



Date: 20/12/2022
Our ref: 2022/4951/PRE
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Dear Jorge Nash,

Re: 19-37 Highgate Road, London, NW5 1JY - Variation of approved scheme reference 2013/5947/P, dated 18/06/2014 (as amended) [for: Demolition of existing buildings and redevelopment to provide: a new Centre for Independent Living at Greenwood Place; and mixed-use development at Highgate Road comprising residential units, including supported affordable housing units, and social enterprise space; highway improvements; plant, landscaping; servicing; disabled car parking etc.]. CHANGES PROPOSED: Elevational changes (omission of winter gardens); Crittal-style windows; simplified brick detailing; red bricks

Thank you for submitting the above pre-planning application enquiry on 13/10/2022. The required fee of £2,818.98 was fully paid on 16/11/2022. Thank you for meeting with myself, Kevin Fisher (Urban Design) and Rose Todd (Conservation) on 30/11/2022 to discuss design.

1. Constraints

- Archaeological Priority Area – Tier II
- Contaminated Sites Potential
- Strategic View Cone – View from Kenwood to St Pauls
- Strategic View Wider Setting – View from Kenwood to St Pauls
- Underground development constraints – Subterranean (groundwater) flow
- Underground development constraints – Surface water flow
- Underground development constraints – Slope stability
- Kentish Town Neighbourhood Plan Area
- Christ Apostolic Church – Grade II listed
- Site Allocation 39 (19-37 Highgate Road, former Lensham House (A&A Storage) and 25-37 Greenwood Place / Draft Site Allocation KT7 (Highgate Centre)

2. Relevant planning history

Greenwood Centre & Highgate Centre

2022/1603/P: Variation of Conditions 2 (development in accordance with approved plans) and 15 (social enterprise unit opening hours) granted under reference 2013/5947/P, dated 18/06/2014 (as amended by reference 2015/3151/P, 2016/0936/P, 2017/0363/P, 2017/01518/P, 2021/5384/P and 2022/0929/P) (for: Demolition of existing buildings and redevelopment to provide: a new Centre for Independent Living at Greenwood Place; and mixed-use development at Highgate Road comprising residential units, including supported affordable housing units, and social enterprise space; highway improvements; plant, landscaping; servicing; disabled car parking etc.). Amendments to Highgate Road site to include changes to assisted living units provision, net additional residential units, excavation of basement, installation of substation at ground floor, reconfiguration of internal layout, elevational changes, material changes and associated plant, landscaping, servicing, cycle and refuse storage alterations. **Resolution to grant, subject to section 106 legal agreement**

2013/5947/P: Demolition of existing buildings and redevelopment to provide: a new 3,228sqm (GIA) Centre for Independent Living (CIL) (Class D1) comprising 3 storeys plus basement at Greenwood Place; a part 5 part 7 storey mixed-use development at Highgate Road comprising 42 residential units (including 8 supported affordable housing units) and 100sqm (GIA) social enterprise in flexible retail, restaurant/café, office or community use (Classes A1/A3/B1/D1) at ground floor level; highway improvements to Greenwood Place, and associated plant, landscaping, servicing and disabled car parking. **Granted 18/06/2014**

3. Relevant policies and guidance

[National Planning Policy Framework 2021](#)

[The London Plan 2021](#)

[Camden Local Plan 2017](#)

- G1 Delivery and location of growth
- H1 Maximising housing supply
- H2 Maximising the supply of self-contained housing from mixed-use schemes
- H4 Maximising the supply of affordable housing
- H6 Housing choice and mix
- H7 Large and small homes
- H8 Housing for older people, homeless people and vulnerable people
- C1 Health and wellbeing
- C2 Community facilities
- C3 Cultural and leisure facilities
- C4 Public houses
- C5 Safety and security
- C6 Access for all
- E1 Economic development
- E2 Employment premises and sites

A1 Managing the impact of development
 A2 Open space
 A3 Biodiversity
 A4 Noise and vibration
 A5 Basements
 D1 Design
 D2 Heritage
 D3 Shopfronts
 CC1 Climate change mitigation
 CC2 Adapting to climate change
 CC3 Water and flooding
 CC4 Air quality
 CC5 Waste
 T1 Prioritising walking, cycling and public transport
 T2 Parking and car-free development
 T3 Transport infrastructure
 T4 Sustainable movement of goods and materials
 DM1 Delivery and monitoring

[Kentish Town Neighbourhood Plan 2016](#)

[Camden Planning Guidance](#)

Access for All (2019)
 Air Quality (2021)
 Amenity (2021)
 Basements (2021)
 Biodiversity (2018)
 Community uses, leisure and pubs (2021)
 Design (2021)
 Developer contributions (2019)
 Employment sites and business premises (2021)
 Energy efficiency and adaptation (2021)
 Housing (2021)
 Planning for health and wellbeing (2021)
 Public open space (2021)
 Transport (2021)
 Trees (2019)
 Water and Flooding (2019)

[Mayor of London Supplementary Planning Guidance](#)

Affordable Housing and Viability (2017)
 Housing (2016)

4. Assessment

The key planning considerations material to the determination of this application are as follows:

- Background
- Heritage and design
- Quality of residential accommodation (air quality)
- Neighbour amenity
- Fire safety

5. Background

Planning permission reference 2013/5947/P, dated 18/06/2014, related to two associated Council-owned sites: the Greenwood Centre at Greenwood Place and the Highgate Centre on Highgate Road. Permission was granted for the demolition of the existing buildings and redevelopment to provide a Centre for Independent Living at Greenwood Place and a mixed use development at Highgate Road comprising 42 residential units (including 8 supported affordable housing units) and 100sqm (GIA) of social enterprise space.

Planning application reference 2022/1603/P sought to make amendments to the extant permission and related solely to the Highgate Centre site, which is no longer Council-owned. The application was reported to Planning Committee on 15/09/2022 and members resolved to grant planning permission, subject to a section 106 legal agreement. Once the legal agreement is finalised, the decision will be issued.

The changes sought as part of the 2022 application included the following:

- An increase in the overall number of dwellings from 42 to 47 (5 additional units) (the number of market units would increase from 34 to 42);
- Reconfiguration of affordable housing offer to provide 5 affordable assisted living units, staff accommodation and a communal area, all at ground floor level (previously 8 assisted living units across 2 levels without staff accommodation or communal area);
- Reduction in size of social enterprise space;
- Excavation of basement to provide a plant room;
- Installation of sub-station at ground floor;
- Reconfiguration of internal layout;
- Reconfiguration of private amenity space;
- Alterations to elevations;
- Revised landscape strategy.

As part of this pre-application request the following changes are now proposed:

- Elevational changes (omission of winter gardens);
- Crittal-style windows;
- Simplified brick detailing;
- Use of red bricks.

6. Heritage and design

The application site is not located within a conservation area, although it is near to the Dartmouth Park Conservation Area (approximately 90 metres further north up Highgate Road) and is visible in long-range views looking south from that particular conservation area. The Council has a statutory duty to pay special attention to the desirability of preserving or enhancing the character or appearance of a conservation area, in accordance with Section 72 of The Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended).

The adjacent building to the south, Christ Apostolic Church, is grade II listed, and so is The Forum entertainment venue (further to the south). The Council has a statutory duty to have special regard to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest which it possesses, under section 66 of The Planning (Listed Buildings and Conservation Areas Act) 1990 (as amended).

Linton House, to the north, is on the Council's Local List, and is therefore classified as a non-designated heritage asset.

Policy D1 of the Camden Local Plan seeks to secure high quality design in development and Policy D2 seeks to preserve and, where appropriate, enhance Camden's rich and diverse heritage assets, including conservation areas. Policy D3 of the Kentish Town Neighbourhood Plan requires proposals to be based on a comprehensive understanding of the site and its context; and requires proposals to be well integrated into their surroundings and to reinforce and enhance local character. It also states that proposals must identify and draw upon key aspects of character or design cues from the surrounding area; and design proposals must be sustainable and of the highest quality.

At the time of the 2022 section 73 application referred to above, it was considered that the proposed changes would still enable the resultant building to relate successfully to the neighbouring buildings to the south and north and fit comfortably in the streetscene along Highgate Road. The officer's committee report specifically referred to the fact that the two entrances to the building would align with the wintergardens above and that the size of the wintergardens had increased. It also referred to the changes to fenestration and the reduction in building materials to a single brick type and the use of brick detailing to add visual interest. Overall, it was considered that the revised design was ordered and cohesive and it was considered that the building would still be legible and of a domestic scale.

As discussed at the 30/11/2022 meeting, officers feel that wintergardens are a key part of the original building design and they provide benefits to future residents in terms of being able to protect themselves from the noise and poor air quality of Highgate Road (see later comments on air quality). At the meeting we discussed whether it would be technically possible to still provide wintergardens whilst meeting the relevant fire regulations, but it is clear that the applicant does not wish to pursue the wintergardens option.

On balance, the proposed open balconies with vertical metal railings are considered to be acceptable from a design perspective, on the basis that the building would retain its vertical emphasis and would still be cohesive, ordered and legible with a domestic scale. Furthermore, the building would relate successfully to the adjacent Linton House. The

strengthening of the corner as a result of the solid column being introduced also helps in this regard.

The design officers have commented that at first floor level the height of the brick base should be increased so that it forms the lower part of the balustrade for the balconies at that level (example of this in Kings Cross below), both to aid with privacy for the occupiers of those units, and to give the building a more solid base.



The use of Crittal-style windows on the building is considered to represent a design improvement, and would relate well to Linton House and the surrounding area.

The proposed change in brick colour is also considered to be acceptable, as discussed and confirmed with Rose Todd on site.

At the meeting you noted that the decorative brickwork is being further simplified through the removal of a soldier course and simplified corbelling etc.; however, it isn't entirely clear from the submitted documents the extent of the simplification and officers have concerns about this element of your proposals, especially if the wintergardens are to be lost as it represents further erosion of the original design. As noted at the meeting, officers are keen for the building to have a sense of individuality and therefore advise against this proposed change, unless further details and justification can be given.

7. Quality of residential accommodation (air quality)

The most recent officer's committee report (application reference 2022/1603/P) quotes the original officer's committee report (2013/5947/P) which states: "*The balconies on the front of the building are recessed and closable so as to serve as conservatory rooms as required. These 'winter gardens' provide a more protected space on this main road elevation and serve for usable amenity all year round*" (para 6.51).

Officers still consider that the approved wintergardens represent a better option for future residents in terms of noise and being able to 'shut out' Highgate Road; and also in terms of maximising the amount of time the spaces can be used during the year. Nevertheless, it is recognised that the applicant's research suggests that open balconies would be more popular and that they no longer wish to pursue the wintergardens option.

With regards to air quality, the 2022 officer's committee report highlights that the Air Quality Assessment (AQA) is based on future predictions, contrary to the requirements of CPG Air Quality which states: "*Modelling should not predict improvements to future years (future vehicle emissions or future background concentrations)*" (emphasis added). The letter from The PES Ltd submitted as part of this pre-application request also relies on future predictions rather than the worst-case scenario of no improvement on current emissions.

The national objective of $40\mu\text{g}/\text{m}^3$ of NO_2 applies at both the gardens and facades of buildings according to LLAQM19. Taking into account APEC – B from the London Councils, if levels are between 5% above or below the national objective (i.e. 38 to $42\mu\text{g}/\text{m}^3$) appropriate mitigation must be considered including wintergardens and proven ventilation systems.

The new [LAEI 2019](#) London wide maps have recently been published (see extract below) which indicate pollution to the front of the site but this is not above $42\mu\text{g}/\text{m}^3$ and largely below $40\mu\text{g}/\text{m}^3$, but is potentially above $38\mu\text{g}/\text{m}^3$.



The results in the AQA have been modelled for the opening year of 2023. It is noted that at the first floor the NO_2 levels seem to be acceptable in this model but we do not accept future projections.

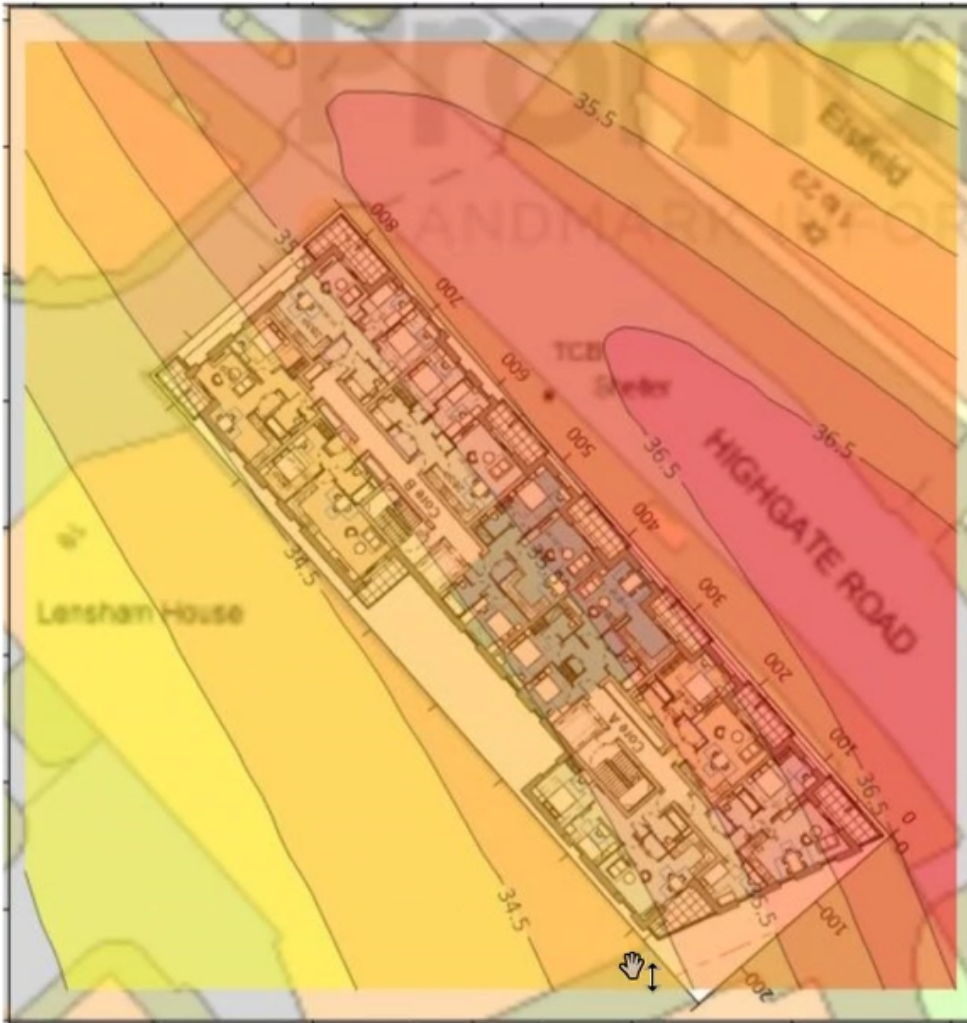


Figure 6 – NO₂ concentrations – 1st Floor

For any units which indicate annual levels of NO₂ over 38µg/m³ officers would like to see MVHR with air inlets from as close to roof level as possible and away from the busy road. We would not generally expect wintergardens unless the pollution levels are over 40-42µg/m³, which is not the case.

Therefore from the LAEI 2019 mapping it is anticipated that for the balconies at first floor and above wintergardens would not be required. However, to confirm this and to provide detail for the location of required MVHR we would expect the modelling in the AQA to be presented using the most up to date air quality monitoring data (N.B. 2019 - as the results for 2020/21 will be affected by the Covid-19 lockdowns).

8. Neighbour amenity

Policy A1 of the Local Plan seeks to protect the quality of life of occupiers and neighbours. It is not considered that the proposed balconies would cause undue harm to the amenities of nearby and neighbouring properties, above and beyond the impact of the approved wintergardens.

9. Fire safety

Policy D5 (Inclusive design) of the London Plan, clause (5), requires developments to be designed to incorporate safe and dignified emergency evacuation for all building users; and Policy D12 (Fire safety) requires that, in the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety. The policy requires that all major developments are submitted with a Fire Statement, produced by a third party, suitably qualified assessor, detailing how the development proposal will function in terms of: the building's construction; the means of escape for all building users; features which reduce the risk to life; access for fire service personnel and equipment; how provision will be made within the curtilage of the site to enable fire appliances to gain access to the building; ensuring that any potential future modifications to the building will take into account and not compromise the base build fire safety/protection measures.

Any formal planning application should be accompanied by an updated Fire Statement

10. Conclusion

The proposed change to open balconies is considered to be acceptable, on balance, as the building would still relate well to its surroundings. This is subject to the proposed design change mentioned above (regarding the first floor balconies). The use of Crittal-style windows on the building is considered to represent a design improvement and the proposed change in brick colour is also considered to be acceptable. However, officers have concerns about the further simplification of the brickwork detailing and would advise against this proposed change, unless further justification can be given.

The proposal may be considered acceptable in terms of the impact on future occupiers; however, air quality information must not rely on future predictions (2019 data must be presented).

The proposal is likely to be considered acceptable in terms of the impact on neighbouring amenity.

Any future application should be accompanied by an updated Fire Statement.

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 Kate Henry on **020 7974 3794**.

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

Yours sincerely,

Kate Henry
Principal Planning Officer
Planning Solutions Team

Validation Checklist

Application form (application to vary or remove a condition)

Application fee

Ordnance Survey map at 1:1250 with the application site outlined in red

Existing and proposed and consented elevations (1:50)

Existing and proposed and consented floorplans (1:50)

Existing and proposed and consented sections (1:50)

Planning Statement

Design & Access Statement (including a summary of the proposed changes)

Heritage Statement

Tree Survey / Arboricultural Impact Assessment

Daylight and sunlight assessment

Noise Impact Assessment

Energy and Sustainability Statement

Air Quality Assessment

Draft Construction Management Plan

Updated Fire Statement