

3 CONSULTATION



PRE-APPLICATION MEETING

1

Date: 09/07/2020
Our ref: 2020/1701/PRE
Contact: Jennifer Walsh
Direct line: 020 7974 3500
Email: Jennifer.walsh@camden.gov.uk

Savills
 33 Margaret Street,
 London
 W1G 0JD

By email

Dear Ms Jordan,

Re: Car Park, Clarkson Row, London

Thank you for submitting a pre-planning application enquiry for the above property. These notes follow on from a pre application meeting dated 11th May, revised information dated 29th May and subsequent drawings received 16th June 2020. No site visit has been undertaken due to Government restrictions at the time.

1. Proposal

1.1. Advice is requested in relation to the following proposed developments:

- Erection of four storey building comprising 9 residential dwellings (5 x 1 bed units; 3 x 2 bed units and 1 x 3 bed unit);

2. Site description

2.1. The application relates to a vacant plot of land which is currently used as an adhoc public car park (sui generis) comprising of hard standing. The plot is situated within the Camden Town Conservation Area and the properties to the rear of the site fronting Mornington Crescent are Grade II listed buildings.

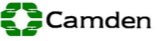
2.2. The site is located within the Euston Area Action Plan (January 2015).

2.3. The site has the following constraints:

- Article 4 Basements
- Business Improvement Districts
- Conservation Area
- CIL Charging Zone
- CMP Priority Area
- Euston Area Plan
- Knowledge Quarter Innovation District
- Strategic View Cone
- Strategic View Wider Setting
- Underground Development Constraint – Slope Stability

o Transport (2019)
 o Water and Flooding (2019)
 o Developer Contributions (2019)

8.2. The application site is located within the Camden Town Conservation Area, wherein the Council has a statutory duty to pay special attention to the desirability of preserving or



Camden
Planning Solutions Team
Planning and Regeneration
 Culture & Environment
 Directorate
 London Borough of Camden
 2nd Floor
 5 Pancras Square
 London
 N1C 4AG

www.camden.gov.uk/planning

4

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).

8.3. Camden's Design CPG emphasises Camden's commitment to design excellence, and expects development schemes to consider:

- The context of a development and its surrounding area;
- The design of the building itself;
- The use and function of buildings;
- Using good quality sustainable materials;
- Creating well connected public spaces and good quality public realm
- Opportunities for promoting health and well-being
- Opportunities for improving the character and quality of an area

Form, massing and detailed design

8.4. The site is 0.02 hectares in site and although it is a vacant site, it is a very tight and constrained site.

8.5. Clarkson Row is situated in the south western part of the Camden Town Conservation Area. This part of the conservation area is characterised by rows of Georgian and Victorian terraces, some of which are listed, and Carreras Cigarette Factory to the east. There are also some infill sites which are not entirely successful.

8.6. The site faces west towards the railway track. To the north, is a 1970's development of three storey, terraced houses. The main body of each building is set back, with an entrance and porch area meeting the pavement edge. The roofs to the rear are dramatically sloped. To the south of the site is a car park and single storey rendered building. To the rear of the site is a Grade II terrace of four storey late Georgian buildings.

8.7. There is not a clearly defined character in this part of the conservation area, however there is to some degree an established scale in terms of building heights which is three to four storeys, and plot widths which are generally narrow. There is a verticality to the buildings which creates refined and elegant street elevations.

8.8. The original pre-application submission shows a three storey building with attic storey. Whilst the height of the building has a relationship with the neighbouring 1970's terrace and the listed buildings to the rear, the overall bulk of the building is problematic. This is likely caused by the position of the building on the pavement line and the relationship with the terrace. The building sits on the pavement edge with little amenity space at the front. This is at odds with the 1970's terrace which is set some distance away from the pavement. This inconsistency results in the proposed building appearing dominant on the street. In addition, despite the building being broken up into three separate elements, there is a horizontality to the elevations that creates a chunky and heavy aesthetic.

8.9. It was suggested in our initial feedback at the pre app meeting, that setting the building line back and adding a clear and proud top storey could alleviate this heavy aesthetic, creating a more vertically proportioned and graceful elevation. As a result, additional proposals have been submitted.

8.10. The revised proposals show a four storey building with a set back attic storey, however issues around the building line and its proximity to the pavement have not been resolved. The submitted drawings do not show that the additional height can be easily accommodated. The building dominates the terrace and the relationship with the listed buildings to the rear is

① The building has been set back 1.5 metres back from back line of the pavement.

5

compromised. This would be especially evident when looking northwards along Clarkson Row. It is appreciated that the plot is an awkward shape and at points fairly narrow, however the building line and its relationship with neighbouring buildings is not ideal. Views of the front elevation have not been submitted and as a result, the overall aesthetic of the building can't be assessed.

8.11. As such, the revised massing is considered to be overbearing. The additional floor with a bigger footprint and set back is too much and this is particularly evident when viewed in the aerial images in the context of the dwellings on Mornington Crescent. Whilst additional height was discussed at the meeting, the subsequent alteration to the massing is considered to be too much and should be one thing or the other. If the additional floor is proposed, the proposed setback floor addition should be removed and the building pulled back from the pavement due to the detrimental impact the proposed has on the overall context. The massing needs to be mindful of the relationship with the listed properties on Mornington Crescent and articulation of the massing along this boundary requires refinement. In the addendum, revisions have been made to the position of the ground floor entrances to the building in relation to the pavement. The building line and massing along Clarkson Row does not respond to the context and should provide the breathing space for the building and the street as evident to the north along Mornington Terrace.

8.12. In the addendum material submitted, a large window and balcony is proposed to the gable elevation fronting the driveway of 1A Clarkson Row. The extensive balcony along the party line is inappropriate and not in keeping with a gable elevation. The previous treatment to this elevation is preferred.

8.13. The North facing windows to the street are shown on the elevation but not on plan. It is considered that this would do little to break up the elevation and should not be included within the design.

8.14. To the rear of the proposed development, the saw tooth plan form is a positive change and mitigates the overlooking to Mornington Crescent. However, the rear elevation is pushing the envelope and concern is raised to the integration of the building into the rear walls of the listed terrace. The rear building line should be pulled back to allow some breathing space between the wall and the proposed rear elevation. Further justification of how the roof of the building works is required. It seems to sit over the whole footprint removing the saw tooth element. This would also reduce the daylight into these rear windows.

8.15. Following on from the pre application meeting, some positive moves have been made. The introduction of additional ground floor entrance doors are seen as a positive as is the removal of bedrooms to the ground floor street frontage. However, the doors opening straight off the pavement edge will be challenging and should be set back especially for Unit 2.

8.16. Therefore, it is considered that the proposals are simply too large for the complex and constrained site. The proposals seek to get too many units on the site and the whole site coverage needs to be considered in order to achieve some usable outside spaces and ensure that the proposed units benefit from sufficient and suitable light and outlook and the building does not appear overbearing and dominant. The context needs to be considered and used as the basis of any proposal. The houses to the north, slope their rear building line away from the listed terrace and yet this proposal sits high and proud straight up from the boundary wall. Whilst the additional height was discussed at the meeting, it needs to be to the street frontage and not across the whole site, as the revised modelling shows that the density of the proposed is not acceptable.

8.17. Further clarification and justification is required on some of the following points:

② The setback fifth floor has been omitted, the current proposal is 4 storey including ground.

③ The design has been revised to show a window only facing on to 1A Clarkson Row.

④ The "saw tooth" design has been retained the building has been pulled back from the rear walls of the listed terrace.

⑤ The building has been moved 1.5 metres from the back line of the pavement as a result the doors do open straight of the pavement edge.

⑥ The building has been reduced by a storey to the rear.



PRE-APPLICATION MEETING

6

- Is the bin store acceptable as part of the main entrance to the flats? Where does the internal communal hallway start?
- The cycle storage is accessed through a bedroom for units 1 and 2?
- The lift changes its orientation as it moves up the building. Whilst you have stated that you can access it both ways, we still question why the shape of the lift is proposed to change through the floors.
- Massing on 3D drawings doesn't match the plan – the top floor massing is inconsistent and the north east corner inaccurate.

8.18. Although there is scope to redevelop this site, the proposals at this point are considered overdevelopment of the site and do not appropriately and sensitively respond to the existing site context and streetscene. As a result, the proposals in their current form would be unlikely to be supported at application stage. It should also be acknowledged that buildings in this part of the conservation area are mostly domestic, and that the building should have a domestic aesthetic. Any development must preserve and enhance the listed buildings to the rear and the wider street context as well as providing a high level of architectural form and internal layout which contributes to the conservation area.

9. Standard of accommodation

9.1. Policy H6 (Housing choice and mix) outlines how the Council will seek to secure high quality accessible homes in all developments that include housing. We will:

- a. encourage design of all housing to provide functional, adaptable and accessible spaces;
- b. expect all self-contained homes to meet the nationally described space standard;
- c. require 90% of new-build self-contained homes in each development to be accessible and adaptable in accordance with Building Regulation M4(2); and
- d. require 10% of new-build self-contained homes in each development to be suitable for occupation by a wheelchair user or easily adapted for occupation by a wheelchair user in accordance with Building Regulation M4(3).

9.2. The Council's Policy D1 requires new residential development to provide an acceptable standard of accommodation in terms of internal arrangements, dwelling and room sizes, outlook, natural light and amenity space. It is also expected that suitable facilities are provided for storage, recycling, refuse, cycle storage, and private outdoor amenity space. Since the publications of the Minimum space standards for new development (DCLG 2015), all new residential units are expected to feature internal areas in line with the nationally described space standards (GIA).

9.3. Concern is raised for some of the units in terms of light within the unit and outlook as well as potential overshadowing to neighbouring properties. The two ground floor units are of particular concern. Unit 1 has an internal lobby and a deep floorplan and light will be difficult to reach into the kitchen space. Any further application should be accompanied by a Sunlight and Daylight report.

9.4. Although the proposed flats meet the nationally described space standards in terms of overall dwelling size, the majority are considered to offer a lack of private amenity space which is a concern and the ground floor units are poor in outlook and daylight.

- 7 An external bin store has been proposed.
- 8 The cycle store is internal for 10 cycle spaces provided with a two tier rack system, unit 1 will have a single cycle space provided to the rear.
- 9 As the footprint of the has been reduced and the proposed building is 4 storeys only, no lift is proposed.
- 10 The units are designed to be Part M4(2) compliant, unit 2 on the ground floor is designed as Part M4(3) compliant, this would involve reconfiguring the internal walls of the bedroom and converting the bath to a shower room.

7

10. Dwelling size and layout

10.1. The Council requires development to contribute to the creation of mixed and inclusive communities by containing a mix of large and small homes. Policy H7 of the Local Plan includes a Dwelling Size Priorities Table as set out below:

	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

10.2. The development would include 1 x 5 bedroom flats, 3 x 2 bedroom flats and 1 x 3 bed flats. Whilst there are a larger number of 1 bed flats than desired, the mix is considered suitable in this location.

11. Neighbouring Amenity

11.1. Policy A1 seeks to protect the quality of life of occupiers and neighbours by only granting permission to development that would not harm the amenity of residents. This includes factors such as privacy, outlook, implications to natural light, artificial light spill, odour and fumes as well as impacts caused from the construction phase of development. Policy A4 seeks to ensure that residents are not adversely impacts upon by virtue of noise or vibrations.

11.2. The application site is surrounded on three sides by residential development on Clarkson Row and Mornington Crescent to the rear. The revised design seeks to create a better relationship with the neighbouring properties due to the saw-tooth design.

11.3. Whilst the revisions shows the building been designed to take overlooking into account, concern is raised to the additional harm which the bulk could cause on the listed properties to the rear of the site. Notwithstanding the harm to the wider conservation area as addressed above, the bulk of the proposal should be reduced so as not to harm the amenity of the properties to the rear.

11.4. From the information provided it is considered that the site's relationship to adjacent properties is one of numerous challenges for the development potential of the site. As stated above, a Daylight and Sunlight Assessment should be undertaken to support any further development on the site. Such an assessment should include a full schedule of the neighbouring windows and amenity areas. Please see chapter 3 of the Amenity CPG for further guidance in the preparation of such assessments.

11.5. Further to the above, Officers note that unless properly managed, the construction phase of the development has the potential to cause significant disruption not only to the local transport network but also to the residential amenities of neighbouring occupiers. Due to the difficult site access and the number and proximity of other sensitive uses, a Construction Management Plan would need to be secured as a Section 106 planning obligation if the scheme were otherwise supported. This requirement will be expanded upon in the transport section of the report.

- Car free development (for the commercial and residential elements)
- Section drawings at a scale of 1:50 labeled existing and proposed
- Demolition plans (elevations)



PRE-PLANNING SUBMISSION: JULY 2020

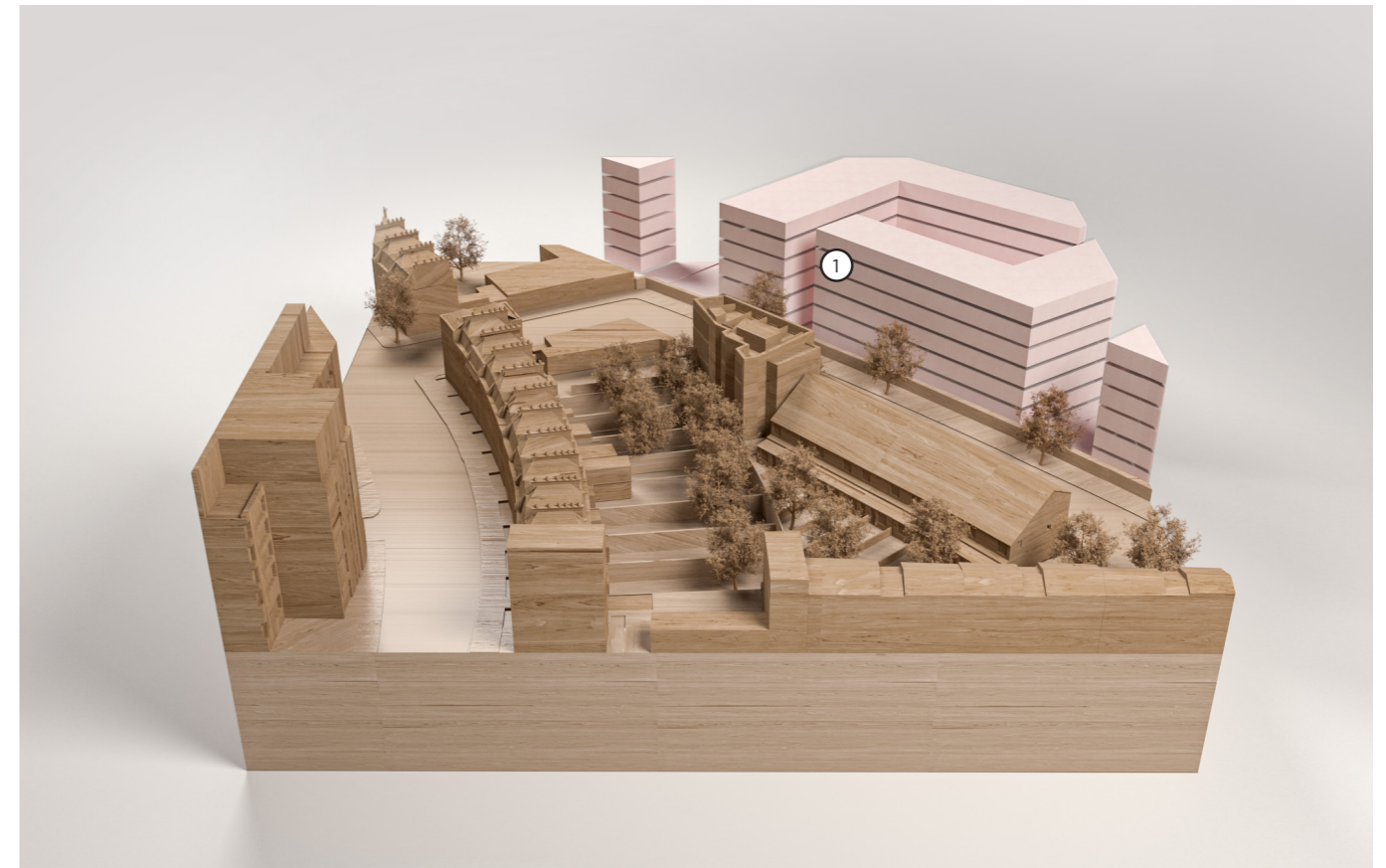
DESIGN DEVELOPMENT: MASSING STUDIES

The following massing studies illustrate the design changes following the pre-application response on the 9th July 2020 (Ref 2020/1701/PRE).

PLANNING SUBMISSION: JANUARY 2021



Aerial View



Aerial View

Key



Proposed development under Euston Area Plan



PRE-PLANNING SUBMISSION: JULY 2020



View South Along Clarkson Row

DESIGN DEVELOPMENT: MASSING STUDIES



Site Plan (Not to scale)
(Approx. site outlined in red)

PLANNING SUBMISSION: JANUARY 2021



View South Along Clarkson Row

The current proposal has been set back from the pavement by 1.5 metres and the setback floor has been omitted.



Key

① Proposed development under Euston Area Plan

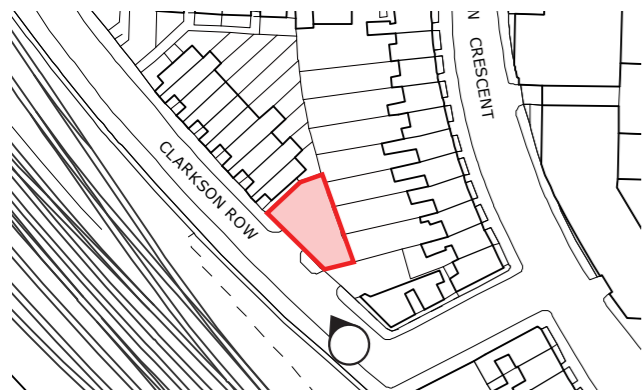


PRE-PLANNING SUBMISSION: JULY 2020



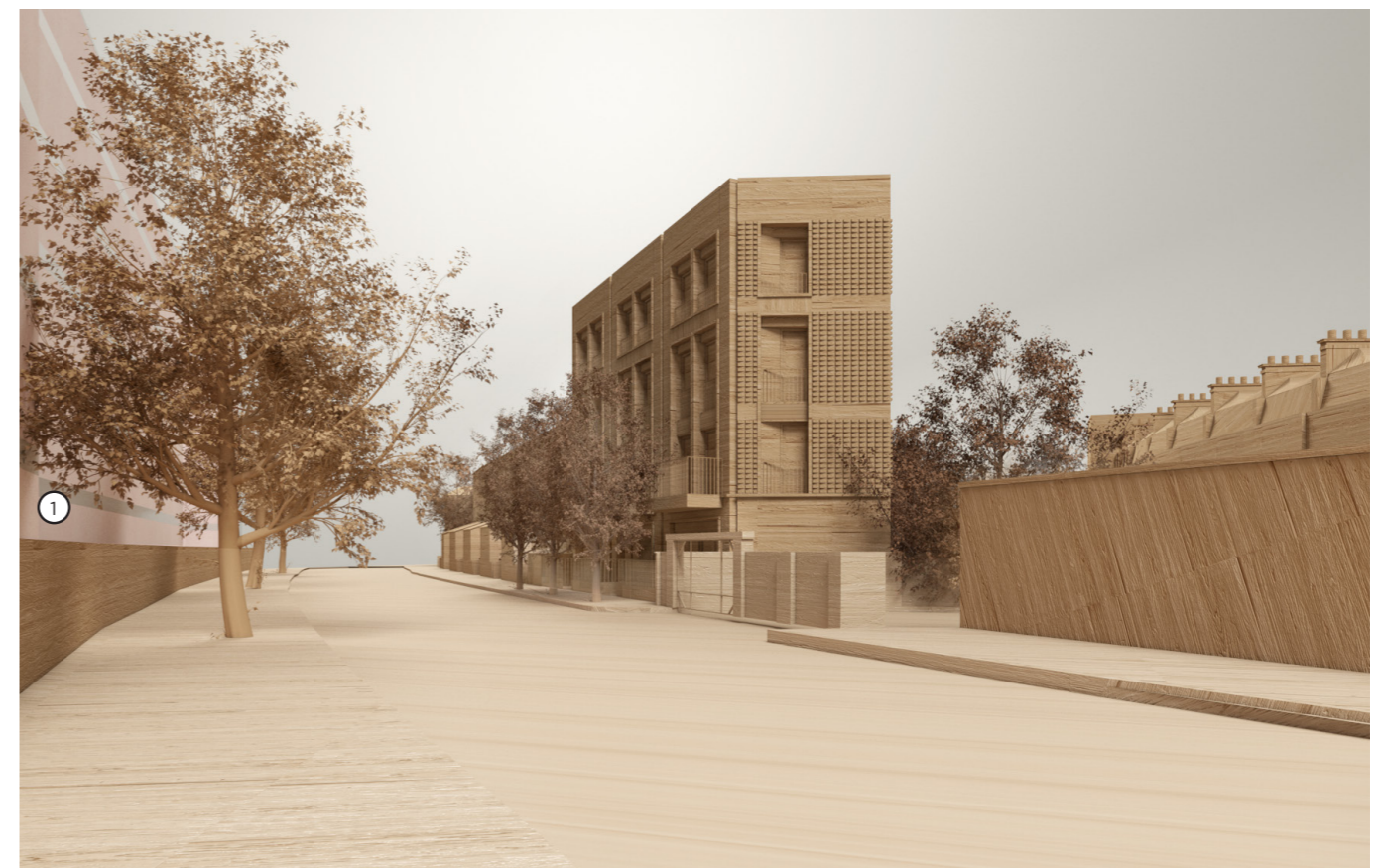
View North Along Clarkson Row

DESIGN DEVELOPMENT: MASSING STUDIES



Site Plan (Not to scale)
(Approx. site outlined in red)

PLANNING SUBMISSION: JANUARY 2021



View North Along Clarkson Row

The building has been set back from the front and the rear resulting in a much reduced massing. The balcony facing over 1A Clarkson Row has been repealed by an angled window facing south.



Key

- ① Proposed development under Euston Area Plan

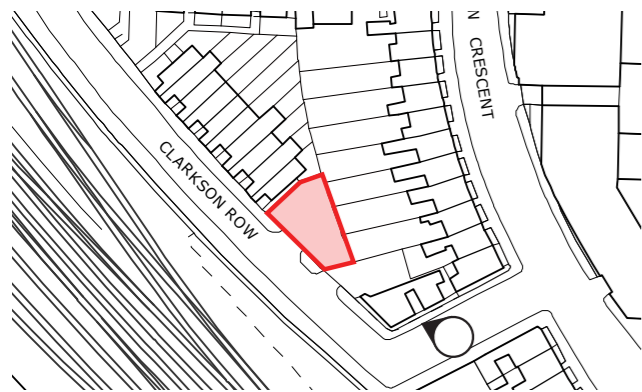


PRE-PLANNING SUBMISSION: JULY 2020



View West

DESIGN DEVELOPMENT: MASSING STUDIES



Site Plan (Not to scale)
(Approx. site outlined in red)

PLANNING SUBMISSION: JANUARY 2021



View West

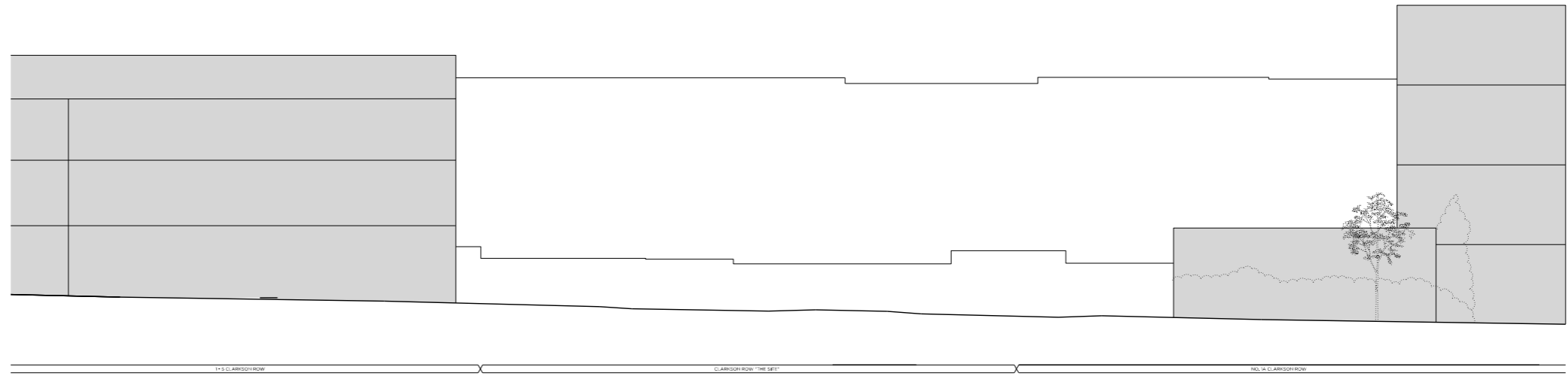
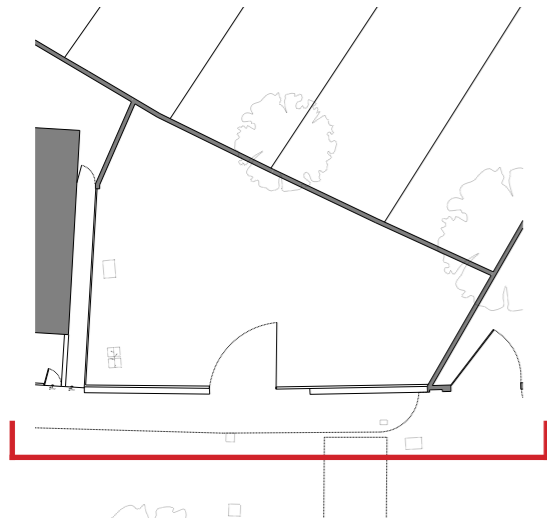
The setback floor has been removed reducing the massing by one floor, the "saw tooth" design is consistent all the way up the façade. The building has been set away from the rear boundary shared with the listed terrace reducing the massing further.



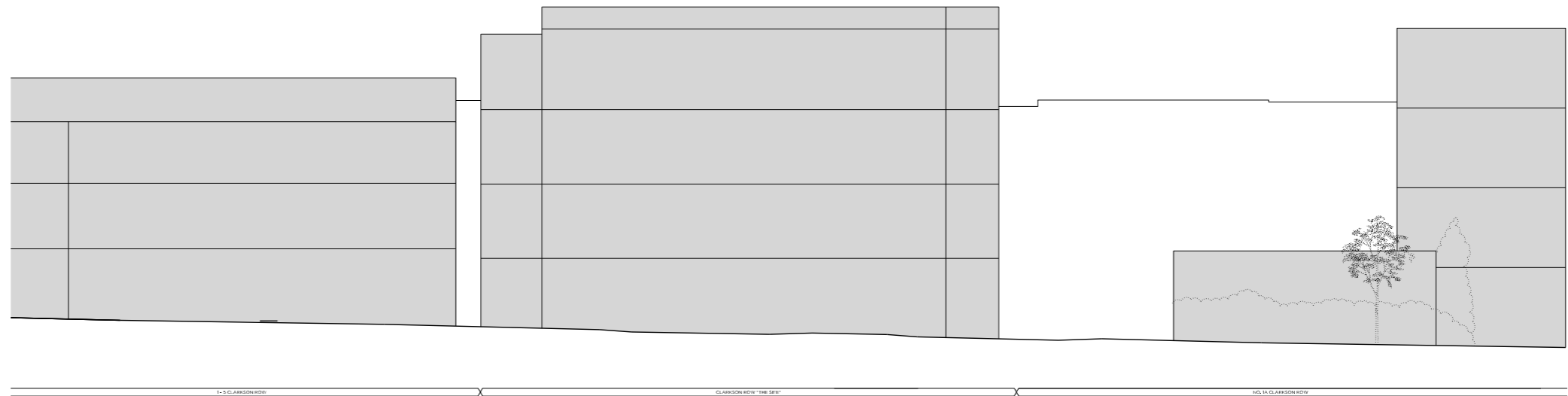
Key

① Proposed development under Euston Area Plan





AS EXISTING



AS PROPOSED

The proposed massing mediates between the scale of the 3 storey block to the North. This is achieved through utilising Victorian hierarchy and massing techniques from the mansion block examples to break down the form.

THE CONCEPT: SCALE AND MASSING

