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**Our ref: 2022/4310/PRE**  
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Dear Mr Pender

### **2022/4310/PRE – St Mary Brookfield Hall, York Rise, NW5 1SB**

I refer to your pre-planning application enquiry 2022/4310/PRE – St Mary Brookfield Hall, York Rise, NW5 1SB. Thank you for sending the pre-application pack and the pre-application enquiry fee (£1,084.00). I write further to our online meeting with yourself, your client and the architect on Monday, December 12<sup>th</sup> 2022.

### **Site**

The application site lies on the east side of York Rise in the Dartmouth Park Conservation Area and it comprises a two storey church hall owned by St.Mary Brookfield Church.

It is a simple pitched roof brick building, it is typical of the period and has little architectural merit. It is described as 'plain' in the Dartmouth Park Conservation Area Appraisal & Management Statement (DPCAA). To the front it is set back from the York Rise pavement line by circa 5m with a tarmac hardstanding, whilst to the sides there are minor external spaces. The applicant is the leaseholder of the main hall, the external frontage to York Rise and the external side area to the south east. The side area to the north-west is demised to provide a separate entrance and access to three flats which are also set within the building. Two of the flats are set within the upper levels of the hall at the front and rear respectively, whilst one is set in the rear lower ground floor area of the building.

The building is not listed, nor are any neighbouring properties. It is not identified as either positively or negatively contributing to the Conservation Area.

There is an electrical substation immediately to the north-west of the plot and further beyond, post-war housing at no.26-34a York Rise. There are residential properties neighbouring to the south west on Laurier Road. Formerly built in the 1930s, no.32 Laurier Road has been recently re-developed.

To the rear, the land formerly used by Mansfield Bowling Club has a relatively recent planning approval for residential development. It is understood the current owners are seeking to apply for a revised planning permission to develop this area as a care home with communal gardens.

## **Proposal**

This application seeks consent for a change of use to provide a primary school. The school is proposed to start in September next year with initially 20 pupils and 4 staff. This will grow to 40 pupils and 6 staff by the 5<sup>th</sup> year of operation. The school will be open 9am-4pm on Monday – Friday during Camden term times. There will be a range of after-school clubs until 5pm which will be open to the wider community. The proposed external works are for the frontage of the building to be provided as a new entrance space and additional external play area, with better (new) provision for bin and bike storage and new boundary fencing with planted areas to both sides. There are also minor modifications proposed to improve the entrance to the separately demised residential units with a new gate. During our online meeting on 12/12/2022 you confirmed that the external space to the south side of the building would be used as an ‘external classroom’. The fencing to the front elevation is proposed as an open timber slatted construction which affords security for the primary school, but also provides an open boundary that can be partly seen through. The planter allows for both a greening of the boundary as is so prevalent in the Conservation Area, as well as an opportunity to provide a larger specimen tree to engage with and enhance the street.

## **Development Plan Policies:**

National Planning Policy Framework 2021

The London Plan March 2021

Camden Local Plan 2017

C2 Community Facilities

C5 Safety and Security

C6 Access for all

A1 Managing the impact of development

D1 Design

D2 Heritage

CC1 Climate change mitigation

T1 Prioritising walking, cycling and car-free development

T2 Parking and car-free development

Dartmouth Park Neighbourhood Plan 2020

DC1 Enhancing the sense of place

DC2 Heritage Assets

DC3 Requirement for good design

CM1 Community facilities

TS1 Safety and accessibility for pedestrians and cyclists

Camden Planning Guidance

Access for All - March 2019

Amenity - January 2021

Design - January 2021

Transport - January 2021

Water and flooding – March 2019

Dartmouth Park conservation area appraisal and management strategy 2009

## **Assessment**

The relevant planning issues are considered to be:

- Land Use
- Conservation & Design
- Effects on the amenity of existing occupiers
- Highways & transport
- Sustainability

## **Land Use:**

The proposal would appear to involve a change in the use of the ground floor of the building from a hall or meeting place for the principal use of the local community (Class F2) to a primary school (Class F1).

Changing from a Class F2 use to a Class F1 use requires planning permission and the proposed change from a church hall to a school would be considered in line with the community use policies in the LB Camden Local Plan 2017 and Dartmouth Neighbourhood Plan.

Part g of policy C2 (Community Facilities) of the Local Plan states the Council's aim to: 'ensure existing community facilities are retained recognising their benefit to the community, including protected groups, unless one of the following tests is met: i. a replacement facility of a similar nature is provided that meets the needs of the local population or its current, or intended, users.'

As stated in our online meeting, it will be necessary for you to qualify and quantify the nature and quantum of uses which last took place in the building. The letter from the vicar for the church (who appear to own/occupy the hall) refers to the use of the hall for a nursery, private functions and 'other occasional uses'. It will be necessary for you to specify the exact uses and

levels of the former uses. If any of the uses have relocated to alternative premises which serve the local populace this should also be indicated. This information is needed so that it can be demonstrated that there would be no loss of a use which benefits the community and/or the provision of replacement facilities which serve the needs of the local community.

The information would also be required so that the proposal can be justified in the context of policy CM1 (Community facilities) of the Dartmouth Neighbourhood Plan which states the aim to 'retain and develop Dartmouth Park's community facilities, by: (a) ensuring that development of any of the existing community facilities identified in Appendix 3 and shown on the plan at Fig. A2 either maintains the existing facilities or provides an equivalent or better facility on the same or another site within the Neighbourhood Area'

The building is listed in Appendix 3 as providing 'nursery, jumble sales, meetings, social gatherings, sports & leisure classes and activities for all age, homeless shelter, etc.'

Therefore the schedule of the previous uses, by type and frequency and information on where the uses have relocated to is also required to justify the proposal under policy CM1 of the Neighbourhood Plan.

### **Conservation & Design:**

The Conservation & Design Officer would have no significant objections to the external alterations which are proposed. A 1.8m high slatted timber fence with planting in front, including a new tree, would be appropriate for the site and would potentially not result in any significant harm to the heritage asset, i.e. Conservation Area. A 'hit and miss' fence would be preferred to a close boarded fence. The planting in front of the fence should be maintained and cleared of any rubbish which might accumulate, in the interests of the appearance of the development. Please include the arrangements for this in your Design & Access Statement (see below).

Timber gates to the residential access, an appropriately designed bin store and bicycle store (see Highways & Transport below) and the re-surfacing of the hard-surfaced forecourt with a softer (artificial) surface would all potentially be acceptable to the character and appearance of the Conservation Area (subject to details of the finish materials and treatment). The additional timber fins on the entrance would also be unlikely to be resisted by the Council on conservation or urban design grounds.

### **Amenity**

No new extensions are proposed to the building and so there would be no effects on the light or outlook at any neighbouring properties from the development.

The alterations/additions at the front would also not harm the amenity or living conditions of any neighbouring occupiers.

The proposed ground floor plan indicates an external play area on the south side of the building (adjacent to 32 – 32b Laurier Road). During our online

meeting you mentioned that this would be an outdoor classroom as opposed to a play space.

Notwithstanding that this space may have been used as break-out space for a nursery before, there is the potential for unacceptable noise nuisance to the occupiers of the adjacent Laurier Road properties if this space is used without restriction for long periods. In the first instance it will be necessary for you to submit a statement to demonstrate how undue noise from this area would be prevented. It is also quite feasible that planning conditions will be recommended/attached to endeavour to restrict the use of this area to mitigate against undue noise levels at the neighbouring noise sensitive premises.

The noise climate in the area might also change as a result of comings and goings by staff, pupils, parents, users and visitors and school and service vehicles.

The Transport Planning Team (see below) has requested information on vehicular movements to and from the site.

You have indicated the school numbers and hours and days of use. The use of the building outside of school hours for extra-curricular/community purposes is also mentioned.

What this all adds up to is that it will be necessary for you to prepare and submit an Operational Management Plan to set out the nature, frequency and scale of uses that will take place and how the uses will be managed to ensure that there is no harm to the amenity of neighbouring occupiers.

You have confirmed that there are existing flats in the basement and on the first floor of the building. The aforementioned Noise Control Statement and Operational Management Plan should address how all sources of noise from within the building and at the site will be controlled to ensure that noise levels are no higher than existing noise levels for these occupiers.

It is also noted that there would be a kitchen. You are advised that any external flues, ductwork, extract fans, condensers, chillers etc. would need planning permission and that these should not result in significant harm to the appearance of the site or the Conservation Area or the living conditions of any neighbouring occupiers.

Any external air conditioning units would have to be justified on 'energy efficiency' grounds in accordance with the Council policy (CC1) for mitigating against climate change from carbon emissions.

A Plant Noise Assessment would be required for any external plant, again to ensure that noise and vibration levels are no higher than existing for adjoining occupiers.

Noise emanating from the building, services and site would be assessed by the Council's Environmental Health (Pollution Control Team) in accordance with LB Camden guidelines and as stated, details would be required within relevant Noise Assessment / Operational Management Plan with any planning application.

## Transport

The site lies within Controlled Parking Zone CA-U, which operates between the hours of 10am and noon Monday to Friday. There is thus the potential for parents to drop off and pick up children at the school opening and closing times (8-9am and 4-5pm) using the Resident parking bays on York Rise, Laurier Road and other surrounding streets. This is likely to cause disruption to local residents during these times. There is also likely to be congestion associated with these vehicle movements, particularly in the immediate vicinity of the site entrance on York Rise and at the junction with Laurier Road.

The site has a PTAL rating of 4, which indicates that it has a medium to good level of accessibility by public transport. The nearest stations are Tufnell Park, located to the southeast of the site, and Gospel Oak, located to the southwest, whilst the nearest bus stops are located on Highgate Road and Dartmouth Park Hill.

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 primary schools, the requirements is for 1 space per 8 staff plus 1 space per 8 pupils for long stay use and 1 space per 100 pupils for short stay use. This gives a requirement for 6 long stay spaces and just under 1 short stay space. In this case, given the very constrained nature of the site, where play space provision is minimal, the short stay requirement can be waived in this instance. None the less, this still leaves a requirement for 6 spaces (3 Sheffield or M-shaped stands). No cycle parking is shown on the submitted plans and this needs to be addressed. The Design and Access Statement states that cycle parking will be provided on-street but this is not considered appropriate for long stay spaces and given the congestion that is likely to occur around the entrance to the site the spaces should be provided within the red line boundary.

In accordance with Policy T2 of the adopted Camden Local Plan, we expect all development in the Borough to be car free. No off-street parking is currently provided and none is proposed. Given the nature of the proposed development, it is considered necessary to secure any future planning application for a similar use at this site as on-street Business parking permit (car) free by means of a Section 106 Agreement.

Given the likely high number of car based trips that this development will generate, it is considered essential that any future planning application be accompanied by a Transport Statement and draft School Travel Plan. A key issue with the acceptability or otherwise of this application will be the applicant's ability to minimise the number of trips being made to the site by car, particularly during school drop off and pick up times. It is essential that every effort is made to reduce reliance on private motor vehicles as a mode of travel to the site. The School Travel Plan and associated Monitoring and Measures Contribution of £5,196 will be secured by means of the Section 106 Agreement and the school will be expected to work towards the highest achievable STARS rate as per the Transport for London STARS rating system.

The Transport Scoping Note (TSN) states that there is only limited trip rate data available for a primary school in this type of location. It is therefore recommended that a survey be undertaken of other schools within the applicant's ownership or that are similar in terms of location, offering and nature to the one proposed here in order to determine appropriate trip rates for the proposed use of the site. This should be a multi-modal survey and not just one based on vehicle trips as is provided in the TSN. The results of the multi-modal trip rate survey should be presented in both the Transport Statement and the draft School Travel Plan.

Deliveries and servicing of the site would take place as existing from the kerb side in front of the building. The existing residents parking bays can be used for loading for periods of up to 20 minutes at a time. Given this, it is not considered necessary to secure a Servicing Management Plan as part of a future application at this site.

Given that the proposed development does not involve any major external alterations to the outside of the building, only minor alterations to the internal layout and the external landscaping, it is considered that a Construction Management Plan will be unnecessary.

It is likewise considered that a highways contribution will not be necessary.

### **Sustainability**

All new development should comply with the Local Plan policies for sustainability and climate change.

The re-use of existing buildings represents a sustainable form of development in principle (subject to compliance with other relevant policies, e.g. land use, conservation & design, amenity, transport)

There would be an aspiration for the greatest possible reduction in carbon emissions below Part L of 2013 Building Regulations.

The site is located within a Local Flood Risk Zone and on a Historically Flooded Street. The use is 'vulnerable' in terms of flooding and therefore a Flood Risk Statement may be required to demonstrate how the proposal would not increase the risk of flooding in the area and how future users would be protected against flood events.

### **Conclusion**

Subject to demonstrating that there would be no net loss of community facilities in terms of type, scale and hours and days of use, the proposed use would be acceptable under the Council and Neighbourhood community use policies.

The proposal is likely to be a source of noise from users and services and it will therefore be necessary to demonstrate by way of an Operational Management Plan and Plant Noise Assessment, that the resultant noise and disturbance levels would be no higher than exiting ambient levels for any neighbouring occupiers.

Subject to details of design and materials the proposed external alterations to the site and building should be acceptable in the context of the townscape and the Conservation Area.

Please see above regarding the transport facilities (e.g. cycle parking) which should be provided on site, requirement for a Transport Statement and Travel Plan and car-free legal agreement. The Transport Statement would be required with the planning application. The Travel Plan would be secured by way of a legal agreement.

If you submit a planning application, I would advise you to submit the following for a valid planning application:

- Completed form (Full planning permission)
- An Ordnance Survey based location plan at 1:1250 scale denoting the application site in red.
- Floor plans at a scale of 1:50 labelled 'existing' and 'proposed'
- Elevation and section drawings at a scale of 1:50 labelled 'existing' and 'proposed'
- Planning Statement including schedule of existing and proposed community uses
- Design and Access Statement including proposed materials
- Operational Management Plan
- Plant Noise Assessment
- Transport Statement
- Draft Travel Plan
- Flood Risk/Protection Statement
- The appropriate fee

This document represents an initial informal officer view of your proposals based on the information available to us at this stage and would not be binding upon the Council, nor prejudice any future planning application decisions made by the Council.

If you have any queries about the above letter or the attached document please do not hesitate to contact Adam Greenhalgh on [Adam.Greenhalgh@camden.gov.uk](mailto:Adam.Greenhalgh@camden.gov.uk).

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

Yours sincerely,

Adam Greenhalgh

Planning Officer

Planning Solutions Team