replaced with hard landscaping. No material has provided for assessment but it would be expected to be permeable. Nonetheless this would result in the loss of soft landscaping and the removal of a tree which would not be supported and, given its visibility from the street, it would be considered harmful to the character and appearance of the conservation area. The transport aspect has been assessed in the section below.

The existing bin store is much closer to the existing servicing gates for waste collection and the new store will be pushed inwards and increased in size. It is acknowledged that the final finish of the metrostar bin store should be in a timber

material which would be more in keeping with the conservation area. It is not shown to have a green roof, but one would be encouraged to help further soften its appearance and add to biodiversity on the site. Details of its substrate levels, planting species and maintenance would be expected. The amount of soft landscaping lost to facilitate the store should be kept to a minimum.

The second bin store to the rear of the site will be repurposed to be used for storage and a roof installed. Given its location behind the existing building it is not considered to be subject to public views. However, the existing height is 2.3m high and the highest part of the new sloping roof would be 3.8m high. It is not clear why such an additional height is required and its height should be reduced to ensure it does not appear as a dominant addition.

Entrance doors will be replaced with steel to improve security. This material is unlikely to harm the building's character and appearance. It is not clear from the drawings provided what the final appearance of the external lighting will be but it should be sensitively sited and not appear dominant on the host property/site.

You are encouraged to liaise with both the local Conservation Area Advisory Committee and the Neighbourhood Forum on the proposal before submitting an application for planning permission.

7. Amenity

Policy A1 seeks to ensure that the amenity of neighbours is protected in regard to levels of light, outlook, privacy together with issues of noise, vibration and construction management. Please note construction management is addressed below in the transport section.

Given the scale, siting and nature of the development, it is not considered to harm neighbouring properties amenity in terms of loss of light, privacy or outlook.

In regards to the external lighting it is not clear from the drawings provided on the final appearance of the external lighting but it should be sensitively sited and not create light pollution or disturbance to neighbouring occupiers.

8. Transport

Local Plan Policy T1 (Prioritising walking, cycling and public Transport) states that *the Council will promote sustainable transport by prioritising walking, cycling and public transport in the borough.*

Local Plan Policy T2 (Parking and car-free development) states that the Council will limit the availability of parking and require all new developments in the borough to be car-free. It goes on to state that the Council will:

- *limit on-site parking to spaces designated for disabled people where necessary.*
- *resist the development of boundary treatments and gardens to provide vehicle crossovers and on-site parking.*

Paragraph 10.21 of Local Plan Policy T2 states:

- *Parking can cause damage to the environment. Trees, hedgerows, boundary walls and fences are often the traditional form of enclosure on Camden's streets, particularly in conservation areas, contributing greatly to their character, as recognised in Camden's Conservation Area Appraisals and Management Strategies. This form can be broken if garden features are replaced by areas of paving or hard standing. Development of boundary treatments and gardens to provide on-site private parking often requires the loss of much needed public on-street parking bays to create vehicle crossovers. Areas of paving can also increase the volume and speed of water run-off. This adds to the pressure upon the drainage system and increases the risk of flooding from surface water. Developments seeking to replace garden areas and/or boundary treatments for the purposes of providing on-site parking will therefore be resisted.*

Paragraph 6.9 of Local Plan Policy A1 includes the following statement:

- *Any development or works affecting the highway will also be expected to avoid disruption to the highway network, particularly emergency vehicle routes and avoid creating a shortfall to existing on-street parking conditions or amendments to Controlled Parking Zones.*

Paragraph 6.10 of Local Plan Policy A1 states:

- *Highway safety, with a focus on vulnerable road users should also be considered, including provision of adequate sightlines for vehicles leaving the site. Development should also address the needs of vulnerable or disabled road users.*

The site is located in the Highgate (CA-U) Controlled Parking Zone (CPZ). The CPZ operates on Monday to Friday between 1000 and 1200 hours. Parking bays are located on both sides of Dartmouth Park Avenue.

The application suggests that residents use the vehicular access road for parking, which is not its intended use. The intended use of this access road is only for refuse lorries to collect larger items from the open bin store at the end of the access road. As seen on Google Street View, cars frequently park at the end of the vehicular access road and partially on the grass area. Bollards to prevent parking on the grass were taken down in recent years. Therefore, it is clear that there are no, or have not been, formal parking spaces on site. The proposal would introduce 4 formal vehicle parking space to the property, where there are currently none. As such the principle of creating new on-site car parking, including a turning circle, would not be supported and any formal application would be refused as it is contrary to the Local Plan Policy T1, T2 and A1. Also, it would be contrary to policies TS1 and TS3 of the Dartmouth Neighbourhood Plan.

In terms of transport, the railings around the site would be acceptable and the gates open inwards which is welcomed as the Council would not support gates that open onwards onto the pavement.

9. Designing Out Crime

With the goal of improving security at the site, the installation of the railings would help to deter crime.

The Designing Out Crime officer has made the following suggestions to consider with the boundary treatment:

- The railings and gates should achieve a security rating of LPS 1175 SR2 or STS 202 BR2.
- The gates should be access controlled through encrypted key fob with data logging to record usage. If maglocks are the preferred mechanism for securing the gates then these should be integral to the frame and positioned one third from the top and one third from the bottom with a push/pull weight of 600 kg per lock. The door should have an auto close feature to mitigate against tail gating. If there are persons within the block with mobility issues then some form of automation should be looked into. The intercom should be audio and visual to enable residents to suitably vet guests prior to entry.
- Avoid fire drop keys at these locations. Fire drop keys are very cheap and easy to purchase. Once activated they cut the power to the door or gate allowing for unrestricted access. If emergency access is required consider solutions from Gerda. The London Fire Brigade have access to Gerda keys. They are much more expensive and harder to purchase as they are controlled by the company.
- Any potential push to release or thumb turn release at these positions need to be protected from the public realm. This can be achieved through distance away from the point of entry and the use of protective shrouds. As another method to boost the perimeter fence I recommend defensive planting (plants with a high prickly content) to be placed immediately the other side of the railings. This will discourage persons climbing over or using the verge to conceal items.
- The vehicle gate should again be security rated and have an auto close feature. Avoid a fire drop key scenario. Also try to avoid the use of magnetic induction loops as a form of automatic opening on the private side. These can be bypassed by sliding a metal object over the plate. Having a secure vehicle gate will be important.
- The location of the proposed railings needs to take into consideration any potential tree/street furniture which could act as a climbing aid. Explore the relocation of street furniture, maintenance of tree branches as options as well as increasing the height of the boundary railing at certain locations is achievable.
- Ensure the railings do not have any exposed fixtures or fittings that could be easily removed. Consider one way screws and the like.

Suggestions were also made regarding the bin store:

- a security rated door to LPS 1175 SR2 or STS 202 BR2 or LPS 2081 is encouraged. Access controlled through encrypted key fob with data logging to record usage. If maglocks are the preferred mechanism for securing the gates then these should be integral to the frame and positioned one third from the top and one third from the bottom with a push/pull weight of 600 kg per lock. The door should have an auto close feature to mitigate against tail gating.
- The door sets with access control from the ground floor level leading into the stair wells again should be security rated to LPS 1175 SR2 or STS 202 BR2. Access controlled through encrypted key fob with data logging to record usage. If maglocks are the preferred mechanism for securing the gates then these should be integral to the frame and positioned one third from the top and one third from the bottom with a push/pull weight of 600 kg per lock. The door should have an auto close feature

to mitigate against tail gating. Data logging to record usage will also prove useful at these locations. Data logging can highlight residents that are causing issues within the block, highlight vulnerable persons that could be taking advantage of as well as misuse of key fobs (lost/stolen).

- Avoid green break glass if possible and opt for push to exit. Green break glass cuts the power to the door until the panel is physically reset with a key. There is no audible alarm to notify management that it has been activated. These can make a secure line vulnerable. The push to exit although cuts the power to the door will re-engage after a period of time (usually a matter of seconds).

10. Conclusion

The replacement of the front boundary is not considered harmful subject to a revised final detailing on the railings proposed. The installation of controlled vehicle gates will help the existing area not to be used as unlawful car parking and keep it solely for the use of servicing. The new bin store closest to the road would be acceptable subject to a timber finish and a green roof is encouraged; it is advised that soft landscaping removal should be kept to a minimum to facilitate this. The installation of a new roof on the bin store to the rear of the site would be acceptable with a lower height roof. The replacement fenestration would be acceptable.

The principle of creating on-site car parking including a turning circle would not be supported. This access is solely for the use for collection of refuse and you are encouraged to reinstate bollards to prevent unlawful parking on the site. This aspect also results in the loss of soft landscaping which is not supported and it is considered to harm the character and appearance of the conservation area.

This document represents an initial informal officer view of your proposals based on the information available to us at this stage and would not be binding upon the Council, nor prejudice any future planning application decisions made by the Council.

If you have any queries about the above letter or the attached document please do not hesitate to contact Sofie Fieldsend on the number above.

Thank you for using Camden's pre-application advice service.

Yours sincerely,

Sofie Fieldsend

Senior Planning Officer
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