



AUGUST 2020

Planning Statement

Godwin and Crowndale Estate, NW1 1PA

Iceni Projects Limited on behalf of
The London Borough of Camden

August 2020

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ON BEHALF OF THE
LONDON BOROUGH OF
CAMDEN

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CONTENTS

1.	INTRODUCTION	1
2.	THE SITE AND SURROUNDING AREA	3
3.	THE PROPOSED DEVELOPMENT	5
4.	CONSULTATION	7
5.	PLANNING POLICY CONSIDERATIONS	12
6.	CONCLUSIONS	25

1. INTRODUCTION

1.1 This Planning Statement is submitted to the London Borough of Camden ('the Council') on behalf of the London Borough of Camden ('the Applicant') in support of an application for full planning permission for the proposed development at Godwin and Crowndale Estate, NW1 1PA ('the Site').

1.2 The application seeks full planning permission for:

"Provision of 10 family-sized dwelling (10 x 4 bed) to provide additional social rented units for the Godwin and Crowndale Estate"

1.3 This Planning Statement has been prepared by Icen Projects Ltd and provides the planning case in support of the proposed development. It assesses the development in the context of relevant adopted and emerging planning policy and guidance at national, regional and local levels.

1.4 The application proposals form part of the London Borough of Camden's Community Investment Programme (CIP), the Council's 15-year plan to investment money into schools, homes and community facilities. The programme is funded by building homes for sale, as well as selling and redevelopment properties that are expensive to maintain and underused and difficult to access. The Site forms part of a pilot project to test and develop a process for provision of new housing development utilising MMC, including off-site manufacturing techniques. It is intended for the proposed residential design to be replicated on other sites across the Borough as a way to meet housing need and the potential to be scaled to larger CIP regeneration projects.

1.5 This planning application follows two pre-application request made in December 2018 and April 2019 and the receipt of Design Review Panel feedback in February 2019. Following the receipt of this feedback, the Applicant has made a number of alterations to the proposed scheme which responds to both the Council and Design Review Panel comments and advice.

The Submission

1.6 This Planning Statement should be read in conjunction with the other documents submitted in support of this submission. These documents comprise:

- Planning Application Form and Certificate of Ownership, prepared by Icen Projects
- Site Plan, Site Location Plan, Existing and Proposed Plans, Sections and Elevations, prepared by Surface to Air;
- Design and Access Statement prepared by Surface to Air;
- Arboricultural Survey and Impact Assessment prepared by Arbeco;
- Recreational Assessment prepared by Icen Projects;
- Sustainability Statement prepared by Icen Projects;
- Energy Statement prepared by Icen Projects;
- Transport Statement prepared by Icen Projects;
- Geotechnical and Environmental Investigation prepared by Land Science;
- Construction Management Plan prepared by Lesko;
- Statement of Community Involvement prepared by LB Camden and;
- Explosive Ordnance Threat Assessment prepared by PLANIT.

2. THE SITE AND SURROUNDING AREA

- 2.1 The application site is located within the St Pancras and Somers Town Ward of the London Borough of Camden (LB Camden) and comprises a car park and Multi-Use Games Area (MUGA) with the southern boundary of the Godwin and Crowndale Estate.
- 2.2 The site lies adjacent to the pedestrianised continuation of Chalton Street and close to the junction with Charrington Street. Part of the site is currently accessed through the existing open space of Godwin Court, whilst the existing enclosed car parking element of the site is accessed via the Crowndale Court access road. The site was initially identified for the pilot programme due to its urban context and restricted vehicular access.
- 2.3 The existing MUGA on site provides 5-a-side football and basketball facilities for the residents of the Godwin and Crowndale Estate. The space is currently an underutilised facility in a poor state of repair, bordered by a large area of fencing as a barrier to the public spaces of Chalton Street. The existing car park on site provides gated parking provision accessed via the Godwin and Crowndale Estate. It is understood that the area of hardstanding provides 18 spaces and that these are rented out individually.
- 2.4 The surrounding area is characterised by a mix of building types, heights and uses. Godwin and Crowndale Courts are both 'C' shaped buildings of 8-storeys in height characterised by a red brick finish. To the south of the site, the Regents High School buildings step down to two storeys to the Chalton Street alleyway, rising to three storeys stepped back from this and finished in a grey brick, wooden slats and white-washed walls. To the south east of the site, Charrington Street is characterised by uniform residential 3 to 4 storey terraces dating from the mid-19th Century and constructed of London stock brick. Building heights in the wider area vary from 2 to 10 storey buildings.
- 2.5 The immediate area is primarily residential (C3) in land use, with a number of retail units (A1), financial and professional services (A2) and educational facilities (D1).

Planning Designations

- 2.6 The site is not subject to any planning policy designations, however the King's Cross St Pancras Conservation Area lies to the east of the site, whilst the existing terraced properties to the south on Charrington Street are Grade II listed.
- 2.7 The site has excellent transport accessibility and is located within an area of PTAL rating 6b. Mornington Crescent London Underground Station, with access to the Northern Line, is located 0.3
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miles from the site. King's Cross and St Pancras National and International Rail Stations are located 0.5 miles from the site which also have access to the London Underground Northern, Victoria and Hammersmith and City Lines. Euston National Rail Station is located 0.5 miles from the site with access to the London Underground Victoria and Northern Line. There are also numerous bus services which stop along Crowndale Road and Eversholt Street.

Planning History

- 2.8 A full review of the Council's planning history records has been undertaken and has not identified any recent planning applications for the site. The only application of relevance is a planning application granted September 1974 (LPA Ref: 19556) for the 'construction of a ball kicking and infants play area, and landscaping to the closed northern end of Chalton Street, Godwin and Crowndale Courts'.

3. THE PROPOSED DEVELOPMENT

3.1 This section outlines the proposed development at the site. The proposed development is submitted under a detailed application for full planning permission.

3.2 The application seeks full planning permission for the following description of development:

“Provision of 10 family-sized dwelling (10 x 4 bed) to provide additional social rented units for the Godwin and Crowndale Estate”

3.3 The project is part of the Council’s Community Investment Programme (CIP). The CIP is London Borough of Camden’s 15-year plan (2010-2025) to invest money in schools, homes and community facilities. To help deliver the CIP vision, Camden are investigating procurement options for the provision of new housing to meet the housing need within the Borough. Initial studies have identified that Modern Methods of Construction (MMC) could offer substantial benefits to the Council in meeting this need. Off-site Manufacturing in particular has been noted as providing a good fit to the Council’s development drivers.

3.4 The proposed scheme is a pilot for the Off-Site Manufacturing (OSM) programme. If successful, it is anticipated that the methods, approaches and technical solutions developed for the pilot project will be applied to other development projects within the CIP, forming an Off-Site Manufacturing programme of works. Additionally, the approach could also be scaled up to assist with the development of other larger CIP schemes.

3.5 The site was initially identified through a wider assessment of the estate and due to its location, urban context and restricted vehicular access, it was considered a good test for off-site manufacturing approaches to construction, delivering 10 family sized, social rent, car-free homes for the Estate.

3.6 The over-arching objective of the proposals is to replace an underused MUGA and area of private car parking with 10 high-quality and sustainable family-sized dwellings along with associated public realm and landscaping improvements to the wider estate.

3.7 Overall, the proposals would provide the following floor areas and unit mix:

Residential Unit	Mix	Proposed GIA (sqm)
Unit 1	4 bed 6 persons	137
Unit 2	4 bed 6 persons	113
Unit 3	4 bed 6 persons	113
Unit 4	4 bed 6 persons	113
Unit 5	4 bed 6 persons	113
Unit 6	4 bed 6 persons	113
Unit 7	4 bed 6 persons	113
Unit 8	4 bed 6 persons	113
Unit 9	4 bed 6 persons	113
Unit 10	4 bed 6 persons	113

4. CONSULTATION

- 4.1 As part of the design development process, the applicant has engaged in pre-application discussions with Planning and Design Officers at the Council and attended a Design Review Panel to gain feedback on the proposals.

Pre-Application Feedback – December 2018

- 4.2 Pre-application feedback was provided by David Fowler, Planning Officer at the Council in December 2018. The feedback noted the following with regards to the proposed development:

- Principle for the loss of the MUGA on the site was not opposed, however an objective assessment of its underuse and other facilities in the area would be required as part of any planning application. The Council suggested this could be done through the mapping of surrounding sites.
- Principle of the loss of car parking would not opposed, however its loss and any impact should be subject to assessment by a Transport Consultant.
- LB Camden highlighted concern as to the 'over-modulation' of the scheme and advised the Team to revisit the design of the gable-ends to ensure that 'turned the corner', rather than provide blank elevations.

Design Review Panel – February 2019

- 4.3 Feedback was received by the Camden Design Review Panel in February 2019. A summary of their comments and recommendations can be found below:

Construction Method

- The Panel considered that LB Camden be applauded for investigating new ways to design and provide housing in the Borough. The Panel supported the approach and felt it had the potential to deliver high quality houses.

Height, massing and materials

- It was felt that the proposed scale and height of the terrace is appropriate to the location and will create significant benefit through improvements to the open space behind the Godwin and Crowndale blocks.

- The panel were supportive of the design and considered the form of the individuals homes to be simple with an inventive approach to providing articulation through roof form, terraces, projecting bays and recessed entrances.
- Whilst the use of yellow brick is appropriate for the character of the surrounding area, the Panel requested that the design team consider a 'redder' colour to reflect the appearance of the nearby mansions blocks.

Design details

- The Panel highlighted that the end gables and the roof would have a significant impact on the appearance of the scheme, and therefore need to be carefully deigned to introduce variation, texture and detail.
- It was noted that design detailing would involve the addition of components such as copings, gutters, downpipes and flashing which will prove crucial to the appearance of the houses. The Panel noted that these should be specified to ensure they form parts of a coherent whole, and that they help the houses to become specific to their location. It was suggested that the proposed valley gutter could prove difficult to access for maintenance, and that their design should be re-examined.
- The Panel suggested that the combination of relatively deep front gardens and either small or opaque windows at ground floor may not provide the surveillance needed to ensure the Chalton Street alley feels safe. It was suggested that further discussions are had with the Camden City Learning Centre on the southern side of the alley to explore the potential for larger windows with a more direct view of the street. It was noted that a street lighting strategy would be needed as part of any application to ensure the alley is well-lit, but to ensure the lights are placed to direct light away from the houses and toward the Camden Learning Centre building. It was suggested this could be achieved through attaching lights to the school wall.
- Concern was highlighted regarding the maintenance of the proposed front garden areas. The Panel suggested that walls and railings may be a better option for the boundary treatment rather than planting.
- It was noted that bike and bin stores were not integrated into the house designs. The panel think this should be considered rather than their placement in front gardens.

Amenity Space

- The Panel supported the proposal to re-open blocked access points from stairwells in to the open space behind the Godwin and Crowndale blocks. The opportunity to introduce food growing space and a play area was supported but that these are placed in the middle of the open space to reduce noise. It was also highlighted that a strategy for managing dog access would be needed.

Public Realm

- The Panel noted that the loss of the MUGA should also be considered against Draft London Plan policy for consistency.
- It was suggested that the potential of expanding the development boundary to include more public realm to the east and west of the site be explored.
- The Panel acknowledged the need to remove trees on site, but supported the intention of taking extra measures to ensure the largest plane tree at the west end of the alley is protected.

Internal Layout

- The Panel welcome the direct access from rear terraces to back gardens.
- The projecting first floor window was highlighted as potentially being a successful feature as long as the element creates a useable internal space.
- For the wheelchair units, it was noted there was no transition between interior and exterior.

4.4 Overall the Panel was impressed by the proposed designs and offered their support both for the scheme and for the use of modern methods of construction.

Pre-Application Feedback – April 2019

4.5 Pre-application feedback was provided by David Fowler, Planning Officer at the Council in April 2019. The feedback noted the following with regards to the proposed development:

4.6 Land Use

- The Council confirmed that housing is the Boroughs priority land use and is encouraged on the site, whilst the affordable housing provision was also welcomed.

4.7 Design

- The Council noted that residential layouts should maximise the feeling of generosity and quality of the new homes.
- Design of southern frontages needs to adequately aid in providing natural surveillance of the alley and provide welcoming and safe entrances to the homes. LB Camden noted that this could be accomplished by providing larger windows at ground floor level.
- The location of the bin store was regarded as producing a visual obstruction between the dwellings and public realm. The Council suggested they should be further integrated into house designs and be aligned north-south on the boundary between dwellings and close to the dwelling itself.
- It was recommended that the break in the front boundary wall be aligned with the front door to provide a direct connection between entrance and street.
- It was noted that the proposed windows at first floor level had been designed around preventing overlooking to the adjacent Camden City Learning Centre. It was noted that usage times between occupants and the school may have limited overlapping and therefore too greater emphasis on avoiding overlooking may have been applied to the design.
- LB Camden noted that internal design should avoid long and narrow spaces, particularly in terms of kitchen and dining area provision and that each unit provide sufficient storage.

4.8 Transport

- The loss of parking on the site was welcomed.

4.9 Trees and Landscaping

- LB Camden confirmed that an Arboricultural Report would be required as part of any planning application and that this should demonstrate an uplift in trees both quantitatively and qualitatively.
- The Council requested that landscaping details should be submitted as part of any planning application including details of ongoing maintenance.

Internal Consultation

- 4.10 Internal consultation has taken place with Camden's Highways Team as well as their Parks and Open Space team and Environmental Team. These meetings have provided detailed feedback with regards to refuse, landscaping and highways strategy to aid in scheme development.

4.11 Following the pre-application and Panel discussions, the following key amendments to the proposed development have been incorporated:

- Reduction in size of residential units in line with DRP comments to become more efficient with internal space and for ease of construction;
- Creation of a divide between kitchen and living room in some of the proposed residential dwellings responding to comments as part of public consultation;
- Revised design to eastern gable end property to provide a side entrance to provide more efficient use of internal space;
- Alterations to the proposed landscape design to be more acoustic friendly to neighbours through the provision of a small mound to help reduce noise impact;
- The architectural team have explored possibilities of introducing more public realm to the east and west of the site and conversations regarding this are ongoing with Highways Officers.
- The location of the bin store has been explored with LB Camden Highways Officers and a preferred option and location agreed. This has been balanced against design comments and locational preferences.
- A review of the entrance approach to each unit has been explored and balanced against the benefits of a less formal approach to the entrance way in addition to the balance of creating greater privacy to the ground floor rooms whilst providing passive surveillance.

5. PLANNING POLICY CONSIDERATIONS

Planning Policy Framework

- 5.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that planning decisions must be made in accordance with the Development Plan, unless material considerations indicate otherwise.

The Development Plan

- 5.2 The statutory development plan for the proposed development consists of the London Plan (2016), together with the Camden's Local Plan (2017).
- 5.3 The Revised National Planning Policy Framework (NPPF) was published on 19 February 2019 and sets out the Government's economic, environmental and social planning policies. The NPPF outlines a presumption in favour of sustainable development as being at the heart of the planning system.
- 5.4 Additionally, the Mayor of London is in the process of preparing the New London Plan, which was published for consultation on 1st December 2017 until 2nd March 2018 and is currently being considered by an Examination in Public which runs until May 2019.
- 5.5 An assessment of the key planning issues in relation to the proposed development against the relevant adopted planning policies is set out below.

Principle of Development

- 5.6 This pre-application seeks the redevelopment of the existing site currently in use as a MUGA and area of car parking to provide 10 x 4-bedroom residential units (Use Class C3).

Residential – C3 Use

- 5.7 The NPPF (2018) seeks to significantly boost the supply of housing. Paragraph 11 states that development applications should be considered in the context of the presumption in favour of sustainable development.
- 5.8 The NPPF is clear in stating that more effective use of land should be taken where sites are well located to good transport links and where there is an existing or anticipated shortage of land for meeting identified housing needs. There is a clear message throughout the NPPF to make more land available for housing and the document highlights the need for a flexible approach to be taken to reflect such changes in the demand for land.

- 5.9 It has been identified at all levels that, particularly in the South East and London, the provision of housing must be a priority to overcome the current shortage of accommodation. London Plan (2016) Policy 3.3 identifies an underlying principle to encourage additional housing at appropriate locations. Table 3.1 contained in the London Plan sets an annual monitoring target for the provision of 889 new homes in LB Camden over a ten year period.
- 5.10 The Draft New London Plan (2017) also recognises and emphasises the pressing need to deliver new homes and has significantly increased the Council's annual housing target from 889 to 1,086. Draft Policy H2 of the London Plan (2017) also emphasises that small sites, capable of delivering up to 25 units, will be critical in meeting these targets and emphasises that boroughs should pro-actively support development that proposes well designed new homes. The policy provides a specific annual target of 376 new homes on small sites in the Borough. Draft Policy H2 sets out that a presumption in favour of small housing developments should be applied where proposals involve the development of vacant or underused sites, and where proposals involve the demolition of existing buildings within PTALs 3-6 or within 800m of a rail station.
- 5.11 LB Camden Local Plan Policy H1 seeks to maximise housing supply in the Borough and aims to exceed a target of 16,8000 additional homes from 2016/17 – 2030/31 including 11,130 additional self-contained homes. The Policy notes that the Council will seek to exceed the target for additional homes by regarding self-contained housing as the priority land-use of the Local Plan and where sites are underused, expect the maximum reasonable provision of housing that is compatible with any other uses needed on the site.
- 5.12 LB Camden Policy H4 seeks to maximise the supply of affordable housing and exceed a borough wide strategic target of 5,300 additional affordable homes from 2016/17-2030/31 and aim for an appropriate mix of affordable housing types to meet the needs of households unable to access market housing. The guidelines mix of affordable housing types is 60% social-affordable rented housing and 40% intermediate housing. The text to accompany this policy does not however that these guidelines will be applied flexibly and in certain circumstances the Council may support proposals which only provide social-affordable rented housing.
- 5.13 The proposals put forward the addition of 10 x 4-bedroom residential units on the site as part of a 100% affordable housing scheme. The proposals will provide much needed family-sized housing within the area which is characterised by flatted residential dwellings and noted as a strategic focus by the Council. It is proposed for all of these units to be of social rent. It has been confirmed by the Council as part of pre-application feedback that the provision of social rented homes in this location, as part of the Godwin and Crowndale Estate would be appropriate and acceptable in planning policy terms.

Loss of MUGA / Open Space

- 5.14 The current London Plan seeks to ensure a satisfactory level of local open space provision and will resist its loss. Policy 7.18 notes that the loss of open space may be acceptable where equivalent or better quality provision is made within the local catchment area. Draft London Plan Policy G4 continues this line of thought and notes that development proposals should resist the loss of protected open spaces in areas of deficiency, where losses are proposed outside of areas of deficiency, equivalent or better-quality provision should be made within the local catchment area unless an up-to-date needs assessment demonstrates this is unnecessary. The Plan notes that proposals to enhance open spaces to provide a wider range of benefits for Londoners will be encouraged. Examples are; improved public access, inclusive design, recreation facilities, landscaping improvements or SUDs. Both the current and draft London Plan note that local open spaces and small open spaces such as that at Godwin and Crowndale Estate should be located less than 400m from the site.
- 5.15 At a local level, LB Camden Local Plan Policy A2 seeks to protect the Council's open spaces on housing estates while allowing flexibility for the re-configuration of land uses. When assessing development proposals, the Council notes that it will take into account:
- i. The effect of the proposed scheme on the size, sitting and form of existing open space and the function it performs;
 - ii. Whether the open space is replaced by equivalent or better provision in terms of quantity and quality; and
 - iii. Whether the public value of retaining the open space is out-weighed by the benefits of the development for existing estate residents and the wider community, such as improvements to the quality and access of the open space.
- 5.16 The policy notes that the loss of an open space will only be acceptable where provision of equivalent or better space is made within an appropriate catchment area for the type of open space. The Council does acknowledge that the reconfiguration of open space and other land uses can be acceptable where significant benefits have been demonstrated (for example provision of new homes and community benefits) in particular for residents of the estate. The Council will consider whether such schemes provide equivalent or better provision in terms of the quality and quantity of usable open space and secure improvements to the accessibility and range of uses.
- 5.17 The site is currently occupied by an under-used and poor-quality MUGA, gated from the rest of the estate open space and accessed only by estate residents through liaison with the Estate TMO. Discussions with the TMO for the estate have confirmed that the site is not regularly used by local residents and that the gated element to this leads to an uninviting space. The MUGA forms part of

the wider Godwin Court open space, currently occupied by an area of grass and frequently used by dog walkers. No facilities are provided as part of this space, but it provides an open grassy area to be used for recreational purposes. Access to this space is through one main entrance from the Godwin Court building and is not accessible via the individual stairwells to the residential units as these had previously been blocked off. Both the existing open space and the MUGA are therefore not an accessible and well-maintained area of open area and as a result the usability of the space in its current format has been limited.

- 5.18 An initial 'Landscaping Workshop' with Estate residents was undertaken on 20 February 2019 to gather feedback on improvements that could be made to the existing open space within the Godwin courtyard as part of this development. An indication of potential proposals was put forward for discussion including the addition of seating areas, community growing zones, play areas and gym equipment and a dog walking zone. Verbal and written feedback at the event was positive. Many residents highlighted that the existing courtyard is not well used, is too empty and would like it to include more features including planting, seating, play space and outdoor exercises facilities. A summary of this consultation has been submitted alongside this Pre-Application Statement within the accompanying Statement of Community Involvement.
- 5.19 The proposals seek the removal of the MUGA on the site. Proposals do not seek to replace the MUGA within Godwin and Crowndale, but to provide improvements to the existing open space to Godwin Court and to ensure sufficient facilities within the immediate catchment area to cater for those who currently utilise the existing MUGA, namely 12+ age group for who there is an acknowledged shortage of playspace within the borough.
- 5.20 An assessment of local MUGA and playspace provision within a 500m radius has been undertaken to demonstrate capacity within the immediate area. A summary of this is contained within the accompanying recreational assessment. This summary confirms 12 existing MUGA facilities in the immediate area with a further additional facility proposed as part of the wider Central Somers Town redevelopment scheme along with 10 play areas for younger children aged 0-6. Once built out, there will be 4 MUGA facilities within a 400m walk of the site. Notably, the new Handyside Sports Pitch falls within the 500m catchment area to the site, which provides a brand new publicly accessible and free sports facility, including a number of MUGA sports pitches. In addition to this, a further 3 play spaces for young children are also within a 500m walk of the site, most notably that of the Somers Town wider redevelopment. It is therefore regarded that there is a wide range and number of facilities within the immediate area and as such, sufficient provision to replace the loss of the underutilised MUGA on the site.
- 5.21 In addition to the wider provision, the scheme also proposes a number of landscaping improvements to Godwin Estate and the existing Chalton Street alleyway, to enhance the existing open space and create a more attractive and useable area with the provision of appropriate facilities to cater to

residents requirements. Based upon an assessment of facilities within the immediate area, particularly the availability of young person play areas, the scheme seeks to incorporate open space and recreational facilities aimed at ages 12 and above. This will include the introduction of gym equipment, seating areas and a community garden. This is to be combined with improved lighting strategies around the site and general improvements to the appearance of the space. Accessibility into the open space and movement around it will be further enhanced by creating new entrances into the courtyard space from the existing stairwell and access points of Godwin Court, whilst a security gate will be added to the south of the site to allow movement from north to south. Whilst the landscaping strategy is yet to be finalised, discussions with LB Camden have been supportive of the improvements to the existing open space and of the provision of facilities for ages 12+ on site.

- 5.22 The loss of the MUGA and the provision of a residential development on the site therefore allows for the enhancement of the existing open space at Godwin Court in line with London Plan suggestions whilst also providing 10 family-sized affordable housing units on the site, thereby providing a significant public benefit in terms of contribution to Borough housing targets.
- 5.23 It is therefore considered that the enhancement of the existing open space for the existing residents, balanced with the quality of facilities available within the area surrounding the site and public benefits from the scheme demonstrates the acceptability of the loss of the existing MUGA on site. It is therefore regarded that the requirements contained within Policy A2 have been adhered to in addition to both current and draft London Plan policy.

Loss of Car Parking

- 5.24 Part of the site is currently occupied by a private car parking area, gated off from the main car parking that forms parking for the Godwin and Crowndale Estate. The area provides 18 car parking spaces which are understood to be rented out to individuals on a weekly basis. The existing main vehicular access and exit point for the car park is taken from Goldington Crescent into Crowndale Court within the Godwin & Crowndale wider estate. It is not possible to enter the site from Chalton Street in the existing situation as the car park is fenced off. The proposals put forward the removal of this area of car parking to facilitate the development of the new residential dwellings.
- 5.25 LB Camden Local Plan Policy T2 notes that the Council will seek to limit the availability of parking in the Borough to spaces designated for disabled people where necessary, and/or essential operational or servicing needs and will support the redevelopment of existing car parks for alternative uses. In redevelopment schemes it is noted that the Council will consider retaining or re-providing existing parking provision where it can be demonstrated that the existing occupiers are to return to the address when the development is completed.
- 5.26 Proposals seek to relocate a total of six spaces on to the existing Godwin & Crowndale Estate. This will be achieved through the conversion of two existing visitor spaces and four commercial spaces

into resident spaces. In addition to this, a further three to four parking spaces to the edge of the site on Chalton Street can be provided.

- 5.27 The scheme therefore proposals the loss of 12 - 13 car parking spaces in total. In order to ensure there is sufficient capacity on surrounding streets to accommodate the additional car parking, a parking survey has been undertaken, surveying the site and each road within 200m on an hourly basis between 07:00-21:00 from Monday 4th to Friday 8th February 2019.
- 5.28 This car parking survey has demonstrated that a maximum of 10 cars parked within the car park at any one time and an average occupancy level of 50%. As such, the surrounding streets will be required to accommodate for any additional cars being parked throughout the day over and above the parking occupancy rate, which would supplement the repurposed visitor and commercial spaces within the existing Godwin and Crowndale Estate along with the three / four parking spaces identified to the eastern edge of the site on Chalton Street.
- 5.29 An analysis of parking within 200m of the site demonstrates that daytime car parking is available each hour between 07:00 – 21:00. This shows that there is availability within the surrounding streets to accommodate any such demand.
- 5.30 As a result of these findings and taking into account the Council's priorities for reducing car parking, the scheme does not seek to re-provide all of the existing car parking spaces on site. Liaison with LB Camden Highways Officers have confirmed that the loss of parking on site is acceptable.
- 5.31 Based upon the above, the proposals in terms of land use can therefore be regarded as in accordance with Local Plan policy, subject to detailed design proposals. Further information regarding the above analysis can be found within the accompanying Transport Assessment.

Design

- 5.32 Paragraph 130 of the NPPF (2019) states that permission should be refused for development of poor design that fails to take the opportunities for improving the character and quality of an area and the way it functions. Paragraph 131 of the NPPF (2019) states that in determining applications, great weight should be given to outstanding or innovative designs which help raise the standard of design more generally in the area. Paragraph 196 of the NPPF (2019) states that where development will lead to less than substantial harm to the significance of a designated asset, this harm should be weighed against the public benefits of the proposal.
- 5.33 Good design is a central objective to the London Plan (2016). London Plan Policy 7.4 requires new development to have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. In addition to this, Policy 7.6 states that

buildings should make a positive contribution to a coherent public realm and streetscape, and should incorporate the highest quality materials and design appropriate to their context. Emerging Policy D6 of the Draft New London Plan (2017) also sets out that development proposals must make the most efficient use of land and be developed at the optimum density. The optimum density of a development should result from a design-led approach to determine the capacity of the site. Policy 7.8 of the London Plan (2016) states that development affecting heritage assets and their settings should conserve their significance through sensitive design in terms of form, scale, materials and architectural detail.

- 5.34 At a local level, LB Camden will seek to ensure high quality design in development. Local Plan Policy D1 requires any proposal to respect local context and character and preserve and enhance the historic environment and heritage assets in line with Local Plan Policy D2.
- 5.35 The proposed development has been modelled through careful studies of the surrounding area, proximity to adjacent buildings and the relationship with the open space of Godwin Court. Whilst an MMC building methodology is proposed, this has been taken into account without affecting or limiting the design rationale for the site. A specific MMC method has not been finalised as the scheme has been design-led from the outset and this will be confirmed once a detailed design has been finalised. The proposed design has however been reviewed in the context as a pilot scheme with the flexibility to provide an equivalent of 'design code' to be applied across numerous sites of various contexts and scales.
- 5.36 The design of the scheme has been centred around responding to the surrounding townscape and streetscene in the area, and to enhance the existing poor-quality MUGA and car parking area whilst simultaneously creating a safer more active space along the Charlton Street alleyway. Particular regard was given to the importance of responding to the existing Estate buildings, the adjacent school and the Grade II Listed properties of Charrington Street. Measures have been taken to ensure that the proposed development serves to respect the setting and character of the surrounding area which displays a diverse architectural character and building height, with examples of traditional and modern buildings with a variety architectural forms in the immediate area.
- 5.37 The proposed massing of the development is of three storeys to provide ten 'townhouse-style' terraced properties. Nine of these units are of identical width, whilst one wheelchair accessible unit is located at the western gable-end of the site which is slightly wider. The proposed building height will seek to mediate between the 8-storey Estate buildings to the north and the two/three-storey Regent High School buildings to the south. As such, the development would not be an incongruous addition to the street, nor stand out or above properties within the immediate area and thereby protect views in and out of the neighbouring conservation area. Both pre-application and DRP feedback noted the appropriateness of the scale and massing proposed to the site and of the terraced design proposed.

- 5.38 The site is unique in that each elevation is visible across the site, with the Estate buildings and open space to the north, Chalton Street to both the east and west and the existing alleyway to the front of the proposed buildings. The proposed design takes a 'modulation' approach, rather than an identical design across each unit, it is proposed to vary set backs and locations of terraces between each property in order to add visual interest and reduce the built form to both front and rear elevations. This also allows varying internal designs to cater for wider occupants. Terraces are proposed at first floor level with steps down to the property's rear gardens, whilst also adding to the visual interest of the development this additionally allows for greater natural surveillance both of the gardens and the wider Godwin Court open space. Due to the unique positioning of the site, particular focus has been had on the gable ends of the proposed development, ensuring these 'turn the corner' and do not provide blank book-ends to Chalton Street. Both of these units have been designed with access from the side elevations and for gardens to wrap around with the existing road.
- 5.39 In terms of materiality and elevational approach, this has acknowledged the surrounding Georgian terraces within the area which are of architectural merit and the primary use of brick in the immediate area. The proposed building seeks to not identically replace this design but to retain a contemporary finish. The primary material proposed is a light brick slip and pale timber, whilst the proposed gable windows will be finished with zinc cladding. It is acknowledged that DRP feedback discussed the possibility of red brick for the site, however whilst this would incorporate the proposed buildings into the Estate, it is regarded the colouring would have a negative impact on the existing alleyway create a dark and unattractive space.
- 5.40 Overall, the proposed development optimises the development potential of the site, responding to the unique positioning of the property with highly visible elevations and access via a pedestrianised alley. Particular regard has been given to the importance of responding to the wider conservation area but also the school and Estate buildings adjacent. The proposed properties are of an appropriate scale to sit comfortably within the surrounding area and allow for the provision of ten high-quality family-sized dwellings on site. The proposed public realm and landscaping improvements surrounding the site will also contribute to enhancing the Chalton Street alleyway and views in and out of the adjacent conservation area. Full details of the proposed design are set out within the accompanying Design Statement prepared by Surface to Air.

Residential Quality

- 5.41 LB Camden Local Plan Policy H6 notes that the Council expects all self-contained homes to meet the national described space standards and provide accessible homes.
- 5.42 The size of the homes within the proposed development comply or exceed the relevant space standards as set out in the nationally described space standards as demonstrated within the following table:
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Residential Unit	Unit Type	Technical House Standards (sqm)	Proposed GIA (sqm)
Unit 1	4 bed 6 persons	112	137
Unit 2	4 bed 6 persons	112	113
Unit 3	4 bed 6 persons	112	113
Unit 4	4 bed 6 persons	112	113
Unit 5	4 bed 6 persons	112	113
Unit 6	4 bed 6 persons	112	113
Unit 7	4 bed 6 persons	112	113
Unit 8	4 bed 6 persons	112	113
Unit 9	4 bed 6 persons	112	113
Unit 10	4 bed 6 persons	112	113

- 5.43 The proposed scheme also incorporates one unit suitable for occupation by a wheelchair user in accordance with Building Regulation M4(3).
- 5.44 The LB Camden Interim Housing Guidance (2018) also notes that all new homes should have access to some form of private outdoor amenity space. Each of the proposed residential dwellings will have access to 54 – 64sqm of their own private amenity space, through ground floor gardens and terraces, plus access to the wider communal open space (2750 sqm) of the Godwin and Crowndale Estate. It is regarded that the combination of both provisions provides ample amenity space for future residents.
- 5.45 Additionally, each of the units have been designed with regard to the both Camden Planning Guidance and the Mayor's Housing SPG, with the residential accommodation receiving adequate levels of daylight and sunlight, natural ventilation and outlook, floor to ceiling heights and accessibility.
- 5.46 The proposed development has been designed to deliver a high-quality residential environment and analysis of the quality of the residential accommodation is included in the supporting Design and Access Statement prepared by Surface to Air.

Amenity

- 5.47 Local Plan Policy A1 and Camden CPG1 Design seeks to ensure that the amenity of neighbours is protected, including visual privacy, outlook, sunlight, daylight and overshadowing.
- 5.48 The proposed development has been designed to take into account the context of its setting and the location of the adjacent school and existing Estate building. The proposed building is set back from the existing alleyway and MUGA building line with the provision of front gardens. This creates greater separation distances between the proposed development and the existing school. Through discussions with the adjacent school it has been established that the windows servicing the northern elevation comprise of classrooms, offices and a kitchen. The size and location of windows have been chosen carefully in order to limit the angle and number of views both from and to the building. At first floor level this has incorporated an angled bay window which allows views out along the alleyway and down to the dwellings entrance which limits direct views and enhances security to the alleyway below.
- 5.49 The proposed terraces to the property are located at third floor level and set back from the building line and vary from the front to the rear of the proposed dwellings. Drawings contained within the accompanying DAS demonstrate that views from the terraces to other buildings will be limited and will offer positive overlooking to the open space of Godwin Court.
- 5.50 Due to the sitting of the proposed development and separation distance between existing buildings, it is not considered that there will be any material impact in terms of daylight and sunlight. This is demonstrated by the shadowing drawings submitted as part of this planning application.
- 5.51 It is therefore regarded that there will be no material detrimental impact in terms of amenity on the surrounding occupiers.

Transport and Servicing

Cycle Parking

- 5.52 Local Plan Policy T1 requires development to provide cycle parking facilities in accordance with the minimum requirements of the London Plan and the design requirements as outline in CPG7, notably secure and step free.
- 5.53 Cycle storage has been provided to each residential unit and will be integrated as part of each residential dwellings design. A total of 20 cycle parking spaces will be provided within the curtilage of each dwelling which is in accordance with standards.

Vehicular Transport

- 5.54 Local Plan Policy T2 states that the Council will limit the availability of parking and require all new developments in the borough to be car-free. The Applicant is willing to enter into a S106 legal agreement to secure a car-free development for all new residents on the site. As noted above, the loss of existing car parking on the site has been deemed acceptable by Highways Officers, but that a limited number of these will be replaced around the site.
- 5.55 Due to the excellent accessibility of the site, the proposed development will be car-free with the exception of a disabled parking space located on-street on Chalton Road. This level of provision accords with standards.
- 5.56 Further information regarding car parking can be found within the accompanying Transport Statement.

Refuse

- 5.57 Refuse on the site will be collected from refuse stores within two separate storage area on site, both of which are within the required dragging distance for council collection operatives. The frequency of collections will be confirmed once the council waste contractors have been appointed and the full refuse strategy will be agreed with LB Camden by condition prior to opening, although for the purposes of this report it is expected to occur weekly.
- 5.58 Further information relating to transport and servicing strategy can be found within the accompanying Transport Statement prepared by Icen Projects.

Energy

- 5.59 The accompanying Energy Statement to this submission provides an overview as to how the proposed development at Godwin and Crowndale Estate contributes to achieve CO₂ emissions reduction and gives an overview of the design proposals that will ensure the development operates in an energy efficient manner over the lifespan of the scheme.
- 5.60 The energy assessment has shown that the proposed development will adopt the Mayor of London's 'Energy Hierarchy' and the proposed strategy shall achieve a 54.8% reduction in carbon dioxide emissions through on-site means alone. 227 tonnes of CO₂ per annum of residential emissions from the development are proposed to be offset through a cash-in-lieu contribution.
- 5.61 Overall, the proposals for the scheme are in line with the policy requirements of the planning authority for energy statements and will provide a development that seeks to promote these principles in operation.
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Sustainability

- 5.62 The accompanying Sustainability Statement to this submission details the sustainable design and construction measures adopted by the proposed development and gives an overview of the design proposals that will ensure the development operates in a sustainable manner over the lifespan of the scheme. The Sustainability Statement report headlines provide a framework for the project team to operate consistently within sustainability guidelines set out by the LB Camden.
- 5.63 The Sustainability Statement shows that the proposed development:
- will develop a brownfield site, replacing an underused Multi-use Games Area (MUGA) and a private, hardstanding car park;
 - is in a location with good access to public transport;
 - will promote cycling and walking, and deter private car ownership;
 - will employ Modern Methods of Construction (MMC), which will aid in minimising the environmental impacts of the proposals during construction, by reducing the time required on-site, and therefore minimising air and noise pollution associated with construction activities, as well as reducing waste arisings through the use of factory manufacturing techniques;
 - will achieve the GLA's zero-carbon target, with an on-site CO₂ emissions reduction of 54.8% compared to the Part L:2013 baseline through energy efficient design, and the use of electric air source heat pumps (ASHPs) to provide space and water heating;
 - will minimise internal water consumption to 105 litres per person per day;
 - will aim to divert the demolition and construction waste from landfill where possible;
 - will minimise the risk of overheating within the proposed development by following the GLA's recommended 'Cooling Hierarchy' approach;
 - will incorporate measures to improve site biodiversity, including the retention of existing trees where possible supported by new tree and biodiverse planting;
 - will reduce surface water runoff rates through the reduction of the area of hardstanding on-site, the provision of new landscaping, and the employment of planted raingardens and swales; and

- will have a negligible effect on local air quality, noise pollution, and water contamination.

5.64 Overall, the proposals for the scheme are in line with the principles of sustainable development as well as the policy requirements of the NPPF, the LB Camden and the GLA and will provide a development that seeks to promote these principles in operation.

6. CONCLUSIONS

- 6.1 This Planning Statement has been prepared on behalf LB Camden in support of a pre-application for development at Godwin and Crowndale Estate, NW1 1PA.
- 6.2 The application site comprises a car park and Multi-Use Games Area (MUGA) to the north of the Godwin and Crowndale Estate.
- 6.3 The application proposals form part of the London Borough of Camden's Community Investment Programme (CIP), the Council's 15-year plan to investment money into schools, homes and community facilities. The Site forms part of a pilot project to test and develop a process for provision of new housing development utilising MMC, including off-site manufacturing techniques. It is intended for the proposed residential design to be replicated on other sites across the Borough as a way to meet housing need and the potential to be scaled to larger CIP regeneration projects.
- 6.4 This pre-application submission follows an initial pre-application request made in December 2018 and the receipt of Design Review Panel feedback in February 2019. Following the receipt of this feedback, the Applicant has made a number of alterations to the proposed scheme which responds to both the Council and Design Review Panel comments and advice.
- 6.5 The over-arching objective of the proposals is to replace an underused MUGA and area of private car parking with 10 high-quality and sustainable family-sized dwellings along with associated public realm and landscaping improvements to the wider estate.
- 6.6 Overall, the proposed development optimises the development potential of the site, responding to the unique positioning of the property with highly visible elevations and access via a pedestraised alley. Particular regard has been given to the importance of responding to the wider conservation area but also the school and Estate buildings adjacent. The proposed properties are of an appropriate scale to sit comfortably within the surrounding area and allow for the provision of ten high-quality family-sized dwellings on site. The loss of the MUGA and car parking on site has fully explored and responded to, providing replacement car parking and enhancements to the existing open space provision at Godwin Court.
- 6.7 Overall, the proposed scheme is considered to constitute a sustainable development that complies with the relevant planning policies of the development plan and will deliver a significant number of planning benefits.