

Application ref: 2022/5620/PRE
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Dear Sir/Madam

Pre-application Medium Development Pre-application Advice Issued

Address:

**Stables Building Former Hampstead Police Station
26 Rosslyn Hill
London
NW3 1PD**

Proposal: Change of use of the existing annex of stables to Class C3 (residential) to provide additional accommodation to approved house in stables block, plus a basement extension, mansard roof extension with dormer windows, link extension to stables, PV panels, cycle parking, hard and soft landscaping to the front.

Drawing Nos: (All prefix) 113-21, PD.01-04, PD.06, PD.07, PD.09, PD.13, MP01, DAS.01, 4422-(1-8) and Cover letter

Site constraints

- Article 4 Basements
- Hampstead Conservation Area
- Hampstead Neighbourhood Plan
- Grade II Listed Building
- Central London Area
- Underground development constraint – Claygate Beds
- Underground development constraint – 50m buffer to Claygate Beds
- Underground development constraint - Slope Stability
- Underground development constraint – Subterranean (groundwater) flow

Relevant planning history

Main Building

2019/2375/P and 2019/2491/L - Change of use of the site from a police station (sui generis) to a one-form entry school (Use Class D1) for 210 pupils and business/enterprise space (Class B1) including alterations and extensions to the rear and associated works. **Refused 15 May 2019 (Appeals dismissed)**

2016/1590/P and 2016/2042/L Change of use from police station (sui generis) to school (Use Class D1) including the partial demolition and extension to the rear of the Grade II Listed Building and associated works. **Refused 9 April 2016**

Stables Building

2022/0329/P and 2022/0624/L Change of use and refurbishment of the Stables building and internal alterations to provide residential accommodation, alteration of the flat roof to provide skylights and adequate insulation, installation of solar PV panels, the opening of windows previously blocked on the side elevation and the installation of a rear dormer window at roof level. **Granted 21st September 2022**

Relevant policies and guidance

National Planning Policy Framework (NPPF) 2021

The London Plan 2021

Camden Local Plan 2017

A1 Managing the impact of development
A3 Biodiversity
A5 Basements
CC1 Climate change mitigation
CC2 Adapting to climate change
CC3 Water and flooding
CC5 Waste
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
T1 Prioritising walking, cycling and public transport
T2 Parking and car-free development
DM1 Delivery and monitoring

Hampstead Neighbourhood Plan 2018

Policy DH1: Heritage
Policy DH2: Conservation areas and Listed Buildings
Policy BA1: Local requirements for Basement Impact Assessments
Policy BA2: Basement Construction Plan
Policy NE4: Supporting Biodiversity

Policy TT4: Cycle and Car Ownership
Policy HC1: Housing Mix

Camden Planning Guidance

Amenity CPG 2021

Basements CPG 2021

Design CPG 2021

Energy efficiency and adaptation CPG 2021

Developer Contribution CPG 2021

Housing CPG

Transport CPG 2021

Water and Flooding CPG

Hampstead Conservation Area Appraisal and Management Strategy (2001)

Site and surroundings

The site is located on the north side of Rosslyn Hill at the junction with Downshire Hill, between Hampstead and Belsize Park. The site is located within the Hampstead Conservation Area. The main building is Grade II listed, it was a former Police Station and Magistrates Court and has been vacant since 2013 (the Magistrates Court was last used in 1998). Ancillary to the main red brick building is the Stable Block (which is curtilage listed) and outbuildings to the rear.

This pre-application relates to a 1960-70s single storey store attached to the stables block and referred to here as the 'Annex'. It is derelict and in poor condition.

The application site is the former police station, including the stables, is 'Sui Generis', being a use that does not fall within any defined use class. The stables building is situated at the rear of the site (the northern part) and is accessed via Downshire Hill.

The stables building comprises a ground floor and first floor. There is a hardstanding area that was used for car parking between the main building and the stables. The site slopes down to the rear, towards the stables building. The site has been vacant since 2013.

The main building is also Grade II listed and sits within the Hampstead Conservation Area. The main building is three storeys, plus a basement, and constructed in red brick with stone dressings.

The site falls within the area covered by the Hampstead Neighbourhood Plan and the proposals are assessed against the policies within this plan as well as those of the Local Plan. The Hampstead Neighbourhood Plan designates this part of the conservation area as Character Area 3 – 19th Century expansion.

The site has a PTAL rating of 4, which is a 'good' accessibility level and the site sits within a controlled parking zone.

The area is predominantly residential. The site is bounded by the rear gardens of flats on Downshire Hill to the north-west and north, by the rear gardens of properties on Hampstead Hill Gardens to the north-east.

ASSESSMENT

The principal planning considerations are the following:

1. Change of use principle
2. Design and Heritage
3. Housing – Unit Mix/Quality of Accommodation/Affordable Housing
4. Basements
5. Neighbouring amenity
6. Transport
7. Energy and sustainability
8. Community Infrastructure Levy

1. Change of Use

As discussed in the previous appeal statements and committee reports, the use of the former Hampstead Police Station was a Sui Generis use.

The principle of a change of use from SG to residential has already been accepted under the previously permission for converting the stable block into a new house at this site (see history above- 2022/0329/P). The proposal is now for redevelopment of the annex structure to provide additional residential accommodation to this approved house in the form of a 2 storey plus basement building (with the 1st floor in the form of a flat topped mansard), providing reception, home office, cinema room and 3 bedrooms, a ground floor link to the main house, plus PV panels on the flat roof and external landscaping to the forecourt.

Camden Local Plan policy H1 and Hampstead Neighbourhood Plan policy HC1 promote housing. Housing is Camden's priority land use. The area is predominantly residential. The building would provide additional residential accommodation to a single-family dwelling house with three bedrooms. The proposal is thus considered acceptable in land use terms.

2. Design and Heritage

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. Policies DH1 and DH2 of the Hampstead Neighbourhood Plan also reinforce these principles and are considered alongside Local Plan policies.

Scale and location

It is felt that the existing store is already inappropriate in its relation to the host stables, being essentially a front extension. Front extensions are considered unacceptable in almost all circumstances. Given that this structure is felt to be unwelcome in its position, it is not considered appropriate to enlarge it. The proposal crowds the front of the listed stables even more than the existing structure, being both taller and deeper. The proposed floor plan shows that the intended structure will challenge the primacy of the historic building to which it is attached; the host stables has an internal ground floor area of about 98m², while the ground floor of the proposed addition will be 81m².

It should be remembered that the existing pattern of development has only come about because a utilitarian structure was crudely attached to the front of an historic building by an institution. It does not form part of a traditional pattern of development. It is not desirable to worsen the existing position by enlarging the front extension into a two-bedroom house, at a right angle to the historic building and directly in front of it.

A structure of the same dimensions as the existing and with a flat roof connected, as now, to the house by a yet more subordinate structure might be considered acceptable. It should not have a larger footprint, as this would obscure yet more of the façade of the listed building. There may be some merit in a design approach that is less “historic/domestic” in nature, although still in brick. This would reflect the history of the site.

Roof Form

A traditional mansard generally provides secondary attic accommodation, rising from behind a parapet. Here, the slated slope rises from the wall head, which results in an incongruous detail. Traditionally a true mansard initially rises at about 70%, then has a shallower slope above, at about 30%. The proposed roof structure is instead a crown roof, a bulky and inappropriate form which fails to relate to the character or setting of the listed building. Not being partly hidden behind a parapet, the proposed roof is not subordinate, being as tall as the ground floor and therefore appears awkward and bulky in appearance. Overall the roof extension fails to have a suitable hierarchy with the building itself and appears ‘top-heavy’.

This lack of hierarchical principle also relates to the large dormer windows which are highly prominent. These windows appear larger the windows on the ground floor and increase the roof extension’s overall bulk. Its bulk is increased by a parapet along its top, intended partially to conceal a solar array. Thus, although the proposal takes styling cues from traditional buildings, it fails to resemble a traditional house. Instead, it takes the form of a double-fronted chalet bungalow, or a ranch-style house, both discordant forms at this location.

Furthermore the presence of a first floor in this location creates an awkward juncture with the original listed building. Whilst the buildings are attached at ground floor, the roof extension at its closest is 1.2m away, meaning that they are very close together and the relationship between the original stables building and this ancillary building is unnatural. The roof extension should be removed in any forthcoming planning application.

Basement

It is proposed to dig a basement beneath the front extension. This could be acceptable in principle, but the lightwell should be at the other end of the extension, away from the host building.

Landscaping

Given the fact that the listed building is a stables, a utilitarian building addressing a yard, it is not considered to enhance its legibility to surround it with flower beds and low walls.

Therefore the proposal fails to comply with policies D1 and D2 of the 2017 Camden Local Plan and DH1 and DH2 of the Hampstead Neighbourhood Plan

3. Housing

Policy D1 of the Local Plan seeks to secure high quality design in development. In relation to housing, part (n) of the policy requires development to provide a high standard of accommodation. The proposals would also need to comply with the sub-text (within paragraph 7.32) regarding the design of housing, with regards space, ceiling heights etc.

The proposed inclusion of the ancillary three storey building or 'annex' adjacent to the stables building means that there would be increase of three bedrooms and a total of 6 double bedrooms on site. The government's nationally described space standards does not go up as high for six double bedrooms. However with an overall GIA of approximately 199sqm, this easily surpasses an acceptable level of accommodation. The space standards set a minimum ceiling height of 2.3 metres for at least 75% of the gross internal area of a dwelling, which are complied with.

The minimum amenity space requirement for units is 5sqm which is easily exceeded here in the form of the front garden

In terms of internal configuration, due to its spacious nature, the unit appears acceptable and the layout seems appropriate and considered. The proposal is dual aspect in places and therefore outlook and daylight access all appear acceptable. Due to the nature of the site the amount of privacy is also acceptable and there is no significant overlooking from neighbours.

In terms of waste storage and collection, the details are listed below:

- 2.6. Kerbside general waste collections are fortnightly and the mixed recycling and food waste is weekly. The minimum bin storage space for general waste on a kerbside street accessed collection based on a 0-3 bedroom property is a 240L bin. For larger residences up to 9 bedrooms an additional 20L for general waste and 20L for mixed recycling per bedroom per week.

Looking at the pre-application plans these standards can be easily incorporated into the scheme.

Unit 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

The Council considers that each development should contribute to the creation of mixed and inclusive communities by containing a mix of large and small homes overall. In terms of policy H7, the application would just extend the existing approved permission by 3 bedrooms. Because of the nature of the site it seems improbable that multiple units can go on the site and therefore the existence of a single residential unit is acceptable.

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

The Council will assess the capacity for additional homes on the basis of multiples of 100sqm GIA, rounding the additional residential floor space to the nearest 100sqm GIA so the assessed capacity will always be a whole number. 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% for each home or 100sqm added to capacity.

4. Basements

The basement measures 7.2m in depth and 10.3m in width and 3.0m in height. The size of the basement is approximately 70.4sqm and mostly covers the footprint of the new annex building.

In terms of impact on the conservation area, the basement is acceptable in principle as it is almost entirely subterranean with only a narrow slot lightwell at the front. However, this aspect to the front of the site would need to be carefully concealed so as not to harm the setting or character of the listed building.

As per policy A5 (Basements) of the 2017 Local Plan and policy BA1 of the Hampstead Neighbourhood Plan in determining proposals for basements and other underground development, the Council will require an assessment of the scheme's impact on drainage, flooding, groundwater conditions and structural stability in the form of a Basement Impact Assessment and where appropriate, a Basement Construction Plan.

The Council, along with its independent auditors Campbell Reith, will need to be satisfied with the basement would not cause harm to neighbouring properties, amenities and structural conditions among other aspects. Advice in the Basements CPG and relevant policies in the Hampstead Neighbourhood Plan should also be strictly adhered to.

The policy requires the basement to remain subordinate to the host property and not contribute to overdevelopment. Even though the annex is being demolished and replaced with a building that is bigger in footprint, the proposed basement still appears to meet the criteria f to l of policy A5 of the 2017 Local Plan when tested against the footprint of the original annex building.

Whilst the size of the annex building is considered unacceptable and will need to be reduced in any application, overall the basement does not appear excessive in the context of the requirements of policy A5. However because of the development scale having to be reduced, the basement will undoubtedly have to be reduced slightly.

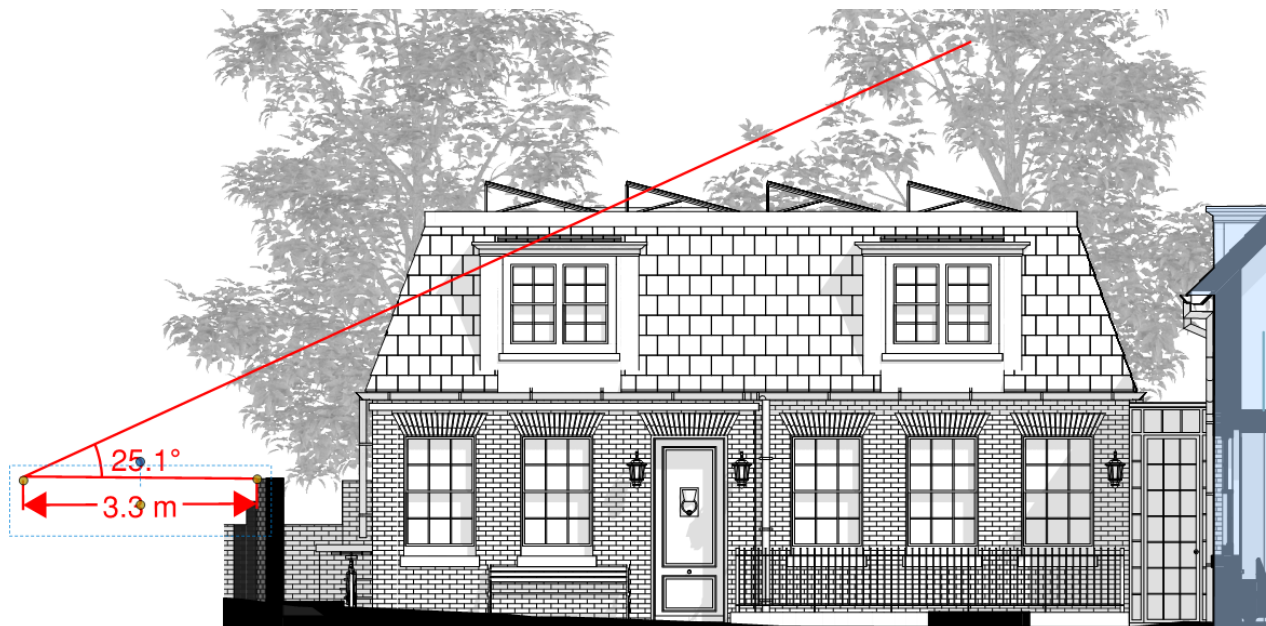
It is important to note that in order for the basement to be fully acceptable, a full BIA including a Basement Construction Plan will need to support the application which will then be independently assessed by Campbell Reith.

5. 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 site itself is fairly stand-alone in character and is of small scale to begin with. The existing annex means there is an existing development in the same location albeit at only one storey. Because of the location of the annex, most neighbours will be unaffected in terms of amenity impacts including outlook, daylight and privacy. In some cases (like nos.3 and 5 Hampstead Hill Gardens) due to the distance away, the development will have no impact; in other cases (like no. 52 and no.51 Downshire Hill and the northern addresses of Hampstead Hill Mansions) the boundary wall will ensure any impact to be minimal.

However the occupants of no.50 Downshire Hill and the southern address within Hampstead Hill Mansions are located within close proximity to the boundary wall and the proposed two storey annex building. This is also compounded as there is a large stepped level change which means the annex building is already set a lot higher than Hampstead Hill Mansions. Whilst the height is increasing by approximately 2.5m it is only 1.3m away from the rear boundary of Downshire Hill properties and on the boundary of Hampstead Hill Gardens and therefore there is some concern for increasing the sense of enclosure and loss of light from the rear windows of these properties. When conducting an approximate test between the nearest windows of 50 Downshire Hill and annex building, the 25 degree line recommended by BRE Guidance to ensure good daylight and sunlight was breached by the proposed mansard (see below)



This demonstrates that there may be some impact on outlook and daylight/sunlight and therefore needs to be assessed further to ensure the impact is not considered significant and harmful. For benefit of Hampstead Hill Mansions, the two rear windows on the first floor should be obscure glazed.

In relation to noise it appears that most of the ASHP units or plant are being included within the building envelope and therefore any noise impacts are not considered significant. However if this is not the case, a Noise Impact Assessment should support the application.

Construction Management Plans are discussed in the 'Transport' section.

6. Transport

Policy T1 aims to promote sustainable transport by prioritising walking cycling and public transport. This is achieved by improving pedestrian friendly public realm, road safety and crossings, contributing to the cycle networks and facilities and finally improving links with public transport. All these measure are in place to ensure the Council meets their zero carbon targets.

Policy T2 limits the availability of parking in the borough and requires all new developments in the borough to be car-free. This will be done through not issuing parking permits, resisting development of boundary treatments and using legal agreements to secure these actions.

The applications site has a PTAL score of 4 which indicates that it has a good level of accessibility by public transport. The nearest station is Hampstead Heath Overground station, located to the west of the site, whilst Hampstead Underground station is located to the North West and Belsize Park Underground station is located to the south east. Numerous bus services run past the site on Rosslyn Hill, whilst additional services are available from Pond Street to the south.

In line with Policy T1 of the adopted Camden Local Plan, there is an expectation that cycle parking is going to be provided in accordance with the standards set out in the London Plan. For residential units with 2 or more bedrooms, the requirement is for 2 spaces per unit although the Hampstead Neighbourhood Plan policy TT4 requires the provision of 3 spaces per 3 bedroom unit. The proposals include the provision of 5 cycle spaces in single cycle stands to the front and to the side of the building. These would be accessed easily and are of a suitable location. One potential alteration would be to provide the cycle parking in one location and have the stands covered.

Given the sensitive location of the site, surrounded by residential properties, it will be necessary to secure a Construction Management Plan and associated Implementation Support Contribution by means of the Section 106 Agreement. This will help prevent the proposed development from having an undue impact on the operation of the local highway network or neighbouring amenity.

Given the location of the site adjacent to the footway on Rosslyn Hill and Downshire Hill, a highways contribution towards repaving the adjacent footway may also be necessary. This will also need to be secured by means of the Section 106 Agreement.

7. Energy and Sustainability

The Council requires all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation. The Council promotes zero carbon development and requires all development to reduce carbon dioxide emissions through following the steps in the energy hierarchy; requires all major development to demonstrate how London Plan targets for carbon dioxide emissions have been met, including zero carbon development; and expects all developments to optimise resource efficiency. All major developments are required to assess the feasibility of connecting to an existing decentralised energy network, or where this is not possible, establishing a new network.

Policy CC1 requires all development to reduce carbon dioxide emissions by following the steps in the energy hierarchy; supports and encourages sensitive energy efficiency improvements to existing buildings; and expects all developments to optimise resource efficiency.

Policy CC2 requires all development to adopt appropriate climate change adaptation measures such as:

- A. the protection of existing green spaces and promoting new appropriate green infrastructure.
- B. not increasing, and wherever possible reducing, surface water runoff through increasing permeable surfaces and use of Sustainable Drainage Systems.
- C. incorporating bio-diverse roofs, combination green and blue roofs, and green walls where appropriate; and
- D. measures to reduce the impact of urban and dwelling overheating, including application of the cooling hierarchy.

The development is classed as a medium development (5-9 units / between 500 – 1000 sqm) by *CPG Energy Efficiency and adaptation*. All medium applications for new dwellings should demonstrate that they meet sustainable design principles and are also required to meet a target of 19% reduction in carbon emissions below Part L of the Building Regulations 2013, of which 20% is achieved by on-site renewable technologies.

The proposal includes ASHP units, PV panels and Solar Hot water panels. The PV panels are located on the roof. The use of renewable energy sources is welcomed by the Council and it is clear that a significant element of the scheme is incorporating energy efficiency and renewable energy sources which is a positive.

One aspect, which was discussed on site, was incorporating green roofs which provide a greater level of biodiversity, soften the design of the extension and reduce risk of flooding. This should be considered within any new proposal.

The Council will also seek to ensure that development does not increase flood risk and reduces the risk of flooding where possible, through the incorporation of water efficiency measures (policy CC3).

Developments must be designed to be water efficient. This can be achieved through the installation of water efficient fittings and appliances (which can help reduce energy consumption as well as water consumption) and by capturing and re-using rain water and grey water on-site. The proposal has included such measures which is welcomed.

Policies D1 and CC2 of the Local Plan encourage sustainable urban drainage systems, green roofs and walls and high quality hard and soft landscaping. The inclusion of a green roof would therefore be welcomed.

8. Community Infrastructure Levy

If the proposal was deemed acceptable it would be liable for both Mayoral and Camden CIL. This would be based on Mayor's CIL2 (MCIL2) and Camden's latest CIL charging schedule from 2020.

Officers note that the floor areas above are approximate and sums are indicative. Final payable contributions would be calculated (following any potential approval of the scheme) by the Council's CIL officers.

CONCLUSION

It is considered that the principle of a residential extension here, a link extension at ground floor to the approved house and a basement are acceptable. However the mansard roof is unacceptable in principle and detail and the overall scale and mass of this building will need reducing. There needs to be a full analysis of amenity impacts that fully demonstrates any impact is not significant as part of any forthcoming application.

Given the sensitive nature of the site itself, it is recommended you begin early consultation and engagement with local resident groups, societies and the CAAC to ensure local residents are consulted

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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