

ADVICE from PRIMROSE HILL CONSERVATION AREA ADVISORY COMMITTEE

20 December 2023

Utopia Village 7 Chalcot Road NW1 8LH 2023/4757/P

1.0 This advice is divided into 2 parts. In the first part we discuss the historic assets and advise on the proposed treatment of the historic fabric, issues to which, with some exceptions, we do not object. In the second part we advise on the proposed plant and associated structures, aspects of the application to which we object very strongly.

2.0 Preliminaries

2.1 The PHCAAC undertook a pre-app review of preliminary refurbishment proposals, following public consultation, on 19 July 2023.

2.2 The Chair and Vice-chair of the PHCAAC were given a brief overview of the revised, application scheme on 2 November 2023, shortly before the application was formally submitted for planning consent. Although the PHCAAC representatives asked questions at this briefing – in particular about the proposed main plant room (Plant Area 1) – we regret that the PHCAAC had no opportunity to continue the pre-app process before the revised scheme was formally submitted for planning consent. We also regret that there was no further consultation with neighbours on the revised scheme before it was submitted.

2.3 The PHCAAC reviewed the application scheme on 29 November 2023. We sought clarification from the applicant's planning consultant of a number of points after that meeting. These clarifications were received on 5 December and were reviewed at our meeting on 6 December. Site visits to neighbouring properties (1 + 11 Egbert Street and 8 Chalcot Road) were undertaken on behalf of the PHCAAC on 5 December and reported to the Committee on 6 December.

2.4 The Committee has received 4 expert reports relating to noise and residential amenity commissioned by neighbours of the site. We understand that these reports have been issued to the Council for publication on the Council's application website by the residents who have commissioned them. These reports are:

Review of Noise Assessments at 8 Chalcot Road NW1 8LH, issued by Syntegra Consulting on 12 December 2023.

Review of Plant Noise Assessment issued by RBA Acoustics on 18 December 2023

Baseline Noise Levels at 8 Chalcot Road issued by Syntegra Consulting on 19 December 2023

Report on review of noise survey report and plant noise assessment issued by Rupert Taylor Ltd on 18 December 2023.

2.5 The Committee further reviewed the application, the additional information supplied by the applicants, and the independent noise reports, and finalized this advice at our meeting on 20 December 2023.

2.6 Our advice is set out with reference to our pre-app review advice dated 19 July 2023, and refers for clarity to the proposals as described in the applicant's Heritage Impact Assessment (HIA), and in their Design and Access Statement (DAS).

Part 1 Work to built fabric

3.1 The PHCAAC's concern with work to the built fabric has been consistently to seek the preservation or enhancement of the character and appearance of the conservation area given the formal recognition of the building complex as a positive contributor to the character and appearance of the conservation area. This objective underlies all the advice set out in this set of comments (paras numbered 3.1-3.9).

3.2 In our pre-app review we stated:

1. The PHCAAC noted the importance of Utopia Village in the area. It is recognized in the *Primrose Hill Conservation Area Statement* (current SPD) at p. 24, as making a positive contribution to the character and appearance of the conservation area, while it has also played a valuable role in offering a range of employment in the local economy of Primrose Hill.

2. The PHCAAC hopes for an exemplary refurbishment of the original and surviving industrial buildings, which date from the 1860s and later, and which offer an example of the use of multi-coloured brickwork, recognized as distinctive in the area in the *PHCA Statement* (p. 14). We would expect to see details, including windows and doors, restored like for like, and in materials consistent with the original.

3.3 Our advice on the application submitted is that while we welcome the stated intentions of refurbishment, given the significance of the building as a positive contributor to the character and appearance of the conservation area, we would advise that the following be subject to approval by condition:

3.3.1 – a method statement on the repair to brickwork, including making good following removal of redundant services (HIA pp. 15-16 introductory para to 'Proposals and potential impact'; p. 16 paras 10, 12).

3.3.2 – approval of type, materials, and colour of repointing of brickwork, noting the formal recognition of the importance of the brickwork in the complex.

3.3.3 – approval of details of proposed replacement glazing sections. We note that we do not object to the Critall style metal windows proposed, or their colour. We further note that we have been reassured by the applicant that the replacement windows will be double glazed. (HIA p. 15 para 3).

3.3.4 – approval of the form and location of the penthouse louvres, noting their potential prominence on the roof line of the complex (HIA p. 16 para 11).

3.3.5 – details of the replacement bridge: we welcome the revised design for the bridge, as submitted, noting that its transparency enhances views of the 'mews' from the public space in Chalcot Road. (HIA p. 15 para 2).

3.4 In our pre-app advice we commented:

8. The Committee observed that Utopia Village is noted in the *PHCA Statement* p. 26, for the use of brick setts in the exterior paved areas: these should be retained.

We also note the use of granite setts in the industrial areas of the conservation area. Natural materials are appropriate.

We advise a condition to ensure the survey and recording of original paving materials, which should be preserved and reset. Where paving needs to be renewed it should be in natural materials appropriate to the industrial origins of the buildings. (HIA p. 15 introductory para to 'Proposals and potential impact')

3.5 In our pre-app advice we commented:

9. We would welcome the opportunity to review soft landscape proposals and express our concern to see sustainable planting recognizing the problems of the climate crisis and water shortages.

We have not had this opportunity. We advise that sustainable planting and planting with water shortages in mind is critical in responses to the climate crisis. Landscaping of the 'mews' falls within the area visible from the public space in Chalcot Road. It should be addressed by condition.

3.6 In our pre-app advice we commented:

10. We would welcome the replacement of the gate to Chalcot Road. We would like to see a simpler design with security equipment (eg, cctv) designed to avoid clutter.

We would welcome the replacement of the gate to Chalcot Road in principle, but we object to the current proposal. While the proportions of the gate may well follow the proportions of the railings to the adjacent houses in Chalcot Road, the detailed forms of the gate should follow the industrial nature of the Utopia Village complex. (HIA p. 15 para 1: DAS p. 15) The present design was felt to be 'heavy', 'over-complicated', 'over-dominant' in the street.

3.7 We object to the proposed replacement gate to the Egbert Street elevation (HIA p. 15 para 1: DAS p. 15). The gate should be consistent with the modernist style and industrial character of the 1950s building. The present proposal risks appearing as a pastiche.

3.8 We note that it is proposed in the application to reclad the external stair to the southeast of the complex (HIA p. 16 para 5). The applicant has confirmed (email 5 December) that this would follow the pattern used in the proposed plant room (Plant Area 1). The HIA states that this change would have 'no impact', but we advise that this is doubtful and needs to be assessed through a detail drawing showing the context.

3.9 Additional projection to accommodate plant (Plant Area 1: DAS p. 14 proposed: not shown p. 16 location 6). We object to the proposed additional forward projection. Projecting forward of the adjacent main historic building, this would diminish the positive contribution of the main western block of the historic building as seen from the public space in Chalcot Road. We also object to the form of enclosure proposed as over-complicated, and to the form and colour as over-dominant in the historic industrial context.

Part 2 Environmental issues and amenity – plant – heating and cooling, noise, light

4.1 In our pre-app advice we commented:

3. We would also want to see an exemplary approach to retrofitting to minimize energy use throughout the complex. We would advise that the spirit as well as the letter of Camden's Local Plan policy CC2 (addressing climate change) should be followed.

4. The proposals for air-conditioning, heating and cooling, and the need for external plant raise serious concerns for the amenity of the community immediately surrounding Utopia Village. We advise that demonstrating that the demand for energy and the buildings' use of carbon has been minimized (see our point 3) would be important.

4.2 The PHCAAC advises that the application should meet the objectives of three sets of policies and provisions: policy for addressing climate change (Local Plan CC2); policy for protecting residential amenity, especially noise (Local Plan A4); and statutory provision for the preservation or enhancement of the conservation area.

4.3 We object strongly to the present proposals which fail to meet all three broad objectives.

Climate change and sustainability

5.1 The PHCAAC is committed to effective retrofitting in our conservation area, and strongly supports the Council's Local Plan (2017) on 'Adapting to climate change' (Policy CC2).

5.2 We note that Camden's Local Plan at 8.39, in support of Policy CC2, states that 'The Council will discourage the use of air conditioning and excessive mechanical plant.' At 8.44 the Local Plan states 'The Council will require all schemes to consider sustainable development principles from the start of the design process and include these in their Design and Access Statement and/or Sustainability Statement'.

5.3 We note that the application makes general statements of intent (DAS pp. 16-18) including the 'Mesh energy statement' (DAS pp. 17-18). But very limited details are provided, making an assessment of whether the proposed plant is 'excessive' impossible. We would advise that the principles of the PassivHaus Trust for 'Efficiency first' should be applied and evidence provided of an integrated insulation and air-tightness strategy for the whole project.

5.4 We also advise that, given the high cooling loads anticipated, a heat recovery strategy is needed. The thermal load determined by the applicant for cooling, 415kW, is greater than that for heating, 370kW (DAS p. 17 section 5.5).

5.5 We note that Camden's Local Plan at 8.39, in support of Policy CC2, also states that 'In addition to increasing the demand for energy, air conditioning and plant equipment expel heat from a building making the local micro-climate hotter.'

5.6 Camden's Local Plan at 8.42 states that active cooling 'will only be permitted where dynamic thermal modelling demonstrates there is a clear need for it after all of the preferred measures are incorporated in line with the cooling hierarchy'. The applicant's DAS 5.2 at p. 16 refers to their comprehensive dynamic thermal model, but it is not available for review. We advise that it should be issued for assessment following Local Plan 8.42.

5.7 The PHCAAC objects strongly to proposals which would make the local micro-climate hotter.

Noise and residential amenity

6.1 The PHCAAC strongly supports the Council's policies for protecting residential amenity including Camden's Local Plan Policy A4 'Noise and vibration'

6.2 The Primrose Hill conservation area is characterized by predominantly low background noise levels: it is a quiet area. This is significant because the area is also characterized by a mix of residential and commercial uses. This mix is characteristic of the historic development of the area from the mid-nineteenth century. Buildings for commercial and industrial use were set in the 'backland' spaces enclosed by the residential development which fronted the streets. Piano making, for which the modern Utopia Village was built (*PHCA Statement*, pp. 7-8), was a use which took advantage of both these rear spaces and the proximity to the Canal which facilitated the transport of the imported exotic woods used in the making of piano cases. The historic mix of uses – with their mix of architectural forms – helps characterize the special appearance of the conservation area. The continuing mix of uses requires a recognition of the importance of residential amenity if the special character of the conservation area is to be preserved.

6.3 We note, and endorse, Camden's Local Plan Policy A4 'Noise and vibration' which states: '... We will not grant planning permission for: a. development likely to generate unacceptable noise and vibration impacts ...', and 'We will only grant permission for noise generating development, including any plant and machinery, if it can be operated without causing harm to amenity.'

6.4 The PHCAAC identifies 3 issues relevant to the present application which lead us to object strongly to the application. These are:

- the assessment of cumulative noise
- the assessment of noise in rear gardens
- the broader adequacy of the noise reports submitted as part of the application.

6.5 The PHCAAC notes the lack of an assessment of cumulative noise and lack of assessment of noise impact in gardens in the applicant's submitted reports are key omissions in a consideration of the application of Local Plan policy A4. We object very strongly to the lack of these assessments which are of key significance in the larger objective of preserving or enhancing the character and appearance of the conservation area.

The assessment of cumulative noise

7.1 We note that in assessing unacceptable noise Camden (Local Plan 6.91) 'will take into consideration ... the cumulative impacts from one or more noise sources and will assess whether tighter noise restrictions, secured by planning condition, should be imposed'.

7.2 We advise, with serious concern, that there is no assessment of cumulative noise in the applicant's noise reports. We note that houses and gardens in Chalcot Road and Egbert Street are in proximity to both Plant areas 1 and 2: cumulative noise from both sources should be assessed.

7.3 We further advise that there is no consideration in the applicant's noise assessments of the noise impacts from the proposed penthouse louvres to the main roof to the north-west block of the complex which the applicant states (DAS 5.2 at p. 17) will be required to cool the comms and service rooms.

The assessment of noise in rear gardens

8.1 We note that Camden has set noise threshold levels applicable to proposed industrial and commercial development, including plant and machinery, at Local Plan Appendix 3 Table C. This table sets noise thresholds for outside the windows of habitable rooms, but also for gardens used for amenity space.

8.2 Houses neighbouring the application site in Chalcot Road and Egbert Street have external rear garden amenity space which is both recognized as essential to family homes, and which is an important element in the character and appearance of the conservation area.

8.3 But there is no assessment of noise levels in these gardens in the application.

8.4 We note that the gardens of the houses in Chalcot Road and Egbert Street closest to the proposed plant areas are some 5m in length between the boundary walls to Utopia Village and the rearmost walls of the houses themselves. That is, these areas of garden directly abut the boundary wall to Utopia Village: they are within a distance from the site boundary of 0m to a maximum of some 5m. In the case of the houses closest to the proposed plant areas, these small, enclosed, garden areas have severely limited benefit from distance attenuating the noise from the proposed plant areas.

Adequacy of the noise reports submitted as part of the application

9.1 The PHCAAC notes that Camden's policy A4 is supported by policy guidance on the assessment of the impact of noise and vibration (Local Plan 6.89-6.96). It is stated (at Local Plan 6.95) that 'when development likely to generate noise is proposed, the Council will require an acoustic report to accompany the application.'

9.2 We note that in *Camden Planning Guidance: Amenity* (2021) at 6.20 on the minimum information expected in a noise report, the following are included:

- details of the plant or other source of noise and vibration both on plan and elevations and manufacturers specifications
- specification of the plant, supporting structure, fixtures and finishes
- details of any associated work including acoustic enclosures and/or screening.

9.3 None of these details or specifications have been provided.

9.4 When the revised scheme was outlined to our Chair and Vice-chair on 2 November 2023, we asked specifically for access to a report on the full technical details of Plant Area 1, stating that the CAAC would wish to review the full technical details with an expert consultant. We understood that this report would be made available to us. But when the application had been submitted no such report was available. We asked the applicant's planning consultant for the report, but he confirmed by email 5 December that no such detailed report existed, acknowledging that the only technical report on the plant area is the summary Mesh energy statement at DAS pp. 17-18.

9.5 While we note that the technical reports commissioned by neighbours have identified key issues in common with our assessment, we also acknowledge that these reports are based in a series of expert assessments of the technical issues raised by the application. We further note that these reports raise doubts about the application ranging from uncertainty about the surveys and analysis of background noise levels and about the calculation of noise levels. They identify the absence of assessments of cumulative noise impacts and the absence of assessments of noise levels in gardens. In particular the report from Rupert Taylor Ltd questions the adequacy and technical practicality of effective mitigation, identifying limitations on possible attenuation measures.

9.6 We acknowledge that these assessments are critical to the full assessment of the application.

9.7 The PHCAAC advises that the applicant's current noise reports are insufficient to enable the Council both to assess the impact of noise on residential amenity as provided for in the Local Plan, and to make a sustainable decision on this application.

9.8 The PHCAAC objects strongly to the application as failing to meet the requirements of Camden's Local Plan Policy A4 'Noise and vibration' and supporting provisions.

Light pollution

10.1 In our pre-app advice we commented:

5. The Committee was also concerned to see measures addressing the problem of light pollution. We note that office hours can conflict with the needs of residential amenity and would want to see active measures to mitigate problems of light pollution.

10.2 We note the provisions of Local Plan Policy A1a and A1g, with para 6.6 and advise that active measures to mitigate potential problems of light pollution be required by condition.

Conclusion

11.1 We advise that the application fails to meet the requirements of relevant Camden Local Plan policies, specifically policies A4 and CC2, and fails to preserve or enhance the character and appearance of the Primrose Hill conservation area.

11.2 We would hope to review a revised application in due course.

Richard Simpson FSA
Chair