

LAND AT HYLDA COURT, 3-5 ST ALBANS
ROAD, LONDON NW5 1RE

Planning Statement

In Support Of:

Demolition of Existing Garage Block and Caretaker's Flat and
Erection of Three Town Houses, Erection of a Roof Extension to
Existing Apartment Building to Provide Three Apartments

On behalf of:

Bankway Properties Limited

12th September 2024

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1. INTRODUCTION

1.1. This Town Planning Statement is prepared by Freeths on behalf of Bankway Properties Ltd (“the Applicant”) in support of a Planning Application for the demolition of existing garage block and caretaker’s house and the erection 3no. town houses, and the erection of a roof extension to the apartment building to provide 3no. flats and associated hard and soft landscaping (“the Proposed Development”) at Hylda Court, St Albans Road (“the Site / Application Site”).

1.2. The description of development is as follows:

‘Demolition of garage block and caretaker’s flat and erection of 3no. town houses. Erection of roof extension to provide 3no. flats and associated hard and soft landscaping.’

1.3. The extent of the Application Site is identified on the Site Location Plan (**Appendix 1**). The Proposed Development is identified on the proposed plans as submitted with this Planning Application.

1.4. The Site currently consists of Hylda Court, a 5no. storey flatted block and a redundant garage block to the rear with a caretaker’s flat in the south corner.

1.5. The Site is located within the Dartmouth Park area of the London Borough of Camden (“LBC”), including the Dartmouth Park Conservation Area.

1.6. The purpose of this Statement is to provide an assessment of the Proposed Development against the Development Plan and other material considerations. The Statement sets out the following:

- **Section 2:** An overview of the Site and Surrounding Area.
- **Section 3:** Summarises the Proposed Development.

- **Section 4:** Outlines the Planning Policy of relevance to the Site and Proposed Development.
- **Section 5:** Assesses the Proposed Development against the Planning Policy context.
- **Section 6:** Provides a summary and conclusion.

- 1.7. This Statement, along with supporting plans and documentation demonstrates that the Proposed Development is consistent with the Development Plan and other material considerations, including the National Planning Policy Framework.
- 1.8. This Statement should be read in conjunction with the submitted plans and documents which accompany this Planning Application.

2. SITE AND SURROUNDINGS

The Site & Surrounding Area

- 2.1. The submitted Design and Access Statement (prepared by scheme architects IBLA) provides an overview of the Site and surrounding area. They key characteristics are summarised below.
- 2.2. The Site consists of an existing five storey art-deco building fronting onto St Albans Road. It currently provides 30 residential apartments which are under the ownership and management of the applicant.
- 2.3. The vehicular and pedestrian access to the Site is available to the north east side of the main building via St Albans Road.
- 2.4. To the rear of the building is an existing block of single storey garages and a two-storey caretaker's flat. The garage block is surplus to requirements as they no longer provide parking for residents. The buildings and their immediate setting adjacent to the apartment block is unsightly and detrimentally impacts the appearance and quality of the Site.
- 2.5. There are several mature trees along all boundaries of the Site with the exception of the frontage along St Albans Road which allows for views of the Site.
- 2.6. The Site is located within the Dartmouth Park Conservation Area where it is referenced as a 'Building of Note'. It is not statutorily Listed. To the east of the Site, 9-11 St Albans Road is Grade II listed.
- 2.7. The Site is located in Flood Risk Zone 1.
- 2.8. The Site is in an accessible location with bus stops approximately 100m west on Highgate Road. It is approximately 650m from Gospel Oak Overground station and 800m from Tufnell Park Underground station.

There is also a Zipcar located immediately outside the Site boundary on St Albans Road. The location has a PTAL rating of 2.

- 2.9. The Site is located in a predominately residential area. To the north, west and east of the Site are residential buildings of varying origins, height and design. The predominant storey heights in the area are mixed and range from 3 to 5 storeys. To the south of the Site are tennis courts which form part of the grounds to the wider site of the La Sainte Union Catholic school.

Planning History

- 2.10. There are no specific planning applications of relevance to the Proposed Development. However, there are a series of applications in relation to tree works around the Site.
- 2.11. The Proposed Development has been subject to 2no. pre-application discussions with LBC Officers. We explain those below.

Pre-Application

May 2022 Pre-application

- 2.12. The first pre-application was submitted in May 2022, with a response received from LBC officers in September 2022 (LBC Ref: 2022/2036/PRE). The proposal in that pre-application was largely similar in principle to the Proposed Development, although also included a basement level flat to replace the now redundant boiler room.
- 2.13. Overall, the principle of the Proposed Development was found to be acceptable, although it was noted work was needed to be done in terms of design, quality of accommodation and details around the sustainability and energy aspects of the proposal. The work needed on the quality of accommodation resulted in the basement flat in the former boiler room being removed from the proposal.

June 2023 Pre-application

- 2.14. In June 2023, the Applicant submitted a follow-up pre-application advice request to LBC. This was largely for the same scheme as submitted in this Planning Application.
- 2.15. The key differences between the May 2022 and June 2023 pre-applications are the removal of the boiler room studio and alterations to the design of the roof extension.
- 2.16. The design changes included a further set back from the front to the roof extension and a more angular design which is considered to be more in keeping with the existing building and provides a subservient roof extension. The changes to the scheme from the first pre-application provide a sympathetic and carefully designed scheme that is an enhancement to the building and surrounding area.
- 2.17. The second pre-application also provided further advice on the amenities of future and neighbouring occupiers in terms of daylight / sunlight and landscaping measures and enhancements.
- 2.18. Further advice was also provided on pre-submission community consultation that should be carried out prior to submission with local groups. We explain that process and discussions in the following section.
- 2.19. Overall officers largely supported the scheme in the pre-application, subject to further information being provided on the standard of accommodation and minor alterations to the fenestration of the building.

3. STATEMENT OF COMMUNITY INVOLVEMENT

- 3.1. The Applicant has undertaken pre-submission consultation sessions with local neighbourhood groups.
- 3.2. We approached the Dartmouth Park Neighbourhood Forum and the Dartmouth Park Conservation Area Advisory Committee by email on 14th and 26th February 2024 to present the scheme and answer questions.
- 3.3. We held a consultation event with the Dartmouth Park Neighbourhood Forum. We did not receive a response from the Conservation Area Advisory Committee. The event was held on Microsoft Teams on 17th April 2024 and was attended by 2no. members of the Planning Sub-Committee of the Forum. The consultation event was also attended by representatives from the Applicant, the scheme architects IBLA and Freeths.
- 3.4. The key messages that came from the consultation event with the Dartmouth Park Neighbourhood Forum was that the overall scheme is well designed and complements the existing building. They also considered the scheme was an improvement to the locality, with demolition of the poor quality garages and overall enhancements to the landscaping.
- 3.5. Queries were raised about being able to include seating within the soft landscaped area to help with further enhancements to amenities to the current and future occupiers of the Site and to enhancing the placemaking aspect of the landscaping.
- 3.6. Some concerns were also raised in terms of outlook and amenities of current ground floor occupiers and also future occupiers of the town houses to the rear. We presented the with internal CGI images of the Proposed Development, which assisted in confirming the position with the members of the Forum.

- 3.7. We have incorporated more information and detail in this Planning Application in order to respond to comments provided by the Forum during the pre-submission consultation event. We have also incorporated outdoor seating areas to enhance the placemaking in the soft landscaped areas.

4. THE PROPOSED DEVELOPMENT

Scheme Overview

4.1. The objective of the Proposed Development is to positively utilise this brownfield Site and provide overall enhancements to the Conservation Area, whilst also providing additional dwellings in this sustainable location. The Proposed Development also aims to provide enhancements to the landscape that surrounds the Site and provide Biodiversity Net Gain.

4.2. The Proposed Development comprises of the following key components:

- Demolition of the single storey garage block and two storey caretaker's flat to the rear of Hylda Court.
- Erection of 3no. two storey town houses to the rear of Hylda Court.
- Erection of roof extension to provide 3no. flats.
- Extensive new soft landscaping to the front, side and rear of the Site, including the planting of new trees and shrubs.
- Installation of environmentally friendly measures such as electric boilers and Photovoltaic panels on the roof of the proposal.

Layout & Height

4.3. The Proposed Development comprises of 6no. dwellings, representing a net gain of 5no. dwellings. This constitutes of 3no. town houses to the rear of Hylda Court and 3no. flats as part of the roof extension.

4.4. The town houses to the rear of Hylda Court are laid out in a row to the rear of the Site on the south east boundary. Each of the town houses are 2no. bedroom, set around their own small courtyard which comprises the private amenity space for each unit.

- 4.5. The town houses are 5.9m in height and a total of 30.6m in width, this is largely the same width as the garage block that is currently at the Site, and slightly taller than the two storey caretaker's flat.
- 4.6. The height of the existing Hylda Court is 15.7m to its tallest point. The proposed roof extension will take this height to 17.9m. The roof extension will sit above the floorplate of the lower floors, set in from each façade. The roof of the extension will have a PV array which will serve the development.

Accommodation Layout & Quality

- 4.7. The Design and Access Statement provides an overview of the Proposed Development and its living environment.
- 4.8. The proposed dwellings all exceed the minimum internal floor space standards as set out in the Nationally Described Space Standards. The proposed units all have access to private amenity space, with the new flats having access to balconies and the town houses each having a central courtyard area. To supplement these private amenity spaces, the hard landscaping currently surrounding the Site will be improved and largely replaced with soft landscaping and enhanced hard landscaping, along with seating areas to provide high quality communal amenity space.
- 4.9. All of the units will be dual aspect and will therefore be able to provide for significant amounts of natural light into the proposed dwellings. The details of the internal and external daylight and sunlight has been assessed and is covered in more detail below.
- 4.10. The dwellings have been provided with the large open plan living spaces which will provide future occupiers with excellent living conditions.

Design & Appearance

- 4.11. The garage block and caretaker's apartment to the rear of the Site currently detract from the Conservation Area. The design of the town

houses to the rear of the Site have been designed to enhance appearance and environment of the immediate site.

- 4.12. The townhouses will be more modern in appearance, but still take design cues from the surrounding area, including incorporating flat roofs and a two tone appearance. The ground floor is a darker colour, with a lighter above, reflecting the entrance doors for Hylda Court. The town houses have large windows which centre around the central courtyard for each unit, which is entered via a timber screen and gate.
- 4.13. The roof extension has been designed to resemble the existing Hylda Court, with a modern take on the art-deco design of the main building. It is set back from the front to provide a subservient appearance and will be constructed from matching materials to the existing building. The proposed windows will match those on the lower floors and are of a similar scale and appearance, as well as matching their location. This provides symmetry between the Proposed Development and the existing building below.

Landscaping & Biodiversity

- 4.14. The Site is currently largely made up of concrete / tarmac to the front, side and rear, with other built form. This creates a low quality landscape for the Site and surrounding area.
- 4.15. There are low level shrubs to the front of the Site adjacent to St Alban's Road and a small, grassed area on the south west boundary of the Site. These are the only landscaped areas around the Site.
- 4.16. The Proposed Development will include extensive landscaping and re-purposing of the hard landscaping to provide much improved soft and hard landscaped areas to the side and rear of the Site. This will enhance the landscaping for future and current occupiers and is a significant benefit of the Proposed Development.

- 4.17. The submitted Biodiversity Net Gain Report (prepared by Arbtech, July 2024) demonstrates that the Proposed Development will achieve a significant Biodiversity Net Gain (“BNG”). The area-based habitat units will see an increase of over 300% and the linear-based habitats will see an increase of 100%. These are substantially over the mandatory requirements of 10%.
- 4.18. The Proposed Development achieves an Urban Greening Factor (“UGF”) of 0.19.
- 4.19. The soft landscaping that will be introduced at the Site will include a variety of native plant species as well as extensive new areas of lawn. This provides a substantial improvement on the flora and fauna of the Site and the locality.
- 4.20. As well as the improved landscaping, the new garden area will provide outdoor seating to enjoy the new high-quality landscaping (see page 27 of the Design & Access Statement, prepared by IBLA).
- 4.21. Details of the landscaping can be secured through an appropriately worded condition.

Access, Parking & Servicing

- 4.22. The Site currently has 10no. garages which are not used for car parking due to their small size and are only used for storage purposes for current residents. Vehicle access will no longer be possible to the rear as a result of the Proposed Development. Vehicles will still be able to enter the front of the Site, for example for deliveries and servicing.
- 4.23. The Proposed Development is being promoted as a car free development.
- 4.24. A new pedestrian access will be created to the north east corner of Hylda Court to create a better sense of approach to the new town houses to the rear of the Site.

- 4.25. The Proposed Development will provide 28no. cycle parking spaces, this is an improvement of 13no. cycle spaces and these will be provided along the south west boundary of the Site. The cycle parking will be covered and accessible via the rear of the Proposed Development. Detail of the cycle parking is provided at page 31 of the Design & Access Statement.
- 4.26. The Proposed Development will be M4(2) compliant for the rear town houses and the new apartments on the roof, with the existing lift being extended to accommodate.
- 4.27. The bin store will be located in the same place as the existing and will be extended to accommodate for an additional 1100l of general, 1100l of recycling and 440l of food waste bin capacity.

Scheme Benefits

- 4.28. The Proposed Development provides numerous social, economic, and environmental benefits. These include:
- Contributing to local housing needs through the provision of net 5no. new dwellings.
 - Provision of 6no. 2 bedroom dwellings which are a high priority for delivery by LBC.
 - Full utilisation of an under-used, brownfield Site.
 - Demolition of unsightly buildings to provide for a significant enhancement to the character and setting of the Conservation Area.
 - Removal of poor quality hard landscaping, being replaced with high quality soft and hard landscaping.
 - A significant Biodiversity Net Gain of over 300% (area based habitats) and 100% (linear based habitats).
 - Provision of energy efficient dwellings with high levels of insulation and provision of PV panels.
 - Development of a car-free scheme that promotes the use of cycling and public transport.

5. PLANNING POLICY

- 5.1. This Section sets out planning policy and guidance which is of relevance to the Site and the Proposed Development and is that to which the LBC will have regard when determining this Planning Application.
- 5.2. Section 38 (6) of the Planning and Compulsory Act 2004, requires all planning decisions to be made in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.3. The Development Plan consists of the following documents of relevance to the Proposed Development:
- National Planning Policy Framework (December 2023).
 - The London Plan (March 2021).
 - The Camden Local Plan (July 2017).
 - Dartmouth Park Neighbourhood Plan (October 2020).
- 5.4. The Application Site is identified on the Proposals Map as being in the Dartmouth Park Conservation Area.

Local Planning Policy – Camden Local Plan (July 2017)

- 5.5. The relevant policies of the Local Plan are listed below. The Proposed Development is then assessed against the relevant provisions of these policies in the following section of this Statement.
- LP Policy H1 – Maximising housing supply
 - LP Policy H4 – Maximising the supply of affordable housing
 - LP Policy H6 – Housing choice and mix
 - LP Policy H7 – Large and small homes
 - LP Policy A1 – Managing the impact of development
 - LP Policy A3 – Biodiversity
 - LP Policy D1 – Design
 - LP Policy D2 – Heritage
 - LP Policy CC1 – Climate change mitigation

- LP Policy CC2 – Adapting to climate change
- LP Policy T1 – Transport
- LP Policy T2 – Parking and car-free development

Neighbourhood Planning Policy – Dartmouth Park Neighbourhood Plan (October 2020)

5.6. The relevant policies for the Dartmouth Park Neighbourhood Plan are listed below. The Proposed Development is then assessed against these policies alongside other policies of relevance from the Development Plan.

- NP Policy DC1 – Enhancing the sense of place
- NP Policy DC2 – Heritage assets
- NP Policy DC3 – Requirements for good design
- NP Policy H1 – Meeting housing need
- NP Policy H2 – Affordable housing
- NP Policy ES2 – Trees
- NP Policy TS1 – Safety and accessibility for pedestrians cyclists
- NP Policy TS2 – Cycling improvements
- NP Policy TS3 – Traffic reduction

Regional Planning Policy – London Plan (March 2021)

5.7. The following policies from the London Plan are of relevance to the Proposed Development.

- Policy GG2 – Making best use of land
- Policy GG4 – Delivering the homes Londoners need
- Policy D1 – London’s form, character and capacity for growth
- Policy D3 – Optimising site capacity through the design-led approach
- Policy D4 – Delivering good design
- Policy D5 – Inclusive design
- Policy D6 – Housing quality and standards

- Policy D7 – Accessible housing
- Policy H1 – Increasing housing supply
- Policy H2 – Small sites
- Policy H10 – Housing size mix
- Policy HC1 – Heritage conservation and growth
- Policy G1 – Green infrastructure
- Policy G6 – Biodiversity and access to nature
- Policy S11 – Improving air quality
- Policy S12 – Minimising greenhouse gas emissions
- Policy T5 – Cycling
- Policy T6 – Car Parking

Material Considerations

National Planning Policy Framework (NPPF, December 2023)

- 5.8. The latest version of the NPPF was published on 20th December 2023 and sets out the Government’s objectives for achieving sustainable development.
- 5.9. The NPPF places a significant emphasis on sustainable development and requires development to ensure they meet with the 3no. key overarching objectives. Including economic, social and environmental objectives.
- 5.10. The Proposed Development represents sustainable development for the purposes of the NPPF on the following grounds:
- **Economic:** Ensuring the efficient use of the Site to deliver a net gain of 5no. additional homes in a sustainable location to contribute to the Council’s housing supply and support further growth in the Borough. The construction phase will provide jobs and the increase in people at the Site will have trickle down effects to the local economy with additional spending.

- **Social:** Creation of local jobs during the construction phase. Creation of a net gain of 5no. new residential units to enhance the residential offer in LBC and the locality.
 - **Environmental:** A well-designed Development in a sustainable location which complements the surrounding townscape and enhances the soft landscaping, demonstrating a BNG significantly over the mandated 10%. The Proposed Development also provide for PV panels on the roof and electric boilers throughout to ensure energy and sustainability requirements are met.
- 5.11. The NPPF has a number of key drivers for supporting development, with key focus on delivering a sufficient supply of homes (Chapter 5) and building a strong, competitive economy (Chapter 6). The Proposed Development clearly supports both of these key focus points, through the jobs created at the construction phase and trickle down effects of the additional spending of new residents in the area.
- 5.12. The Proposed Development also encourages the promotion of healthy and safe communities (Chapter 8) and sustainable transport as it is located in a central location close to public transport nodes, discouraging the use of cars and promoting walking and cycling (Chapter 9). The Proposed Development also makes the most effective use of the land (Chapter 11) by utilising a brownfield plot with in an existing urban area.
- 5.13. The Proposed Development is well designed (Chapter 12) and has had input from LBC officers and local neighbourhood groups to ensure the overall design of the built form, and the landscaping are of the highest quality.
- 5.14. The Proposed Development is considered to have a positive impact on the Dartmouth Park Conservation Area (Chapter 16). As the Proposed Development poses to enhance the locality, we expect the scheme will be supported in this regard.

Supplementary Planning Documents and Guidance

5.15. The following Camden Planning Guidance (“CPG”) documents are of relevance to the Proposed Development.

- CPG Design
- CPG Amenity
- CPG Energy Efficiency and Adaptation
- CPG Transport
- CPG Planning obligation

5.16. The Dartmouth Park Conservation Area Appraisal and Management Guidelines (2009) is also of relevance to the Proposed Development given its position within the Dartmouth Park Conservation Area.

Emerging Local Plan

5.17. It is noted on the LBC website that the Regulation 18 Draft New Camden Local Plan was consulted upon between January and March 2024. The latest update is that the consultation responses are being reviewed, and a submission version for publication and further consultation (Regulation 19) is being prepared.

5.18. The latest Local Development Scheme estimates the submission of the draft Local Plan to the Secretary of State for Examination in Public to be Spring 2025.

5.19. Given the early stage of the adoption of the draft Local Plan, it holds no weight in the decision-making process. This is not expected to change during the consideration of this planning application.

Summary & Conclusions

5.20. Based on this assessment, the key in-principle and development management considerations are:

- The principle of development;
- The design and appearance of the Proposed Development;
- Effect of the Proposed Development on the Conservation Area;
- Effects of the Proposed Development on neighbouring occupiers;
- Residential amenity of future occupiers;
- Highway safety, parking and servicing;
- Biodiversity Net Gain & Trees;
- Ecology; and
- Energy & Sustainability.

5.21. These considerations are assessed in Section 6 of this Statement.

6. PLANNING CONSIDERATIONS

Policy Framework

- 6.1. Section 38 of the Planning and Compulsory Purchase Act 2004 requires that applications for planning permission must be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 6.2. The key considerations as outlined in Section 5 are assessed below along with other key planning considerations.

Principle of Development

- 6.3. The Proposed Development is to create 5no. additional dwellings (6no. in total) to a Site with an existing residential use and will improve the appearance of the Site through the removal of old garages and a caretaker's flat which are of a poor design and quality. As such, the principle of creating additional housing in a predominantly residential area, is acceptable.
- 6.4. The principle of development is acceptable and complies with Local Plan policies G1 and H1, as well as London Plan policies GG2 and GG4 and policy H1 of the Dartmouth Park Neighbourhood Plan.

Loss of existing garages

- 6.5. The garages are not used for any parking as they are too small for modern cars. They are currently only used for storage of belongings for current residents. The garages therefore make no contribution towards parking capacity in support of the site.
- 6.6. Following the removal of the garages as a result of the Proposed Development, there will be no impact on on-street parking capacity due to their present use. Therefore, the removal of the garages is considered to be acceptable in principle.

Affordable Housing

- 6.7. As the Proposed Development provides for a net gain of 5no. new dwellings at the Site and has a capacity for less than 25no. additional homes, a payment in lieu of affordable housing is considered as being acceptable (as per LBC pre-application response ref: 2023/2703/PRE, provided as **Appendix 2**) as opposed to on-site provision.
- 6.8. The CPG for housing confirms that that a payment in lieu will be calculated through applying an affordable housing target to the total floorspace and then applying a multiplier of £5,000 per sq.m.
- 6.9. The calculations in the CPG for 5no. additional homes provide a payment in lieu of £264,500. This is calculated as follows:
- Affordable Housing percentage target: capacity x 2% = 5 x 2% = 10%.
 - Affordable Housing floorspace target: 10% x floorspace = 10% x 529 = 52.9.
 - Payment in lieu required: 52.9 x £5,000 = **£264,500**.
- 6.10. The provision of the payment in lieu of on-site affordable housing can be secured through a s106 agreement. As such, the principle of the housing to be delivered can be considered as acceptable as it would accord with the requirements of Local Plan policy H4 and Neighbourhood Plan policy H2.

Housing Mix

- 6.11. The Proposed Development will provide 6no. 2 bedroom dwellings, split as 3no. 2 bedroom, 3 person town houses and 3no. 2 bedroom, 4 person apartments.
- 6.12. The Dwelling Size Priority Table provided in the Camden Local Plan at paragraph 3.189 / Table 1 demonstrates how 2 bedroom market dwellings are of the highest priority to LBC. The provision of a mix of

2no. bedroom units across the Site is therefore acceptable and a benefit of the scheme.

Principle of Development Conclusions

6.13. Against this background, the principle of residential development is acceptable in principle.

Design and Appearance

6.14. The existing Site consists of Hylda Court, which is a 5no. storey flatted block built in an art deco design. The garages and caretaker's flat to the rear were built at a later date and do not contribute positively to the Dartmouth Park Conservation Area (see paragraph 4.19 of the Heritage Statement prepared by The Heritage Practice).

6.15. The decision-making framework around assessing the design and appearance of a proposal includes policies D1 of the Local Plan and DC3 of the Neighbourhood Plan. These place emphasis on respecting local context and character, as well as appropriate use of materials and high quality standards of design that reflect the local area. These requirements are also found in London Plan policies D1, D4 and D5 and throughout Chapter 12 of the NPPF.

Roof Extension

6.16. Taking the roof extension first, the Proposed Development will see the addition of a new floor to the roof of Hylda Court. This will be in a similar design and appearance to the floors below, with a rectilinear form and parapet roof. The windows of the new floor will align with those below and will reflect their appearance and style.

6.17. The proposed additional floor will be set back from the frontage and sides, providing a recessive and subordinate feature to the host building.

- 6.18. Furthermore, the new floor will be finished with white render, which will directly resemble and reflect the existing Hylda Court. Various features of Hylda Court will be reflected in the new floor, including stepped façade features and extended chimneystacks to provide a sense of relation and continuation in the Proposed Development. This is demonstrated in the axonometric / isometric views provided on pages 9 and 22 of the Design and Access Statement.
- 6.19. The new floor, due to its set back and in longer views, screening by mature vegetation that surrounds the Site, will not be seen as a prominent feature of the street scene. This is clearly evidenced in pages 13 – 18 of the Design and Access Statement which provides a view analysis of the Proposed Development.
- 6.20. It is considered the roof extension is an appropriate response to the host building and the surrounding area. As such, the roof extension is acceptable in terms of its design and appearance.

Mews Houses

- 6.21. The mews houses to the rear of the Site, which replace the poor quality garages and caretaker's flat have been designed to respond appropriately to their setting and location and maximise the space available to provide much needed 2no. bedroom housing.
- 6.22. The mews houses will be 2no. storey in height with a flat roof, constructed from a light colour brick base and render to the upper floor which resembles the two tone entrance of Hylda Court facing St Alban's Road.
- 6.23. Each of the mew houses will be accessed via a central courtyard which will be screened with a timber gate to provide security, privacy and visual interest. Each mews house will be provided with 2no. bay window features to provide further visual interest to the front elevation.

- 6.24. The mews houses will be set within the new landscaped gardens, along with high quality hard landscaping, which will be marked improvement from the current situation.
- 6.25. The height of the mews houses will be 5.9m in height and will be seldom seen in the surrounding area. However, there will be glimpsed views down the north east side of Hylda Court, through to the rear. The height of the mew houses will allow for important views to the trees to the rear in the background and the improved landscaping will also enhance the immediate foreground in this view. This view is demonstrated on page 20 of the Design and Access Statement.
- 6.26. It is therefore considered that the design and appearance of the mews houses, to the rear of Hylda Court, is acceptable and in combination with the improved landscaping will provide for a well presented and well designed scheme that is an asset to the streetscape.

Design and Appearance Conclusion

- 6.27. The Proposed Development will provide for a subservient roof extension, that will be seldom seen from surrounding views, but is of a high quality design and appearance that it would appropriately reflect the existing Hylda Court.
- 6.28. The mews houses to the rear will be more modern in their design and appearance and again, will have seldom views due to their location behind Hylda Court. They will be provided with improved landscaping which will be a significant benefit to the scheme and are designed to an excellent standard so that they will be an asset to the locality, whilst maintaining important views of the trees to the rear.
- 6.29. It is considered the design and appearance of the Proposed Development is acceptable, in accordance with Local Plan policy D1 and Neighbourhood Plan policy DC3. In addition, it is in compliance with London Plan policies D1, D4 and D5 and the requirements of the NPPF to achieve well-designed and beautiful places (Chapter 12).

Effect on the Dartmouth Park Conservation Area and Heritage Assets

- 6.30. The Proposed Development has been assessed against its impacts on the Dartmouth Park Conservation Area and other statutorily listed buildings through the Heritage Statement prepared by The Heritage Practice.
- 6.31. Local Plan policies D1 and D2 focus on ensuring there is no harm on heritage assets as a result of development proposals. Specifically in Conservation Areas, developments are expected to preserve or where possible enhance the character or appearance of the area and incorporate high quality design. This is reflected in policy DC1 and DC2 of the Neighbourhood Plan. These requirements are also set out in the NPPF in Chapter 16, specifically paragraphs 205 – 214.
- 6.32. Taking the impact of the Proposed Development on statutorily listed buildings, given the distance between the Proposed Development and listed heritage assets, and its modest scale and appearance, there is not considered to be any harm on the surrounding listed buildings.
- 6.33. Turning to the effects of the Proposed Development on the Dartmouth Park Conservation Area. The Proposed Development provides an opportunity to enhance the setting of Hylda Court through the removal of garages and the caretaker's flat which do not have a positive impact on the Conservation Area.
- 6.34. The new houses will not have any harmful impacts on views from outside the Site due to their location to its rear. However, when combined with the enhanced landscaping and their modest scale, adopted on a similar footprint to the current built form, they stand to provide an enhancement to the Site.
- 6.35. The roof extension, through its high quality design and subordinate nature will preserve the character and appearance of the Dartmouth Park Conservation Area.

- 6.36. Overall, the Proposed Development will serve to conserve and preserve the character and appearance of the Conservation Area and surrounding listed buildings. Therefore, the Proposed Development should be considered to not have a harmful impact on these heritage assets and be considered an acceptable addition to the street scene and surrounding area.
- 6.37. As result, the Proposed Development is considered to be in accordance with the NPPF, London Plan policy HC1 and Local Plan policies D1 and D2. Furthermore, the scheme will also be in accordance with Neighbourhood Plan policies DC1 and DC2.

Living conditions of neighbouring occupiers

- 6.38. The Proposed Development requires assessment of its relationship with neighbouring occupiers of the Site. The relevant Local Plan policy for this assessment is policy A1 which seeks to ensure the amenities of all communities, occupiers and neighbours are protected. The policy lists various factors that are of relevance, which includes privacy, outlook, overshadowing and transport impacts amongst others.
- 6.39. London Plan policy D3 ensure that proposals optimise site capacity through a design-led approach, which ensure that amenities of neighbouring occupiers are protected.

7 and 16 - 32 St Alban's Road

- 6.40. The Proposed Development is sufficiently set back from neighbouring occupiers at no's 7 and 16 - 32 St Alban's Road so there will not be a detrimental impact on their outlook or privacy. This conclusion is particularly drawn as both the roof extension and mews houses are proposed on existing built form. Whilst it is noted the mews houses are taller than the garages they replace, their separation distances to neighbouring occupiers mitigate for any harm in respects to outlook and privacy.

- 6.41. This conclusion is further reinforced by the presence of intervening vegetation and the built form of Hylda Court which will obscure views of the mews houses.
- 6.42. Turning to overshadowing and daylight and sunlight effects on these neighbouring occupiers, the Proposed Development has been assessed by Herrington in the submitted Daylight and Sunlight Assessment.
- 6.43. In terms of daylighting impacts, both 7 and 16 - 32 St Alban's Road will have full compliance with the relevant BRE Guidelines in terms of the Vertical Sky Component and No Sky Line Analysis. As such, in terms of daylighting to these neighbouring occupiers, there will be no change in the current situation as a result of the Proposed Development. Please see Section 5 of the Daylight and Sunlight Assessment by Herrington for full detailed analysis.
- 6.44. Turning to sunlight and overshadowing impacts, the Annual Probable Sunlight Hours analysis confirms that all windows tested for both 7 and 16 – 32 St Alban's Road, both across the year and in the winter will achieve 100% compliance with the BRE Guidelines.
- 6.45. When assessing the Proposed Development against sun on the ground, the assessment has taken properties further afield into consideration. The assessment includes 7, 9, 16-36 and 62-69 St Alban's Road.
- 6.46. All properties experience no change to their current sun on ground levels, the only exception to this is a very small variation to 7 St Alban's Road which experiences a change from 95% of the area lit to 93%. This is an acceptable reduction according to the BRE Guidelines and will be imperceptible.
- 6.47. Therefore, it is considered that the amenities of the neighbouring occupiers that surround the Site will be protected as a result of the Proposed Development.

Occupiers of Hylda Court

- 6.48. It is also important to understand the effects of the Proposed Development on the occupiers of Hylda Court.
- 6.49. When assessing Hylda Court against the Vertical Sky Component, the results in table 5.1 of the Daylight and Sunlight Assessment show 13no. of the 43 rooms tested do not comply with the BRE Guidelines. It is noted that of these 13no. rooms, 10no. serve kitchens which are below 13sq.m.
- 6.50. Where a kitchen is less than 13sq.m, it is considered that such a room is considered to be non-habitable (see London SPG – Housing, paragraph 1.319). As such, 10no. of the rooms that do not pass the Vertical Sky Component test should be discounted as they are not considered habitable rooms.
- 6.51. The remaining 3no. rooms are on the ground floor and serve 2no. living rooms and a kitchen. It is noted in the analysis in the Daylight and Sunlight Assessment that the transgressions in these rooms are very minor. Also, bedrooms are considered to be less important than other rooms in respects to the BRE Guidelines given they are rooms that would mostly in the dark when in use.
- 6.52. In respects to the living rooms, there are oversailing balconies on the floor above and recessed windows which would contribute to the transgression found. A sensitivity test was carried out removing the balcony and this confirmed that one of the rooms effected would then pass the Vertical Sky Component test. The other would still fail to meet the BRE Guideline requirements but this is due to the unavoidable reduction in Vertical Sky Component due to the design of the Hylda Court and the window serving this room.
- 6.53. Therefore, it is considered that the Vertical Sky Component test for Hylda Court is passed.
- 6.54. Turning to the No Sky Line analysis, it is noted there are 16 rooms which do not satisfy the BRE Guidelines. However, as described above, 13no.

of these rooms are kitchens measuring less than 13sq.m and therefore not considered to be habitable rooms.

- 6.55. The remaining 3no. rooms consist of 2no. living rooms on the ground floor and a bedroom on the third floor. The living rooms assessed are more than 5m deep and the BRE Guidelines acknowledge that deeper, single aspect rooms are more difficult to achieve compliance with the No Sky Line Analysis. Due to the deep nature of these rooms, reductions in overall daylight distribution will be unavoidable due to the design of the room.
- 6.56. The bedroom on the third floor has a very minor reduction of 0.66sq.m of floorspace seeing less sunlight. BRE Guidelines recognise that bedrooms are less important to be lit due to their use. As such, this very small reduction in lit floor area is considered to be a very minor and acceptable transgression.
- 6.57. In respects to Annual Probable Sunlight Hours for the occupants of Hylda Court, 7no. windows experience reduction in probable sunlight hours and 4no. in the winter probably sunlight hours test. However, it should be noted all these windows will still retain some direct sunlight throughout the year.
- 6.58. All the windows identified, with the exception of 1no. serving kitchens below 13sq.m and should be considered non-habitable rooms. As such, in respects to the occupants of Hylda Court, there will be a negligible impact.
- 6.59. As there are no amenity areas to assess for Hylda Court in respects to sun on the ground, this has not been assessed.
- 6.60. In terms of privacy or outlook impacts, the roof extension will not have any detrimental impact on the occupiers of Hylda Court due to its location directly above and set back from all other flats within the block.
- 6.61. The mews houses have the potential to impact on the outlook of the ground and first floor of Hylda Court. These floors currently look out on to hard landscaping and unsightly garages. The Proposed Development

seeks to improve that situation with new high-quality landscaping and the well designed mews houses. This will undoubtedly improve the outlook from both the ground and first floor.

- 6.62. It could also be considered that the mews houses will impact on the privacy of the ground and first floors. However, the windows serving the ground floor of the mews houses that face Hylda Court will be provided with obscure glazing and intervening proposed planting. This will mitigate for any inter-visibility and maintain the privacy for occupiers at Hylda Court.
- 6.63. The first floor windows in the mews houses look laterally across the Site, directly facing into the opposite bedroom / living room in the same mews house. There could be potential for these first floor windows to overlook into Hylda Court. However, as is demonstrated on pages 29 and 30 of the Design and Access Statement, there are only very oblique long glimpsed views of the ground and first floors of Hylda Court. Such relationships are not unexpected in dense urban areas.
- 6.64. It is considered that as a result of the design and layout of the Proposed Development, the amenities of the neighbouring occupiers and occupiers of Hylda Court, will be maintained and not be detrimentally impacted.

Draft Construction Management Plan

- 6.65. A draft Construction Management Plan has been prepared and submitted with this Planning Application, prepared by In House Contractors who will be constructing the Proposed Development should it be granted planning permission.
- 6.66. The draft Construction Management Plan outlines the construction hours, delivery times and construction timescales. It also outlines how neighbouring occupiers will be consulted prior to finalising.
- 6.67. The draft Construction Management Plan also confirms that the Site will be registered to the Considerate Constructors Scheme, it also outlines

the construction traffic from the nearest main arterial road (the A1) to the Site, avoiding as many residential areas as possible.

- 6.68. Further details on all the measures taken to mitigate and minimise construction impacts such as dust and other air pollution can be found in the draft Construction Management Plan.
- 6.69. All the measures in the draft Construction Management Plan will provide for mitigation measures during the construction phase of the Proposed Development, ensuring the protection of neighbouring occupiers amenities.
- 6.70. Therefore, it is considered the Proposed Development is in compliance with Local Plan policy A1.

Living Conditions of Future Occupiers

- 6.71. Local Plan policy D1, London Plan policy D3 and D6 are key policies in respects to the future occupiers of new housing.
- 6.72. Each of the proposed dwellings will accord with the Nationally Described Space Standards in terms of internal Gross Internal Area. In addition to this, the Proposed Development will provide for in excess of the London Plan standard for private amenity spaces. Each of the private amenity spaces will be well lit and usable for all future occupiers.
- 6.73. In addition to the ample internal and external amenity space, the new landscaped area around the Site totals approximately 400sq.m, which will supplement the private amenity spaces.
- 6.74. The proposed dwellings will all be dual aspect, with large windows, which will provide ample internal light into each of the units. This is evidenced in Section 7 of the Daylight and Sunlight Assessment with all proposed dwellings meeting all relevant BRE Guidelines for internal daylight and sunlight requirements.
- 6.75. As such, it is considered the amenities of all future occupiers will be catered for and will result in excellent amenities for all future occupiers

of the Site. Therefore, the Proposed Development is in compliance with Local Plan policy D1 and London Plan policies D3 and D6.

Highway Safety, Parking and Servicing

- 6.76. All requirements with regards to highway safety, parking and servicing are considered through Local Plan policies T1 and T2, as well as London Plan policies T5 and T6. Further policies of relevance are policies TS1, TS2 and TS3 of the Neighbourhood Plan.
- 6.77. The Proposed Development is being provided as a car free development, which is the starting point for all developments in London. This can be secured through agreements for removing the ability for future occupiers to apply for on-street parking permits. Furthermore, it should be noted that the garages to be demolished as part of the Proposed Development are not currently used for car parking, therefore there will be no additional stress on on-street parking by removing the garages.
- 6.78. As such, it is considered that the proposed car free approach, along with cycle parking is acceptable given the high levels of accessibility of the Site within walking distance of bus stops on Highgate Road, and Gospel Oak Overground Station and Tufnell Park Underground Station.
- 6.79. The Proposed Development represents a net gain of 5no. dwellings, all of which are 2no. bedrooms requiring 2 cycle parking spaces per dwelling. The Proposed Development proposes to provide an increase of 13no. cycle spaces. These will be covered and secure, as well as being to the side of Hylda Court to ensure that any bicycles will be safe.
- 6.80. The existing bin store will be extended and provided to align with the LBC refuse store standards as per the Design CPG. Details of the proposed bins can be found on page 31 of the Design and Access Statement and on the Proposed GF Plan (Ref: 1143 P10D).
- 6.81. It is therefore considered that the car free approach, in combination with the cycle parking is acceptable. The Proposed Development provides

sufficient bin stores to ensure servicing is acceptable. As such, it is considered that the Proposed Development is in accordance with Local Plan policies T1 and T2, London Plan policies T5 and T6, and policies TS1, TS2 and TS3 of the Neighbourhood Plan.

Biodiversity Net Gain & Trees

- 6.82. Biodiversity Net Gain (“BNG”) became a mandatory requirement for planning applications in April 2024, requiring a net gain of 10% in biodiversity on development sites.
- 6.83. Whilst this is a new requirement of development proposals, Local Plan policy A1 and A3 and London Plan policy G1 and G6 reflect the requirements to enhance biodiversity and green infrastructure through development proposals. Neighbourhood Plan policy ES2 is also of relevance to trees within the Plan area.
- 6.84. The Site has been assessed against BNG by Arbtech, their report has been submitted with this Planning Application. It explains how the Site has a low biodiversity baseline given the majority of the Site is covered tarmac / hard standing with little soft landscaping.
- 6.85. The Proposed Development will introduce a significant uplift in biodiversity with new areas of lawn, shrubs and trees. The new flora and fauna will see a net gain of 312% of area based habitats and an uplift of 100% for linear based habitats. This represents a significant uplift in BNG which should be seen as a substantial benefit to the scheme.
- 6.86. The pre-application response from LBC requested an Urban Greening Factor (“UGF”) score of 0.4. However, this is not a policy requirement as UGF is only required on major schemes. Regardless, Arbtech have undertaken an assessment of the UGF and have been able to achieve a score of 0.19. It is considered that this is the maximum score possible for the Site.
- 6.87. The trees that surround the Site will be protected throughout the construction phase of the Proposed Development. The Arboricultural

Report prepared by Arbtech demonstrates the tree protection measures throughout the Proposed Development.

- 6.88. It is therefore considered that the Proposed Development is in accordance with legislative requirements for BNG and Local Plan policy A1 and A3 and London Plan policy G1 and G6. The scheme is also in accordance with Neighbourhood Plan policy ES2 in relation to trees and their protection.

Ecology

- 6.89. The Proposed Development has been assessed by Arbtech in a Preliminary Ecology Assessment and Preliminary Roost Assessment. This is then assessed by Local Plan policy A3, London Plan policy G6 and Neighbourhood Plan policy ES3.
- 6.90. The Preliminary Ecology Assessment does not highlight any issues or concerns with respects to the Proposed Development. However, a bat emergence survey has been recommended to confirm there is no presence of bats at the Site. The assessment confirms the likelihood of bats is low, but an emergence survey can only confirm this. The survey is being undertaken and is to follow the submission of the planning application.
- 6.91. There are a series of other recommendations, including demolition of buildings to be undertaken outside the nesting bird season and avoiding disturbance of any nearby nesting birds. Further recommendations are provided, including avoiding rubble piles and chemicals / pollutants to avoid harm to amphibians and other animals such as hedgehogs.
- 6.92. It is considered that the Proposed Development does not have any detrimental impacts on ecological matters, subject to the full implementation of the recommendations in the Preliminary Ecological Assessment and Preliminary Roost Assessment. It is therefore in compliance with Local Plan policy A3, London Plan policy G6 and Neighbourhood Plan policy ES3.

Energy & Sustainability

- 6.93. Key policies in assessing the energy and sustainability characteristics of the Proposed Development are policies CC1 and CC2 of the Local Plan and Policies SI1 and SI2 of the London Plan and policy ES4 of the Neighbourhood Plan. Furthermore, paragraphs 158 – 164 of are relevance from the NPPF.
- 6.94. The Proposed Development will be provided with electric boilers to provide the heating and hot water throughout, with PV panels on the roof of Hylda Court to provide renewable sources for the Site. The dwellings will be provided with mechanical ventilation with heat recovery and energy efficient LED lighting throughout where possible.
- 6.95. The combination of the above measures results in Carbon Dioxide emissions of 52.07% which is in compliance with all policy requirements.
- 6.96. Further detailed analysis of the Carbon Dioxide emission savings can be found in the Energy and Sustainability Statement prepared by Cudd Bentley (July 2024).
- 6.97. The Proposed Development would therefore provide a high level of sustainability and energy saving measures that will accord with the requirements of policies CC1 and CC2 of the Local Plan and Policies SI1 and SI2 of the London Plan and Neighbourhood Plan policy ES4 as well as paragraphs 158 – 164 of the NPPF.

Summary & Conclusions

- 6.98. It has been demonstrated that the Proposed Development is compliant with the Development Plan. In addition to this, the Proposed Development has a significant number of substantial benefits which should weigh considerably in its favour.
- 6.99. As this Planning Statement has not identified any negatives associated with the Proposed Development, it should be approved without delay.

7. CONCLUSIONS

- 7.1. Planning permission is sought for the demolition of existing unsightly garages and caretaker's flat to the rear of Hylda Court and the erection of 3no. mews houses and the erection of a roof extension to provide 3no. flats, totalling a net gain of 5no. dwellings across the Site. The Proposed Development will also include significant improvements to the soft and hard landscaping across the Site.
- 7.2. The Proposed Development provides numerous social, economic, and environmental benefits which weigh in favour of approval. These comprise:
- Contributing to local housing needs through the provision of net 5no. new dwellings.
 - Provision of 6no. 2 bedroom dwellings which are a high priority for delivery by LBC.
 - Full utilisation of an under-used, brownfield Site.
 - Demolition of unsightly buildings to provide for a significant enhancement to the character and setting of the Conservation Area.
 - Removal of poor quality hard landscaping, being replaced with high quality soft and hard landscaping.
 - A significant Biodiversity Net Gain of over 300% (area based habitats) and 100% (linear based habitats).
 - Provision of energy efficient dwellings with high levels of insulation and provision of PV panels.
 - Development of a car-free scheme that promotes the use of cycling and public transport.
- 7.3. The planning application has been supported a suite of technical assessments and justification. These demonstrate that the scheme is acceptable against the requirements of the Development Plan and other material considerations and there is no harm arising. On this basis, the Proposed Development should be approved without delay, consistent with paragraph 11 of the NPPF.

Appendix 1

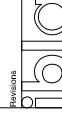
- 1. Do not scale
- 2. Plot figured dimensions only
- 3. Fit in any format task

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PLANNING



Revisions
A 20/06/2024 Planning Issue



Client
Bankway Properties Ltd

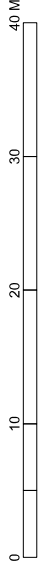
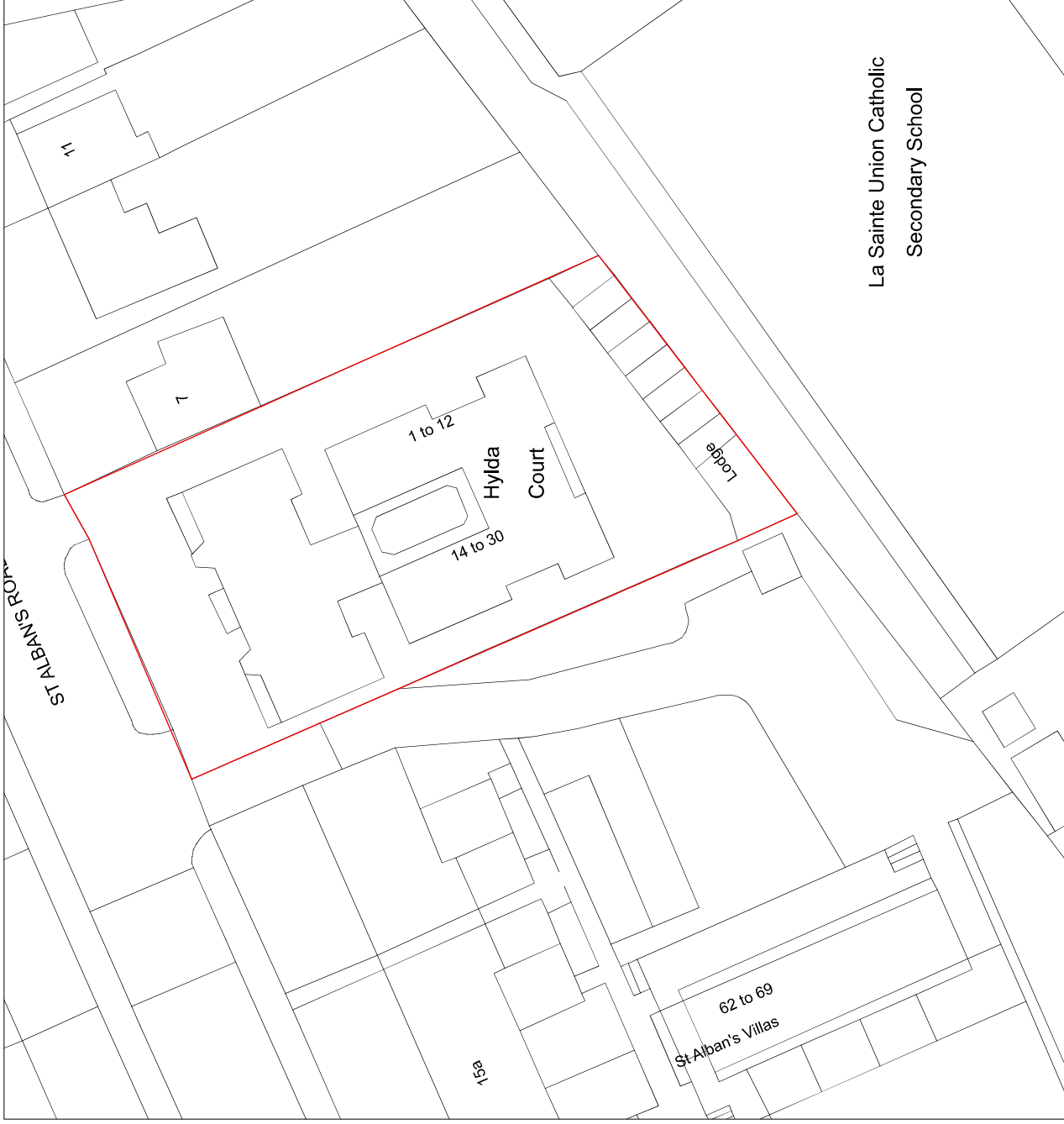
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Hylda Court NW5 1RE

Drawing
Location Plan

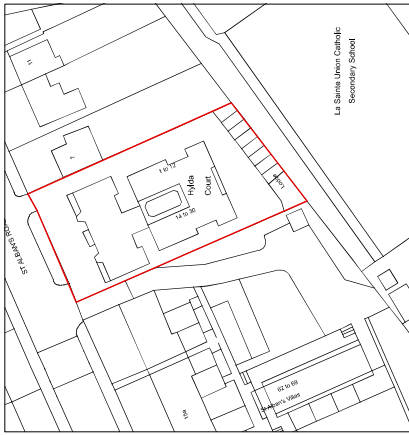
Scale
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Date
Jan 22

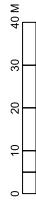
Ref.
1143 P01A



SITE PLAN 1:400@A3/1:200@A1



LOCATION PLAN 1:1250@A3/1:625@A1



Appendix 2

Application ref: 2023/2703/PRE
Contact: Ewan Campbell
Tel: 020 7974 5458
Email: Ewan.Campbell@camden.gov.uk
Date: 10/10/2023

Development Management
Regeneration and Planning
London Borough of Camden
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Daniel Hyde
Freeths LLP,
1 Vine Street,
Mayfair,
London

Dear Sir/Madam

Pre-application Medium Development Pre-application Advice Issued

Address:

Hylda Court
3 - 5 St Alban's Road
London
NW5 1RE

Proposal: Demolition of existing garage block and erection of 3x town houses, 1x roof extension to the existing apartment building to provide 3x apartments. Following up on previous pre-app 2022/2036/PRE

Site constraints

- Article 4 Direction Basement Development
- Dartmouth Park Conservation Area
- Dartmouth Park Neighbouring Forum
- Local Flood Risk Zone – York Rise
- Underground development constraint – Subterranean (groundwater) flow)

Relevant planning history

2022/2036/PRE - Demolition of the existing garages and erection of three two storey two-bedroom town houses; Roof extension to the main apartment block to provide three two-bedroom apartments; Conversion of the existing basement boiler room to a single studio apartment (Previous Pre-app)

Relevant policies and guidance

National Planning Policy Framework (NPPF) 2023

The London Plan 2021

Camden Local Plan 2017

G1 Delivery and location of growth
A1 Managing the impact of development
A3 Biodiversity
A4 Noise and vibration
D1 Design
D2 Heritage
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
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

Camden Planning Guidance

CPG Design
CPG Amenity
CPG Water
CPG Energy Efficiency and Adaptation
CPG Transport
CPG Planning obligation

Site and surroundings

Hylde Court is a purpose built Art Deco residential block comprising 30 flats arranged over 5 floors. The building is concrete-framed, with a pale coloured render facade and horizontal banded windows.

There is an existing block of single storey garages and a two storey caretaker's house to the rear of the main block on the boundary with La Sainte Union Catholic School which is located to the south.

The site is located in Sub Area 8 of the Dartmouth Park Conservation Area. This area is generally characterised as 'an area of predominantly 19th century properties east of Highgate Road built on a more level area than its surroundings'.

The statement carries on to describe St Albans Road itself, 'Between Highgate Road and Brookfield Park there are properties that cover the wide spectrum of 19th and 20th century housing. At the Highgate Road end the 1950s St Pancras Council redevelopment known as St Albans Villas, built on bombed sites, is continued eastwards on the north side, with a corresponding block opposite, Four storey brick with pitched roof, the detailing of the balconies lifts the design. The flats are set back behind hedges and grassed areas. The south side of the road continues with another block of flats dating from the early 1930s, Hylde Court. A five storey block with horizontal metal windows, pale coloured façade, horizontal banding formed

by the balconies, a porticoed entrance with reproduction classic '30s lettering. The internal full-height court is impressive. Pevsner describes it as 'an Art Deco period piece'.

There are several mature trees on the adjoining land to the rear (i.e. Hepworth Court and the air shaft). The canopies of these overhang the garages on the site.

This pre-application proposal follows a previous pre-app (2022/2036/PRE) where the principle of a roof extension was established and, providing a thorough assessment on the garages, these could be demolished to provide housing.

ASSESSMENT

The principal planning considerations are the following:

- Principle of Development and Land Use
- Design and Conservation
- Neighbouring amenity
- Standard of Accommodation
- Transport
- Site Contamination
- Trees and Landscaping
- Sustainability

1. PRINCIPLE OF DEVELOPMENT AND LAND USE

Loss of existing garages

The previous pre-app advised that the use of the existing garages would need to be established before the loss of the garages could be accepted. Whilst this was not fully explored within the pre-app feedback, it was confirmed in the meeting that some were vacant and the area represented an underused part of the site.

In any planning application, a supporting statement would be required to be submitted to justify the loss of the existing garages and should include an assessment which demonstrates that this will not have an adverse impact on the surrounding residential uses and on street parking stress.

Provision of new residential buildings

In policy terms the proposal would comply with policy G1 and H1 of the 2017 Local Plan providing new residential floorspace in this location. Issues of trees, amenity, and standard of accommodation, efficiency, sustainability and transport need to be overcome and are discussed further in the sections below

Affordable Housing

Policy H4 aims to maximise the supply of affordable housing. The Council expects a contribution towards affordable housing from all developments that provide one or more additional homes and involve a total addition to residential floorspace of 100sqm GIA or more.

A sliding scale target applies to developments that provide one or more additional homes and have capacity for fewer than 25 additional homes, starting at 2% for one home and increasing by 2% of for each home added to capacity.

Whilst, in the first instance the affordable housing provision should be 'on-site', the proposed quantum of residential units falls below the on-site requirement of 10 residential units, only providing 6 residential units. Considering this a payment in lieu would be the more appropriate solution.

The payment-in-lieu would be calculated by applying the affordable housing target to the total floorspace and applying a multiplier of £5,000 per sq m (as set out in the CPG Housing).

Housing Choice and Mix

Policy H7 of the Local Plan aims to secure a range of homes of different sizes that will contribute to the creation of mixed, inclusive and sustainable communities and reduce mismatches between housing needs and existing supply. The policy requires that all housing development, including conversion or extension of existing homes and non-residential properties contributes to meeting the priorities set out in the Dwelling Size Priorities Table (DSPT) (see below); and includes a mix of large (3 or more bedrooms) and small homes.

Table 1: Dwelling Size Priorities

	1-bedroom (or studio)	2-bedroom	3-bedroom	4-bedroom (or more)
Social-affordable rented	lower	high	high	medium
Intermediate affordable	high	medium	lower	lower
Market	lower	high	high	lower

Considering the site constraints it is welcomed that two bedroom properties are being proposed and represents a benefit of the scheme. All units feature two bedrooms; and are split between three 3-person units and three 4-person units.

2. STANDARD OF ACCOMMODATION

CPG Housing & CPG Design highlights the importance of high quality housing that provides secure, well-lit accommodation that has well-designed layouts and rooms.

All units appear to exceed the national space standards in terms of overall GIA. Below a table shows the GIA of each flat.

Flat Number	Apartment Type	NSS GIA	Internal GIA
Penthouse 1	2B4P	70sqm	106sqm
Penthouse 2	2B4P	70sqm	95sqm
Penthouse 3	2B4P	70sqm	95sqm
House 1	2B3P	70sqm	77sqm
House 2	2B3P	70sqm	76sqm
House 3	2B3P	70sqm	78sqm

All units contain at least 5sqm of private amenity space including roof terraces for each of the penthouses houses and a ground floor courtyard for the mews houses.

In terms of internal configuration, the penthouses have a functional layout and are dual, and triple aspect, using this to maximise daylight and outlook to the habitable rooms. This approach is accepted.

During the meeting it was discussed in detail regarding the dual aspect nature of the mews houses and concern was raised that the outlook on the ground floor was limited due to the obscure glazed windows on ground floor, and that the first floor rooms were in close proximity to each other. It is considered that the only views would be into the opposite room from the courtyard and oblique views out to the rear of Hylda Court.

The Council accepts that the site is constrained due to its close proximity to the rear of Hylda Court and accepts that infill development can provide less outlook or even privacy than other forms of new development; however, the current design is considered to provide a low quality of outlook with very limited, single aspect views. It is highly suggested that alternative design options should be explored to improve the outlook of these units.

The concerns regarding privacy of these units has addressed through obscuring the glazing on the ground floor. Whilst this achieves a degree of privacy, there is a question about how the buildings interact with Hylda Court. This will be discussed further in the section below. One potential solution is to reduce the amount of obscure glazing and replace it with timber shutters or louvres.

A daylight and sunlight assessment has been submitted to demonstrate that each room of the units have an adequate level of access to daylight and sunlight. The assessment appears to show that each unit would benefit from enough daylight/sunlight however, as the design will need to be amended an supporting DSO assessment in any formal submission should reflect these changes.

In terms of waste storage and collection, the following capacities should be incorporated into the residential elements:

Waste collection in Camden

8.10 The Council currently offers waste collection of the following minimum volumes per dwelling with three bedrooms or less, per week:

- 120 litres of bin, box or sack volume for general waste or 'refuse'
- 140 litres of mixed dry recycling
- 23 litres of food waste

Following the previous pre-application, there is still some concern regarding how servicing and deliveries and waste collection would impact the occupiers of the existing and proposed residential dwellings. The rear alleyway appears to be actively utilised and there remains a lack of information on how many vehicles use this space, how frequently they use this space, what time they deliver, or how waste is collected etc.

3. DESIGN AND HERITAGE ISSUES

Local Plan policies D1 (Design) and D2 (Heritage) are aimed at achieving the highest standard of design in all developments. Policy D1 requires development to 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.

The Dartmouth Park conservation area has a variety and complexity that charts the history of domestic architecture from the late 18th century to the present day. Late 18th century terraces contrast with contemporary housing estates; tiny cottages, large mansion blocks and Victorian villas, all exist together in Dartmouth Park.

Following the previous pre-application proposal, officers advised that the principle of a roof extension is likely acceptable pending submission of a design that better reflected the existing condition of the host building. In terms of the mews houses, the principle was accepted; however, officers stressed that views between sites and trees were an important feature to maintain. Comments also related to detailed design elements and how this should be developed to provide a better context for the site.

The proposed roof extension now responds to the existing architecture and constitutes a subtle addition that creates a more cohesive building. The scale is considered acceptable with a setback incircling the roof extension. Options should be explored to increase the setback to the front to reduce visual impacts of the extension. Another aspect which is absent is the impact on the design that the terraces will have. The proposal includes front and side terraces for the new penthouse units and this will undoubtedly lead to increase roof top clutter in the form of more balustrading and furniture in these prominent locations. Whilst a terrace to the front of the building would not be supported because of this, the proposed plans give little information on the location and operation of the roof terraces. Further information, including location of access doors and location of balustrades should be provided

Whilst the extension does create a level of subordination, providing CGI views of multiple angles along St Albans Road would be helpful within a formal submission to demonstrate the impact on the building and area. Moreover, while the additional height is generally considered acceptable it would be helpful to demonstrate how the height of the building aligns with others along the street.

Details like retaining the chimney feature and providing Crittall windows help in relating the extension to the existing building; however, more thought should be considered especially along the front elevation. The original building contains front bays, corner windows and horizontal banding with different coloured render in a light blue colour. Options should be explored to incorporate these defining architectural features. The height and design of Hylda Court is impressive and is described as an 'art-deco period piece'. Thus, the proposed roof extension should reflect this condition and be designed with high quality materials and details.

The demolition of the garages and the principle of residential units at the rear of the site is accepted. The DAS confirms that the garages are an underutilised part of the site with most of them being too small to fit in modern vehicles. This rationale is accepted ; however, a future application should demonstrate through annotated pictures/ supporting statement to prove the continuation of their use would be very limited.

The design of the mews houses, in principle, is accepted and represent a functional approach. The site of the garages is a large rectangle to the rear of the site with the rear of Hylda Court within close proximity. Therefore, the detailed form and design of the new mews houses will need to overcome their constrained location.

The 2022 pre-application comments noted that the views of greenery to the side of Hylda Court should be retained, with the structure most visible from the street being single rather than two storey structure in order to maintain these views. Views of greenery within the gaps between buildings is an important aspect of the Conservation Area and there does not appear to be a justified reason for these views to be removed as part of the proposal. The mews houses should feature an overall architectural language, but not need to be the same size/shape/form.

The 'C' shaped design of the units with a central courtyard provides some level of articulation and amenity space; however, the buildings are considered overbearing considering the distance between the mews houses and Hylda Court with building distances ranging from 6.0m – 11.5m. Due to all three units being two bedroom, the floor area is driving the scale and proximity to the rear of Hylda Court, which results in an uncomfortable relationship. This is particularly evident at the east of the site where the distance between the two buildings is only 6.0m. This proximity means that the fenestration details and form of the buildings are quite closed off creating potentially dead facades. The ground floor features a fully glazed window with a completely blank flank wall on the first. It is appreciated that this has had to be done to incorporate two bedroom units but it is questioned whether this is the appropriate design approach in this location. Providing one bedroom, two person units over one or one and a half storeys is a possible solution, which would provide a more generous relationship between the mews houses and Hylda Court. Opportunities to include high quality fenestration details, improve privacy concerns from Hylda Court, and improve outlook and daylight/sunlight for the proposed mews houses should be explored. An overall scheme having three two bedroom units and three one bedroom units would provide an acceptable unit mix and should be explored further.

4. NEIGHBOURING 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.

The roof extension is stepped back from the edge which would mitigate its impact in relation to outlook for neighbouring properties. The proposal includes windows on the side, rear and front elevations and therefore an assessment should be completed to measure privacy impacts to residential occupiers on the north side of St Albans Road. In terms of daylight/sunlight, the roof extension will be due south for properties on the north side of St Albans Road. Rear windows of neighbouring no.7 could be affected by the increase in height. Impacts on the existing circular stairwell in the middle of the building, which also acts as a lightwell for windows facing onto it, should be explored. Due to these concerns, a Daylight/Sunlight Assessment should be provided at planning stage.

The proposed mews houses located at the rear of the site have different amenity impacts compared to the roof extension. School playing fields are located to the south of the site, thus it is considered there is no impact in terms of loss of outlook, daylight/sunlight and privacy. Whilst the impact on the neighbours on St Albans Road is likely to be limited but should be investigated.

The properties that are considered to be most significantly impacted by the proposals are those units at the rear of Hylda Court which are in close proximity to the proposed mews houses. No information has been submitted on the uses of the rear facing rooms; further information should be submitted in order to assess any future amenity impacts.. The existing garages are small, single-storey, and are set further back than the proposed mews houses; thus, their impact on existing occupiers is considered minimal.. With the erection of mews houses at the rear of Hylda Court, those rear facing properties are likely to experience increased amenity impacts with regards to loss of privacy with occupiers of the mews houses utilising the space more frequently than current users. Overlooking from the second level of the mews houses into habitable rooms of Hylda Court are also of a concern.. The flats to the rear of Hylda Court are dual aspect and therefore the impact on outlook would not be adverse; however, there is concern over privacy and the close relationship between these windows (on ground and upper levels) and the mews houses.

The new proposal will increase the height of the existing building, but not significantly enough to raise any concerns with regards to impacts on daylight/sunlight. The submitted plans confirm that the mews houses do not comply with the 25 degree line test from the rear windows on Hylda Court. Therefore a Sunlight & Daylight Assessment is required to analyse the impact of the development on all neighbouring dwellings. The assessment should also include the rear facing habitable room windows in Hylda Court as it is not clear if the proposal would have a harmful impact on the daylight to windows in the rear rooms of this block.

The Council seeks to control operations during construction through Construction Management Plans (CMP). You should submit a draft CMP pro-forma in the event of a future planning application. In the event of a future planning application, formal consultation would be undertaken with neighbours, and their comments/objections would be taken into account prior to making any decision.

5. TRANSPORT

In line with Policy T1 of the Camden Local Plan, we expect cycle parking at developments to be provided in accordance with the standards set out in the London Plan. For residential units with two or more bedrooms, the requirement is for two spaces per unit, which gives an overall requirement for 12 spaces for this development. The submitted plan shows 14 M-shaped stands (28 spaces) at the rear right hand side of the building to serve both the existing and proposed flats. This cycle store should be covered to protect the cycles from the elements. The provision of the 14 stands should be secured by condition.

In accordance with Policy T2 of the Camden Local Plan, all 6 residential units should be secured as on-street Residents parking permit (car) free by means of a Section 106 Agreement. This will prevent the future occupants from adding to existing parking pressures, traffic congestion and air pollution whilst encouraging the use of more sustainable modes of transport such as walking, cycling and public transport. The loss of the redundant garages is supported by Policy T2 as this reduces the amount of parking on site. The applicant states that the garages are used for storage, not parking, due to their small size and so there should be no overspill of parking from existing residents on to St Albans Road.

Given the location of the site in the predominantly residential area and the level of construction proposed, it is recommended that any future application be subject to a Construction Management Plan and associated Implementation Support Contribution of £4,194 and Impact Bond of £8,000, to be secured by means of the Section 106 Agreement. This will help ensure that the proposed development is carried out without unduly affecting neighbouring amenity or the safe and efficient operation of the local highway network, in accordance with Policy A1 of the Camden Local Plan.

It is considered that a highways contribution is unnecessary for this development. The existing crossovers to site are being retained in order to provide access to the front courtyard, bins and rear the cycle parking. It is considered unlikely that the footway adjacent to the site will become damaged during the construction works

6. SITE CONTAMINATION

As the site has been/is used for garages it will be necessary to submit a Site Contamination Survey which should identify and make provision for the need for intrusive investigation and if necessary, remediation. This will be assessed by the Council's Environmental Health (Pollution Control) Team to assess the impacts on the health of future residents from contaminants.

7. TREES AND LANDSCAPING

Policy A3 aims to protect and enhance sites of nature conservation and biodiversity. This will be achieved through several criteria (a to i). The Council will assess developments against the ability to improve biodiversity and secure management plans where appropriate. This policy also seeks to resist the loss of trees and vegetation of significant amenity, historic, ecological or cultural value but also promote incorporating trees within any proposal. There is also an expectation, where developments are near trees, the relevant documents should be provided.

The site is situated within the Dartmouth Park Conservation Area. As such all trees over 75mm in diameter at 1.5m above ground level are automatically afforded legal protection. There is a mature willow tree in the communal front garden of the property which is subject to a tree preservation order ref. C196 1998. No trees are proposed for removal in order to facilitate development.

The submitted arboricultural impact assessment does not include trial pit investigations to inform foundation type, although a method statement for this is included. Trial pit investigations are required if a full application is to be submitted. The proposed foundations are also to be no deeper than existing which is welcomed. The scheme has been designed to allow for the retention of, and views, of existing trees. However, off-site trees to the south of the application site are likely to be under repeat pruning pressure to their close proximity to the dwellings, particularly in the southeastern corner of the site where some rooms have areas below required lux levels.

In relation to the design of the landscaping scheme, this appears positive, with new walkways and increased level of greenery and plants. This drastically improves this part of the site and is a welcome part of the scheme. Within a formal submission a material palette, like with the proposed extension and mews houses, should support the scheme detailing the materials used. An indication of what plants and trees should also be provided.

8. SUSTAINABILITY

All new development should comply with the Local Plan policies for sustainability and climate change. Further guidance is available in the CPG Energy Efficiency and Adaptation 2021. A Sustainability Statement will be required to demonstrate how the development in its entirety (construction and operation) would reduce carbon dioxide emissions through following the steps in the energy hierarchy. More information can be found following this link below:

<https://www.camden.gov.uk/sustainability-statements>

In the CPG Energy Efficiency and Adaptation 2021 it is noted that residential developments of up to 4 new dwellings or 500 sq m should achieve carbon emission reductions of at least 19% below Part L of 2013 Building Regulations would be required.

The supporting DAS states that it will meet the requirements above, provide green roofs and increased landscaping which will help with water runoff. This is a good start; however, further development is needed on this part in order to officers to fully assess.

Whilst this may be difficult for the units on the roof extension, it is expected that the new mews houses incorporate passivehaus principles and will be or as close as possible to passivehaus standards. These are small new built properties and therefore there does not appear to be any reason why this cannot be achieved.

In addition, a robust energy strategy should be include and demonstrate the inclusion of renewable technology including PV panels and the use of ASHPs with supporting Noise Impact Assessment if proposed. The scheme would also need to achieve the 0.4 Urban Greening Factor score, and have a net gain of biodiversity. This is considered achievable to the proposed landscaping and officers would urge the scheme to go further and aim for a higher score in this instance.

9. CONCLUSION

Overall, the principle of the development and building uses remain acceptable. The standard of accommodation should be improved which links in with the comments regarding the scale of the mews houses. The roof extension is supported subject to the alterations to some of the fenestration. The Council still needs more information regarding impact on neighbouring amenity, impact on trees, sustainability and landscaping. There are still outstanding issues of site contamination and servicing from the previous pre-app. Below is a list of documents required in any formal submission:

- Completed form – [Full planning application]
- An ordnance survey based location plan at 1:1250 scale denoting the application site in red.
- Block Plan at scale 1:200 or 1:500
- Floor plans at a scale of 1:50 labelled 'existing' and 'proposed'
- Roof plans at a scale of 1:50 labelled 'existing' and 'proposed'
- Elevation drawings at a scale of 1:50 labelled 'existing' and 'proposed'
- Section drawings at a scale of 1:50 labelled 'existing' and 'proposed'
- Demolition plans (elevations)

Supporting information

- Acoustic report (incorporated Noise, Vibration & Ventilation Assessment and Noise Impact Assessment for any plant equipment required)
- Daylight / Sunlight report (internal / external)

- Design and access statement
- Draft Construction Management Plan (in line with pro forma)
- Energy / Sustainability Statements
- Planning statement (Inc. a full schedule of areas by land use)
- Sample photographs/mmanufacturer details of proposed facing materials (if possible at this stage)
- Please see supporting information for planning applications for more information.

This document represents the Council's initial view of your proposals based on the information available to us at this stage. It should not be interpreted as formal confirmation that your application will be acceptable, nor can it be held to prejudice formal determination of any planning application we receive from you on this proposal.

If you have any queries about the above letter or the attached document, please do not hesitate to contact **Ewan Campbell**

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

It is important to us to find out what our customers think about the service we provide. To help us in this respect, we would be very grateful if you could take a few moments to complete our online survey at the following website address: www.camden.gov.uk/dmfeedback. We will use the information you give us to help improve our services.