

Date: 02/11/2021

Our reference: 2021/4762/PRE

Contact: Miriam Baptist

Email: miriam.baptist@camden.gov.uk

Dear Sir/Madam,

Town and Country Planning Act 1990 (as amended)

Re: 5 Albert Terrace, London, NW1 7SU

Thank you for submitting the above pre-application request with the correct fee. The proposal is to:

- Replace windows to side and rear elevation
- Alterations to garden and garden wall
- Alterations to front lightwell including installation of a AC unit
- Alterations to the rear fenestration including replacement of windows at first floor level with doors to access proposed balcony.
- Tidy up work to external pipework, vents and extracts

Drawings & Supporting Documents: Cover Letter, Pre-app Design Brochure, Front Lightwell Section, Front Lightwell Plan, Tree Constraints Plan Proposed, Tree Constraints Plan Existing, Acoustic Report, Arboricultural Impact Assessment.

Constraints

- Article 4 Heritage and Conservation
- Primrose Hill Conservation Area

Policy

National Planning Policy Framework (2021)

The London Plan (2021)

Camden Local Plan (2017)

A1 Managing the impact of development
A2 Open Space
A3 Biodiversity
CC1 Climate Change Mitigation
CC2 Adapting to Climate Change
D1 Design
D2 Heritage

Camden Planning Guidance

CPG Home Improvements (2021)
CPG Design (2021)

Primrose Hill Conservation Area Statement (2000)

Assessment

Heritage and design considerations

- The application site is located within the Primrose Hill Conservation Area, wherein the Council has a statutory duty to pay special attention to the desirability of preserving or enhancing the character or appearance of that area, in accordance with Section 72 of The Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended).
- The application site is situated directly facing a notable sensitive heritage location, Primrose Hill. The property is identified as a positive contributor in the conservation area statement, and Albert Terrace, identified as a principal road. These reasons add to its significant heritage value.
- Policy D1 of the Local Plan seeks to secure high quality design which respects local context and character and which preserves or enhances the historic environment and heritage assets in accordance with Policy D2.
- Policy D2 seeks to preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and listed buildings.

Replace windows to side and rear elevation

Camden strongly discourage the replacement of original windows in conservation areas which can be repaired rather than replaced. Glazing forms a significant part of a house's appearance and therefore its contribution to the conservation area. As well as diminishing the historic visual character of a property, replacement glazing results in existing windows being sent to landfill, wasting their embodied energy, and requires the manufacture of new windows, creating yet more emissions.

As Historic England state, 'Traditional timber and metal windows can almost always be repaired, even when in quite poor condition and normally at significantly less cost

than complete replacement' (p.7 *Energy Efficiency and Historic Buildings: Secondary glazing for windows, Historic England, March 2012*). Advice contrary to this is usually received from the company quoting for replacement windows. Rotten sections are usually replaceable. Camden's position is that repairing, draught-roofing, general overhaul of opening mechanisms, use of heavy curtains and shutters and installation of internal secondary glazing are the first measures to be undertaken.

The profile and thickness of glazing bars must be retained. Often double glazing is far heavier than single glazing, and the effects of this on frame thicknesses should be borne in mind. Slim glazing systems may be lighter. Double glazing also has different reflective qualities to single glazing, the visual impact of which is exacerbated when the building is part of a terrace or group or only one window is being replaced. Multi-pane windows should remain multi-pane. It is usually obvious where a single double-glazed unit has been used. Stick-on glazing bars are not acceptable, they must be integral. If large panes are required, Histoglass should be considered, which has an uneven finish on the outer pane that mimics an historic appearance.

The timber used in eighteenth and nineteenth century window frames had a far lower proportion of sapwood than the plantation-grown timber that is used today. As a result, historic window frames will often remain serviceable for over 250 years, compared to the mere decades of contemporary joinery. If the existing sashes are historic, it is less wasteful if they are reused. They can be routed out to allow thicker units. Slim double glazing systems are easier to fit into existing sashes. Generally the use of uPVC is considered inappropriate in conservation areas.

Alterations to garden and garden wall

The proposed designs include a great extent of paving and a subsequent loss of green space. It is noted that greenery is significant for many reasons, including those below:

- Greenery plays a significant role in maintaining the borough's green infrastructure and biodiversity
- Greenery contributes to the character of an area in terms of the relationship between buildings and spaces, the resulting openness or sense of enclosure, and the outlook from adjacent buildings.
- Grass and other ground covers can reduce air temperatures by absorbing solar radiation and encouraging cooling by evaporation assists with cooling, prevents soil erosion and increases. Soft landscaping also aids drainage by reducing surface run off.

The proposal to cover the entire front and rear garden and side passage in hard surfacing is not acceptable in terms of tree impact, loss of biodiversity, missed opportunity to enhance biodiversity and securing high quality design. The verdant character and appearance of this part of the conservation area should be reflected in the landscaping. As such, these alterations are not acceptable in the current form.

It is noted that a conservation area tree works notification was submitted for the removal of T1 and T2 ref. 2021/3838/T. The council did not object and they are now approved for removal. The proposed replacement trees are welcomed. The off-site cat.B Magnolia tree (T5) is proposed for retention. As per section 4.17 of the submitted Arboricultural Impact Assessment report, replacement boundary treatments adjacent to T5 will require trial pit investigation to assess rooting activity and therefore influence construction methods.

There are no objections to the perimeter wall but it may need to be reviewed more closely in relation to the existing boundary treatments and materials to ensure it is not too imposing or out of character in the surrounding context. No objection in principle to lowering of the garden level.

Alterations to Lower Ground Level including lightwell

As exists, the majority of the lightwell area to the front of the property is dense vegetation. The proposal reduces the area of planting to increase the width of the lightwell and therefore increase the light provided to the lower level. The subsequent loss of flower bed and vegetation is noted, any possible increase in width and depth of the proposed planter, or minimising of paved area, would be encouraged.

There is no objection to the lowering of the floor level at lower ground level by 300mm, this is not considered basement development. It is appreciated that noise and disturbance to neighbours has been considered with the submission of an Acoustic Report.

Active cooling (air conditioning) is unlikely to be considered acceptable. It will only be permitted where its need is demonstrated and the steps in the cooling hierarchy are followed (Local Plan policy CC2). Submission should include a Noise and Vibration assessment as well as stating all the other measures that have been taken to address overheating in the property.

Alterations to the facades including replacement of windows at first floor level with doors to access proposed balcony

An almost full-width balcony is proposed on the rear elevation. From the information provided it seems that the balcony is likely to directly overlook the adjacent rear garden of no 6 Albert Terrace. Amendments, perhaps reduction in width, are likely to be necessary to make this acceptable in terms of neighbouring amenity. A black metal balustrade is considered appropriate to the conservation area, however the balcony may be required to be rendered to match the external envelope of the house rather than be clad in natural stone.

At first floor level, the proposal is that the original windows be replaced with tall doors to provide access onto the balcony. We would specify any glazed doors at this level to be timber framed rather than metal, and of traditional aesthetic rather than modern. The natural stone framing of the new openings on the rear façade are

deemed inappropriate. Although modern alterations may be acceptable at lower ground/garden level, this higher level is more prominent and visible from the public realm on Regents Park Road. In terms of the openings themselves, they should be restricted in position and width to match those of the existing windows on first floor level, and bear relationship to the tri-part windows above.

Alterations to the existing roof terrace on the front elevation

There are no objections to the black metal railings mounted on top of the parapet wall to replace the existing ones, however a more traditional railing may be more suitable on this façade and in relation to the ironwork below windows. There are objections to the ridge rooflight on heritage grounds which is inappropriate on a front façade directly facing a sensitive heritage location, Primrose Hill. No objection in principle to the tidying of grilles, vents or replacement pipework.

Neighbouring Amenity

The majority of the proposed changes are not a cause for concern on neighbour amenity grounds, bar the rear terrace as previously discussed which may have a negative impact in term of loss of privacy. The perimeter wall will also need to be assessed to ensure it does not negatively impact the daylight or sunlight of adjoining neighbours. The replacement of like-for-like windows and changes to the existing terrace on the front façade do not have significance in terms of changing the current levels of daylight, sunlight or overlooking.

Conclusion

The proposal in its current form is not wholly appropriate. In summary some of the key issues are highlighted here. Concerns of climate change adaption and mitigation are not considered acutely enough with the proposed active cooling (air conditioning) and the extensive paving over of external space. The loss of greenery not only damages the setting of the house in terms of its green, historic context but does not support the green infrastructure (trees) that are proposed to be retained. The council's position on the property's historic windows is that they are of high heritage value and should be retained and repaired where possible rather than replaced. This is both more cost effective in most cases and better for the environment.

The balcony to the rear, although not unacceptable in principle, is likely to infringe on neighbour's privacy at its current length. While modern fenestration changes may be acceptable at a lower level on the rear façade, they are not acceptable at first floor level. Changes at this level should be restricted to traditional materials and relate to existing proportions on the rear elevation.

This document represents an initial informal view of your proposals based on the information available to us at this stage and would not be binding upon the

Council, nor prejudice any future planning application decisions made by the council.

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

Yours sincerely,

Miriam Baptist
Planning Officer