



# **CRSA - Clarkson Row**

**Design and Access Statement** 

Network Rail

30 April 2021

158085-ATK-REP-EAR-000001-A01



# Notice

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# 1. Introduction

This Design and Access Statement has been prepared in support of the attached planning application for the provision of the new track maintenance vehicles access point/ car park below the Granby Terraces overbridge no. 5A at Clarkson Row, as a part of HS2 On-Network Works.

### 1.1. Background

The Clarkson Row project will deliver solutions to enable Network Rail (NR) (and emergency services) access to the track and rail infrastructure from the East side of the rail corridor. This will allow for regular maintenance and incident response in cases of fault remediation, fire incidents, plant work or for emergency service access.

# 1.2. Need for the proposed development

The existing west side access to the Network Rail (NR) tracks will be removed as part of HS2 Phase 1; therefore, a new access point is required on the eastern side of the railway corridor to provide vehicle and pedestrian access from street level to the NR tracks for inspection, maintenance and intervention works.

# 1.3. Planning policy considerations

The project addresses relevant policies of **the** National Planning Framework, London Plan and London Borough of Camden's Planning Development Framework.

Whilst the new access point is required because of the HS2 project, it is partially located outside the area designated by the High Speed Rail Act 2017. The project is essential for the existing railway operations as well for future extensions. The location outside of the HS2 Act limit implies the separate planning application.

#### 1.3.1. National Planning Policy and Guidance (2019)

The National Planning Policy Framework states in section 9: *Promoting sustainable transport point 104 that planning policies should: e) provide for any large scale transport facilities that need to be located in the area and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy.* 

The project is essential to support the safety of the existing railway, and to increase capacity of national railway transport related to Euston station, including HS2. The continuous improvement to the operation of large-scale public transport facilities is one of the priorities of current national policies. The existing facilities require regular maintenance which must not affect continuity of railway services. Any increase in capacity would create additional needs for support to the existing network during the improvement works and after their completion. Based on the approved plans, the current access point location will be utilised for the network expansion. The replacement provision in a new location is critical for safe operation of major national transport facilities in the Euston interchange area including HS2, and their expansion in line with the NPPF policy.

### 1.3.2. London Plan (2021)

London Plan covers the project primarily with reference to Policy T3:

Transport capacity, connectivity and safeguarding requires in point B that Development Plans and development decisions should ensure the provision of sufficient and suitably-located land for the development of the current and expanded public and active transport system to serve London's needs, including by:

1) safeguarding existing land and buildings used for public transport, active travel or related support functions (unless alternative facilities are provided to the satisfaction of relevant strategic transport authorities and service providers that enable existing transport operations to be maintained and expanded if necessary)



2) identifying and safeguarding new sites/space and route alignments, as well as supporting infrastructure, to provide necessary strategic and local connectivity and capacity by public transport, walking and cycling, as well as to allow for sustainable deliveries and servicing

The project identifies and safeguards the supporting infrastructure for providing necessary strategic connectivity by public transport. By using the existing infrastructure land for servicing the railway it addresses the sustainability requirement for servicing infrastructure of a national importance.

#### 1.3.3. Local Planning Policy

#### 1.3.3.1. Local Plan

Section 38(6) of the Planning and Compensation Act 2004 requires that determinations are made in accordance with the development plan unless material TP/LNE/2019 -037 Page 8 considerations indicate otherwise. For Camden, the development plan consists of the Camden Local Plan which was adopted on the 3rd July 2017.

The following policies of the Camden Local Plan form background for the project:

- 1. Paragraph 1.34 of the plan sets out strategic objectives which include: creating the conditions for growth, to strengthen Camden's nationally important economy, to promote sustainable transport for all, to promote and protect the high levels of amenity and quality of life.
- 2. The following specific policies are relevant to the consideration of this application:
  - Policy D1 'Design' seeks to secure high quality design including preserving and enhancing the historic environment and heritage assets in accordance with policy D2.
  - Policy D2 confirms the position of the NPPF that substantial harm or loss of a heritage asset will not be permitted unless it can be demonstrated that substantial public benefits outweigh the harm or loss. Similarly, less than substantial harm to the significance of heritage assets will not be supported unless the public benefits convincingly outweigh that harm.
  - Policy T1 seeks to promote sustainable transport by prioritising walking, cycling and public transport.

The project promotes sustainable transport for all and will create conditions for Camden's growth in a national context by enabling development and operation of the Hight Speed Rail 2 connecting London with the Northern counties. It directly supports the strategic objectives of the Camden Local Plan.

The proposed development is located on the boundary of the Camden Town Conservation Area. The proposed development will not inflict substantial harm to the significance of the heritage assets in its setting (see attachment A). It would therefore satisfy Clause 'f' of Policy D2 as the buildings that would be demolished do not make a positive contribution to the conservation area. The proposed intervention is essential for the maintenance and emergency response related to the railways in the Euston station area including HS2, which are components of national economic and transport strategies. Please refer to the point 2.2. for the brief description of the neighbouring heritage assets, the impact of the project on their settings and reasons for which the Heritage Assessment (appendix A) was prepared and submitted with the application.

#### 1.3.3.2. Camden Town Conservation Area Appraisal and Management Plan:

The Conservation Area Appraisal and Management Plan supports removal of the garage structure, which fails to positively contribute to the special character of the area and was considered as alien in the residential context.

There is a greater sense of open space in the residential portions of the Conservation Area, in part due to the main Euston railway cutting immediately to the west but also the result of wide tree-lined streets and private front and back gardens, especially in Albert Street and Mornington Terrace. The trees and greenery of back gardens are only visible in occasional glimpses from the public realm but contribute to the nature of the western part of the Conservation Area. Views of back gardens are retained, especially where development has been kept single-storey or where gaps have been preserved. Gaps also occur at the end of terraces; these allow views to back gardens over high garden walls, introducing a welcome respite to an otherwise very urban environment and making a major contribution to the visual amenity and the character of the area. In an area lacking in open space and street trees these views into gardens with mature trees are an important element in the character and appearance of the Conservation Area.

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.



The project directly responds to the Camden Town CAAMP by demolishing the one storey structure on Clarkson Road which is considered as detracting from the area's residential character. Additionally, it will reveal another heritage asset by enabling the view towards the Grade II Listed Bridge from Clarkson Row.

# 2. Site Context

The site is located within the London Borough of Camden next to the rail track, to the west of Mornington Crescent, to the south of Clarkson Row and north to the Granby Terraces overbridge.

# 2.1. Justification for the Proposed Clarkson Row Access Point

As part of Network Rail's option selection process other access point options were considered, primarily from Granby Terrace, dissecting the former Addison Lee Compound. It was considered the embankment was unlikely to support additional loading from construction vehicles and a new access ramp, which would therefore need a complete re-grading as part of the construction process. In the constricted building site offered this would have needed Network Rail's contractors to sink large piles, export many tonnes of material to then import similar volumes of material to build back up to road level. This would have created a large amount of additional disruption, cost and environmental impact from the access ramp construction. Much of the embankment is close to the overhead lines of the operational railway, which would have necessitated a lot of night-time working to keep the construction engineers safe which would have brought greater disruption to the residents. Moving the amounts of material needed and then importing a similar amount of material caused options using this route to have a significantly greater carbon impact and introduce many more lorry movements to Camden's roads.

Once built, vehicles using the ramp would have needed to take a potentially hazardous route. Designers assessed vehicle pathways and established that the long wheel-based vans would need to swing across a second lane of traffic to be able to fit the geometry of the new access way. This would have created a difficult to use access ramp which brings additional risk to the users of the access ramp and members of the public.



#### Figure 2-1 - Area accessed from the access point

Therefore, it was considered Clarkson Row is the most suitable option and has the following benefits:



• The Clarkson Row access point will allow Network Rail to access the area shown in the diagram (figure 2-1), i.e., from the buffer stops at Euston station to the north end of Park Street tunnel (on the south end of Gloucester Avenue), spanning approximately 68 chains (0.85 miles)

• Network Rail can currently access the east side via platforms 1-7 at Euston station but only in a very limited way, i.e. it requires line blockages as it is red zone banned. Taking blockages is very disruptive as it essentially blocks traffic in and out of our east side platforms from around the Granby Terrace bridge area

• Even with disruptive line blockades access is limited to small numbers of people carrying light hand tools, i.e., it's not suitable for heavy maintenance or normally for responding to serious faults. Therefore, Network Rail would usually access at Juniper Crescent in Camden in these circumstances instead, which takes much longer if any work is required in the Euston station area, over 1 mile away – we have to drive up from Euston station and then walk back down again by the side of the tracks

• When there is a need for low-side (east lines) blocks Network Rail also lose considerable time moving materials and people down from Juniper Crescent. The Clarkson Row access point means Network Rail will be able to carry out our work more quickly, easily and cheaply, saving taxpayers' money, especially as we typically have a lot of track faults in this area due to how heavily it is used.

• Network Rail will also be able to respond to faults in this area more quickly and reduce perturbation for passengers. It is also expected that this will reduce both pedestrian and vehicle traffic around Euston station and the surrounding roads, which residents typically see when there is a big fault and trains are not running. This will reduce congestion and thus also pollution, both in terms of how Network Rail responds, reducing general traffic in the area.

# 2.2. Site Context

Clarkson Row is a two-way street. The south corner of the street is currently occupied by two single storey commercial buildings (operated as vehicle garages) and a Distribution Network Operator (DNO) electrical cabinet. The road is supported by retaining wall W00006 which runs parallel to the track. The main development area (Wide Cess Area) on the lower level spreads between the retaining wall and the railway track. On the upper (street) level the main access to the site is proposed in lieu of the existing garage building.



Imagery @2020 Google, Imagery @2020 Bluesky, Getmapping plc, Infoterra Ltd & Bluesky, Maxar Technologies, The GeoInformation Group, Map data @2020 Figure 2-2 - Existing Site Aerial View



### 2.3. Heritage assessment

The project is located on the boundary of the Camden Town Conservation Area behind the back gardens of Grade II listed buildings: the terraces of houses at 2-12 Mornington Crescent and 259-263 Hampstead Road. The proposed development does not involve demolition of any listed buildings.

The garage building proposed to be demolished is not considered as positively contributing to the special character of the Conservation Area as per Appendix 6 Townscape Appraisal to the Camden Town Conservation Area Appraisal and Management Plan (CAAMP) published by Camden Council in Dec 2006.

The parapet wall at the top of railway cut retaining wall – a non-designated structure on the Conservation Area boundary, is locally listed (Camden's Local List, January 2015). As the proposed ramp is cutting through the parapet wall, there will be some changes to the setting of the heritage assets. In order to identify and assess possible impacts of these, the Heritage Assessment was prepared (please refer to the document in appendix A).

The Proposed Ramp would introduce minor to moderate harm to the heritage asset, which would classify as less than substantial harm, to the settings of 2-12 Mornington Crescent. There would be no harm to 1 Mornington Crescent and very little harm through minor changes in their settings to 261-263 Hampstead Road, Camden Town Conservation Area, Regent's Park Conservation Area, Mornington Street Bridge piers, 13-24 Mornington Crescent and 30, 32, 34 and 36A and B Park Village East. There will be little harm to the non-designated structures of the cutting and nearby bridges.

In accordance with the requirements of the NPPF in relation to the less than substantial harm to the designated heritage assets identified above, the test of the acceptability of the proposals is set out in paragraph 196 of the NPPF, which states that the harm should be weighed against the public benefits of the proposal.

The works approved under the High Speed Rail (London – West Midlands) Act 2017, mean that access to the railway for maintenance requires a ramp in the vicinity. The ramp is needed to enable the continued maintenance of the railway and the maintenance of the transport system between London and the Midlands. The benefits of the proposal, a functioning railway system considerably outweighs the less than substantial harm identified above.

In accordance with Local Plan Policy D2, the character and appearance, and significance of the two conservation areas as well as that of the listed buildings would be substantially preserved, while the removal of buildings on parts of the garden areas of 11 and 12 Mornington Crescent would represent a slight enhancement. There would not be substantial harm caused to any designated assets.

In relation to the policy's requirements for proposals in conservation areas specifically, there would be an enhancement to aspects of Camden Town Conservation area's character, in accordance with clause 'e' of the policy, in that the glimpses of the back garden areas from the public realm would be increased by the demolition of the detracting garage and its replacement with a lighter weight ramp structure.

Clause 'f' of Policy D2 would be satisfied as the buildings that would be demolished do not make a positive contribution to the conservation area.

Any harm to unknown archaeology or the foundations of the mid-19<sup>th</sup> century buildings that formerly occupied the south side of Clarkson Row would be compensated by preservation by record in accordance with a Written Scheme of Investigation to be agreed with the Greater London Archaeological Advisory Service, who advise the council.

In summary, the proposed development may incur minor harm to designated heritage assets, which is considered as outweighed by the public benefits of enabling delivery of HS2 and safe maintenance of the existing railway network in the area. The scheme will also create some enhancement by meeting the recommendations of the Camden Town CAAMP.

For the full text of the Heritage Assessment please refer to Appendix A.

### 2.4. Environmental Impact Assessment

Camden Council planning officers confirmed in an e-mail on **18 January 2021** that an Environmental Impact Assessment will not be required to be submitted along with this application.



# 3. The Scheme

The site is located within a residential area with existing residential properties immediately adjacent to the site. The main site entrance through the gates on the upper level is proposed through the approach compound currently occupied by NR-owned commercial property - the garage at 12a Clarkson Row.



Imagery @2021 Google, Imagery @2021 Bluesky, Getmapping plc, Infoterra Ltd & Bluesky, Maxar Technologies, The GeoInformation Group, Map data @2021

Figure 3-1 - Existing Clarkson Row elevation

# 3.1. Proposed interventions

An existing Wide Cess Area site re-purposed to provide the required access is in the railway cut, significantly lower than the surrounding roads, requiring a new vehicular ramped road and pedestrian footpath with stairs. The existing garage will be demolished. The works include provision of a new lighting control cubicle, new lighting equipment to illuminate the car park, turning area, vehicle access ramp, pedestrian staircase, and pedestrian walkways.

Existing Clarkson Row kerb lines will not require modification for dropped kerbing, as the main gate will be located in place of the existing garage gate.



Figure 3-2 - Proposed Site Development Plan

For plans, sections and elevations including elevations from Clarkson Row and trackside; elevations of the new access gate and its details, track drawings, barrier treatment, floor treatment, parking and turning area tracking plans please refer to the drawings:

- HS2\_158085-16610-LEC1-ZN18-DDR-C-510101 Clarkson Row Planning Application Existing Plan Drawing,
- HS2\_158085-16610-LEC1-ZN18-DDR-C-510101 Clarkson Row Planning Application Proposed Plan Drawing,
- HS2\_158085-16610-LEC1-ZN18-DDR-C-510102 Clarkson Row Planning Application Proposed General Arrangement,
- HS2\_158085-16610-LEC1-ZN18-DDR-C-510103 Clarkson Row Planning Application Proposed Vehicle Tracking.



# 3.2. Appearance and materials

A palisade fence is proposed to be 2400mm high with a 900mm wide pedestrian gate and a 4000 mm wide double leaf vehicle gate to match the existing galvanised steel fence and height of the retained garage. Fence panels, posts and mountings shall be polyester powder coated in a green colour as per NR compliance. All palisade fencing shall be designed in accordance with BS 1722-12:2006. For the detail of the front elevation please refer to drawing HS2\_158085-16610-LEC1-ZN18-DDR-C-530001



Figure 3-3 - Proposed Clarkson Row elevation

The proposed access will consist of steps, handrails, gates/fences, footway edgings, footway fill, asphalt road, concrete road, and kerbs. The proposed infrastructure will have a design life of 25 years, unless stated otherwise:

- Palisade Fence & Gates: 25 years
- Steel/GRP tread staircase: 50+ years
- Electronic equipment and devices: 10-15 years
- Lighting Installation (column mounted): 20-25 years
- Electrical installation including wiring distribution boards and accessories: 25–30 years.



Figure 3-4 – Proposed track side elevation

The ramp structure is planned to be made of weathered steel to minimise necessity of maintenance over its lifetime. The pedestrian access stairs to be compliant with Network Rail standard with steps made of the black GRP with yellow nosing. Handrails designed as galvanised steel to BS1461:1999 system solution compliant with BS7818:1995 quality standards (pedestrian restraint systems in metal).





Figure 3-5 – Proposed materials: palisade fence, precast ramp, steel columns









#### 3.2.1. Lighting strategy

The proposed lighting is designed to prevent light pollution by controlling light spill towards residential properties nearby and glare affecting train operations.

The light spill control is achieved by applying low level fixtures with shields where appropriate and by locating light columns behind the existing structures of the walls and fences. On the Clarkson Row (upper) level all the lighting is proposed as low-level bollards along the footpath and the luminaires installed in handrails. The adjacent terrace houses will be shielded from light spillage by the garage wall and fences along the property boundary. There are four lighting columns planned at lower level, 2 no. 5m high in eastern and 2no. 6m high in western end of the carpark. The lamps at the top of the lighting columns are below the top of the parapet wall located on top of retaining wall and are designed as downlighters to minimise impact on adjacent properties.







Figure 3-7 - Proposed lighting

The proposed lighting (shown on fig 3-7 above) will consist of: the bollard lamps (drawing on the left), lighting integrated within guardrails (central photo) and downlighters on the lighting columns (photo on the right).





Figure 3-8 - Visualization of the area showing the site context.

All lighting circuits from the Clarkson Row lighting control cubicle shall be controlled by a photocell mounted on top of lighting column. System shall energise when the lighting level falls below 70 lux. For the light level map please refer to drawing HS2\_158085-16610-LEC1-ZN18-DDR-E-601002.

# 4. Access statement

### 4.1. Access to the site

The proposed access ramp, walkway and trackside area for work vehicles will enable rail-side maintenance staff access from Clarkson Row. Clarkson Row is a residential two-way street with low traffic levels and therefore maintenance vehicles will be able to enter/exit the access point in a safe and convenient manner without causing undue adverse effect to the operation of the road network.

The existing access via pedestrian spiral stairs and the walkway form the Granby Terraces overbridge will remain in place. The proposed access to the site will be provided through the 4000mm wide double leaf vehicle gate and 900 mm wide pedestrian gate, both opening inwards over the proposed driveway and footway.

There will be 5 parking spaces provided. Workers will arrive principally in works vehicles and when necessary, in crew vans to keep the numbers of vehicles within the capacity of the parking provision. Vans will be parked for duration of maintenance visit, anticipated to be less than 12hrs a day during normal operations and at times day or night when maintenance is required.

### 4.2. Movement on site

The vehicle tracking is shown on Figure 3-2 above in the document. The interface with the highway will be provided through the gate using the existing kerb drop, with pavement cross-over strengthened if necessary, in consultation with the local highways department. There is a three-point turn designed at vans' car park level at the bottom of the ramp.

### 4.3. Trip generation

The number of trips generated by the new access point is limited by the number of parking spaces and frequency related to needs for change of staff or deliver materials etc. It is estimated that the proposed 5 places might introduce between 0 and 30 movements in/out each day. On average 'quiet' day may be 5 or so movements (assuming no east side line blocks and therefore little/no routine maintenance/inspections happening). A busy day could see up to 30 movements (assuming east side line blocks and therefore busy period of maintenance happening and potentially a fault or two to respond to, which don't routinely happen every day). If there's a major incident, e.g., a dewirement (wires down) or a derailment, etc then usage may be increased further. Whilst not intended for this purpose, the provision will enable ambulance access and limited fire service access and thereby increase options for gaining access if required to attend incidents.

# 4.4. Facilities

No accommodation nor facilities, other than parking, will be provided. It is anticipated that a significant proportion maintenance tasks will be of sufficiently short duration for no permanent onsite welfare facilities to be necessary since their permanent presence would pose an added maintenance challenge. If in conjunction with more lengthy work activities, any welfare facilities are deemed necessary, they will be portable and temporary only.

### 4.5. Accessibility

The site will provide restricted access for authorised personnel only. Staff (mainly track maintenance, welders, and signalling/ telecoms engineers) will be required to meet certain core capabilities in order to remain safe, which includes hearing, seeing, and recognising a potential hazard and if necessary, moving away from it. Moreover, the track and trackside environment will necessitate a level of ambulant mobility to step over rails and similar obstacles. No trackside accommodation is to be provided whereby there may be forms of employment where these core capabilities are not required.

The staff are expected to get to the trackside level principally by vehicle owing to equipment that they will need to transport. However, pedestrian access is available should staff arrive by public transport or wish to access local services from the location. Owing to limited space available, the vehicle ramp will be too steep to use safely for access by foot or wheelchair and only appropriate for vehicular use. There will however be a designated pedestrian path with stairs provided, to enable authorised workers with requisite core capabilities to get to the track level and to do so in manner which is separate from vehicles and thereby affords greater safety.



Should for whatever reason a person, who would otherwise require step free access, wish to meet maintenance staff then alternative arrangements would not be unreasonable including choosing an alternative location to meet or to access the trackside by vehicle as most of the maintenance staff are expected to do. Consequently, there is no reasonable necessity for step free pedestrian access nor egress given the work activities for which the proposals are designed for. Design and detailing of the stairs will however afford a degree of accessibility for individuals with moderate ambulant mobility impairment who are still capable of demonstrating that they can meet core capabilities for carrying out work and doing so safely.

# 4.6. Site security

The security design for Clarkson Row will consist of physical measures only, which has been agreed with the Network Rail representatives, as an appropriate and proportionate approach for the project. The physical security measures proposed include: barriers, gates, fences, doors, and locks.

It was agreed in a meeting on 8<sup>th</sup> February 2021 with NR that the security design will not mitigate the terrorist threats, and the design will not follow the Security in Design of Stations (SIDOS) guidance.

To provide warning and deterrence through information there is proposed display safety and security signage at the gate and throughout the site to clearly convey necessary site access restrictions and hazards.

### 4.7. Construction logistics

The structural framing of the ramp would be composed of steel columns and beams assembled on site; complemented with a precast or in-situ concrete on permanent formwork deck. Use of precast structure manufactured off site will reduce the time of construction and disruption to the neighbouring properties. The main deliveries to the construction site are planned from the track side by train and by vehicle from Clarkson Row.

# 5. Public engagement

The current Covid-19 pandemics related social distancing rules limited the possibilities of direct interactions with the public. Consultations will proceed with online engagement sessions, leaflets and letter drops. The engagement sessions will give the neighbours of the proposed development opportunities to familiarize with the design, intended site operation and construction schedule raise concerns and pose questions, should any arise.

# 6. Conclusions

An access point is a critical part of the maintenance and safety regime of the railway. It will allow the necessary work on the tracks and emergency access in case of accident. The proposed development addresses current planning policies including those related to heritage and environment protection.

The changes to the historical setting of the conservation area will cause no or minor harm to the settings of the historical buildings. The demolition of the garage building and replacing it with the fence will improve the visibility of the back-garden's greenery from the street, enhancing its residential character. With preservation by record there would be at most minor harm to unknown archaeology.

Due to the low level of traffic incurred by the development, its impacts on highways will be neutral or negligible.

The public benefits of the proposal: a safely functioning railway system with an increased capacity considerably outweighs the harm to the heritage assets.

# **Appendices**

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# Appendix A. Heritage Statement

### A.1. Introduction, proposals and relevant historic environment policy

This Heritage Statement assesses the harm and weighs it against the wider public benefits of the Clarkson Row ramp proposals, in accordance with the requirements national and local policy. It should be read in conjunction with the submitted drawings (HS2 HS2\_158085-16610-LEC1-ZN18-DDR-C-510101 – Clarkson Row Planning Application Proposed Plan Drawing; HS2\_158085-16610-LEC1-ZN18-DDR-C-510102 – Clarkson Row Planning Application Proposed General Arrangement and HS2\_158085-16610-LEC1-ZN18-DDR-C-510103 - Clarkson Row Planning Application Proposed Vehicle Tracking) and the rest of the Design and Access Statement, to which this forms an Appendix.

This Heritage Statement:

- summarises national and local policy;
- describes the significance of the heritage assets affected and the contribution of their settings to their significance; and
- assesses the impacts on the heritage assets in terms of harm, as required by the NPPF and weighs harm against the wider public benefits of the proposed Scheme

There are no registered parks or scheduled monuments in the vicinity and the relevant heritage assets include listed buildings and conservation areas. The site is not within one of the London Borough of Camden's 13 Archaeology Priority Areas. The foundations of the ramp outside the railway cutting will be shallow and localised (up to 1m in depth), as shown on the application drawings. Given that the ramp foundation outside the railway cutting will be in location of 20th century garages and structures on the south side of Clarkson Row and the rear elements and gardens of the 19th century development of the area, there is a possibility that the foundations may be deep enough to reveal evidence of 19th century development and earlier agricultural activity, probably of low heritage significance. Given the shallow nature of the foundations and the age and significance of possible archaeology we propose an archaeological watching brief, following the approval of a Written Scheme of Investigation.

#### A.1.1. Proposals

In relation to the historic environment the proposals include:

- The demolition of the westernmost garage on the south side of Clarkson Row, including the adjoining retaining wall's post-1906 parapet, which forms the lower part of the west wall of the western garage, and which is stepped back (north east) from the line of the parapet wall along Clarkson Row roadway, which dates to 1906. The post-1906 parapet wall is set at the back (north east side) of the much thicker retaining wall.
- The lowering of the thick retaining wall beneath the parapet by 1m-1.5 to accommodate the foundations of the permanent access ramp. To facilitate the lowering of the wall a narrow (up to 1m wide) strip of soil will be removed to the same depth alongside the wall. This soil will be removed in a location that is beyond the ends of the historic back gardens of Mornington Crescent, will not extend as far south as the boundary between the gardens of 10 and 9 and should therefore not require the demolition of curtilage listed structures.
- The removal of the garage slab and its replacement with a new ramp slab to a similar depth as the existing slab. The top of the new slab will rise slightly from the level of Clarkson Row where it crosses the cutting's retaining wall.
- The ramp will turn and run into the cutting parallel to the retaining wall. The ramp foundations within the cutting would be cut into ground that has already been truncated, to a maximum depth of approximately 1.25m and would not disturb any archaeology.

#### A.1.2. National Policy

Section 16 of the NPPF contains specific national policies relating to the historic environment and how the importance of a heritage asset should be considered in light of development proposals.

Paragraph 189 of the NPPF requires a description of the significance of the heritage assets affected by a proposal including the contribution made by their setting to be included in the planning application. The level of



detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

Paragraph 190 states that there should be avoidance or minimisation of 'conflict between the heritage asset's conservation and any aspect of the proposal'.

Paragraph 193 states 'when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance'.

Paragraph 194 states 'any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justification'.

Paragraph 195 states 'where a proposed development will lead to substantial harm to, or total loss of significance of, a designated heritage asset, local planning authorities should refuse consent', unless the substantial harm or total loss is necessary to achieve sustainable public benefits that outweigh the harm or loss.

For proposals that lead to less than substantial harm, this harm should be weighed against the public benefits of the proposal (paragraph 196).

Paragraph 197 states 'the effect of an application on the significance of non-designated heritage assets should also be taken into account in determining the application'.

Paragraph 199 states 'Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted'.

Paragraph 200 enjoins Local planning authorities to look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

Paragraph 201 states that 'not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance' such that the harm to the significance of elements affected needs to be assessed under paragraph 195 or 196 as appropriate, with their contribution to the significance of the Conservation Area or World Heritage Site 'as a whole' taken into account.

#### A.1.3. Local Policy

The London Borough of Camden's Local Plan (2017), Section 7, includes Policy D2, which covers Heritage. local policies on the Built and Historic Environment.

Policy D2 states that:

The Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.

In relation to designated heritage assets (listed buildings and conservation areas) the Policy states that:

"The Council will not permit the loss of or substantial harm to a designated heritage asset, including conservation areas and Listed Buildings, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

a. the nature of the heritage asset prevents all reasonable uses of the site;

b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;

c. conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and

d. the harm or loss is outweighed by the benefit of bringing the site back into use.

The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm."



In relation to conservation areas specifically, Policy D2 states that "in order to maintain the character of Camden's conservation areas, the Council will take account of conservation area statements, appraisals and management strategies when assessing applications within conservation areas.

The Council will:

e. require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;

f. resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;

g. resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and

h. preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which provide a setting for Camden's architectural heritage."

In relation to listed buildings specifically the policy states that in order to "preserve or enhance the borough's listed buildings, the Council will:

i. resist the total or substantial demolition of a listed building;

j. resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building; and

k. resist development that would cause harm to significance of a listed building through an effect on its setting."

For archaeological remains Policy D2 states that "The Council will protect remains of archaeological importance by ensuring acceptable measures are taken proportionate to the significance of the heritage asset to preserve them and their setting, including physical preservation, where appropriate."

Policy D2 specifies that the "Council will seek to protect other heritage assets including non-designated heritage assets (including those on and off the local list), Registered Parks and Gardens and London Squares. The effect of a proposal on the significance of a non-designated heritage asset will be weighed against the public benefits of the proposal, balancing the scale of any harm or loss and the significance of the heritage asset."

### A.2. Heritage Assets, their significance and setting

The significance of the heritage assets is set out below. This is introduced by a short historic summary. The heritage assets are shown on Figure HS-4. The listed building numbers (NHLE numbers) shown on the drawing are set out below.

#### A.2.1. Historical summary

The location of the Clarkson Row Ramp was agricultural fields until the early 19<sup>th</sup> century (see Figs HS-1 and HS-2) in the ownership of the Earl of Southampton (see Fig. HS-3). In the early 19<sup>th</sup> century he developed his fields with speculative housing from the New Road (now Euston Road), northwards from 1801 onwards, with the area of Mornington Crescent and Clarkson Row being the last area of his estate to be developed.

Park Village East was developed by John Nash in the 1820s to mid-1830s, with houses on both sides of the Road, and Mornington Terrace into which the NW-SE orientated part of Clarkson Row, was developed a little later in the mid-19<sup>th</sup> century, although before the construction of the railway. The mid 1830s map (see HS-3 below) shows that Clarkson Row ran over the then planned much narrower railway cutting (which was finished in 1836), across a bridge and that other than the terraced housing of Mornington Crescent itself there were no buildings on Clarkson Row.

The first edition of the 25 inch Ordnance Survey (viewed on National Library of Scotland Website <u>https://maps.nls.uk/view/103312994</u>, Sheet XXV, surveyed 1870, published 1876) shows that by this date there were three houses on the south side of Clarkson Row, behind the back garden of what is now 12 Mornington Crescent (the corner house). Part of the easternmost house would have occupied the area immediately adjacent to current cutting retaining wall. There were also two houses on the north side of Clarkson Row, behind the garden of 13 Mornington Crescent.

In 1906 the railway cutting was widened both to the east and west. This necessitated the demolition of the houses on the east side of Park Village East and on the west side of Mornington Terrace. The houses on the



south side of Clarkson Row were also demolished, as was the Clarkson Row bridge that spanned the railway. The two houses on the north side of Clarkson Row, behind the garden of 13 Mornington Crescent, were also demolished and the southern part of the SE-NW orientated part of Clarkson Row was moved to the north west.

The road bridge on Granby Terrace, to the south of the Scheme, would also have been rebuilt at this time.

This arrangement is shown on the 1914 edition of the Ordnance Survey (viewed on National Library of Scotland Website https://maps.nls.uk/view/103312994, London Sheet V.5, surveyed 1914, published 1916).

In the mid-20<sup>th</sup> century two single storey brick and concrete garages, housing a car repair business, were built on the south side of Clarkson Row, which are still in place today. These structures occupy what would have been the garden of number 13 Mornington Crescent include a car lift, the pit of which is likely to have removed the former garden soils beneath. The extreme west end of these structures, where they butt up to the 1906 cutting's parapet wall, would have been in the location of the eastern part of the easternmost of the three mid 19<sup>th</sup> century houses demolished in c.1900.

In the mid-20<sup>th</sup> century the houses on the part of Park Village East to the west of the railway were replaced by residential blocks of 5-8 storeys. A single storey building was constructed in former garden of 13 Mornington Crescent, on the north side of Clarkson Row, and to the north west of this, any buildings that stood on Clarkson Row, south of Mornington Place were, were replaced with modern terraced housing.



Fig. HS-1 Rocque's map of 1741-1745, showing that the vicinity of the site the top left corner of the map) was agricultural fields at that time.



Fig. HS-2 Cary's map of 1792. The Site is in the top left of the map and is shown as undeveloped at that time



Southampton Estate

Bedford Estate

Fig. HS-3 Ownership of the Estates in the vicinity in the 1834 (the railway cutting was in planning at the time, being finished in 1836). Clarkson Row was in the Earl of Southampton's estate. Clarkson Row ran from the south west part of Mornington Crescent across the new railway on a bridge (see top left of the map). The area of the ramp, where it would be located outside the railway cutting, was gardens and roadway.

#### A.2.2. 2-12 Mornington Crescent (Grade II listed-no: 1113138)

This terrace of houses was built as part of the overall development of Mornington Crescent (which originally faced a semi-oval grassed garden between the road and Hampstead Road) in 1821-1832. They were listed in 1974. The buildings are two bay, three storey houses yellow stock brick houses, with additional original attics and basements, with the pairs of houses at the ends of the terraces being four storeys with additional attics and



basements. The houses' frontages have area railings and channelled stucco ground floors, with the taller houses at the end of the terraces having fully stuccoed front elevations, with their channelling to the ground floors. The ground floor doors and windows have rounded arches, with the upper floor windows having flat arches. Each house has a first floor balcony that spans the two windows. The front elevations and the side elevation of 12 Mornington Crescent are little altered.

The other terraces of Mornington Crescent (which are all grade II listed), are of the same design, with their front elevations showing little alteration and the rear elevations of many of the houses showing evidence of alteration.

The rear elevations of 2-12 Mornington Crescent have been altered, with rear extensions on some of the buildings and some openings blocked or altered. However, they largely retain their historic character. The gardens survive to varying degrees, although those of 11 and 12 Mornington Terrace have mostly been replaced by the buildings of the car repair business. The retaining wall of the railway cutting is beyond the historic rear boundaries of the gardens of 10-12 Mornington Crescent, and is therefore not listed in the vicinity of the works.

In relation to the settings of the listed buildings of Mornington Crescent, the buildings were originally meant to be seen from the crescent itself and from Hampstead Road (the latter view now lost).

#### A.2.3. 1 Mornington Crescent (Grade II listed-no: 1113137)

This house was built at the same time as the other's on Mornington Crescent and forms the end of the terrace including 261-263 Hampstead Road. It is a stucco fronted four storey plus basemented house, with four bays facing Mornington Crescent and a single bay on Hampstead Road. Its rear elevation is only one bay wide and its garden is short, backing onto those of the adjacent properties.

In relation to its setting the frontage onto Mornington Crescent and its location at the end of the curved terraces of that street form the main contributory element of its significance. It's presence on Hampstead Road and its part in the views into Mornington Crescent and as a book end of the surviving elements of the now foreshortened terrace of houses on Hampstead Road, also make a contribution to its significance, although in relation to Hampstead Road itself the setting has been diminished by large scale later development on Harrington Square.

The constrained nature of the rear elevation, the fact that this was always subordinate to the frontage, and the fact that the rear elevation was not historically meant to be seen from public view means that the views of the rear of the building contribute little to its significance. Views out of the building at the rear are of the railway and modern blocks to the south west and west.

#### A.2.4. 261 and 263 Hampstead Road (Grade II listed-no: 1378712)

This pair of two bay four storey terraced 1830 houses have fully stuccoed frontages, with first floor balconies and are extended to the rear. Number 263 has historic associations with the late 18<sup>th</sup> and early 19<sup>th</sup> century cartoonist, George Cruickshank.

In relation to their setting, except for the houses relationship with their street frontage and with Mornington Crescent the houses are out of their historic context, with the terraced housing that was formerly attached to the buildings being bombed in WWII and the other buildings fronting Hampstead Road in the immediate vicinity having been redeveloped with 20<sup>th</sup> century development. The rear extensions and redevelopment to the west mean that the rear settings contribute little to their significance.

#### A.2.5. Camden Town Conservation Area

Camden Town Conservation Area is centred on the Camden High Street which was developed from a small core around a tavern/inn at the junction of Chalk Farm Road and Kentish Town Road along the route to Highgate. The conservation area was developed in the 19<sup>th</sup> century with streets of terraces within garden plots, with more commercial uses on Camden High Street. The conservation has two sub areas, the commercial main road, and the quieter residential area to the west. The parts of the scheme that are north east of the railway cutting within and in the vicinity of the Site are within the residential sub area of Camden Town Conservation Area. The residential sub area is homogenous in character and was laid out between 1820 and 1850. The Conservation Area Appraisal identifies that this area has a greater sense of open space, partly due to the railway and partly due to the presence of partly tree-lines streets and front and back gardens. It mentions that the trees and gardens are only visible in occasional glimpses from the public realm, and views of gardens are retained especially where development is only 1 storey or where gaps have been preserved.



The southern edge of the conservation area is just south of 261 and 263 Hampstead Road and its south west edge runs along the west side of the railway cutting. This part of the conservation area is characterised by its Georgian terraces. The immediate area around Clarkson Row is focussed on the formal, designed foci of Mornington Crescent with its radiating roads, and Harrington Square. The Conservation Area Appraisal states that When Mornington Crescent itself was originally built it had views of open country in both directions but that it "has suffered quite extensively becoming sandwiched between the railway lines at the rear and the enormous bulk of Greater London House" to its east, originally the 1920s Carreras Tobacco Factory. Further north west, out of sight of the proposed ramp, is what remains of Mornington Terrace and the Georgian terraces of the heart of the residential sub area.

Key vistas identified in the Conservation Area Appraisal in sub area 2 of the conservation area include the curve of Mornington Crescent and views of to the west from along Mornington Terrace of Park Village East.

The current garages on the site have no heritage value and the Townscape Appraisal map within the Conservation Area Appraisal identifies the building on the north side of Clarkson Row as making a positive contribution, rather than the garages on the south side.

#### A.2.6. Regent's Park Conservation Area

Regent's Park Conservation Area (Camden) covers the eastern part of Nash's Regent's Park Development, to the east of Regent's Park, which was part of his wider scheme that included Regent's Park, the areas on either side of it and which extended along Regent Street to the Duke of York Column on Waterloo Place. The northern end of Park Village East and Park Village West, to the west of Regent's Park, are Picturesque residential developments of national significance that set the precedent for subsequent development of the suburban villa (both detached and semi-detached). The architectural influences are eclectic and generally a mixture of Strawberry Hill gothic and classical. Nash's development also formed an ambitious development in masterplanning which covered a development catering to all classes. The most significant parts of the setting of the conservation area are its relationship with Regent's Park, its relationship with the rest of Nash's scheme to the South on Marylebone Road and its northern edge.

The suburban Villas of Park Village East, the nearest part of the conservation area, were built on sightly meandering roads to achieve a sense of intimacy and show of the architecture of the buildings. The widening of the railway in 1906 removed the villas on the east side of the road, so that the remaining houses (all listed) faced the cutting retaining wall and beyond that the cohesively designed frontage of Mornington Terrace (also now listed). To the south of Mornington Street bridge, which was rebuilt in 1906, the early 19<sup>th</sup> century villas peter out, and the area to the south within the conservation area, along its eastern edge, contain mid to late 20<sup>th</sup> century residential blocks, which have little heritage value no historic association with the Site, but which from a modern edge to the conservation area, which addresses the historic road alignment of Park Village East. The historic houses within the conservation area are therefore either screened from the proposed ramp or are some distance away and the site bears little part in their setting.

#### A.2.7. Mornington Street Bridge piers (Grade II listed-nos: 1391094 and 1409727)

There was a historic bridge in this location from the construction of the railway in the 1836. With its rebuilding in 1906 the stone piers at either end of the parapets were reused to frame the parapets and have been listed. The site makes no contribution to the settings of these piers, which are much closer to Mornington Terrace and Park Village East, which dominate their setting.

#### A.2.8. 13-24 Mornington Crescent (Grade II listed-no: 1113139)

13 to 24 Mornington Crescent is the terrace of grade II listed buildings to the north of Clarkson Row, on Mornington Crescent. The low building behind 13 Mornington Crescent and the garages on the site of the proposed ramp are low, preserving the wider open views at the rear of these buildings. However, the main contributory element in their settings is the way they address and are addressed by Mornington Crescent itself and its component terraces.

#### A.2.9. Listed Buildings on Park Village East (Grade II\* listed-no: 1322056)

Numbers 30, 32, 34 and 36A and B Park Village East are the southernmost surviving grade II\* listed villas of Nash's Park Village East scheme. The main elements of their setting are their relationship to each other and with the meandering road of Park Village East, which survives in its historic alignment, and views towards the surviving Georgian terraces of Mornington Terrace over the railway cutting's parapet wall and the parapet walls of Mornington Street Bridge . Clarkson Row makes a neutral contribution to its setting, as it includes a terrace



of late 20<sup>th</sup> century houses and is sited obliquely to the villas. The 20<sup>th</sup> century blocks to the south of the villas, Silsoe House and Richmond House detract from their setting.

#### A.2.10. Non-Designated Heritage Assets

The relevant non-designated heritage assets are the 1906 and later structures of the railway cutting and its bridges. These are of low significance. The cutting parapet to the rear of 2-12 Mornington Terrace appears to have been relocated to the rear (north east side) to the retaining wall, detracting from its architecture. The settings of these structures have been eroded recently by the demolition of the railway shed that occupied the western part of the cutting opposite the proposed ramp. The parapets behind the gardens of 2-12 Mornington Crescent are in very poor condition and have been subject to extensive vandalism and graffiti.



Fig. HS-4 Relevant Designated Heritage Assets-The site is shown in red

### A.3. Impact on the Historic Environment and Conclusions

This section assesses the impacts on the significance of the heritage assets identified above from the presence of the proposed railway access ramp, in accordance with the requirements of the NPPF and local policy. The assessment is heritage asset by heritage asset, after which there is a general conclusion.

#### A.3.1. 2-12 Mornington Crescent

The ramp is proposed within the footprint of the westernmost of the two 20<sup>th</sup> century garages to the rear of 11-12 Mornington Crescent and will not rise to the same height as the garage. There would therefore be some harm to the settings of the listed terrace through an alteration in the view to the rear, especially where the ramp will run over the lowered railway cutting's parapet wall. However, the ramp would have a less obtrusive presence in the settings of these buildings than the garage it replaces, and the main contributory element of the settings of the terrace is the roadway to its west, on Mornington Crescent itself, which would remain unaltered. The harm would therefore be minor to moderate and less than substantial. The low height of the ramp outside



the cutting would mean that there would still be clear views across the cutting and the existing gardens to the south of the gardens of 10 Mornington Crescent would remain unaltered. The railway cutting's post-1906 parapet wall is beyond the ends of the gardens of 10-12 Mornington Crescent and is therefore not listed. In relation to 11-12 Mornington Crescent, the removal of a garage that detracts from these houses' setting will partly reinstate the gardens spaces behind these houses, representing an enhancement in their setting.

#### A.3.2. 1 Mornington Crescent (Grade II listed)

The shortness of the building's rear garden, the constrained nature of its rear elevation, set back from those of the properties on either side, and the fact that its principal elevations on Mornington Crescent and Hampstead Road address the main elements of its setting, means that there would be no impact, and thus no harm resulting from the proposals for a the railway access ramp.

#### A.3.3. 261 and 263 Hampstead Road (Grade II listed)

As stated above (see **Error! Reference source not found.**) 261 and 263 Hampstead Road are largely out of their historic context due to major redevelopment and demolitions to the south and west and due to large scale rear extensions to the houses themselves. The construction ramp will at worst cause minimal harm to the settings of the buildings.

#### A.3.4. Camden Town Conservation Area

The garages make a neutral to slightly detracting contribution to the conservation area. One of the two is derelict with parts of the roof missing and the proposed railway access ramp would not affect any of the significant vistas identified in the Conservation Area Appraisal. Removal of one of the garages and its replacement with the ramp would increase the rare glimpses of the garden areas from the public realm, identified in the Conservation Area Appraisal as a contributory aspect of the more open parts of the conservation area, on its western edge. In relation to the setting of the conservation area the ramp would be relatively low, with the highest level of its deck being deck being approximately 0.5m above the height of Clarkson Road's surface, and its top roughly at or below the level of the existing shed roofs, in scale with the surrounding townscape, with the bulk of its structure within the cutting. The ramp would be located in one of the least sensitive parts of the conservation area's setting, at its south end, where its setting has already suffered most erosion. In relation to paragraph 201 of the NPPF, which requires in relation to conservation areas that the harm to the elements affected need to be assessed with their contribution to the significance of the conservation area or World Heritage Site 'as a whole' being taken into account, the garage and areas of the railway cutting beyond the ends of the gardens of 10-12 Mornington Crescent make little contribution to the significance of the conservation area as a whole, and there would therefore be considerably less than substantial harm to the conservation area overall arising from the ramp.

#### A.3.5. Regent's Park Conservation Area

The ramp would be opposite the modern buildings on the southern part of Park Village East, in one of the least sensitive parts of the conservation areas setting. In relation to paragraph 201 of the NPPF the area around Granby Terrace and Clarkson Row makes little contribution to the significance of the conservation area as a whole and there would be very little harm to its overall contributory setting. The main elements of the conservation areas southern edge and its north edge. The contribution of the vicinity of the proposals to the setting of the conservation area relates to the long glimpses and views of the rear elevations of Mornington Crescent from within the edge of the conservation area. These would be maintained, with the relatively low height of the ramp above the railways cutting's retaining wall parapet. From the more historic part of Park Village East the main setting elements relate to the views across the railway to the impressive façade of the northern parts of Mornington Terrace. These views would not be affected.

#### A.3.6. Mornington Street Bridge piers (Grade II listed)

Mornington Crescent's rear elevations would continue to play the same role in the setting of the bridge and its listed features, as these views would not be impeded significantly by the ramp. The ramp would appear within the railway cutting. However, given the cutting's sheer scale the ramp would be a subordinate feature within the cutting framed by Granby Terrace Bridge, the 1906 cutting's retaining walls, and Mornington Street Bridge. There would be very little harm equivalent to considerably less than substantial harm.



#### A.3.7. 13-24 Mornington Crescent (Grade II listed)

The setting of the southern part of 13 to 24 Mornington Crescent would be slightly altered by the removal of the westernmost garage and construction of the ramp. The wider views from the rear of these properties would be maintained and the elements of their settings that make most contribution to their significance would remain unaltered. There would therefore at most be very little harm to the significance of this terrace.

#### A.3.8. Listed Buildings on Park Village East (Grade II\* listed)

The main elements of the settings of the Park Village East villas, the views along Park Village East itself and the relationship between the villas themselves, would remain unaltered, as would the views over the railway of Mornington Terrace over the railway cutting's parapet wall and the parapet walls of Mornington Street Bridge The 20<sup>th</sup> century character of the area to the south of the villas would not be altered appreciably. There would therefore be little harm to the significance of 30, 32, 34 and 36A and B Park Village East.

#### A.3.9. Archaeology

There is potential for unknown archaeology, or the foundations of the houses that stood on the south side of Clarkson Road between the mid-19<sup>th</sup> century and 1906 to be disturbed by the narrow slot of soil that would be excavated along the north west side of the cutting retaining wall. This would be recorded by a proposed watching brief undertaken in accordance with a Written Scheme of Investigation to be agreed post-consent. With preservation by record there would be at most minor harm to unknown archaeology.

#### A.3.10. Non-Designated Heritage Assets

The realigned parapet wall of the railway cutting will be demolished where it formed part of the westernmost garage and within the cutting itself the ramp will form a new feature in the settings of the non-designated railway structures. As the re-aligned parapet makes little contribution to the overall significance of the cutting structures its loss will only slightly diminish the significance of the eastern cutting retaining wall and the settings of the wider space of the cutting.

### A.4. Conclusions

The Proposed Ramp would introduce minor to moderate harm, which would classify as less than substantial harm, to the settings of 2-12 Mornington Crescent. There would be no harm to 1 Mornington Crescent and very little harm through minor changes in their settings to 261-263 Hampstead Road, Camden Town Conservation Area, Regent's Park Conservation Area, Mornington Street Bridge piers, 13-24 Mornington Crescent and 30, 32, 34 and 36A and B Park Village East. There will be little harm to the non-designated structures of the cutting and nearby bridges.

In accordance with the requirements of the NPPF in relation to the less than substantial harm to the designated heritage assets identified above, the test of the acceptability of the proposals is set out in paragraph 196 of the NPPF, which states that the harm should be weighed against the public benefits of the proposal.

The works approved under the High Speed Rail (London – West Midlands) Act 2017, mean that access to the railway for maintenance requires a ramp in the vicinity. The ramp was originally envisaged at Granby Terrace (which would have a similar level of impact on the settings of the Hampstead Road and Mornington Crescent buildings as the current proposals but was found to be impractical). The ramp is needed to enable the continued maintenance of the railway and the maintenance of the transport system between London and the Midlands. The benefits of the proposal, a functioning railway system considerably outweighs the less than substantial harm identified above.

In accordance with Local Plan Policy D2, the character and appearance and significance of the two conservation areas and the significance of the listed buildings would be substantially preserved, and the removal of buildings on parts of the areas of the gardens of 11 and 12 Mornington Crescent would represent a slight enhancement. There would not be substantial harm to any designated assets.

In relation to the policy's requirements for proposals in conservation areas specifically, there would be an enhancement to aspects of Camden Town Conservation area's character, in accordance with clause 'e' of the policy, in that the glimpses of the back garden areas from the public realm would be increased by the demolition of the detracting garage and its replacement with a lighter weight ramp structure.

Clause 'f' of Policy D2 would be satisfied as the buildings that would be demolished do not make a positive contribution to the conservation area.



Any harm to unknown archaeology or the foundations of the mid-19<sup>th</sup> century buildings that formerly occupied the south side of Clarkson Row would be compensation by preservation by record in accordance with a Written Scheme of Investigation to be agreed with the Greater London Archaeological Advisory Service, who advise the council.

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# Appendix B. Historic England Pre-Application Archaeological Advice



Mr Ken Sabel Atkins Global

Your Ref:

Our Ref: CLO 33597

Contact: sandy Kidd Direct Dial: 07760 456812 Email: sandy.kidd@historicengland.org.uk

26 May 2021

Dear Mr Sabel,

#### TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED) NATIONAL PLANNING POLICY FRAMEWORK 2019

Clarkson Row

New permanent maintenance access ramp

#### **Pre-Application Archaeological Advice**

Thank you for your consultation received on 19/05/21

The Greater London Archaeological Advisory Service (GLAAS) gives advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter.

NPPF Section 16 and theLondon Plan (2017 Policy HC1) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. NPPF paragraph 189 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.

I agree with the suggestion made in your email of 19th May that the Heritage Statement could refer back to the Euston Area DDBA to justify a conclusion that at most only minor archaeological impact is anticipated which could be mitigated by a watching brief. As you say the only significant potential relates to industrial archaeology of the railway.



Historic England, 4<sup>th</sup> floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA Telephone 020 7973 3700 Facsimile 020 7973 3001 HistoricEngland.org.uk Please note that Historic England operates an access to information policy. Correspondence or information whichyou send us may therefore become publicly available.



If planning consent is granted, paragraph 199 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public.

I therefore conclude that the development could cause harm to archaeological remains. However the significance of the asset and scale of harm to it is such that the effect can be managed using a planning condition. A pre-commencement condition is necessary for clarity on what is required to safeguard archaeological interest once works begin on site.

This Initial Pre-application advice relates solely to archaeological considerations, is provided without prejudice to the local authority's decision-making role, and may be shared with the local authority on whose behalf it is given. You should also consult Historic England's Development Advice team on statutory matters.

You can find more information on archaeology and planning in Greater London on our website.

Yours sincerely

SANDY KIDD

Archaeology Advisor Greater London Archaeological Advisory Service London and South East Region



Historic England, 4<sup>th</sup> floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA Telephone 020 7973 3700 Facsimile 020 7973 3001 HistoricEngland.org.uk Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



# Appendix C. Drawings

C.1. Existing General Arrangement Plan



Safety, Health and Environmental Information The works are to be undertaken by a competent contractor, and therefore only exceptional risks relating to the works associated with this drawing are identified below. For further details refer to the Designs Risk Assessment,



- 1. ALL DIMENSIONS ARE IN MILLIMETRES UNLESS NOTED
- 2. DO NOT SCALE FROM DRAWING.
- 3. ALL LEVELS ARE IN METRES AND ARE ABOVE ORDNANCE DATUM.

# SERVICE KEY:

# WATER MAIN - THAMES WATER COMBINED SEWER - THAMES WATER - VIRGIN MEDIA UK POWER NETWORK CADENT GAS 11kV CABLE

# FOR RELOCATED MEP EQUIPMENT REFER TO MEP DRAWING REFERENCE HS2\_158085-16610-LEC1-ZN18-DDR-E-601001

P01	13/08/21	First Issue			NM	КM	,	KM
P02	13/08/21	ISSUED FOR	PLANNING		РВ	КM		KM
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Euston Existing Assets Model

# Drawing Title CLARKSON ROW ACCESS POINTS PLANNING APPLICATION EXISTING PLAN

Designed	W. Bambam	Signed Date Electronically Signed 13/08/21
Drawn	P.Bhojani	Signed Date Electronically Signed 13/08/21
Checked	K.McGregor	Signed Date Electronically Signed 13/08/21
Approved	K.McGregor	Signed Date Electronically Signed 13/08/21
Scale(s)	· · ·	ELR & Mileage To From
As Sho	own	LEC1 83.0495 -0.0066
Alternative Re	eference	Sheet
		<b>1</b> of <b>1</b>
Drawing Num	ber	Revision

HS2\_158085-16610-LEC1-ZN18-DDR-C-530011

A01



# C.2. Proposed Development Site Plan



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C.3. Proposed Development General Arrangement



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# C.4. Proposed Vehicle Path and Turning Drawing



![](_page_37_Figure_1.jpeg)

A02

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VEHICLE PATH - REVERSING PARKING INTO SPACE 3 1:200

![](_page_37_Figure_6.jpeg)

VEHICLE PATH - EXITING PARKING SPACE 4 1:200

![](_page_37_Figure_8.jpeg)

VEHICLE PATH - EXITING PARKING SPACE 5 1:200

![](_page_37_Picture_10.jpeg)

![](_page_37_Picture_14.jpeg)

HS2\_158085-16610-LEC1-ZN18-DDR-C-510103

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A02

![](_page_38_Picture_0.jpeg)

C.5. Proposed Lighting Lux Plot

![](_page_39_Figure_0.jpeg)

Sheet Size A1+1 594 x 1051

![](_page_40_Picture_0.jpeg)

Spencer Bell BEng IEng MICE Civil Engineer / Team Lead

#### Atkins (member of SNC-Lavalin Group)

No.1 Croydon 12-16 Addiscombe Road Croydon CR0 0XT

Phone: 0208 663 5459

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