

Application ref: 2023/2703/PRE
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Daniel Hyde
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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**

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