

ADVICE from PRIMROSE HILL CONSERVATION AREA ADVISORY COMMITTEE

12A Manley Street London NW1 8LT

15 May 2024

Utopia Village 7 Chalcot Road NW1 8LH 2023/4757/P REVISED APPLICATION April 2024 – Supplementary advice

1. The PHCAAC became aware of the April 2024 revisions in early May: a draft of this updated, supplementary advice was circulated in advance of our meeting on 15 May when the draft was revised and agreed for submission on 16 May 2024.

2. This advice is a response to the April 2024 revisions in the form of a supplement to our advice dated 20 December 2023. We hope this minimizes repetition and achieves clarity.

Our December 2023 Advice Part 1 ‘Work to built fabric’ paras 3.1 to 3.9

3. At 3.3 we advised that a number of issues be addressed by condition. We now request the following additional conditions to address revised proposals dated 11 and 19 April 2024:

4. ADDITIONAL 3.3.6 to address the approval of the form and location of the proposed new roof terminals for the new ventilation systems. These are proposed for locations in roofs facing the rear of Egbert Street and the rear of Edis Street (see First Floor and Second Floor revised plans drawings 22029-PP0031-D and 22029-PP0032-C). These terminals are also raised here in our Supplementary advice Part 2.

5. ADDITIONAL 3.3.7 to address the approval of the form and details consequent on the demolition and opening up of the courtyard area to the boundary with the rear of Chalcot Road and Egbert Street. This demolition and the re-formation of the ground floor enclosure are also raised here in our Supplementary advice Part 2.

6. ADDITIONAL 3.3.8 to address the approval of the form and details of the new roof to former proposed Plant Room 2, see section AA drawing 22029-PS0010-D. We welcome the removal of proposed Plant Room 2, and request the condition to ensure the preservation or enhancement of the character and appearance of the conservation area.

7. OUR EXISTING 3.8. Proposed re-cladding of external stair to southeast of complex (HIA p. 16 para 5). The applicant confirmed to us (email 5 December 2023) that this cladding would follow the pattern used in the proposed Plant Area 1. Now that this cladding has been withdrawn, we request details of the proposed cladding in order to assess the impact on the character and appearance of the conservation area.

8. OUR EXISTING 3.9. We welcome the revised scheme for the cladding of the proposed Plant Area, previously Plant Area 1. We would have no objection to the revised form of the cladding now proposed nor to the revised footprint to the access yard.

9. Note: our other objections in our 20 December 2023 Part 1 still stand.

Our December 2023 Advice Part 2 ‘Environmental issues and amenity’ paras 4.1 to 9.8

10. In addition to the new drawings submitted in April 2024, the applicant also submitted a note, apparently by MESH consultants ‘Summary of changes to mechanical systems following planning comments’, and an ‘Updated noise survey and plant noise assessment report for Utopia Phase 2’ by Noico Limited. The PHCAAC has reviewed all these

submissions, and the following reports relating to noise and residential amenity which have been commissioned by neighbours of the site and submitted to LB Camden.

Addendum to Peer Review of Noise Assessments, prepared by Syntegra Consulting;

Acoustic Technical Briefing Note (Addendum Version), prepared by Acoustical Control engineers and consultants;

Review of Plant Noise Assessment, prepared by RBA Acoustics (ref. 13262.LE01.1);
and

Engineering Analysis Letter of Revised Noise Reports, prepared by Rupert Taylor (dated 26 April 2024).

Climate change and sustainability paras 5.1-5.7

11. We advised in December 2023 that Local Plan policies on adapting to climate change (Local Plan CC2) have strong support in our community. We recognize the climate crisis as real, and strongly urge the full implementation of all policies which help address the crisis. It is critically important that all development is, and is seen to be, fully consistent with Camden's requirements for effective adaptation to climate change.

12. In December we advised:

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.

13. We note now, in May 2024, that the revised proposals submitted, including the MESH 'Summary', still do not provide information sufficient to enable the Council to make a sustainable decision on the question of 'excessive mechanical plant'.

14. The revised application is not fully consistent with Camden's requirements for effective adaptation to climate change (Local Plan CC2)..

15. We also noted in December that:

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.

16. We note now, in May 2024, that the revised proposals submitted, including the MESH 'Summary', still do not provide information sufficient to enable the Council to make a sustainable decision on the question of avoiding making the local micro-climate hotter.

17. The revised application is not fully consistent with Camden's requirements for effective adaptation to climate change (Local Plan CC2)..

Adequacy of noise reports paras 9.1-9.8

18. We comment that effective protection of amenity for all residents is critical to the preservation and enhancement of the character and appearance of the conservation area. The Primrose Hill CA is characterized by a mix of uses and the close juxtaposition of the mixed uses. For one user to harm the living conditions of another is to harm the social and economic viability of the area, as the history of the CA demonstrates. We further note that the predictability of such protection in the long term is essential to stimulating growth.

19. We advised in December that the application failed to provide the technical details required by Camden's Local Plan policy A4 with *CPG: Amenity*:

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.

20. We noted (our 9.4) that the PHCAAC had sought this detailed information but had been told that no detailed report existed.

21. We note now that it is stated in the revised documentation that, for 'Plant room details refer to M. Eng. and acoustic information for further details' see Section BB drawing 22029-PS0010-D.

22. Neither the MESH 'Summary', nor the updated NOICO report, submitted in April provide these details. The NOICO report at section 7 'Mechanical Plant details and noise data' pp. 5-6, identifies the Daikin equipment and mentions acoustic attenuation but gives no details of the plant or installation.

23. Fulfilling the requirements of the Local Plan and *CPG* have a clear practical importance here. Rupert Taylor Ltd in their revised report dated 26 April 2024 concluded:

'It appears that the size of the required attenuators means that it would be impossible to accommodate the attenuators and plenum along with the plant within the plantroom indicated on submitted drawings 22029-PS0010-D 22029-PP0030-E.'

24. It seems either that the noise attenuation would be inadequate to meet Camden's required noise levels, or that new enclosure(s) would be required with implications for the character and appearance of the conservation area.

25. We further note that the revised scheme includes proposed new roof terminals for new ventilation systems: revised First floor and Second floor plans drawings 22029-PP0031-D and 22029-PP0032-C shows them facing rear of houses in Egbert Street and facing rear of houses in Edis Street.

26. We note that no details are provided for these terminals and their associated plant, nor is it clear how their noise output has been assessed and accounted for.

27. We note again that no details are provided for the proposed penthouse roof louvres (see our December advice 7.3), nor is it clear how their noise output has been assessed and accounted for.

28. The revised proposals submitted, including the MESH 'Summary', still do not provide information sufficient to enable the Council to make a sustainable decision on the question of the sources of noise and vibration as required by the Local Plan and CPG.

The assessment of noise in rear gardens

29. We note with dismay the continuing inadequacy of the assessment of potential noise levels in back gardens (Our December advice 8.1-8.4). We note the expert report by Acoustical Control engineers and consultants dated 25 April 2024 which comments on the continued inadequacy of the assessment of potential noise levels in back gardens at 6.6 and 8.1.

30. Again, upholding Camden policies which protect the amenity of residents is critical to the function of external rear garden amenity space which is both recognized by the Council as essential to family homes, and which is an important element in the character and appearance of the conservation area.

Adequacy of noise assessment

31. As in December 2023, the PHCAAC has taken account of the expert reports undertaken for residents on the revised scheme.

32. We endorse our advice of December

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.

33. We add now that we are deeply concerned that statements in the revised Noico report submitted by the applicant at sections 4.2-4.4 suggest uncertainty about the noise levels which might be considered acceptable in this application.

34. We urge that the design criteria applied should be the appropriate criteria set out in the Local Plan (2017) at Appendix 3 Table C in support of Policy A4.

General comment

35. The PHCAAC recognizes the Local Plan as setting out the agreed ground rules for development in our Borough. They are the result of a professional and democratic process in which local community groups – like the PHCAAC – have actively participated, and which has included rigorous testing through public examination.

36. To fail to apply these ground rules is to undermine not only the democratic process, but also to create uncertainty which undermines long-term growth.

37. We repeat our advice that we object strongly to the application which 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.

38. We still hope to review a further revised application in due course.

Richard Simpson FSA
Chair