Date: 01/11/2023
Our ref: 2023/2810/PRE
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Dear Patrick Bankhead,

Re: 87 Holmes Road, NW5 3AX

Thank you for submitting the pre-application enquiry. The proposal involves the erection of a new three storey building in the north-eastern corner of the site to be used as an administration block. Works to the windows of the original school building are also proposed and a condition report and options appraisal was provided with the pre-application enquiry which has formed the basis of officers' response.

Site description

The Grade II listed subject site covers a sizeable site between Holmes Road, Cathcart Street, Willes Road and Inkerman Road, within the Inkerman Conservation Area. The site comprises a mix of educational buildings ranging from one- to three-storeys dating from the 19th to 21st century, centred around a grade II listed former London Board School, used in the 20th century by Westminster Kingsway College as an Adult Education Institute, and converted and extended in 2010 for use by Collège Français Bilingue de Londres (CFBL) which opened in 2011. The original building was built from 1873-74 to the neo-Gothic designs of E R Robson, with later additions to the west and south dating from 1891. The 19th century buildings are constructed from yellow stock brick with red brick and stone dressings, with slated roofs including gables to alternating bays, and with a central wooden bellcote topped by a fleche. The main forms of fenestration are painted timber casement, sash and top- and bottom-hung windows. The site also contains notable open spaces including the principal playground to the south-west and two smaller playgrounds to the east and north-east, all of which are bounded by a high brick boundary wall which is included in the grade II listing.

The site is located on the northern boundary of the Inkerman Conservation Area, which is largely residential in character with a predominance of mid- to late- Victorian terraced houses. As such, the site is adjacent to two- and three- storey properties on Cathcart Street and Inkerman Road to the south, and is bounded by a former three-storey Victorian public house on its north-west side. In contrast its neighbours to the north, comprise larger-scale residential and commercial blocks including a Council depot and recently constructed student housing.

Much of the school's administration and maintenance staff are currently located off-site due to the constraints of the existing accommodation in Holmes Road.

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

- Design and conservation
- Amenity
- Energy and sustainability
- Transport

DESIGN AND CONSERVATION

New admin staff building

It is noted the Council previously gave pre-application advice in 2017 under ref 2016/6261/PRE for "Erection of additional school building of 480sqm to existing college comprising of 3 storey extension (Site A) and extension at first floor level (Site C)". The advice given on Site A is relevant to the current pre-application inquiry. The main points to note are as follows:

- The principle of a new building to replace the existing single-storey buildings was seen as acceptable in principle, subject to various considerations. This area of the site is highly visible in long views, including from within the Inkerman Conservation Area on Cathcart Street and Holmes Road.

- At 3-storeys, it was considered too high, in terms of its impact on the character and appearance of the conservation area and upon the setting of the grade II listed school building bordering the playground. It was advised that a new building should not be higher than 2-storeys and should retain views of the upper-level windows of the main building visible from Cathcart Street.

- It was recommended a simple architectural language be employed, resulting in a subtle low-key architectural statement not competing with the Victorian school buildings and with minimal visual impact on the conservation area.

- The submitted design had a roof form intended to emulate the pitched roofs and gables of the Victorian school buildings, but which was overly modelled. A more low-key approach, such as a mono-pitch roof, was therefore recommended.

- A new building on the site should not exceed the then proposed footprint, and the loss of playground space needed to be fully justified.

- The proposed 3-storey building was intended for shared use by the school and the wider community (possibly Queen's Crescent Community Centre), which was seen as a potential public benefit.

Site strategy

We understand the new building is wanted to accommodate non-teaching staff who are currently situated off site and in unsuitable locations in the main school building. We would like to see a comprehensive existing site and buildings assessment including uses location (i.e. teaching spaces, ancillary, staff, etc) to assess if other spaces could be reconfigured for admin use and/or if other uses could benefit from being relocated into this new proposed building.

We are concerned that relocating the admin staff into this new playground building is driven solely by ease (by not remodelling any other spaces) and does not take advantage of the great

opportunities a new building in this location could provide to the students and teaching staff. In particular, the relationship between building and playground could provide great inside - outside teaching opportunities i.e. a use that would build on its location within a playground and provide natural surveillance and opportunities for interaction.

We are concerned that the proposed uses (i.e. SENco, admin, maintenance) may not be best suited in this location due to the need for privacy, safeguarding and separation. The building would therefore not take advantage of its playground location and in a sense ‘turn its back’ to the outdoor space.

Massing

The proposed massing is currently too bulky and too high and considered detrimental to the setting of the listed building. A three-storey element is not acceptable in the playground and the massing from Cathart/Holmes road is not acceptable foreground to the host building.

We consider a new building in the playground is possible but should be of a smaller scale, subservient whilst contextual. Examples of Victorian school 'pavilions' or 'outbuilding' are found across the area (see for example the various outbuildings of Yerbury Primary School, N7).

Various massing options should be tested, presented and discussed. The massing should be simpler and lower (e.g. a single long pitch, etc). It is anticipated that a max height of c.2 storeys with potential inclusion of a '3rd floor' attic loft space may be acceptable.

The proposed massing for the stair is overwhelming the playground space and conflicts with the existing listed elevation, especially considering the closeness of the buildings. Incorporating the stairwell within the new 'pavilion' massing would help simplify the massing and reduce the impact on the context.

Footprint and playground space

We are concerned that this new building is not providing as much benefit to students as it could do whilst taking away much needed outdoor play space in an already quite space-pressured school. We very much appreciate the attempt to provide some covered play space and would like to see this increased in quantum and especially in quality; by reducing the ground floor provision and revisiting the layout.

We consider the massing of the building above is detrimental to the overall quality of the outdoor playspace (i.e. reduced sunlight and view of sky).

Landscaping

Consideration of the playground's use and landscaping should be designed in a coordinated manner with the proposed massing and footprint. For example, whilst the retention of trees is important, we are not convinced the layout should shape itself around the existing planters, the outdoor play uses should be designed together with the façade to make best use of the walls surrounding the students and creating opportunities for play.

Architectural expression and character

The current proposal has an overcomplicated set of massing, proportions and material palette. The design is currently made of many different parts and does not form a satisfactory whole.

The horizontality of the proposed and its layered appearance (floor over each floor), especially against the verticality of the stairwell, is distracting and overbearing. The colonnade is designed as a set of structural columns that carry the floor above and is another set of parts. Making them read as the façade (as inspired by the host building) could help unify the building's character.

Oversailing the sub-station is not helpful for creating a simple massing and the junction between existing and new needs careful attention to detail.

The proposed building would be very prominent in views from Cathart / Holmes Road. Here, the amalgamation of overstated design elements and the stepped facades detract from the host building behind without providing a clear and simple building of high architectural quality in the foreground.

A suggested approach for the new building's character is a subservient 'pavilion', contextual to the listed school building. Simplifying massing, proportions and material palette whilst ensuring care and refinement to the architectural details and palette is key to achieving a building that is more low key and respectful to its host.

A balcony/terrace for staff use is proposed at 2nd floor level, which will be very prominent within the streetscene of Cathcart Street as it will be positioned immediately behind the boundary wall on the southern end of the building close to the school gates. This element is considered to be out-of-keeping with the character of the conservation area, which is generally of a residential nature with private amenity space mostly found behind the terraced houses rather than at high level up against the street. It would also jar with the special interest of the listed school building, which has elevations of a solid and enclosing character with high window cills providing privacy to the classrooms.

Works to Historic Windows

At the recent site visit the proposed works relating to the operation of the historic windows in the main school buildings was discussed in some detail. Whilst the pre-application submission originally addressed means of upgrading the 100 or so existing windows in the historic elements of the school buildings, it transpires that advice is primarily sought on the most pressing issue which is the operation of the tall Victorian classroom windows by staff.

Officers explained that the style of windows featuring inward-opening top- or bottom-hung openers operated by a traditional wooden pole with a hook is commonplace, particularly in former London Board Schools such as this one. However, staff are struggling to open the windows due to their weight and height, which is particularly challenging in hotter temperatures and is obstructive to teaching and learning. Staff are also finding many of the sash windows difficult to open.

Whilst the use of a pole with a hook is a traditional means of opening many of the historic windows in the school buildings, it was acknowledged that to assist staff, alternative operational mechanisms could be explored, of either an electronic or manual nature. A central operating system in each classroom or space lit by a set of the windows was considered a potential way forward. Problems with opening sash windows would also be considered.

Whether the proposed installations will affect the special interest of the listed building is dependent on their detailed design, size, extent in numbers, reversibility, positioning and servicing. Officers stated at the site visit that it would be preferential if a solution could be agreed by exchange of letter rather than requiring listed building consent. However, if it transpires the designs will have a more major impact than formerly anticipated, listed

building consent may be required. As such, it was agreed that the applicant would look into the matter further and provide officers with some further details for assessment (see Option 4 below).

A window report has been produced which explores the following issues:-

• Window Full Repair - Overhauling.
• Window replacement.
• Introduction of secondary glazing.
• Installing manual or electric operator systems; where windows might be too high, heavy, or depth of door reveals impede easy reach.

The report identifies factors contributing to the poor condition of the windows located at all levels of the 19th century school buildings. The findings include poor pointing between the frames and surrounds, an absence of putty, wrongly-specified glass, paint failure, overpainting, and broken ironmongery and sash cords. As a result, many windows are subject to damp ingress causing wet rot, and others are ill-fitting and failing to open.

Various options have been explored to resolve the problems, as follows:-

Option 1 - Upgrade to the Existing Windows: Full Repair - Overhauling: Thermal performance and operation improvement. A degree of repair, local element replacement, reinforcing, upgrading and re-decorating is suggested in order to keep the right maintenance level and rectify the identified issues within the original window assemblies. These works proposed do not exclude other proposals such as the addition of a secondary glazing system.

Officer response: The proposed schedule of repairs and upgrading works involves like-for-like repairs and minor works of alteration such as changes and adjustments to ironmongery. It is considered that these works are non-contentious and necessary for the longevity of historic fabric, and unless more major changes are required will not require listed building consent. However, it is recommended that a schedule of works is based on a full survey of all existing windows to give some certainty as to the scope and extent of repairs and adaptations.

Option 2 - Window Replacement: A full window replacement is proposed as an option to overcome the current challenges. As part of the proposal the following points would be regarded:

• It is proposed that the replacement windows match the form, detailing and operation of the original window, and the profiles of all window components would be accurately copied. If acceptable, other timber species could be explored to allow for less extensive maintenance regimes.

• It is proposed that ironmongery is overhauled and reused where possible or if beyond repair, like for like replacement is proposed.

• Better performing double glazing would be proposed, which could potentially increase the thickness of the glazing assembly. This option is consulted as an alternative to a full window repair in case a detailed survey of the windows exposes major challenges in repairing the original windows.

Officer response: The replacement of historic windows of all types (casements, sashes, top- and bottom-hung openers, etc) will involve the loss of substantial amounts of historic fabric (window joinery, and in some instances historic glass and ironmongery), which is likely to

cause harm to the special interest of the grade II listed building and to a certain extent the character and appearance of the conservation area. The replacement of windows, either on a wholesale or individual basis, would need to be fully justified by a condition survey outlining the degree of decay of the existing windows and their incapability of repair.

Whilst the report states that the detailed design of any replacement windows would match the existing historic windows, it does not examine variations between the existing windows and the sealed unit double-glazed units of proposed replacement windows. No comparative studies on thermal performance have been provided and the applicant is encouraged to consider other measures first such as the overhaul of the existing joinery so that it is better-fitting (as outlined in Option 1) and draft-proofing measures to make the windows more airtight.

Option 3 - Secondary Glazing (combined with Option 01 Full Repair /Overhauling): A fully independent window system installed to the room side of the existing windows is proposed, maintaining the existing windows in the current position. Based on the access and operation requirements of each of the windows, a different typology would be proposed; openable, removable, fixed, or a mix of the previous options. The openable panels can be either side hung casements, horizontal sliding sashes, or vertical sliding sashes. The installation of secondary glazing units seems to be a good approach in order to achieve not only a significant thermal performance improvement, but also minimise the noise within the building from the playground and main street. Since the original windows would not be altered, the secondary glazing could be dismantled in the future if required (revert to the original condition).

Officer response: The installation of secondary glazing in conjunction with repairs to the windows under Option 1 is likely to be less harmful to the special interest of the listed building than the replacement of the historic windows. It will also provide better acoustic insulation than sealed-unit double glazing due to the necessary wider gap between the glass panes. The positioning, detailing and materiality of the units will need to be carefully considered. Secondary glazing units will be both visible internally and externally, with the reflective qualities of a second layer of glass changing the appearance of the windows which are an important architectural component of the listed building.

Secondary glazing is also likely to affect the operation of the existing windows, so it will be necessary for the units to open to allow for ventilation. The submitted drawings show different configurations and layouts of secondary glazing, which in some cases will visually compromise the historic windows, such as where mid-rails will be positioned at different heights from those of the sash windows. If secondary glazing is considered to be an option worth pursuing, the reversibility of the designs as well as the overall designs and operability will need to be considered. Such works will require listed building consent.

Option 4 – Proposed methods to improve operation of windows: The installation of any new gear is intended to be fully reversible should the building require a different use in the future. To deal with the different conditions the following is recommended:

• Sash Windows:
i. Rebalancing of sash windows including servicing of pulleys and replacement of sash damaged sash cords.
ii. Repairing or replacing damaged ironmongery
iii. Easing/Adjusting windows.
iv. Once the above steps are taken, the most suitable actuator can be proposed for windows that may have not been sufficiently improved; there are options available but they wouldn't have been designed to specifically open sliding windows so adaptations are likely to be required.

• High Level - Out of reach hinged windows:
v. Repairing/ overhauling window
vi. Repairing or replacing damaged ironmongery
vii. Easing/Adjusting windows.
viii. Once the above steps are taken, the most suitable actuator can be proposed.

Officer response: The preliminary works required for both types of opening window are considered to be repairs and minor upgrading which are unlikely to require listed building consent. The submitted report gives examples of manual winding gear system which can be used for single and multiple windows with the latter employing a junction box to minimise cable connections. A second option shows automatic electric chain actuators with single, double and synchronised single options for different window sizes.

Whilst the employment of both manual and electric opening devices is likely to be acceptable in principle, the size, positioning, fixing, servicing and reversibility of the apparatus and controls will need to be carefully considered to ensure they do not compromise the detailing of the historic windows or any internal historic features affected by the installations. The apparatus may also need to be compatible with other items such as secondary glazing, where applicable. It is helpful that the report contains some visual examples taken from product information, but for officers to fully assess the impacts it will be necessary for visuals tailored to typical window types in the building to be provided. Such images should be fully annotated and to-scale so that the impacts of the actuator components on historic joinery, and the impacts of cabling, chains, handles, switches, control panels, etc in their context can be appreciated. It should then be possible for officers to determine whether or not listed building consent will be required.

AMENITY

Policy A1 of the Local Plan seeks to protect the quality of life of occupiers and neighbours. The factors to consider include: visual privacy, outlook; sunlight, daylight and overshadowing; artificial lighting levels; noise and vibration; odour, fumes and dust; and impacts of the construction phase, including the use of Construction Management Plans.

Owing to the distance from surrounding residential windows, and the relatively low height of the proposal (insofar that amenity impact is concerned), there is unlikely to be an impact on daylight/sunlight or outlook of surrounding occupiers. The terrace at second floor level would have direct views towards the windows of the student accommodation opposite at a distance of around 12m which is less than the 18m recommended by CPG Amenity and could therefore lead to a loss of privacy for the occupiers.

ENERGY AND SUSTAINABILITY

Policy CC1 of the Local Plan requires all development to minimise the effects of climate change and encourages all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation. The policy promotes zero carbon development and requires all development to reduce carbon dioxide emissions through following the steps in the energy hierarchy. For minor non-residential developments, the greatest possible reduction below Part L of Building Regulations is encouraged together with the incorporation of renewable technologies.

Policy CC2 requires development to be resilient to climate change, by adopting appropriate climate change adaptation measures such as the protection of green spaces and promoting new green infrastructure; not increasing, and wherever possible reducing, surface water run-off through increasing permeable surfaces and use of Sustainable Drainage Systems;

incorporating bio-diverse roofs, combination green and blue roofs and green walls where appropriate; and, measures to reduce the impact of urban and dwelling overheating, including application of the cooling hierarchy.

For minor non-residential developments such as this, a BREEAM 'Excellent' rating is encouraged.

No information has been provided as part of this pre-application request but energy and sustainability statements would need to accompany a formal planning application. Please refer to *CPG Energy and efficiency and adaptation* for further information on the policy expectations for a development of this scale and what the energy and sustainability statements should include.

TRANSPORT

Cycle parking

Policy T1 of the Local Plan promotes sustainable transport by prioritising walking, cycling and public transport in the borough. The policy seeks to ensure that development provides for accessible, secure cycle parking facilities exceeding minimum standards outlined within the London Plan.

Should the proposal for a new admin block be pursued, it is suggested that cycle parking is provided in line with the requirements for office floorspace which requires 1 space per 90 sqm. Should the use change, cycle parking requirements can be advised on at a later stage.

Construction Management Plan

Policy T4 of the Local Plan promotes the sustainable movement of goods and materials and seeks to minimise the movement of goods and materials by road. Given the scale of construction works involved with the proposal, a Construction Management Plan is likely to be secured by section 106 legal agreement if an application was approved.

Highways works

The carriageway and footway adjacent to the application site may sustain damage as a result of the works. The Council would need to undertake remedial works to repair any such damage following completion of the proposed development and therefore a financial contribution towards highways works would be likely to be secured by the section 106 legal agreement.

Planning application information

Should you choose to submit a planning application which addresses the outstanding issues detailed in this report satisfactorily, I would advise you to submit the following for a valid planning application:

- Completed form – Full Planning Application and Listed Building Consent
- An ordnance survey based location plan at 1:1250 scale denoting the application site in red
- Floor plans, roof plan, elevation drawings and section drawings at a scale of 1:50 labelled 'existing' and 'proposed'
- Demolition drawings
- Planning statement
- Heritage statement

- Design and access statement
- Energy and sustainability statement (can be included in planning statement)
- Noise impact assessment (for any plant proposed)
- The appropriate fee

We are legally required to consult on applications with individuals who may be affected by the proposals and we would do this via e-alerts and the display of site notices in the vicinity of the site. The Council must allow 21 days from the consultation start date for responses to be received.

Non-major applications are typically determined under delegated powers, however, if more than 3 objections from neighbours or an objection from a local amenity group is received the application will be referred to the Members Briefing Panel should it be recommended for approval by officers.

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 Kristina Smith on **020 7974 4986**.

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

Yours sincerely,

Kristina Smith