
Planning Statement

Clarkson Row, London, NW1 7RA



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1. Introduction

1.1. This Planning Statement has been prepared on behalf of our client in support of a Planning application for the following development at Clarkson Row, London, NW1 7RA-

“Erection of a four storey building comprising 8 residential dwellings (Class C3) (1 x studio, 4 x 1 beds and 3 x 2 beds)”.

1.2. The existing site is currently an unoccupied car park (Sui Generis), comprising a hard standing yard, which contrasts with the predominantly residential surroundings. The proposed residential scheme represents an appropriate use of this currently vacant brownfield land, in order to provide much needed housing in the London Borough of Camden.

1.3. This Planning Statement has been prepared following an examination of the site and surroundings, research into the relevant planning history of the site and an examination of adopted and emerging planning policy documents. This statement provides background information on the site and an assessment of the proposals in relation to planning policy and other material considerations, set out under the following sections:

- **Section 2** outlines the site and its context within the surrounding area;
- **Section 3** details the relevant planning history, as well as details of the pre-application advice received;
- **Section 4** details the proposals;
- **Section 5** outlines the planning policy framework;
- **Section 6** considers the main planning considerations;
- **Section 7** examines the likely attraction for planning obligation and CIL
- **Section 8** draws our conclusions in respect of the proposals.

1.4. This Planning Statement is accompanied, and should be read in conjunction with, the following documents:

- Design and Access Statement, prepared by MWA;
- Viability Assessment, prepared by Savills Viability;
- Energy and Sustainability Statement, prepared by Cundall;
- Construction Management Plan, prepared by Mayer Brown;
- SUDs and Foul Drainage Assessment, prepared by GTA Civils & Transport;
- SUDs Maintenance & Management Plan, prepared by GTA Civils & Transport;
- Noise Assessment, prepared by Cundall;
- Transport Statement, prepared by Mayer Brown;
- Arboricultural Report, prepared by John Cromer; and
- Daylight and Sunlight Report, prepared by Hollis.

2. Site and Surroundings

Application Site

- 2.1. The site is located at the south-eastern corner of Clarkson Row, NW1 7RA and is bound by residential properties to the north, east and north-west, whilst Clarkson Row fronts the site to the south, beyond which lies mainline rail tracks running into Euston station.
- 2.2. The site is located within the London of Camden and specifically within the Regents Park ward.



Figure 1- Site Location

- 2.3. The site is currently an unoccupied car park (sui generis use), comprising a hard-standing yard, external site walls and gated fence accessed from Clarkson Row.
- 2.4. The total site area is approximately 0.02 hectares.



Figure 2- Aerial image of the site

Site Designations

- 2.5. The site is situated within the Camden Town Conservation Area. The adjacent terrace along Clarkson Row is not mentioned within the Conservation Area Appraisal and Management Plan, however in relation to the site, the Camden Town Conservation Area Appraisal (2007) states *“the southernmost stretch of Mornington Terrace, where it turns to join Mornington Crescent, has been renamed in recent years ‘Clarkson Row’. It contains one-storey buildings originally of a light industrial nature. A car workshop survives on the south side at No 1, breaking from the predominantly residential feel of the neighbourhood. Opposite, on the north side, No 1A has been sensitively converted to residential use with careful landscaping, demonstrating that high quality design can be achieved through adaptation”*.
- 2.6. No. 1A located adjacent to the site, is identified as a positive contributor to the Conservation Area in the Conservation Area Appraisal, whilst the site lies south of a Grade II Listed Terrace at 13-24 Mornington Crescent, located to the rear of the site.
- 2.7. The site is located approximately 0.2 miles to the south-west of Mornington Crescent London Underground station, whilst Euston station is located approximately 0.6 miles to the south of the site. The site is also well connected by bus routes, accessed most locally on Hampstead Road to the east of the site. Consequently, the site benefits from a Public Transport Access Level of 6a, on a scale of 0-6b, which indicates an excellent level of Public Transport accessibility.

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- 2.8. The site is located within the area covered by the Euston Area Action Plan, which provides a single strategic plan to help shape change in the area around Euston Station up to 2031. The AAP was prepared jointly by Camden Council, the Greater London Authority and Transport for London and was adopted by the Council in 2015.

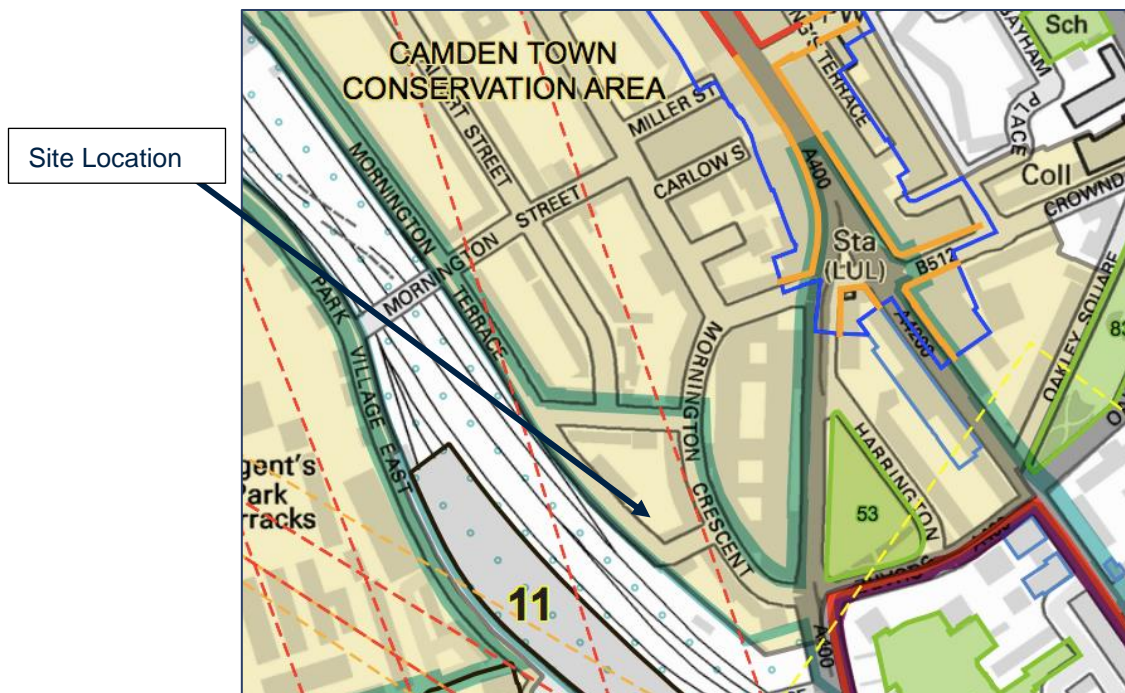


Figure 3- Extract from the Camden Council Policies Map showing the site location

Surrounding Context

- 2.9. The site is situated within a predominantly residential neighbourhood, directly adjacent to No. 1-10 Clarkson Row (a row of modern terrace houses). As set out above, the site adjacent to the Grade II listed row of terraced houses along Mornington Crescent (13-24). At the end of Clarkson, the one-storey buildings of a light industrial nature are at odds with the surrounding streetscape.
- 2.10. The surrounding building stock is predominantly residential with terraced, semi-detached and detached houses of generally 4-storeys Victorian, post-war, and 21st Century origin. It is understood that many of these houses have been sub-divided into flats.

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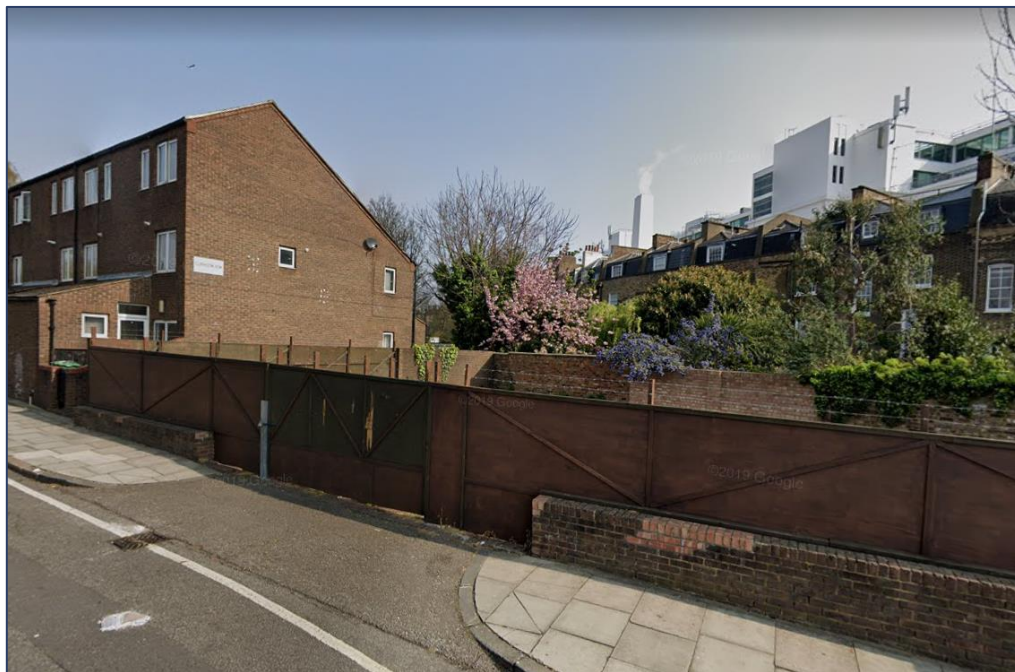


Figure 4- View looking north from the site

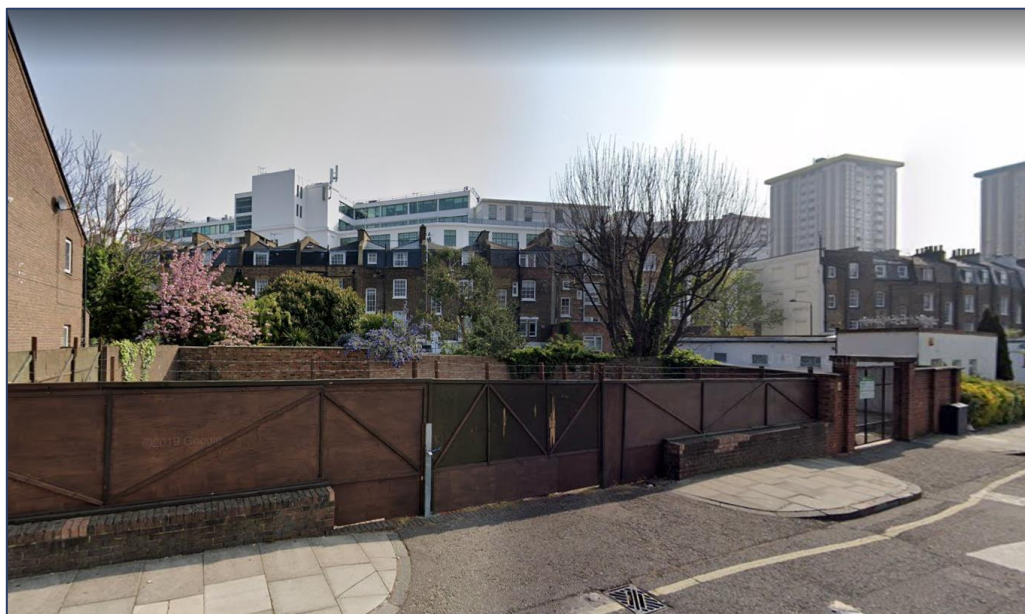


Figure 5- View looking south



3. Planning History and Pre-application Feedback

- 3.1. According to the Council's online planning register, the site has no relevant planning history.
- 3.2. A pre-application request was submitted to the Council on the 21st April 2020, and a meeting was held to discuss the proposals on the 11th May. Following the meeting, revised information was submitted on the 29th May and subsequent drawings on the 16th June 2020. Following this, a formal advice letter was received on 9th July 2020 (ref: 2020/1701/PRE), within which the council were supportive of the principle of development, subject to suggested amendments to the scheme.
- 3.3. The relevant responses or rebuttals to the specific points raised in the pre-application advice has been provided in the table below:

Pre-application advice	Response
Land Use	
The site is currently in vacant use having been used as an informal car park (Sui Generis). There is no objection to the loss of this car park use on the site in line with Policy T2.	Noted.
Self-contained housing will be regarded as the priority land use within the Borough. Housing is considered to be appropriate in this location. The development would be compliant with Policy H1 provided that the units meet Council and national residential development standards and the development did not harm local amenity.	Noted.
Affordable Housing	
The Council will expect a contribution to affordable housing from all developments that provide one or more additional homes and involve a total addition to residential floorspace of 100sqm GIA or more. Where developments have capacity for fewer than 10 additional dwellings, the Council will accept a payment-in-lieu of affordable housing.	The proposals are for 8 residential units on site, which is considered to optimise the sites capacity whilst ensuring appropriate scale, height and massing for the area. As such a payment-in-lieu of affordable housing will be agreed through S106 agreement. The application is supported by a full viability assessment, prepared by Savills Viability which has been submitted as part of this planning application.
Design and Conservation	
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.	Noted. The building has been designed to respond to this prevailing character and incorporates design changes following the pre-application discussions. The building is proposed at four storeys in height, mirroring the surrounding building heights and verticality to maintain elegant street elevations.

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<p>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. 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.</p>	<p>The revised design has removed the set-back fourth storey. In addition, the building has been set-back from the pavement edge with front gardens for the ground floor flats which provide outdoor amenity space, as well as acting as defensible space to the building itself.</p>
<p>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.</p>	<p>The overall massing and bulk of the proposed building has been reduced such to better relate to the surrounding properties and the listed terrace at the rear. The building has been set back in from the property boundary at the rear, and significant separation distances are achieved. The separation distance from the rear extension of the terrace to the rear of the site (e.g. the closest point) is 16 metres, with the main body of the houses being set further away (at 22 metres). It is worth noting that none of the windows in the proposed scheme look directly toward the terrace at the rear, they are angled away from the terrace.</p>
<p>The revised proposals show a four storey building with a setback 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 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.</p>	<p>Views of the proposed elevations have been submitted as part of the application in order to allow the overall aesthetic of the building to be assessed.</p>
<p>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.</p>	<p>This elevation has been revised to remove the window and balcony, reverting to the previous treatment of this elevation. Pared back brick window detailing is used on the side elevations as well as chamfered bricks placed following the same hierarchy to the front elevation.</p>

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<p>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.</p>	<p>The north facing windows have been removed from the proposals.</p>
<p>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.</p>	<p>In line with the Council's comments, the proposed building has been set-back further from the site boundary, in order to allow breathing spaces between the wall and proposed rear elevation. With this set-back, the building sits a significant distance from the listed terrace at the rear. The roof of the building maintains the saw tooth design, as shown on the submitted roof plans. A Daylight and Sunlight assessment has been prepared by Hollis which concludes that the majority of neighbouring windows fully satisfy the BRE guidelines for daylight, sunlight and overshadowing. Windows closest to the proposed development will experience some reductions in daylight and sunlight levels, however are windows serving rooms lit by multiple windows. BRE guidelines are not mandatory, as outlined in paragraph 1.6, and should be interpreted flexibly. The reductions are not considered to be out of context with the dense central London context of the site.</p>
<p>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.</p>	<p>The proposed building has been set back from the pavement edge by 1.5m, with gardens acting as defensible space between the property entrance and the street frontage.</p>
<p>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.</p>	<p>The proposed massing has been reduced whilst the building has been set back from the site boundary to the rear of the listed terrace, with a significant separation distance achieved. This proposed height has been reduced, with the set-back fourth storey removed, thus the building responds to the surrounding building heights. In addition, the building has been set back from the street frontage so that the building does not appear dominant on the street. The proposed density has been informed by the Sustainable Density Matrix in line with Local Plan Policy H1. 6.31. It should be noted that residential density is becoming increasingly design led, with the NPPF moving to minimum as opposed to maximum density standards and the existing matrix being scrapped in the new London Plan in favour of policy D1B (part 3) 'Optimising housing density site capacity through the design-led approach'.</p>

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<p>Further clarification and justification is required on some of the following points:</p> <ul style="list-style-type: none"> • 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. 	<ul style="list-style-type: none"> • The bin store is accessed from the street frontage and not as part of the main entrance to the flats. The proposed main entrance is now located in the centre of the proposed building and leads straight into a communal hallway, as shown on the plans. • A secure internal cycle store is located at ground floor level accessed through the communal hallway, whilst 1 storage space is accessed at the rear of the development via an exit from the cycle store. Whilst this store could be accessed via the bedroom of unit 1, the occupier does have the ability to access the space through the cycle store should they so choose. As the building has been reduced in scale, no lift is proposed. • The proposed massing on the 3d drawings has been altered and now matches the plans.
<p>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 street scene. 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.</p>	<p>The proposals have been significantly redesigned taking account of the Council's pre-application comments. The massing has been reduced such to sensitively respond to the neighbouring buildings and the domestic prevailing characteristics of the area.</p>
<p>Standard of accommodation</p>	
<p>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.</p>	<p>A daylight and sunlight assessment has been undertaken which concludes that the vast majority of neighbouring windows and amenity spaces will remain unaffected by the proposals. Whilst it noted that some of the neighbouring windows will experience a slight reduction in daylight and sunlight levels, these windows serve rooms which are served by alternative windows or are non-habitable rooms. In addition, a window serving the kitchen has now been provided in all units at first floor and above.</p>

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<p>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.</p>	<p>All proposed dwellings are provided with high quality private outdoor amenity space in line with Nationally Described Standards. The ground floor units will benefit from front private gardens, whilst all units are dual aspect in order to ensure adequate and appropriate levels of outlook, daylight and sunlight.</p>
<p>Dwelling size and layout</p>	
<p>Whilst there are a larger number of 1 bed flats than desired, the mix is considered suitable in this location.</p>	<p>The unit mix has been altered and now incorporates 1 x studio, 4 x 1 beds and 3 x 2 beds. It is considered that the location of the site is most suitable for smaller housing rather than a greater number of family sized units</p>
<p>Neighbouring Amenity</p>	
<p>The revised design seeks to create a better relationship with the neighbouring properties due to the saw-tooth design. Whilst the revisions show 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. The bulk of the proposal should be reduced so as not to harm the amenity of the properties to the rear.</p>	<p>The bulk of the proposals have been reduced taking account of officer comments in order to not cause harm to the listed properties at the rear of the site, with the building now well set-back from the property boundary.</p>
<p>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.</p>	<p>A Daylight and Sunlight Assessment has been carried out by Hollis and is submitted in support of the application. This document includes a full schedule of neighbouring windows and amenity areas. This assessment concludes that the vast majority of neighbouring windows and amenity areas will meet the BRE target criteria for daylight, sunlight and overshadowing. Whilst there are a small number of windows which will see reductions below BRE guidance, these windows relate to rooms which are served by multiple windows and as such will maintain adequate daylight and sunlight. It is considered that in its context, the results of the daylight and sunlight assessment are acceptable and should not be a reason to prevent development.</p>
<p>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. A Construction Management Plan would need to be secured as a Section 106 planning obligation.</p>	<p>A Transport Assessment and draft Construction Management Plan has been prepared to ensure the impact of construction is kept to a minimum.</p>
<p>Sustainable design and construction</p>	

<p>All developments involving five or more dwellings and/or more than 500 sqm of (gross internal) floorspace will be required to submit an energy statement demonstrating how the energy hierarchy has been applied to make the fullest contribution to CO2 reduction. All new residential development will also be required to demonstrate a 19% CO2 reduction below Part L 2013 Building Regulations (in addition to any requirements for renewable energy). This can be demonstrated through an energy statement or sustainability statement.</p> <p>The Council will expect developments of five or more dwellings and/or more than 500 sq.m of any gross internal floorspace to achieve a 20% reduction in carbon dioxide emissions from on-site renewable energy generation (which can include sources of site related decentralised renewable energy), unless it can be demonstrated that such provision is not feasible.</p>	<p>An Energy and Sustainability Statement has been prepared by Cundall following the GLA's Energy Hierarchy. This Statement outlines that through passive and active design measures, the development would achieve a 14.15% reduction over the Part L1A 2013 TER, therefore the Be Lean performance achieves a 10% reduction over the Part L TERs.</p>
<p>All developments involving five or more dwellings and/or more than 500 sqm gross internal floor space are encouraged to assess the embodied carbon emissions associated with the development within the energy and sustainability statement.</p>	<p>Embodied carbon emissions have been assessed within the Energy and Sustainability Assessment.</p>
<p>The Council will require developments to utilise Sustainable Urban Drainage Systems (SuDS), to achieve greenfield run-off rates, unless demonstrated that this is not feasible.</p>	<p>The proposals include Sustainable Urban Drainage and a SuDS report has been prepared by GTA Civils & Transport which considered the SUDs hierarchy. Given the clay soil type and there being unduly limited space over 5m from foundations, the only viable option is to route the roof's surface water into the combined sewer at a controlled discharge rate. Foul water will be routed via gravity into the existing combined sewer. A SUDS Attenuation Tank is also proposed at ground floor level.</p>
<p>All new developments will be expected to submit a statement demonstrating how the London Plan's 'cooling hierarchy' has informed the building design. Any development that is likely to be at risk of overheating (for example due to large expanses of south or south west facing glazing) will be required to complete dynamic thermal modelling to demonstrate that any risk of overheating has been mitigated.</p>	<p>The Energy and Sustainability Assessment includes dynamic thermal modelling to demonstrate mitigation for any risk of overheating.</p>



<p>Active cooling (air-conditioning) will only be permitted where dynamic thermal modelling demonstrates there is a clear need for it after all of the preferred measures are incorporated in line with the cooling hierarchy. Any proposals for plant should be integrated into the design/build and not crudely added onto the roof.</p>	
<p>Nature Conservation and Biodiversity</p>	
<p>Policy A3 seeks to enhance biodiversity in the borough. The Council would expect the development to provide benefits for biodiversity through the layout, design and materials used in the built structure and landscaping elements of a proposed development, proportionate to the scale of development proposed. These should include green roofs, bird and bat boxes, etc.</p>	<p>The site currently comprises impermeable hard landscaping. The landscaping proposals have sought to utilise natural drainage strategies to manage surface water on site, but also to positively contribute to the site's biodiversity. These measures have resulted in a Urban Greening Factor of 0.41, exceeding new London Plan policy G5.</p>
<p>Trees and Landscaping</p>	
<p>Consideration should be given to the existence of trees adjacent to the site, in the rear gardens of Mornington Crescent and the root protection zones needed by these trees. The proposed groundworks would likely be in very close proximity to these trees, and it is unclear whether the works could be completed without causing significant harm to these trees, which the council would not support.</p> <p>An Arboriculture report should be submitted as part of any future planning application. This will need to provide information about:</p> <ul style="list-style-type: none"> - species, spread, roots and position of trees, - which trees will be affected in any way by the proposed development, and - the measures that will be used to protect them during construction. <p>You will need to provide the information in the form of the documents and plans listed below inline with BS5837:2012 (trees in relation to design, demolition and construction):</p> <ul style="list-style-type: none"> - a pre-development tree survey - a tree constraints plan - an arboricultural impact assessment - an arboricultural method statement including a tree protection plan. 	<p>An Arboricultural Report has been prepared by John Cromer which considers the existing tree amenity value and condition of trees in the vicinity of the site. A series of tree protection measures have been outlined within this report which will maintain the long term health of the trees in the vicinity.</p>

Refuse and recycling	
Camden Local Plan policy CC5 (Waste) and CPG (Design) are relevant with regards to waste and recycling storage and seek to ensure that appropriate storage for waste and recyclables is provided in all developments. Any proposal should demonstrate that the development would include facilities for the storage and collection of waste and recycling.	Waste storage is provided in a secure store at ground floor level, with easy access from the street. As such, collection can be made directly from the street, as per the existing arrangement for neighbouring properties.
Transport	
The Council will now “require all new developments in the borough to be car-free”. If the scheme were otherwise supported, this would be secured by legal agreement for the resulting units to be car-free (and therefore not eligible for parking permits within the CPZ). The development would be secured as car-free via a Section 106 Legal Agreement.	The proposed development is car-free and it is noted that future residents will not be eligible for parking permits to be secured through a permit-free agreement in the S106.
All new residential units should include adequate provision for cycle storage. In line with London Plan standards, the development would be expected to provide a minimum of 2 parking spaces per 2 bed unit. This storage provision would need to be covered, secure and fully enclosed and need to be of sufficient dimensions to allow access and egress to them easily and comfortably with their bicycles.	Cycle parking is provided in line with London Plan Policy T1. The residents are served by a single cycle store accessed from the communal corridor. The cycle store has a capacity of 10 no. two tier spaces. Unit 1 has a cycle storage space accessed through the rear of the unit taking the total number of spaces up to 11.
Due to the sensitive location of the site and the difficulties involved with construction at such heights, a CMP would be required. A draft CMP (in the Council’s pro-forma) would be expected to be submitted alongside any formal application. A CMP Implementation Support Contribution which would also need to be secured as a Section 106 planning obligation if planning permission is granted.	A CMP pro forma has been prepared and is submitted in support of the application. It is noted that a CMP contribution will be secured as a Section 106 planning obligation.
A CMP implementation support contribution of £7,564.5 and Construction Impact Bond of £7,500 would also need to be secured as a Section 106 planning obligation if planning permission were to be approved.	Noted.

<p>Due to the site access arrangements and likely requirement for HGV deliveries, the pavement could be become damaged as a direct result of the proposed work. Paragraph 6.11 of the Local Plan states that the Council will repair any construction damage to transport infrastructure or landscaping and reinstate all affected transport network links, road and footway surfaces. The Council would therefore require a financial contribution for highway works as a section 106 planning obligation if the scheme was supported. A cost estimate for highway works would be requested from our Design Engineering Team if officers were otherwise supportive of proposed works post-submission.</p>	<p>Noted.</p>
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- 3.4. Following pre-application discussions, the proposals have been altered to respond to officer comments, as outlined in the following sections of this Planning Statement.

4. Proposals

- 4.1. The proposal comprises the development of the site to provide a four storey building comprising 8 residential dwellings (1 x studio, 4 x 1 bed and 3 x 2 beds).



Figure 6- Proposed CGI

- 4.2. The four storey building has been set back front the pavement edge, with front amenity space and planters creating separation between the pavement edge and the building line. Two sheltered entrances are provided, one private entrance to the ground floor studio flat, and one entrance for the remainder of the properties.
- 4.3. The materials have been chosen with inspiration from the neighbouring properties in order to compliment this existing character and context. Red brickwork and gold metalwork is carried throughout, whilst timber louvered doors and panels are used at the front entrances. Pared back brick window detailing and chamfered bricks are expressed on the side and rear elevations and are placed following the same hierarchy as the front elevation.

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- 4.4. The proposed flats all meet and exceed minimum space standards and have been logically and efficiently laid out. The proposals comprise private amenity space in the form of front gardens for the flats at ground floor, private balconies for the properties at first floor level, whilst the properties at second and third floor levels are provided with private amenity space at roof level.

5. Planning Policy Context

Policy Framework

- 5.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications and appeals are determined in accordance with the development plan for an area, unless any material considerations indicate otherwise. This legal requirement is reiterated in the introduction to the National Planning Policy Framework (NPPF).

Adopted 'Development Plan'

- 5.2. The adopted 'development plan' comprises the following:
- The Camden Local Plan (July 2017);
 - The London Plan (March 2021)

Camden Local Plan (2017)

- 5.3. The Camden Local Plan was adopted in July 2017 and sets out the Council's planning policies to deliver the strategic vision for the borough. The most relevant policies in this document are outlined as follows:

Policy D1 Design- Seeks to ensure high quality design in development which respects local context and character, preserves or enhances the historic environment and comprises details and materials that are of high quality complementing the local character.

Policy D2 Heritage- States that the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and listed buildings.

Policy A1 Managing the impact of development- States that the Council will seek to protect the quality of life of occupiers and neighbours and will grant permission for development unless this causes unacceptable harm to amenity.

Policy H1 Maximising Housing Supply- Promotes the delivery of a sufficient supply of homes to meet the needs of existing and future households by maximising the supply of housing and exceeding a target of 16,800 additional homes over the plan period (2016-2030).

Policy H4 Maximising the supply of affordable housing- States that the Council will seek a contribution to affordable housing from all developments that provide one or more additional homes. For developments of less than 10 units, a payment-in-lieu of affordable housing will be accepted by the Council.

Policy H6 Housing Choice and Mix- States that the Council will aim to create mixed, inclusive and sustainable communities by seeking high quality accessible homes. The Council will also seek to secure a variety of housing suitable for existing and future households overall across development in the borough.

Policy H6 Large and small homes- Aims to secure a range of homes of different sizes that will contribute to creation of mixed, inclusive and sustainable communities and reduce mismatches between housing needs and existing supply.

Policy T1 Prioritising walking, cycling and public transport- States that the council will promote sustainable transport and reduce reliance on private cars by prioritising walking, cycling and public transport in the borough.

Policy T2 Parking and car-free development- States that the Council will limit the availability of parking and require all new developments in the borough to be car-free.

The London Plan (2021)

- 5.4. The new London Plan was adopted in March 2021 and is the statutory Spatial Development Strategy for Greater London prepared by the Mayor of London. The most relevant policies in this document are outlined as follows.

Policy H1 Increasing Housing Supply- Outlines the pressing need for more homes in London and sets out that housing delivery should be optimised on all suitable and available brownfield sites. Policy H1 states that boroughs should plan for their 10 year minimum housing targets.

Policy H2 Small Sites – Sets out that Boroughs should pro-actively support well-designed new homes on small sites (below 0.25 hectares in size) through both planning decisions and plan-making in order to significantly increase the contribution of small sites to meeting London’s housing needs.

Policy H10 Housing size mix – States that schemes should generally consist of a range of unit sizes.

Policy GG2 Making the best use of land - Sets out that a design-led approach should be applied to determine the optimum development capacity of sites

Policy GG4 Delivering the homes Londoners need – States that those involved in planning and development must ensure that more homes are delivered.

Policy D6 Housing quality and standards - sets out that housing development should be of high quality design and provide adequately-sized rooms with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures.

Policy D3 Optimising site capacity through the design led approach – States that all development must make the best use of land by following a design led approach that optimises the capacity of sites. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site’s context and capacity for growth. The design led approach includes a consideration of how to enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions.

Other Material Considerations

- 5.5. As well as the development plan there are number of other documents that are relevant to the proposal. The main relevant supplementary planning documents adopted by the Council are:
- Camden Town Conservation Area Appraisal and Management Plan (2007);
 - Camden Design SPG – March 2019; and
 - Camden Amenity SPG – March 2018
- 5.6. The following are also material planning considerations:
- National Planning Policy Framework (2019) (NPPF); and
 - National Planning Policy Guidance (2019) (NPPG)

National Planning Policy Framework

- 5.7. The National Planning Policy Framework (NPPF) does not form part of the development plan, but is a material consideration.
- 5.8. The NPPF maintains the presumption in favour of sustainable development (paragraph 11) which is defined in paragraph 8 as incorporating economic, social and environmental objectives. The framework recognises the overwhelming need to accommodate and accelerate housing development and make more effective use of land and gives ‘substantial weight’ to the value of using suitable brownfield land for new homes

Housing and effective use of land

- 5.9. Paragraph 59 states that to support the Government’s objective of significantly boosting the supply of homes it is important that a sufficient amount and variety of land can come forward where it is needed.
- 5.10. The document introduces a new section (11) titled ‘Making Effective Use of Land’ which recognises that, due to the need to accelerate housing delivery, strategic policies must seek to make as much use as possible of previously developed land.

- 5.11. Paragraph 118 specifically promotes the development of underutilised land and buildings, 'especially where land supply is constrained and available sites could be used more effectively'. It goes on to state at part d) that decisions should promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure).
- 5.12. Paragraph 122 states that planning decisions should support the efficient use of land taking into account the needs for different types of housing, local market conditions, the capacity of local infrastructure and services, the desirability of maintaining an areas character or promoting its change and the importance of good design.
- 5.13. Paragraph 123 c) states that authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).

6. Planning Considerations

6.1. The main planning considerations associated with this planning application are considered to be:

1. **Principle of development;**
2. **Design;**
3. **Impact on neighbouring Heritage Assets and the wider Conservation Area;**
4. **Housing Mix and Density;**
5. **Affordable Housing;**
6. **Housing Quality;**
7. **Residential Amenity;**
8. **Highways and Construction;**
9. **Energy and Sustainability;**
10. **Plant and Noise**

6.2. Each of these considerations are addressed in turn below.

1. Principle of Development

6.3. The general thrust of national, regional and local planning policy is to secure sustainable patterns of development and regeneration through the efficient re-use of previously developed urban land, and through concentrating development in accessible locations and on small sites (below 0.25 hectares), as detailed in the London Plan (policy H2). Clarkson Row is a 'small site' according to the London Plan definition and as such, well designed new homes on this small site should be proactively supported in order to significantly increase the contribution of small sites to meeting London's housing targets. This is also encapsulated in the presumption in favour of sustainable development set out in the NPPF, which states that proposals which accord with an up-to-date development plan should be approved without delay.

6.4. Paragraph 118 of the NPPF acknowledges planning decisions should promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively. The GLA's Housing SPG also highlights the importance of using previously developed brownfield sites for residential development to enable boroughs to meet the housing targets set out within the London Plan.

6.5. Policy H1 of the Local Plan seeks to maximise housing supply and states where sites are underused or vacant, expecting the maximum reasonable provision of housing that is compatible with any other uses needed on the site. The supporting text to Policy H1 states that 'where vacant or underused sites are suitable for housing in terms of accessibility and amenity, and free of physical and environmental constraints that would prevent residential use, we will expect them to be redeveloped for housing'. The site is vacant and is located in a highly accessible location and the proposed design of the building will respond to the amenity of the surrounding neighbours.

- 6.6. In addition, policy T2 of the Camden Local Plan outlines support for the redevelopment of existing car parks for alternative uses given the constraints on land supply, particularly within a densely populated area such as Camden. Images of the vacant car park site located in a residential area are provided below. As such, the proposals to redevelop currently under-utilised land to provide much needed housing supply is considered to be not only acceptable in principle but to be actively encouraged by local, regional and national planning policy.



Figure 7- Photographs of the existing site

- 6.7. Policy H1 of the London Plan seeks the provision of a total of 522,870 homes by 2029. It also identifies a housing provision target of 10,380 additional homes to be completed between 2019 and 2029 in Camden. This translates to an annual requirement of 1038 dwellings per year for the Borough (representing a 17% increase on the previous London Plan target).
- 6.8. The London Plan also includes a new policy in relation to small sites (policy H2). A small site is below 0.25 hectares in size in line with the application site (which measures 0.02 hectares). Table 4.2 sets out the 10 year targets (2019/20 to 2028/29) for net housing completions on small sites and sets a target of 4,330 homes. The supporting text to Policy H2 states that incremental intensification of existing residential areas within PTALs 3-6 or within 800m distance of a station or town centre boundary is expected to play an important role in contributing towards the housing targets for small sites.
- 6.9. The policy states that this can take a number of forms, such as: new build, infill development, residential conversions, redevelopment or extension of existing buildings, including non-residential buildings and residential garages, where this results in net additional housing provision. These developments should generally be supported where they provide well-designed additional housing to meet London's needs.

- 6.10. In February 2020, the Government published the latest results of the Housing Delivery Test: 2019 Measurements (with updated in February 2021). The HDT compares the net homes delivered over three years to the homes that should have been built over the same period against the authority's housing requirement. The London Borough of Camden is currently achieving an 87% measurement, which means that an action plan must be produced by the Council to outline how the homes needed will be delivered. This outlines that demand is currently outstripping demand in the borough and indicates a pressing need to deliver new homes.
- 6.11. The provision of eight high quality residential units on a vacant brownfield site in a sustainable location should therefore be considered a significant planning benefit in the consideration of this pre-application. In this regard, the proposals are consistent with the wider planning objectives of the Camden Local Plan that seeks to support sustainable development.
- 6.12. The proposed development would comprise residential development on a sustainably located, small site in accordance with the emerging London Plan and NPPF policy requirements. On the basis of the above, the principle of the proposed redevelopment of the site is considered to offer significant planning benefits and is considered to be acceptable in principle. Indeed, this was confirmed during pre-application discussions, with the officer stating that the loss of a car park would support the Council's policies on reducing car usage across the borough, whilst the use of the site for *"housing is considered to be appropriate in this location"* and *"development would be compliant with Policy H1"*.

Design

- 6.13. Policy D1 of the Local Plan seeks to secure high quality design by making sure all development respects local context and character. The policy states that the Council will require that development:
- Respects local context and character;
 - Preserves or enhances the historic environment and heritage assets;
 - Comprises details and materials that are of high quality and complement the local character; and
 - Contributes positively to the street frontage.
- 6.14. The Local Plan states 'good design takes account of its surroundings and preserves what is distinctive and valued about the local area. Careful consideration of the characteristics of a site, features of local distinctiveness and the wider context is needed in order to achieve high quality development which integrates into its surroundings.'
- 6.15. The proposals have been designed following detailed analysis of the site's context and the character of the area, making the most efficient use of the site, whilst providing a building of the highest architectural quality and avoiding any adverse impact upon neighbouring properties. The proposed redevelopment of the site to construct a new building fronting Clarkson Row, mirroring the existing building line of neighbouring properties, will complete the street frontage and remove the site's current negative contribution to the street scene and wider conservation area.

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- 6.16. The proposal will also ensure that there is passive surveillance over the street with living rooms and bedrooms at ground to third floor levels fronting onto Clarkson Row (a total of 14 rooms providing passive surveillance to this front elevation). This is in contrast to the existing vacant site which has no surveillance currently and is a source of anti-social behaviour and disturbance to the local community.
- 6.17. The proposed design has evolved following pre-application discussions, to take account of officer comments with the building now set back from the pavement edge, as well as being set-back from the site boundary to the rear. This design approach ensures that there is no adverse impact on the properties to the rear. Furthermore, the building is set back where it borders No. 1 Clarkson Row mirroring the existing main building line of the terrace.



Figure 8- Proposed Elevations looking north along Clarkson Row

- 6.18. The proposed choice of materials is considered to be sympathetic to the context of the surrounding area and helps the building to become a comfortable addition to the street scene. Red brickwork and bronze metalwork are the primary features carried throughout the design, which have been chosen in order to mirror and compliment the surrounding context. On the side and rear elevations, pared back brick window detailing and chamfered bricks are proposed following the same hierarchy of the front elevation (see images below):

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Figure 9- Proposed façade detailing

- 6.19. The building stock in the surrounding area is predominantly residential with terraced, semi-detached and detached houses of generally 3 or 4 storeys, with many of these houses having been sub divided into flats. The adjacent terrace along Clarkson Row comprises three storeys, and Grade II listed terrace to the rear comprises four storeys. The four storeys are required to optimise the use of the site in this highly accessible location as required under Policy H2 of the Draft Local Plan. Indeed, at the pre-application meeting, height in this location was discussed, and design amendments were suggested in order to ensure the building height was not overbearing. These design amendments have been made, thus it is considered that the proposed height is acceptable and responds to the surrounding context.
- 6.20. The existing site is at odds with the established residential character of the surrounding area and in its current state it does not contribute positively to the street scene, in fact it has a negative impact on the street scene. The overall contribution of the proposed building to the streetscape is a significant improvement on the existing situation.
- 6.21. In light of the above, the proposals are considered to represent high quality design, responding to the character of the surrounding area and adjacent terraces. In addition, the design has been significantly altered following pre-application discussions to take account of officer comments, and to ensure that the proposed building does not have a detrimental impact on the surrounding properties and the listed terrace to the rear. The development is therefore considered to be in accordance with Policy D1 and the guidance within the Design SPG, and the NPPF.

Heritage

- 6.22. Policy D2 of the Local Plan states that the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and listed buildings. With regard to Conservation Areas, the policy requires all development to preserve or, where possible, enhance the character and appearance of the area and resists development that would cause harm. The supporting text to the policy makes clear that reference should be made to the associated character appraisals.
- 6.23. The property is sited within the Camden Town Conservation Area. The adjacent terrace along Clarkson Row is not noted within the Conservation Area Appraisal and Management Plan. The CAA splits the Conservation Area into two parts – 1) the commercial sub area and 2) the residential sub area. The site sits within the residential sub area and is therefore an appropriate location for new residential.
- 6.24. No 1A located adjacent to the site has been listed a positive contributor to the Conservation Area in the Camden Town Appraisal. The site lies south of the Grade II Listed Terrace at 13-24 Mornington Crescent which overlooks the site. The curve of Mornington Crescent is listed as a key vista in the Camden Town Conservation Area Appraisal.

- 6.25. In relation to the site, the Camden Town Conservation Area Appraisal (2007) states “*the southernmost stretch of Mornington Terrace, where it turns to join Mornington Crescent, has been renamed in recent years ‘Clarkson Row’. It contains one-storey buildings originally of a light industrial nature. A car workshop survives on the south side at No 1, breaking from the predominantly residential feel of the neighbourhood. Opposite, on the north side, No 1A has been sensitively converted to residential use with careful landscaping, demonstrating that high quality design can be achieved through adaptation*”.
- 6.26. The CAA acknowledges that the predominantly residential neighbourhood is broken up by the light industrial buildings at the end of Clarkson Row, acknowledging the sensitive conversion of No. 1A to residential use. The new development will be visible from the view of the positive contributor (see below) but given the proposed new building is of high quality design and the view is of a small part of the top two storeys of the south eastern end of the building, this is considered acceptable.



Figure 10- 1A Clarkson Row with the proposed development to the rear

- 6.27. With regard to new development, the CAA identifies that high quality design and execution will be a key requirement. It identifies that where new development has been unsuccessful, it has been due to “*inappropriate building massing, and detail, and poor choice and use of materials, with inadequate attention to the form and character of surrounding buildings*”.
- 6.28. As outlined previously, the proposals have carefully considered the site’s context and the surrounding character of the area. The detailing and choice of materials has taken inspiration from the surrounding streetscape and the wider conservation area. The existing vacant and unused site currently detracts from the streetscape and wider conservation area and the proposals seek to sensitively redevelop the site, to create a building which provides a positive enhancement to the street and conservation area as a whole.

- 6.29. Policy D2 states in regards to listed buildings that the Council will resist development that would cause harm to the significance of a listed building through an effect on its setting. The proposed development will be visible from the vista of the Grade II listed Mornington Crescent, but as above, the proposals seek to significantly improve the existing condition of the site and the wider conservation area. In addition, the listed terrace primarily derives its significance from the front elevation of the terrace and not the rear where the proposed development will be visible. Therefore it is considered that the proposals will have a positive impact on the setting of the listed building when compared to the existing site.
- 6.30. Camden’s Design CPG emphasises Camden’s commitment to design excellence, and expect development schemes to consider the following, especially is Conservation Areas and within the setting of listed buildings:
- 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; and
 - Opportunities for improving the character and quality of an area.
- 6.31. The development scheme has taken into account the surrounding area, as outlined previously and good quality, sustainable materials have been chosen, which seek to complement the surrounding buildings. The proposals will improve the existing condition of the site, which has a negative impact on the Conservation Area, and provides active frontages providing natural surveillance, which in turn will improve the safety of the surrounding street.
- 6.32. Overall, it is considered that the proposals will preserve and enhance the appearance of the Camden Town Conservation Area, in line with policy D2 of the Local Plan.

Housing Mix

- 6.33. Policy H6 of the Local Plan seeks to create mixed and inclusive neighbourhoods that are accessible to all including meeting National space standards and building regulations for wheelchair adaptable and accessible units. Policy H7 requires development to contribute to the specific needs of the Borough by providing a mix of large and small homes having regard to the priority table 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

Figure 11- Dwelling size priorities outlined in the Camden Local Plan

- 6.34. Local Plan policy H7 states that having regard to criteria (c) to (h) in Policy H7, the Council acknowledges that it will not be appropriate for every development to focus on the higher priorities in Table 1 (above). However, they consider that each development should contribute to the creation of mixed and inclusive communities by containing a mix of large and small homes overall.
- 6.35. The proposals seek to provide 1 x studio unit, 4 x one-bedroom units and 3 x two-bedroom units. It is considered that the location of the site is most suitable for smaller housing rather than a greater number of family sized units, which was accepted by the Council at pre-application stage, where the council stated that *“whilst there are a larger number of 1 bed flats than desire, the mix is considered suitable in this location”*. It should be noted that since pre-application stage, an additional two bedroom unit has been provided.

Density

- 6.36. Local Plan Policy H1 seeks to boost the supply of housing and the supporting text states 3.32 – 3.35 states that it will use the sustainable density matrix in the London Plan as a guide to assessing the density of development, though it will not be applied prescriptively. Table 3.2 of sustainable residential quality (SQR) density matrix from the London Plan sets out an acceptable range of 4-8 units. The proposals seek to provide 8 units, in line with this guidance.
- 6.37. It should be noted that residential density is becoming increasingly design led, with the NPPF moving to minimum as opposed to maximum density standards and the existing matrix being scrapped in the new London Plan in favour of policy D1B ‘Optimising housing density site capacity through the design-led approach’. In this approach, the design should ‘enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions.’ The proposals have also taken this approach and the development seeks to enhance the local context through its sensitive design.

Affordable Housing

- 6.38. Policy H4 of the Local Plan states that the Council will expect a contribution to affordable housing from all developments that provide one or more additional homes and involve a total addition to residential floorspace of 100sqm GIA or more. Part G of the policy states where developments have capacity for fewer than 10 additional dwellings, the Council will accept a payment-in-lieu of affordable housing.
- 6.39. A viability assessment has been prepared by Savills Viability and has been submitted with this planning application.

Housing Quality

- 6.40. Policy H6 states that the Council will expect all self-contained homes to meet the nationally described space standards. In this instance, all of the proposed units meet and exceed the technical space standards as set out in the London Plan.

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Unit	GIA (sq.m)	Space Standard (sq.m)
1 (Studio, 1 person)	44	39
2 (1 bed, 2 person)	54	50
3 (1 bed, 2 person)	50	50
4 (2 bed, 3 person)	66	61
5 (1 bed, 2 person)	50	50
6 (2 bed, 3 person)	66	61
7 (1 bed, 2 person)	50	50
8 (2 bed, 4 person)	72	70

- 6.41. The internal layouts proposed are logical and efficient with the majority of rooms served by one or multiple windows and each flat is proposed to be dual aspect receiving morning and evening sunlight and daylight, in line with draft London Plan policy D6.
- 6.42. Local Plan policy D1 states that new development should provide a high standard of accommodation and incorporate outdoor amenity space. The supporting text of policy A2 Open Space recognises at paragraph 6.49 that private amenity space can be “challenging” but encourages developers to “explore all options for the provision of new private outdoor space”.
- 6.43. Following pre-application discussions, the design has evolved in order to ensure all of the proposed units are provided with private outdoor amenity space, with the ground floor flats benefitting from private gardens, the first floor flats provided with private balconies whilst the second and third floor flats are provided with private amenity space at roof level. The following sets out the individual sizes of each amenity space (all of which meet or exceed the minimum standard)

Unit Size	Amenity Space Size (Sq.m)	London Plan Policy Requirement (Sq.m)
1 (Studio, 1 person)	5	5
2 (1 bed, 2 person)	14	5
3 (1 bed, 2 person)	5	5
4 (2 bed, 3 person)	10	6
5 (1 bed, 2 person)	6	5
6 (2 bed, 3 person)	15	6
7 (1 bed, 2 person)	10	5
8 (2 bed, 4 person)	10	7

- 6.44. The site is in close proximity to Regent's Park (located less than half a mile from the site), which provides additional open space to be enjoyed by future residents of the flats.
- 6.45. Policy H6 of the Local Plan requires 90% of new-build self-contained homes in each development to be accessible and adaptable in accordance with Building Regulation M4 (2) and 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). All units meet Part M4 (2) compliance and one unit on the ground floor (unit 2) is part M4 (3) compliant.
- 6.46. Given the above, it is clear that the proposed dwellings are of high quality and provide high quality, accessible living accommodation for future residents, in accordance with Local Plan Policy D1.

Residential Amenity

- 6.47. Local Plan Policy A1 requires all development to protect the quality of life of occupiers and neighbours and states that planning permission will be granted unless it causes unacceptable harm to amenity. The relevant amenity considerations identified in the policy in this case are visual privacy, outlook, sunlight daylight and overshadowing, noise, disturbance, transport and construction impact.
- 6.48. As illustrated in the aerial image below, the separation distance between the currently vacant site and the Grade II listed terrace to the north is considerable (approximately 16 metres to the closet wing of the properties to the rear and approximately 22 metres to the main rear elevation). The site is also separated from these terraced properties by a boundary of trees and landscaping.



Figure 12- Separation distances between existing site and neighbouring properties

- 6.49. Following pre-application discussions with the Council, the proposed buildings massing has been reduced, with the building set in from the site boundary. As such there is a significant separation distance between the new building and the existing properties to the rear, therefore the impact on these properties is minimised.
- 6.50. Notwithstanding the significant separation distance to the rear, a saw tooth rear elevation is proposed in order to further mitigate overlooking into and out of the rooms at the rear. This design approach was considered to be acceptable at pre-application stage, subject to a further reduction in bulk, which is now proposed. As such, the design of the building at the rear has responded to officer concerns at pre-application stage and is considered acceptable.
- 6.51. There are a number of small windows on the side elevation of No.1 Clarkson Row (as illustrated in the image below). These windows appear to serve bathrooms but nevertheless have been considered in the design of the proposals. The bin store has been located on the site adjacent to the closest boundary with No.1. There are also no windows on the western boundary to minimise overlooking to the terrace. In addition, the proposed building line steps back closest to No. 1 Clarkson Row such to match the existing building line of the main building.



Figure 13- Number 1 Clarkson Row adjacent to the site

- 6.52. A Daylight and Sunlight Assessment has been prepared by Hollis, which has assessed the impacts of the proposals on neighbouring properties, in line with the officer requests at pre-application stage. This report concludes that post-development, the vast majority of neighbouring windows and amenity spaces record levels of daylight and sunlight above BRE guidelines.

- 6.53. A small number of windows record reductions below BRE guidelines, including those directly adjacent to the site shown in figure 13. It is important to note that the BRE guidelines state at paragraph 1.6 that *“the advice given here is not mandatory and the guide should not be seen as an instrument of planning policy, its aim is to help rather than constrain the designer. Although it gives numerical guidelines, these should be interpreted flexibly since natural lighting is only one of many factors in site layout design”*. The affected neighbouring windows largely serve non-habitable rooms, or these rooms are served by more than one window. Given this, the context outlined by the BRE guidelines and the site context in a dense, central London location, the presented results are considered to be acceptable.

Highways

Car Parking

- 6.54. The proposals involve the redevelopment of an existing car park for residential use. Policy T2 of the Camden Local Plan outlines support for the redevelopment of existing car parks for alternative uses and therefore the principle of redevelopment is considered to be acceptable.
- 6.55. Policy T2 of the Local Plan states that all new development should be car-free which means restricting on-site parking provision for disabled users only (where necessary) or for essential servicing. On-street permits will not be granted for new residents. The site is located within an area of excellent public transport accessibility, with a PTAL of 6a and the proposed development is therefore car free in line with Policy T2.

Cycle Parking

- 6.56. London Plan Table 10.2 states that the total number of cycle store spaces required for C3 use is 1 space per studio/1 bed and 2 spaces for all other dwellings. As such, a total of 11 cycle parking spaces have been provided in a secure cycle store at ground floor level, in line with Local Plan policy T1.

Construction

- 6.57. Policy A1 and T4 of the Camden Local Plan require Construction Traffic Management Plans (CMP) to be secured to demonstrate how development will minimise the impacts from movement of goods and materials during the construction process.
- 6.58. A CMP (in the Council's pro forma) has been produced in line with the Council's pro-forma and is submitted as part of the application. It is noted that a CMP contribution will be secured by planning obligation.

Energy and Sustainability

- 6.59. Policy CC1 of the Local Plan required development to minimise the effects of climate change and requires all developments of five or more dwellings to submit an energy statement demonstrating how the Council's energy hierarchy has been applied to make a contribution to CO2 reduction. All residential development will also be required to demonstrate a 19% CO2 reduction below Part L 2013 Building Regulations.



6.60. In line with policy CC1, an Energy and Sustainability Statement has been prepared by Cundall. This report sets out the development’s approach to sustainability, energy efficiency and renewable energy strategies in order to meet the targets set out in the National Planning Policy Framework (NPPF), the GLA’s London Plan and the Camden Planning Guidance. The design of the proposed scheme has been developed to reduce its annual energy consumption, provide energy in an environmentally friendly way, and to minimize its annual CO2 footprint. To achieve this, the Statement follows the GLA’s Energy Hierarchy.

6.61. The regulated CO2 emissions and savings for the proposed domestic building elements are presented in the table below (extracted from the submitted Energy and Sustainability Statement):

Regulated Domestic Carbon Dioxide Savings		
	(Tonnes CO2 per annum)	(%)
Savings from energy demand reduction	0.71	10%
Savings from heat network / CHP	0.00	0%
Savings from renewable energy	3.24	45%
Cumulative on site savings	3.96	55%
Cumulative savings for off-set payment	N/a due to the scale of development	

6.62. Energy efficient measures that will be incorporated into the scheme are as follows:

- A centralised a low temperature heat loop feeding all dwellings will be provided. Thermal energy for the heat loop will first be generated centrally by ASHPs. Then at the local level, the heat will be upgraded using WSHP in each dwelling. This will deliver space heating, cooling and DHW demands.
- Building materials, where possible, will be sourced locally to reduce transportation pollution and support the local economy.
- All timber will be procured from responsible forest sources.
- Water use will be minimised by the specification of water efficient taps, dual flush toilets and low water use appliances.
- Water metering will be installed to monitor and minimise wastage.
- Surface water run-off in will be minimised on site.
- The construction site will be managed in an environmentally sound manner in terms of resource use, storage, waste management, pollution.
- Recycling facilities will be provided on site for construction and operational waste.

- The site benefits from excellent transport links, reducing reliance on personal cars and local pollutants.
- Secure cycling parking facilities have been provided.

Plant and Noise

- 6.63. Policy A4 of the Local Plan outlines that the Council will seek to ensure that noise and vibration is controlled and managed and that development has regard to Camden's Noise and Vibration Thresholds. Policy A4 goes on to state that planning permission will not be granted for development that is likely to generate unacceptable noise and vibration impacts, or development sensitive to noise in location which experience high levels of noise unless appropriate attenuation measures can be provided.
- 6.64. Plant associated with the proposed units has been accommodated in two separate locations, at ground floor level and roof level. At ground floor level, plant is proposed within a plant room adjacent to the cycle store. At roof level, air source heat pumps are proposed. These ASHPs will be located within a small acoustic enclosure. As a result, it is not considered that the proposed development will generate unacceptable noise and vibration impacts in accordance with policy A4.
- 6.65. The main source of noise in the proximity of the site is that from rail noise generated by the neighbouring rail lines serving Euston Station. Whilst the site is adjacent to existing residential units, therefore there is an established residential use adjacent to this noise generator, the impact of this on the proposed residential use has been assessed.
- 6.66. The application is supported by a Noise Report, which has been prepared by Cundall and is submitted with this planning application. The Noise and Vibration report details that, with mitigation in place, the site would be at 'low' to 'medium' risk of adverse effects on future residents as a result of noise without mitigation. An assessment of internal and external noise levels has been undertaken and the report outlines a series of mitigation measures in the form of proposed glazing, façade and ventilation opening acoustic performance requirements.
- 6.67. The proposals will implement the measures which have been proposed within the Noise and Vibration report and with this will meet the BS8233/ProPG and LBC internal and external noise level guidelines.
- 6.68. In addition to noise impacts on the proposed development, a vibration survey has been undertaken due to the site's proximity to the rail lines serving Euston station. Vibration levels have been analysed in terms of Vibration Dose Values and compared to the upper limits set out within the Camden Local Plan. This assessment has been found to meet the requirements of Camden Council and when assessed against BS6742-1: 2008 are at a level where there is low probability of adverse impact.
- 6.69. Resultant of the above, the site is considered suitable for residential development. The proposed mitigation measures will ensure a high living standard for future occupiers, in line with policy A4 of the Camden Local Plan.

7. Section 106 / 278, Planning Obligations and CIL

Section 106 / Section 278

- 7.1. A Section 106 agreement will be prepared alongside Camden's solicitor. This will secure the permit free agreement and any planning obligations (if required). The pre application advice also set out that in addition to the aforementioned items, the following items would need to be secured under the Section 106:
- Affordable housing contribution
 - Construction Management Plan and Bond (plus monitoring fee)
 - Energy Efficiency Plan
 - Highways contribution (in case of damage to the public highway)
 - Sustainability Plan
- 7.2. Highways works are proposed within the red line boundary, comprising the removal of the crossover and planting on the pavement. These works will need to be secured as part of a Section 278 agreement. We will await contact from Camden's solicitor to commence the drafting of the Section 278 and the Section 106 heads of terms.

Planning Obligations

- 7.3. Given the relatively small scale of the proposals, it is not considered that the development will attract a requirement for any planning obligations, save for the CMP monitoring fee contribution and perhaps a highways contribution (in case of damage to the public highway as set out above) both of which were referenced by officers at pre application stage.
- 7.4. The submitted viability statement demonstrates that the proposals are not capable of delivering a payment-in-lieu of affordable housing provision.

Community Infrastructure Levy (CIL)

- 7.5. The proposed scheme will attract Mayoral and Borough CIL liability for the new residential floorspace (580 sq.m). There are no existing buildings on site so no floorspace can be offset from the proposed CIL liability. As such, a CIL additional information form has been prepared and is submitted as part of the application.

8. Conclusions

- 8.1. This Planning Statement has been prepared on behalf of our client in support of a planning application submitted to Camden Council for the proposed development at Clarkson Row.
- 8.2. The proposals seek the erection of a four storey building comprising 8 residential dwellings (1 x studio, 4 x 1 bed and 3 x 2 beds). The scheme has been carefully designed, taking account of pre-application feedback from officers, to make the most efficient use of the vacant site and to be of high architectural quality, whilst at the same time avoiding any adverse impacts on existing neighbouring properties.
- 8.3. The proposed residential scheme represents an opportunity to create an appropriate use of this vacant brownfield land to provide much needed new housing in the London Borough of Camden and to provide passive surveillance and a significant improvement to the street scene. The existing site is currently an unoccupied car park which experiences anti-social behaviour and contrasts starkly with the largely residential nature of the surrounding area.
- 8.4. The proposed scheme provides 580sqm GIA of additional floorspace which will be liable for Borough and Mayoral CIL, as well as making a contribution towards the Borough's housing stock where demand currently outstrips supply. In addition, the future residents of the dwellings will be of benefit to the local economy through local spend and the proposals will enhance the conservation area by replacing an existing negative contributor with a building of high quality design.
- 8.5. The proposed scheme brings with it the following material planning benefits which should form part of the consideration of the scheme.

Social Benefits

- The scheme utilises a vacant car park to provide additional homes on a small site, in line with Chapter 11 of the NPPF and the new London Plan;
- The scheme will provide an active frontage and an enhancement to the street scene on a site which currently experiences anti-social behaviour;
- The scheme will deliver a total of 8 high-quality residential units, contributing much needed housing to the borough's stock;
- The scheme delivers an appropriate mix of units which can accommodate individuals, couples or small families;
- The proposed units will be accessible with all units meeting Part M4 (2) and one unit on the ground floor (unit 2) being part M4 (3) compliant.

Economic Benefits

- The proposed scheme will create new jobs during the construction phase of the development;
- The future residents of the proposed residential units will be of benefit to the local economy through their local spend;

- The proposed residential units will be liable for Council Tax payments, money which the site currently does not generate;
- The scheme will be liable for both Borough and Mayoral CIL payments.

Environmental and Heritage Benefits

- The proposed development will make use of an under-utilised brownfield site to provide much needed housing supply which will reduce the need for new development to accommodate on greenfield sites;
- The proposals replace an existing negative contributor to the Conservation Area with a building of high-quality design to the benefit of the Conservation Area;
- The proposals will replace an existing car-park and will be car-free, whilst policy compliant cycle parking which is fit-for-purpose and conveniently located is proposed. Cumulatively, this will reduce car usage in the borough, whilst encouraging future residents to use sustainable modes of travel;
- The proposed units will be energy efficient and sustainable

8.6. The proposals are in accordance with local, regional and national planning policy therefore should be considered positively with a view to granting planning permission.

