



GERALDEVE
A NEWMARK COMPANY

Town Planning Statement

300 Gray's Inn Road, London, WC1X 8DX

On behalf of: Platignum Properties Limited

26 May 2023

U0019137/LJW/ANE/LLJ/KAT

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Contents

Page Appendices

1	Executive Summary	3	A	Planning History Schedule
2	Introduction	5		
3	Site and surroundings	10		
4	Planning History	14		
5	Pre-Application Engagement and Consultation	16		
6	Proposed Development	19		
7	Planning Policy Framework	27		
8	Land Use	33		
9	Design, Bulk and Massing	40		
10	Historic Environment and Townscape	45		
11	Energy and Sustainability	52		
12	Other Material Considerations	56		
13	Planning Obligations and the Community Infrastructure Levy	69		
14	Summary and Conclusions	71		

1 Executive Summary

- 1.1 This Town Planning Statement is submitted on behalf of Platignum Properties Limited (the “Applicant”) in support of an application for full planning permission for the refurbishment and extension of 300 Gray’s Inn Road, London, WC1X 8DX.
- 1.2 The Applicant has appointed Beltane Asset Management as development managers to bring forward the proposals, alongside Haptic Architects as lead designers with a full design team to deliver the proposals.
- 1.3 The Proposed Development seeks to sensitively and sustainably refurbish and extend the existing building to provide a mixed-use office led development, with new residential accommodation in the heart of the Knowledge Quarter Innovation District. It would provide high quality sustainable workspace, seven new flats alongside an exemplar design. The existing building is considered to be a detractor from the Bloomsbury Conservation Area and the proposals present an opportunity to make it a positive contributor to the local townscape.
- 1.4 “We Make Camden” is the Council’s updated vision for the Borough centred around six key ambitions:-
- (1) Camden is a borough where every child has the best start in life
 - (2) Camden’s local economy should be strong, sustainable, and inclusive – everyone should have a secure livelihood to support them to live a prosperous life
 - (3) Camden actively tackles injustice and inequality, creating safe, strong and open communities where everyone can contribute
 - (4) Camden communities support good health, wellbeing and connection for everyone so that they can start well, live well, and age well;
 - (5) Everyone in Camden should have a place they call home;
 - (6) Camden should be a green, clean, vibrant, accessible, and sustainable place with everyone empowered to contribute to tackling the climate emergency

- 1.5 It is considered that the Proposed Development aligns with these ambitions by providing a high quality, highly sustainable mixed-use development in the heart of the KQID, contributing positively to the community and the local area.
- 1.6 The Applicant and design team have engaged thoroughly with Camden's Officers, other key stakeholders and the local community to inform the final design of the Proposed Development.
- 1.7 This Town Planning Statement provides an assessment of the Proposed Development in planning terms in line with Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) which requires planning applications to be determined in accordance with the Development Plan unless material considerations otherwise.
- 1.8 It is considered that the Proposed Development fully complies with the development plan and meets the objectives and aspirations for Camden and the Applicant. On this basis, we consider that planning permission should be granted.

2 Introduction

- 2.1 This Planning Statement has been prepared by Gerald Eve LLP on behalf of Platignum Properties Limited, (herein referred to as the “Applicant”), in support of an application for full planning permission for the refurbishment and extension of the building to provide residential flats (Class C3) and commercial, business and service use (Class E) at 300 Gray’s Inn Road, London, WC1X 8DX (herein referred to as the “Site”). The land in question is shown on the accompanying Site Location Plan, prepared by Haptic Architects.
- 2.2 The Applicant has appointed Beltane Asset Management to bring forward and manage the development on their behalf. Beltane and their development partners have a history of delivering development in London. Their vision focuses on delivering comprehensive refurbishments and extensions of buildings that look and feel like new ones.
- 2.3 The Applicant has a commitment to delivering schemes of exceptional design quality (both internally and externally), with an occupier focus on wellbeing and sustainability that ultimately make a positive contribution to the vibrancy and vitality of London as the economic heart and the UK.
- 2.4 In the last 10 years, they have successfully delivered, and secured planning permission for development which is under construction and at, Millennium Bridge House, 150 Aldersgate Street and 3-4 Bartholomew Place, and is completed at 55 Gresham Street, 24 King William Street, 33 Queen Street, 108 Cannon Street, Asia House, 77 Queen Victoria Street, St. Paul’s House, 12 Mason’s Avenue, 9 Cloak Lane and Borneo House. The Applicant can confirm that funding is already in place to deliver the project.
- 2.5 The Applicant has appointed Haptic Architects, alongside a full project team to bring forward proposals at the Site. The works proposed are summarised in Section 6 of this Statement as well as in the accompanying Design and Access Statement.
- 2.6 In summary, the proposals include the comprehensive refurbishment of the existing building and provision of a two-storey extension to provide seven residential flats (Class C3), and 4,342sqm of commercial, business and service use (Class E) floorspace. External alterations for new facades are proposed to all elevations. Terraces will be introduced for both the residential and commercial floorspace, with entrances and servicing being reconfigured.

Cycle parking provision will be provided at ground floor level and within the courtyard to the rear of the site. Hard and soft landscaping will be provided within the courtyard.

2.7 Accordingly, full planning permission is sought for (herein referred to as the “Proposed Development”) the following:-

“Refurbishment and extension of the building to provide residential flats (Class C3) and commercial, business and service use (Class E) including external alterations for new facades to all elevations, the introduction of terraces, reconfiguration of entrances and servicing arrangements, new hard and soft landscaping, provision of cycle parking and other ancillary works.”

2.8 This Statement should be read in conjunction with the submitted plans and drawings as well as the following documents which are submitted in support of the planning application:

- Completed Application Form (ref. PP-11840270), prepared by Gerald Eve LLP
- Covering Letter, prepared by Gerald Eve LLP
- Completed Ownership Certificate B and requisite notices;
- Additional CIL Information Form, prepared by Gerald Eve LLP;
- Town Planning Statement (this document), prepared by Gerald Eve LLP including;-
 - Employment and Training;
 - Draft Section 106 Heads of Terms;
- Site Location Plan, prepared by Haptic Architects;
- Existing Plans, Elevations and Sections, prepared by Haptic Architects;
- Demolition Plans, Elevations and Sections, prepared by Haptic Architects;
- Proposed Plans, Elevations and Sections, prepared by Haptic Architects;
- Area Schedule, prepared by Haptic Architects;
- Drawing Issue Sheet, prepared by Haptic Architects;
- Design and Access Statement, prepared by Haptic Architects, including:
 - Accessibility Statement, prepared by Haptic Architects;
 - Landscape Statement (including Urban Greening Factor), prepared by BBUK Landscape Architects;
 - Crime Impact Assessment, prepared by Haptic Architects;
 - Circular Economy Strategy, prepared by Love Design;

- Embodied and Whole Life Carbon Strategy, prepared by Haptic Architects;
- Residential Amenity Management Plan, prepared by the Applicant;
- Sustainability, Energy and Overheating Assessment, prepared by GDM, including:
 - Camden Sustainability and Energy Pro-Forma, prepared by GDM;
- BREEAM Pre-Assessment Checklist, prepared by Twin and Earth;
- Noise Assessment Report, prepared by Auricl;
- Daylight/Sunlight and Overshadowing Assessment, prepared by Point 2 Surveyors;
- Preliminary Ecological Appraisal, prepared by Chevrons;
- Heritage, Townscape and Visual Impact Assessment (including Accurate Visual Representations), prepared by The Townscape Consultancy and Miller Hare;
- Fire Statement, prepared by Clarke Banks;
- Sustainable Drainage Strategy, prepared by Elliot Wood;
- Flood Risk Assessment, prepared by Elliot Wood;
- Transport Statement, prepared by Caneparo;
- Framework BREEAM Travel Plan, prepared by Caneparo;
- Framework Delivery and Servicing Management Plan, prepared by Caneparo;
- Draft Construction Management Plan (Camden Pro Forma), prepared by Caneparo;
- Air Quality Assessment, prepared by Air Quality Consultants; and
- Statement of Community Involvement, prepared by London Communications Agency.

2.9 This Statement provides an assessment of the Proposed Development against the relevant national, regional and local planning policy framework for the Site. It is structured as follows:-

- A description of the Site and its Surroundings at Section 3;
- A summary of the Planning History at Section 4;
- A summary of the pre-application engagement with the London Borough of Camden and consultation with other stakeholders at Section 5;
- A description of the Proposed Development in detail at Section 6;
- A summary of the adopted and emerging Planning Policy Framework at Section 7;
- An assessment of the land use considerations at Section 8;
- An assessment of the design, bulk and massing considerations at Section 9;
- An assessment of the historic environment and townscape considerations at Section 10

- As assessment of the energy, sustainability and landscaping considerations at Section 11;
 - An assessment of the transport, noise, air quality and amenity considerations at Section 12;
 - A summary of Planning Obligations (including draft Heads of Terms) and the Community Infrastructure Levy arising from the Proposed Development at Section 13; and
 - Summary and Conclusions at Section 14.
- 2.10 The Applicant has proactively entered into a Planning Performance Agreement (“PPA”) with Camden (ref. 2022/1795/PRE), and the Proposed Development has evolved through a series of pre-application meetings with the London Borough of Camden, Transport for London and the Metropolitan Police concentrating on topics such as design, deliveries/servicing, townscape and sustainability.
- 2.11 The proposals were presented to Camden’s Design Review Panel on 24 February 2023 for scrutiny. The proposals have developed iteratively in direct response to Officer and DRP feedback.
- 2.12 The Applicant has also undertaken consultation with the local community, business groups, ward councillors, and community groups. The feedback received has resulted in design changes. Details of this engagement are included within the Statement of Community Involvement, prepared by London Communications Agency and summarised at Section 5 of this Statement.
- 2.13 The Applicant has sought to maintain a clear and open dialogue with the community throughout the design phase to discuss the plans and receive their feedback, to ensure the plans benefit the community and the wider area.
- 2.14 This Statement provides a comprehensive review of national, regional and local planning policy and guidance relevant to the proposals. It assesses the degree to which the proposals accord with policies of the Development Plan and takes other material considerations into

account, in accordance with the requirements of Section 38(6) of the Planning and Compulsory Purchase Act 2004 and the statutory tests.

- 2.15 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 2.16 Beltane Asset Management and the Applicant have a strong track record of delivering projects in Central London with a focus on sustainable development, particularly deep retrofit projects that delivers buildings back to the market as if they are completely new from the ground up.
- 2.17 The Proposed Development delivers social, environmental and economic public benefits which include but are not limited to; the optimisation of land to maximise floorspace, introduction of seven high quality residential units, delivering high quality commercial space which achieves BREEAM “Excellent” accreditation at pre-assessment stage with aspirations for “Outstanding”, increased level of urban greening, and the introduction of cycle parking and associated end of trip facilities.
- 2.18 The Proposed Development is considered to fully align with Camden’s aspirations to deliver mixed use development in Central London to support balanced communities and deliver commercial growth in the Knowledge Quarter Innovation District (“KQID”). The proposals would see a detractor from the Bloomsbury Conservation Area re-imagined while retaining approximately 90% of the existing building structure to deliver a “deep retrofit” scheme to optimise the Site.
- 2.19 For the reasons and those set out in detail in this Statement, it is considered that the Proposed Development is in accordance with the Development Plan, and as such the Application should be granted planning permission accordingly.

3 Site and Surroundings

3.1 This section describes the Site's location and context in greater detail. It is described further in the Design and Access Statement, prepared by Haptic Architects.

The Site

3.2 The Site occupies a prominent corner site on the junction of Acton Street and Gray's Inn Road, in the King's Cross ward in the London Borough of Camden. Gray's Inn Road and Acton Street are part of the strategic road network comprising part of the A501 which is a Transport for London managed road, leading towards Euston Road and King's Cross St Pancras.

3.3 The existing building is an L shape which comprises two principal elements;-

- i Part ground plus two storey facing Acton Street; and
- ii Part ground plus seven storey facing Gray's Inn Road.

3.4 An existing service yard is located to the rear and accessed from an opening on the Acton Street frontage.

3.5 The building is currently occupied by BUPA for use as an office at the upper floors and private medical clinic at ground and basement level which both fall within a lawful Commercial, Business and Service (Class E) use. The office component has been largely vacant since the coronavirus pandemic, with BUPA consolidating their office accommodation elsewhere within London.

3.6 The existing building on site is not statutorily or locally listed however it is in the Bloomsbury Conservation Area (sub area 14). The Bloomsbury Conservation Area Appraisal and Management Statement notes that the building is a detractor/opportunity site.

3.7 The site is located within the landmark viewing corridor of the London View Management Framework ("LVMF") Assessment Point 2A.1 (Parliament Hill to St Paul's Cathedral).

3.8 The Site is located within the 1 mile radius of King's Cross which is an area identified for significant growth and clustering of knowledge organisations in the Camden Local Plan 2017.

3.9 The Site has the following planning policy designations in accordance with the Camden Local Plan Policy Proposals Map (adopted July 2017 and most recently updated in January 2021):-

- Central Activities Zone (CAZ);
- Central London Area;
- LVMF Landmark Viewing Corridor (2A.1 - Parliament Hill to St Paul's Cathedral); and
- Bloomsbury Conservation Area.

3.10 The Site is located within the emerging KQID as part of the draft Site Allocations Local Plan published in February 2020.

3.11 The Site has an excellent Public Transport Accessibility Level ("PTAL") with the highest rating of 6b. The nearest station is King's Cross/St Pancras station interchange located approximately 450 metres to the north and provides mainline intercity trains to the north of England, the Midlands, Thameslink services between Bedford and Brighton.

3.12 St Pancras International also provides regular Eurostar services to mainland Europe (Paris, Brussels and Amsterdam) and Kent via High Speed One. The London Underground Victoria, Piccadilly, Northern, Hammersmith and City, Circle and Metropolitan lines are served from the station. There are also a number of nearby bus routes and networks that surround the site.

3.13 The total site area within the application boundary is 0.08ha and is shown on the submitted Site Location Plan, prepared by Haptic Architects.

Surrounding Area

3.14 Immediately to the south of the Site are terraced properties with retail at ground floor and residential on the upper floors. To the east of the site running along the south side of Acton Street and north side of Frederick Street is a terrace of three storey residential properties the majority of which are Grade II listed. To the west and north, the character and typology is much more varied.

- 3.15 Gray's Inn Road has a varied character, scale and typology. The area was subject to significant bomb damage in World War II which led to significant development in the 20th Century. It is an important part of the area identified for growth and change as part of Camden's KQID.
- 3.16 The KQID spans from Camden Town to Holborn and Covent Garden and is home to a world-class cluster of scientific and knowledge-based institutions and companies that specialise in areas like life sciences, data and technology and the creative industries. In recent years the innovation district has seen tremendous growth due to its excellent transportation links, highly skilled workforce, high-quality office and lab spaces and enhanced retail, art and leisure offer.
- 3.17 There are several new developments emerging along Gray's Inn Road that will start to transform this location. These include the development of the Eastman Dental Hospital as the new Institute of Neurology (currently under construction); the mixed use redevelopment of the Royal National Throat Nose and Ear Hospital (330 Gray's Inn Road) comprising a new hotel; knowledge quarter office building and homes with new public spaces; and the approved redevelopment of Acorn House as the off-site affordable housing and affordable workspace development for MSD's new Headquarters at Belgrove House opposite King's Cross Station.
- 3.18 There are a number of grade II Listed Buildings in the form of residential terraced houses to the east of the Site along Frederick Street and Acton Street. These are outlined below:

Acton Street:

- Numbers 53 and 55 and attached railings;
- Numbers 31-51 and attached railings;
- Numbers 19-29 and attached railings;
- Numbers 15 and 17 and attached railings;
- 64, 66 (Queen's Head Public House) and 68 Acton Street and attached railings;
- Numbers 36-42 and attached railings;
- Numbers 28-34 and attached railings; and
- Numbers 24 and 26 and attached railings.

Frederick Street

- Numbers 54-72 and attached railings;
- Numbers 48, 50 and 52 and attached railings;
- Numbers 42,44 and 46 and attached railings;
- Numbers 34-40 and attached railings;
- Numbers 28, 30 and 32 and attached railings; and
- Numbers 12-26 and attached railings.

4 Planning History

- 4.1 An examination of Camden's planning register has been undertaken, a comprehensive list of all relevant planning history is included at Appendix A. The relevant applications are summarised in this Section. There have not been any significant applications at the Site for some time.
- 4.2 In December 1973 planning permission was granted for:-
- “The redevelopment of the site by the erection of a basement, part 7 storey and part 3 storey building comprising basement and storage, ground floor showrooms, first floor showrooms and offices, second floor offices and residential and third to sixth floors as offices.”**
- 4.3 In May 2000, planning permission was granted for the change of use of basement, ground and part first floor from health screening unit (D1) to office (B1) use.
- 4.4 In April 2012, planning permission was granted under application reference 2012/2165/P for:
- “Change of use of 5th floor from office (Class B1a) to flexible use comprising office (Class B1a) and Health Clinic (Class D1).”**
- 4.5 The permission was granted on 15 June 2012 as a flexible permission under Schedule 2 Part 3 Class V of the Town and Country (General Permitted Development) (England) Order 2015 (as amended). The fifth floor is currently in use as an office. When the permission expired on 15 June 2022, after 10 years since it was granted, the lawful use reverted back to office.
- 4.6 The original residential use on Site ceased between 1990 and 1995 from review of historic lease plans. It is considered that the planning history does not establish the lawful use of the building.
- 4.7 On 21 July 2020, the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 (the “Regulations”) were laid before parliament and came into force on 01 September 2020. The Regulations revoked Parts A and D of the Town and Country Planning (Use Class Order) 1987 (as amended) from 01 September 2020.

4.8 In the absence of any restrictive conditions or planning obligations pertaining to land use at the Site, it is considered that the entire building is within a lawful Commercial, Business and Service (Class E) use. This means that planning permission would not be required for use of the entire existing building as offices or another use within Commercial, Business and Service (Class E).

4.9 In terms of surrounding planning permissions, Acorn House lies to the north of the Site. Full planning permission was granted (ref. 2020/3880/P) on 01 November 2021 for:-

“Redevelopment of Acorn House as a part 6, part 10 storey mixed-use building with 33 affordable homes (with external playspace at level 6, a community room and terrace at level 9), affordable office space and retail unit at ground and basement level; together with cycle parking facilities and associated ancillary uses.”

4.10 Works are underway to begin construction of the development. This permission is considered relevant in terms of overall bulk, height and scale in considering proposals for the Site. The Committee Report concludes *inter alia*:-

- The proposed building respects the local context and character and would enhance the character and appearance of the Bloomsbury Conservation Area;
- It would preserve the setting of the adjacent and nearby listed buildings on Swinton and Acton Street;
- Consideration has been given to the way the building relates to its neighbours and devices have been employed to break down the massing of the building, particularly where visual impact and amenity is most sensitive;
- The building would follow the same L shaped plan form of the existing Acorn House which would allow the building to respond to the varied height, bulk and massing and townscape contexts of Gray’s Inn Road and Swinton Street.
- The massing facing Gray’s Inn Road has been informed by the larger, civic buildings along the street which bookend the low rise Georgian terraced side streets;
- The massing has been carefully composed and reinforces the street hierarchy through its sculpting of the building form, responding carefully to the two different street contexts that converge at the site. The massing and height of the building respond to the surrounding townscape, and are considered appropriate and acceptable.

5 Pre-Application Engagement and Consultation

- 5.1 This section summarises the outcome of the pre-application and consultation process and how the Proposed Development scheme has responded to comments received.
- 5.2 The Localism Act 2011 emphasises the need to involve and engage with the local community during the planning process.
- 5.3 In respect of pre-application engagement, paragraph 39-43 of the National Planning Policy Framework highlights the important of pre-application engagement and front loading; early engagement has significant potential to improve the efficiency and effectiveness of the planning system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improves outcomes for the community.
- 5.4 Local Planning Authorities have a key role to play in encouraging other parties to take maximum advantage of the pre-application stage and the more issues that can be resolved at pre-application stage, the greater the benefit.

Community Consultation and Engagement

- 5.5 London Communications Agency have undertaken a programme of consultation which is detailed in full in the submitted Statement of Community Involvement, prepared by London Communications Agency.
- 5.6 A consultation website was launched in early April 2023, with key stakeholders contacted directly in March 2023 prior to the start of formal consultation. Letters were sent to approximately 3,700 addresses in the local area inviting neighbours to comment on the proposals. An advertisement was placed in the Camden New Journal on 20 April 2023.
- 5.7 A public consultation event was held on 27 April 2023 at the Chadswell Healthy Living Centre and a webinar event was held on 16 May 2023.

5.8 Feedback was largely positive with residents focussed on ensuring that overlooking and privacy matters were addressed in the design. The design has evolved in response to the feedback received.

London Borough of Camden

5.9 The Proposed Development has evolved through a series of pre-application meetings with Officers of the London Borough of Camden between August 2022 and May 2023. The Applicant entered into a Planning Performance Agreement with Camden (ref. 2022/1795/PRE) and workshops and formal meetings were held in relation to design, heritage and townscape, amenity, sustainability, and transport matters.

5.10 The key feedback that has been received is briefly summarised as follows:-

- The retention of the existing structure is welcomed;
- The extension to the building appears comfortable;
- The design of the new façade should be exciting and bold and of exemplary quality;
- The sustainability aspirations of the project are supported;
- The additional massing needs to be considered in terms of its impact on views from Frederick Street and provide a calm backdrop;
- The southern elevation should provide visual interest;
- The ratio of solid to glazing should consider solar gain;
- The residential accommodation is strongly supported;
- The ground floor activation is welcomed;
- The loss of the off-street servicing and the changes to loading arrangements on Acton Street is justified (in conjunction with discussion with Transport for London); and
- A very low amount of less than substantial harm would occur to designated heritage assets that need to be outweighed by public benefits.

5.11 The proposals have developed iteratively in direct response to Officer feedback, further detail on the design development of the proposals can be found in the Design and Access Statement prepared by Haptic Architects.

Design Review Panel

- 5.12 The proposals were scrutinised by Camden’s Design Review Panel (“DRP”) on 24 February 2023 and the written report was issued on 13 March 2023.
- 5.13 The DRP found much to admire in the proposals, including the extent of retained structure and overall sustainability ambitions. The DRP considered the proposed height to be generally acceptable and noted that the design was high quality. The DRP made some recommendations for the design to be improved and refined. This is set out in full in the Design and Access Statement, prepared by Haptic Architects.
- 5.14 The pre-application process has been iterative, with Officer feedback informing the Proposed Development which has been refined as a result of this engagement.

Other Consultees

- 5.15 The Applicant and design team have reviewed the proposals with the Metropolitan Police Designing out Crime Officer and Transport for London.
- 5.16 The Applicant has sought to maintain a clear and open dialogue with the community throughout the design phase to discuss the plans and receive their feedback, to ensure the plans benefit the community and the wider area.
- 5.17 The Applicant has proactively worked with Camden Officers, statutory consultees and key stakeholders in the development of these proposals in line with the National Planning Policy Framework and the Localism Act 2011.

6 Proposed Development

6.1 This Section should be read in conjunction with the Design and Access Statement which has been prepared by Haptic Architects. It contains a full description of the Proposed Development and the rationale for its design, scale, layout, access and materiality.

6.2 For the avoidance of doubt, full planning permission is sought for:-

“Refurbishment and extension of the building to provide residential flats (Class C3) and commercial, business and service use (Class E) including external alterations for new facades to all elevations, the introduction of terraces, reconfiguration of entrances and servicing arrangements, new hard and soft landscaping, provision of cycle parking and other ancillary works.”

6.3 The Applicant’s vision for the Site is to retain as much of the existing structure as possible while revitalising the existing building to meet changing office demands and modernise the office accommodation, in addition to delivering seven high quality residential units.

6.4 The Proposed Development is summarised as follows (this includes works which would be secured via Section 278 Agreement with the Local Planning Authority and Transport for London):

- Removal of the existing facades;
- Two storey extension of the building along Gray’s Inn Road and Acton Street;
- Use of the building as a mix of Office (Class E) and residential (Class C3) use;
- Introduction of new lifts, stairs and plant equipment;
- Removal of the existing vehicular access and crossover from Acton Street;
- Alterations to the rear courtyard and introduction of new hard and soft landscaping;
- Introduction of new private office terraces;
- Installation of solar PV panels at roof levels;
- Introduction of new blue and green roofs to levels five and ten;
- Alteration to the location of the office entrance from the corner of Acton Street and Gray’s Inn Road to the centre of Gray’s Inn Road;
- Reconfiguration of an existing bus stop and loading bay on Acton Street; and

- Provision of new long and short stay office and residential cycle parking with associated end of trip facilities.

6.5 Table 1 summarises the floor areas of the existing building and the Proposed Development on the basis of gross internal area.

Table 1: Gross Internal Area (GIA) by Land Use

Land Use	Existing sqm GIA	Proposed sqm GIA	Uplift sqm GIA
Commercial, business and service (Class E)	3,785	4,342	+557
Residential (Class C3)	0	714	+714
Total	3,785	5,056	+1,271

6.6 Table 2 summarises the floor areas of the existing building and the Proposed Development on the basis of gross external area.

Table 2: Gross External Area (GEA) by Land Use

Land Use	Existing sqm GEA	Proposed sqm GEA	Uplift sqm GEA
Commercial, business and service (Class E)	3,785	4,808	+1,023
Residential (Class C3)	0	845	+845
Total	3,785	5,653	+1,868

6.7 The residential accommodation is proposed to be delivered as seven market dwellings with the following mix:-

- 3 x 1 bed 2 person
- 3 x 2 bed 4 person
- 1 x 3 bed 5 person

6.8 14% of the proposed residential accommodation will be delivered as M4(3)(2a) adaptable dwellings and these are marked on the proposed drawings. All of the dwellings feature private amenity space in the form of terraces/balconies and storage space. In terms of residential quality this would meet the London Plan standards, with all units being dual aspect, accessed from a central stair and lift core with a dedicated entrance, bin store and cycle store that is accessible from Acton Street. The proposals seek to visually separate the two uses with the commercial office facing Gray's Inn Road and the residential dwellings from Acton Street.

6.9 The predominant land use will remain within an Office (Class E) use and provide 4,342 sqm GIA of high-quality flexible workspace in this part of Camden. A total of seven market (714 sqm GIA) homes are provided in the form of flats, which results in a total uplift of 1,271 sqm GIA.

Bulk, Height and Massing

6.10 The building would comprise a part ground plus nine (+55.48 m AOD), part ground plus four (+37.827 m AOD) storey building including all plant and lift overrun.

6.11 The existing building is taller than its immediate surroundings, but the proposed building has been designed in response to the emerging context within this part of Camden's KQID and in response to the surrounding townscape. The surrounding area includes Acorn House, 330 Gray's Inn Road and Eastman Dental Centre which represent the changing nature of Gray's Inn Road as a key feature of the growing KQID.

6.12 The approach to the massing has been derived from the need to retain as much of the existing structural frame as possible. Approximately 10% of the structure would be demolished to allow for reconfiguring of the existing floors, introduction of new cores and a lightweight roof extension to the Acton Street and Gray's Inn Road parts of the Site which would be extended by two floors.

6.13 A new façade treatment is proposed to give the building an entirely new appearance. Setbacks are proposed at level nine and ten of the office component of the building and at level five of the residential component of the building to break up the massing. The rear element of the residential component has a stepped form.

6.14 In terms of lateral extensions, a new core serving the commercial office element would project eastwards from the existing structure to house new stairs and lifts. The new core would be setback

from Acton Street is proposed to create visual separation between the office and residential components of the proposal.

- 6.15 Plant equipment has been reduced as far as possible at roof level to maximise the usable floor area and to minimise bulk. Commercial office terraces are proposed at level eight and nine where the floors are setback and the rear element of the residential massing steps back to allow for private balconies and terraces for the new dwellings.
- 6.16 A small amount of stopping up of the highway on Acton Street would be required to rationalise the building line. An existing low level vent projects outward from the existing building onto Acton Street which would be removed to compensate for the area to be stopped up.

Façade and Materiality

- 6.17 In terms of appearance, the Proposed Development presents an opportunity to completely renew and refresh the appearance of the building. New facades are proposed to all elements of the building which has been informed by the surrounding context and a detailed assessment of the Bloomsbury Conservation Area.
- 6.18 The Proposed Development has two different design characters facing Acton Street and Gray's Inn Road. The vision is to create a calm, light, ordered, natural and decorative treatment to the building that positively responds to the surroundings. The office component facing Gray's Inn Road responds to the Conservation Area in particular by taking on a coarser grain, strong vertical definition, rhythmic window patterns and a strong ground floor treatment. The Telephone Exchange building located on the western side of Gray's Inn Road opposite the Site is a key inspiration for the Proposed Development.
- 6.19 The residential component facing Acton Street features a finer urban grain, with a defined horizontal grid with a vertically proportioned window pattern to provide distinction between the two components and respond to the differing contexts.
- 6.20 In terms of a material palette, again drawing inspiration from the surrounding Conservation Area has resulted in the selection of a mix of low carbon concrete with differing aggregate and profiling, metal window frames with timber reveals, metal balustrades, a stone/precast base and brick

façade treatments. The brick treatment is proposed to the residential component with the concrete and metal finish proposed for the office component.

Energy, Sustainability and Urban Greening

- 6.21 Sustainability is a key aspect of the Proposed Development in all manners, not only in terms of BREEAM and life-time carbon reduction but in its operational phase in terms of health and wellbeing. The Proposed Development would be highly sustainable with central plant equipment at basement levels and the roof to service the building. The Energy Strategy for the building proposes an all-electric solution with no gas or CHP boilers to minimise greenhouse gas emissions. Low-zero carbon technologies are proposed with photovoltaic panels at roof level.
- 6.22 Openable windows are proposed to all levels as part of a mixed mode ventilation strategy to minimise the demand and need for mechanical cooling systems.
- 6.23 The submitted Sustainability, Energy and Overheating Assessment, prepared by GDM sets out that the Proposed Development is set to achieve an overall 63% reduction in carbon dioxide emissions over Part L 2021 using SAP 10 carbon factors. The commercial component is designed to achieve a 60% reduction over Part L 2021 and the residential component is designed to achieve a 76% reduction over Part L 2021. A £45,151 Carbon Offsetting Contribution would be provided to offset the remaining amount to achieve net zero, and be secured by Section 106 Obligation.
- 6.24 A BREEAM pre-assessment has been prepared by Twin and Earth which concludes the Proposed Development will achieve a minimum score of 75.55% “Excellent” for the office component with aspirations for “Outstanding” with a further 25.97% of potential credits identified in the pre-assessment. The minimum 60% of credits for energy and water and 40% for materials have been met.
- 6.25 The introduction of new hard and soft landscape in the ground floor courtyard and introduction of new green/blue roofs contribute to the Proposed Developments Urban Greening Factor score of 0.31.
- 6.26 The sustainability considerations are discussed in detail at Section 11 of this statement.

Deliveries and Servicing

- 6.27 A Delivery and Servicing Management Plan has been prepared by Caneparo Associates and is submitted in support of this application.
- 6.28 The Proposed Development seeks to remove the existing off street servicing area, which is considered unsafe due to the lack of turning space and requirement for vehicles to exit rearwards onto Acton Street after entering. Instead, the Proposed Development would be serviced on-street via Acton Street. The Development proposes to utilise a new 15m shared-use loading bay on Acton Street allowing loading for up to 20 minutes between 10:00-16:00 Monday to Saturday, anytime between 19:00-08:00 overnight Monday to Saturday and at all times on Sunday. The shared-use loading bay will also allow for short-term disabled parking. This would require relocation of bus stands and an existing loading bay located further east along Acton Street. This element of the proposals would be secured as part of a Section 278 Agreement with Transport for London.
- 6.29 Where possible, deliveries will be undertaken by small to medium sized vehicles (e.g. bicycles, motorbikes, and vans) and electric or hybrid vehicles.
- 6.30 The commercial floorspace is be expected to receive 9-10 deliveries per day, with the residential units predicted to receive one delivery a day.
- 6.31 Internal access to the residential waste store will be provided via the residential lobby and a back of house area for residents. A separate on-street access will be provided from Acton Street, giving direct access for the Council's waste collection teams to transport bins between the store and the waste collection vehicle on Acton Street which is carried out weekly. Separate arrangements have been made for general waste, food collection and recyclable waste, these are marked on the plans.

Cycle Parking

- 6.32 At present, the existing building has no cycle parking provision, showers, lockers or changing facilities. The Proposed Development would provide new high quality cycle parking and end of trip facilities in line with the London Plan and London Cycle Design Standards, resulting in a significant improvement to the building.

6.33 Cycle parking facilities are set out within Table 3.

Table 3: Cycle Parking Facilities

		Existing	Proposed
Long Stay Cycle Parking	Commercial	0	8 (Foldable Bike Lockers) 4 (2 Accessible Stands) 6 (4 Sheffield Stands) 36 (18 Two-Tier Racks) 22 (Vertical Racks) (76 Bikes)
	Residential	0	2 (Accessible Stands) 10 (Two-Tier Racks) (12 Bikes)
Short Stay Cycle Parking	Commercial	0	12 (Sheffield Stands)
Short Stay Cycle Parking	Residential	0	2 (Sheffield Stands)

6.34

6.35 All cycle parking facilities will be accessed from Acton Street.

6.36 Separate residential and commercial cycle parking is provided within the building, accessed via Acton Street.

6.37 In terms of long stay cycle parking, four accessible racks, two Sheffield stands, four foldable bike racks (a total of 18 cycle parking spaces) and four lockers will be provided for the commercial bike storage internally at ground floor level.

6.38 A further 18 two-tier bike racks will be located within the commercial cycle store within the external courtyard (a total of 36 cycle parking spaces). An additional 22 vertical bike racks (a total of 22 bikes) and 69 lockers can be access via the stairs in the external courtyard leading to the basement.

6.39 Separate male and female changing facilities are provided at basement level.

- 6.40 Shower and locker facilities are provided, equating to 8 showers (1 of which is accessible), and 73 lockers.
- 6.41 In terms of short stay cycle parking, 14 spaces are required. It is envisaged that this would be delivered on street by Camden as highway authority through a Pedestrian, Cycling and Environmental Contribution secured by Section 106 Legal Agreement.

7 Planning Policy Framework

- 7.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the statutory development plan unless material considerations indicate otherwise.
- 7.2 The statutory development plan for the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004 comprises:
- The London Plan, published in March 2021; and
 - The Camden Local Plan, adopted in July 2017.
- 7.3 The National Planning Policy Framework, published in July 2021, National Planning Practice Guidance (“NPPG”) and Camden Planning Guidance are material considerations.

National Planning Policy Framework and Guidance

- 7.4 The Ministry of Housing, Communities and Local Government (now the Department for Levelling-up Housing and Communities “DLUHC”) published the revised National Planning Policy Framework (“NPPF”) in July 2021. This is the second revision of the NPPF since 2012.
- 7.5 The NPPF sets out the Government’s economic, environmental and social planning policies for England. It summarises, in a single document, all previous national planning policy advice (contained within PPG and PPS). Taken together, these policies articulate the Government’s vision of sustainable development, which should be interpreted and applied locally to meet local aspirations.
- 7.6 The NPPF confirms that the purpose of the planning system is to contribute to the achievement of sustainable development. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally. The NPPF explains that the policies of the Framework, taken as a whole, constitute what the Government considers sustainable development to mean in practice.

- 7.7 The presumption in favour of sustainable development in the new policy guidance is designed to ensure that the planning system as a whole focuses on opportunities. The presumption, in practice, means that significant weight should be placed on the need to support economic growth and housing delivery through the planning system and local planning authorities should plan positively for new development and approve all individual proposals wherever possible. However, development should not be allowed if it would undermine the key principles of sustainability in the Framework.
- 7.8 The NPPF makes clear that the policies should apply unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits (paragraph 49). Specifically, paragraph 19 states that the planning system should do all that it can to promote sustainable economic growth in order to create jobs and homes to meet the challenges of global competition alongside a low carbon future. The NPPF states that significant weight should be placed on the need to support economic growth and housing delivery through the planning system.
- 7.9 The NPPG is an online resource which is maintained by the DLUHC and is regularly updated. It provides guidance relating to a number of planning matters, the Conserving and Enhancing the Historic Environment PPG is considered relevant to the Proposed Development.
- 7.10 On 22 December 2022, DLUHC consulted on reforms to national planning policy being considered as part of the Levelling Up and Regeneration Bill. The consultation concluded on 02 March 2023 and included a revised NPPF which proposes changes to plan making, housing delivery and targets and the role of density and the presumption in favour of sustainable development. It also sought views on future changes to plan-making, decision making and aspirations for national development management policies that would not come forward immediately.
- 7.11 On Monday 24 April 2023, the Rt Hon Rachel Maclean, Minister of State for Housing and Planning confirmed at the Levelling Up, Housing and Communities Select Committee that the Government had received over 26,000 consultation responses which were still being considered and could not commit to a timeframe for the publication of the revised NPPF.

The London Plan

- 7.12 The London Plan is the overall strategic plan for Greater London, defined to include the 32 Boroughs and the City of London.
- 7.13 The London Plan is centred around 'Good Growth', with a focus on building strong and inclusive communities, making the best use of land, creating a healthy city, growing a good economy and increasing efficiency and resilience. The Plan recognises the key role of Central London as a driver for London and the wider UK economy with the CAZ being critical in supporting growth.
- 7.14 The London Plan places great emphasis on sustainable development for major applications, especially those that are referable to the Mayor. This includes maximising energy efficiency, carbon offsetting and assessment of the whole life carbon implications of demolition to be considered.

Other Greater London Authority ("GLA") Guidance

- 7.15 The following GLA London Planning Guidance ("LPG") are also considered to be material to the determination of this application:-
- Accessible London (2014);
 - Planning for Equality and Diversity (2007);
 - Character and Context (2014);
 - Public London Charter (2021);
 - Energy Planning Guidance (2020);
 - Be Seen energy monitoring (2021);
 - The control of dust and emissions in construction (2014);
 - Use of planning obligations in the funding of Crossrail, and the Mayoral Community Infrastructure Levy (2019);
 - The Mayor's Transport Strategy (2018) ;
 - Whole Life Carbon (2022);
 - Good Quality Homes For all Londoners (2021);
 - Housing (2016);

- Shaping Neighbourhoods: character and Context (2014);
- Sustainable Transport, Walking and Cycling Guidance (2022);
- Air Quality Neutral (2023);
- Air Quality Positive (2023); and
- Urban Greening Factor (2023).

7.16 In addition, the draft Fire Safety London Planning Guidance document (2021) has also been considered in the preparation and assessment of the proposals.

Local Planning Policy

7.17 The Camden Local Plan was adopted in July 2017 and sets out how development will be managed within the borough. The Plan seeks to address a number of challenges; adapting to Camden’s growing population and to social change, the supply and cost of housing in the borough, maintaining a successful economy and improving opportunities, inequalities, health and wellbeing, improving transport, quality of the environment and crime and safety.

7.18 To address these challenges, the Plan sets three key objectives:-

- 1) Developing new solutions with partners to reduce inequality and improve health and wellbeing;
- 2) Creating conditions for and harnessing the benefits of economic growth; and
- 3) Investing in our communities to ensure sustainable neighbourhoods.

7.19 The Council’s objective is to create the conditions for growth to provide the homes, jobs and other facilities needed to support it, while ensuring that growth delivers opportunities and benefits for our residents and businesses. The Plan aims to deliver sustainable growth while continuing to preserve and enhance the features that make Camden such an attractive place to live, work and visit.

7.20 Camden Planning Guidance (“CPG”) provides further detailed guidance in assessing development in the Borough. Those considered in the preparation and assessment of the proposals include:

- Access for All CPG (2019)

- Air Quality (2021)
- Amenity (2021)
- Biodiversity (2018)
- Design (2021)
- Developer Contribution CPG (2019)
- Employment sites and business premises (2021)
- Energy efficiency and adaptation (2021)
- Housing (2021)
- Planning for health and wellbeing (2021)
- Transport (2021)

Emerging Local Planning Policy

- 7.21 Camden have now commenced a review of their Local Plan.
- 7.22 Camden first consulted on their draft Site Allocations Local Plan (“SALP”) between 13 February and 27 March 2020. A second round of consultation was undertaken between 30 November 2021 and 24 January 2022 to reflect national, regional and neighbourhood level planning law and policy changes.
- 7.23 A call for sites and issues and options on the Local Plan Review was carried out between 4 November 2022 and 13 January 2023. The responses received as part of this will feed into the preparation of the draft Local Plan that is anticipated to be published for consultation later in 2023.
- 7.24 The draft SALP is still at an early stage. Having regard to the three tests set out in Paragraph 48 of the NPPF, currently very limited weight can therefore be applied to the policies within it. The aspirations of the draft SALP, particularly for the KQID, have been taken into account in the assessment of the proposals.

Policy Considerations

- 7.25 The following sections of this Statement consider the Proposed Development against the following key planning considerations:

- Land Use and Principle of Development;
- Design, Bulk and Massing;
- Historic Environment and Townscape; and
- Energy and Sustainability.

7.26 Other Material Considerations including daylight, sunlight and amenity, ecology and landscaping; transport, car and cycle parking; deliveries, servicing and waste; and noise and air quality.

8 Land Use

Principle of Development

- 8.1 Paragraph 11 of the NPPF states that there is a presumption in favour of sustainable development, and that development that accords with an up-to-date Local Plan should be approved. For the reasons set out within this chapter, the Proposed Development is considered to be in accordance with the key policies contained in the development plan and represents sustainable development.
- 8.2 Chapter 1 of the new London Plan sets out how growth should be managed in the Capital to build strong and inclusive communities, making the best use of land, creating a healthy city, delivering the homes Londoners need, growing a good economy and increasing efficiency and resilience.
- 8.3 London Plan Policy GG1 encourages development to seek to ensure changes to the physical environment achieve an overall positive contribution to London.
- 8.4 London Plan Policy GG2(C) sets out that development should proactively explore the potential to intensify the use of land to support additional workspaces, promoting higher density development, particularly in locations that are well connected to jobs, services infrastructure and amenities by public transport, walking and cycling.
- 8.5 London Plan Policy GG2(D) highlights that proposals should use a design-led approach to determine the optimum development capacity of sites.
- 8.6 London Plan Policy D3 requires all development to make the best use of land by following a design-led approach that optimises the capacity of sites.
- 8.7 Policy G1 of the Local Plan sets out how the Council will create conditions for growth to deliver homes, jobs and infrastructure by supporting development that makes the best use of the site, providing a mix of uses in accessible parts of the Borough (including self-contained housing) to deliver 16,800 new homes, 695,000sqm of new office floorspace and 30,000 sqm of new retail floorspace by 2031. The Council anticipate the most significant growth to be

delivered across the Borough, with Central London playing a key role in facilitating that growth.

- 8.8 Supporting paragraphs 2.7-2.8 set out that the Council wants to promote and encourage high quality developments with high densities to make the most efficient use of Camden's land and buildings, particularly in the most accessible parts of the borough. Whilst also seeking to improve the quality of the environment, protect the amenity of occupiers and neighbours and meet other planning objectives.

Assessment

- 8.9 The application proposes a more efficient use of the land, which is consistent with the aims of sustainable development. The Proposed Development seeks to optimise previously developed urban land, which is well served by public transport.
- 8.10 The Proposed Development would reuse the existing structure and facade, whilst extending the building on Site to utilise the land more effectively. The proposals will provide the opportunity to increase the density of the Site in accordance with the character of the surrounding area whilst ensuring that the impacts of the development are acceptable in environmental terms. The Proposed Development will incorporate sustainable materials and design, where appropriate, which will result in a more energy efficient building.
- 8.11 The Proposed Development will therefore bring an outdated and inefficient building into use whilst also contributing to the provision of high-quality new workspace and homes within the Borough in accordance with the NPPF, London Plan Policies GG1, GG2 and D3 and Policy G1 of the Local Plan.

Employment and Office Use

- 8.12 The NPPF sets out the Government's commitment to securing economic growth and advises that plans should proactively meet the development needs of businesses and support an economy fit for the twenty first century. Paragraph 81 of the NPPF goes on to state that significant weight should be given to supporting economic growth and productivity, taking into account local business needs and opportunities for development.

- 8.13 London Plan policy GG5 sets out principles for growing a good economy to conserve and enhance London's global economic competitiveness and ensure that economic success is shared amongst all Londoners. London Plan Policy D3 requires all development to make the best use of land by following a design-led approach that optimises the capacity of sites. Policy E1 echoes this and makes specific reference to improvements to the quality, flexibility and adaptability of office space. Policy E1(C) of the London Plan is clear that the unique agglomerations and dynamic clusters of world city businesses and other specialist functions of the central London office market should be supported and promoted.
- 8.14 Policy SD4 of the London Plan sets out how the strategic functions of the CAZ should be promoted and enhanced.
- 8.15 Chapter two of the Camden Local Plan sets out the Council's spatial strategy for growth. Paragraph 2.52 states that the Council recognises the unique character and challenges of Central London, in particular in balancing its economic, social and cultural role. The Council will support the concentration of educational, cultural and research institutions within Central London that form an integral part of the Knowledge Quarter.
- 8.16 Policy E1 of the Local Plan supports the provision of a range of business and employment floorspace including the intensification of existing employment sites and direct new office development to the growth areas, Central London and the town centres to meet expected demand of 695,000sqm by 2031.
- 8.17 Policy E2 of the Local Plan reiterates that the sites which are suitable for continued business use will be protected and the intensification of employment uses will be supported provided they are maintained or increased.
- 8.18 Part f) of Policy E2 sets out that the Council will consider higher intensities of redevelopment of premises or sites that are suitable for continued business provided that the proposed premises includes floorspace suitable for start-ups, small and medium-sized enterprises (SME), such as managed affordable workspace where viable. Paragraph 5.44 of the Local Plan sets out that affordable SME workspace will be secured through a planning obligation for

large scale employment developments with a floorspace of 1,000sqm or more. This is reflected at paragraph 36 of the Employment sites and business premises CPG.

8.19 Part g) of policy E2 requires schemes to increase employment opportunities for local residents including training and apprenticeships. Paragraph 63 of the Employment sites and business premises CPG states that developments of over £3 million in build costs will be required to recruit one construction apprentice through Camden Council, or its nominated partner, for every £3 million of build cost where the length of the project allows.

8.20 To ensure sustainable growth and success of the KQID, Draft policy KQ1 of the draft Site Allocations Local Plan documents sets out that major proposals for additional employment must:

- A) Demonstrate they have been developed in a collaborative way to meet the needs of the knowledge quarter;
- B) Be supported by evidence that the type of floorspace appropriately reflects current and emerging needs of the knowledge economy;
- C) Seeks to prioritise creation of suitable floorspace for priority growth sectors;
- D) Provide a suitable mix of workspaces;
- E) ensure buildings are designed to support future reconfiguration;
- F) ensure at least 20% additional employment floorspace is affordable workspace;
- G) contribute to reducing inequalities and increasing life chances by maximising social value; and
- H) contribute towards the provision of new physical and social infrastructure, such as new homes, public realm enhancements and transportation improvements.

Assessment

8.21 The Proposed Development will deliver 4,342 sqm of high-quality flexible office (Class E) space to a shell and core standard which is supported by planning policy at a regional and local level. The proposed office space has been flexibly designed to cater for future office requirements and has been designed to cater for one or more tenants in the building. The proposal represents an increase in 571 sqm of office floorspace. Office floorspace is a key

supporting function for Camden's growing Knowledge Quarter and will contribute to the principle of clustering within the CAZ.

- 8.22 As the proposals results in an uplift of 557 sqm of office floorspace, the requirement to provide affordable SME workspace is not triggered in accordance with the Local Plan.
- 8.23 It is anticipated that the development would provide a minimum of four construction apprenticeships which would be secured by section 106 obligation.
- 8.24 The Proposed Development would comply in full with policies GG5, SD4, E1 of the London Plan and policies E1, E2 of the Local Plan and the Employment sites and business premises CPG.

Mixed Use Policy and Residential Accommodation

- 8.25 Chapter 5 of the NPPF provides a framework for delivering a sufficient supply of homes by setting out how Local Authorities should assess, and plan for housing need to be met through sufficient land being available to meet housing need.
- 8.26 Policy SD4 of the London Plan states that the unique international, national and London-wide roles of the CAZ, based on an agglomeration and rich mix of strategic functions and local uses, should be promoted and enhanced.
- 8.27 Policy SD5 of the London Plan states that new residential development should not compromise the strategic functions of the CAZ. Part C states that offices and other CAZ strategic functions are to be given greater weight relative to new residential development. Part F of the policy states that mixed use residential/office proposals should be supported where there is an equivalent or net increase in office floorspace.
- 8.28 Policy H1 of the Local Plan sets out that self-contained housing is the priority land use across the Borough.
- 8.29 Policy H2 of the Local Plan seeks to achieve commensurate levels of self-contained housing whenever non-residential development is proposed to ensure a balance of uses across the Borough. The policy requires where more than 200sqm GIA of non-residential development

is proposed in the Central London Area, 50% of the additional floorspace will be required to be delivered as self-contained housing with an appropriate mix, including affordable housing where relevant. The requirement to deliver affordable housing on Site is subject to a set of criteria which is set out at Policy H4 of the Local Plan and the Interim Housing CPG.

- 8.30 Policy H3 of the Local Plan resists development that would involve a net loss of residential floorspace.
- 8.31 Policy H4 of the Local Plan sets out the Council's approach to affordable housing provision which is based on a site's capacity to provide housing, with affordable housing being required on a sliding scale between 2% and 50%. Part G of the policy also states that where development sites have capacity to provide fewer than 10 dwellings, that the Council will accept the provision of affordable housing as a payment in lieu of on-site provision.
- 8.32 Policy H6 of the Local Plan requires 10% of new building housing to be accessible or adaptable for wheelchair users. Policy H7 of the Local Plan seeks to secure a mix of large and small homes with dwelling size priorities.
- 8.33 The Housing CPG provides detailed guidance on calculating a site's capacity to provide housing, along with a split between market and affordable.

Assessment

- 8.34 The Proposed Development would see a total uplift of all uses of 1,271 sqm. Under policy H2, this generates a requirement for 635.5 sqm of that uplift to be provided as housing as part of a mix of uses. In line with the Housing CPG, the Site has a capacity to provide seven self-contained dwellings with a target split of 12% (76.3 sqm GIA) affordable, 88% (559.2 sqm GIA) market.
- 8.35 Policy H4(g) allows payments in lieu of affordable housing where sites have a capacity for less than ten dwellings, therefore the Proposed Development is not required by policy to provide affordable housing on Site. The Proposed Development would introduce seven high quality market flats (714 sqm GIA uplift) which would meet and exceed the market housing

- requirement generated by the Council's mixed-use policy and provide 57% of the uplift as residential, exceeding the 50% target.
- 8.36 In line with policy H4(g) and the Housing CPG, a policy compliant payment in lieu of £114,390 to the Council's affordable housing fund would be secured via Section 106 Legal Agreement.
- 8.37 The Proposed Development would deliver three 1 bed x 2 person units, three 2 bed x 4 person units, and one 3 bed x 5 person unit. This mix of units is considered to be an appropriate mix in line with the Council's dwelling size priorities for market housing.
- 8.38 One three bed (14%) within the proposed residential accommodation will be delivered as M4(3)(2a) adaptable dwellings.
- 8.39 The new residential accommodation would comply with New London Plan space standards by providing private amenity space in the form of terraces/balconies, internal storage, generous floor to ceiling heights and dual aspect which would support housing growth in the Borough. The Proposed Development would introduce residential accommodation to the Site, exceeding Camden's target for 50% of uplift to be residential, achieving a mix of uses on the Site in line with London Plan Policy SD4, SD5, Local Plan Policies H1-H4 and H6-H7 and the Housing CPG.

9 Design, Bulk and Massing

- 9.1 The Section considers the Proposed Development against relevant national, regional and local design policy and guidance. This Section should be read alongside the Design and Access Statement, prepared by Haptic Architects.
- 9.2 The Government attaches great importance to the design of the built environment in the NPPF. Paragraph 126 states that good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.
- 9.3 Paragraph 130 of the NPPF stipulates that it is important to plan positively for the achievement of high quality and inclusive design for all development, which will function well over the lifetime of the development, are visually attractive, sympathetic to local character, establish a strong sense of place, optimise the potential of the site, and create places that are safe.
- 9.4 London Plan policy D2 states that the density of development should be proportionate to the site's connectivity and access to public transport. Policy D3 sets out that all development must make the best use of land and use a design led approach to optimise the capacity of sites. Part B of the policy states that development proposals should have regard to form and layout, experience and respond to the quality and character of the surroundings.
- 9.5 Policy D4 states that the design of development proposals should be thoroughly scrutinised. The scrutiny of a proposed development's design should cover its layout, scale, height, density, land uses, materials, architectural treatment, detailing and landscaping. The design and access statement should explain the approach taken to these design issues.
- 9.6 London Plan Policy D5 Inclusive Design requires development proposals to achieve the highest standards of accessible and inclusive design. Design and access statements for development proposals should include an inclusive design statement. When dealing with historic buildings and heritage assets, careful consideration should be given to inclusive design at an early stage.

- 9.7 Policy D1 of the Local Plan seeks to secure high quality design in development by requiring development to respond to local character and context, be highly sustainable in design and construction, integrating well to the surrounding streets and townscape, comprises high quality architecture, is accessible for all and designed to minimise crime and anti-social behaviour.
- 9.8 Policy C6 of the Local Plan seeks to promote access for all by expecting all buildings and places to meet the highest standards of accessibility and inclusive design.
- 9.9 Further detailed design guidance is set out within the Design CPG published in March 2019.
- 9.10 It is not considered that the building would be classified as a “tall building” in line with paragraph 7.35 of the Local Plan for the purposes of design assessment and therefore policy D9 of the London Plan is not considered.

Assessment

- 9.11 The Proposed Development has been designed by Haptic Architects to an exemplary standard and architectural detail with careful and appropriate consideration for its surroundings.
- 9.12 The Site sits within the Bloomsbury Conservation Area and is considered a negative contributor to the Conservation Area. The existing building is taller than its immediate surroundings.
- 9.13 Immediately to the south of the Site are three 3-4 storey terraced properties. To the east of the site running along the south side of Acton Street is a terrace of three storey residential properties the majority of which are Grade II listed.
- 9.14 To the west and north, the character, scale and typology is much more varied. The area was subject to significant bomb damage in World War II which led to significant development in the 20th Century. It is an important part of the area identified for growth and change as part of Camden’s KQID. There are a number of new developments in the pipeline along Gray’s Inn

Road that will start to transform this location including; Eastman Dental Hospital, Royal National Throat Nose and Ear Hospital (330 Gray's Inn Road) and Acorn House.

- 9.15 The Proposed Development seeks to respond to the overall bulk and massing of the surrounding townscape and takes consideration of the emerging context within this part of the Camden's KQID. An additional two storeys are proposed to the commercial component facing Gray's Inn Road, with a set back at top floor level and the north western corner at level nine behind façade elements.
- 9.16 Two additional storeys are proposed to the residential component so that the massing steps down along Acton Street with setbacks at levels four and five to respond to the finer grain context of Acton Street.
- 9.17 The Proposed Development would therefore comprise a part ground plus nine (+55.48 m AOD), part four (+37.827 m AOD) storey building including all plant and lift overrun. The massing is considered to be appropriate and strikes a balance between the two different townscape contexts.
- 9.18 In terms of lateral extensions, a new core serving the commercial office element would project eastwards from the existing structure to house new stairs and lifts. A setback from Acton Street is proposed to create visual separation between the office and residential elements of the proposal.
- 9.19 The approach to the massing has been derived from the need to retain as much of the existing structural frame as possible, whilst also giving consideration to the varying townscape contexts. Approximately 10% of the structure would be demolished to allow for the reconfiguring of the existing floors, introduction of new cores and a lightweight extension with a new façade treatment giving the building an entirely new appearance.
- 9.20 Plant equipment has been reduced as far as possible at roof level to maximise the usable floor area and to minimise bulk.
- 9.21 Commercial office terraces are proposed at level ten where the floors are set back and the rear element of the residential massing steps back to allow for private balconies and terraces

for the new dwellings. This will lead to the creating of high quality residential and commercial amenity space.

- 9.22 In terms of appearance, the Proposed Development presents an opportunity to completely renew and refresh the appearance of the building. The proposed material palette sees the commercial element of the Proposed Development faced in a mix of low carbon concrete with differing aggregate and profiling, metal window frames with timber reveals, metal balustrades, a stone/precast base. The core separates the commercial and residential buildings, with the residential component comprised of a brick treatment and a finer urban grain with a defined horizontal grid to better reflect the Acton Street and to provide separation between the two building components. The materiality has been informed by the surrounding context and a detailed assessment of the Bloomsbury Conservation Area.
- 9.23 The Proposed Development has responded to feedback from Camden’s Design Review Panel by:
- i Relocating the commercial entrance from the corner of Gray’s Inn Road and Acton Street to along Gray’s Inn Road;
 - ii Provision of framing to the eighth floor terrace
 - iii Clearer distinction in materiality between the residential and commercial components; and
 - iv Relocation of the substation to along Acton Street.
- 9.24 Further details of how the Proposed Development has responded to feedback from Camden Council and the Design Review Panel during the pre-application process is set out within the Design and Access Statement prepared by Haptic Architects.
- 9.25 The Proposed Development would provide level access to all uses and entrances into the building. Ramps are proposed within the external courtyard to facilitate access for all users.
- 9.26 It is considered that the Proposed Development would secure the delivery of a high-quality building that respects and positively responds to the local context and character by striking a balance between the contrasting scales of Gray’s Inn Road and Acton Street. The building has been designed to be highly sustainable and provide an active ground floor commercial frontage to design out crime and antisocial behaviour. The Proposed Development will

refurbish and extend the existing building and would contribute to the ongoing rejuvenation of the wider area.

- 9.27 It is considered the Proposed Development would provide an exemplary and highly sustainable design in a prominent location allocated for growth and change. The proposals have also been considered by Camden’s Design Review Panel. The proposals therefore fully comply with the NPPF, London Plan Policies D2-D5, Local Plan policy D1 and C6 and the Design CPG.

10 Historic Environment and Townscape

- 10.1 This section considers the Proposed Development against relevant national, regional and local heritage planning policy and guidance relating to designated heritage assets, archaeology and townscape. This section also considers the Proposed Development in respect of townscape views and impact heritage assets, notably the setting of one the Grade I Listed terraces on Bedford Square.
- 10.2 A full analysis of the impact of the Proposed Development on designated heritage assets is included within the submitted Heritage and Townscape, Visual Impact Assessment (including Accurate Visual Representations (AVR) prepared by Miller Hare (“HTVIA”), prepared by The Townscape Consultancy and submitted as part of the application and should be read alongside this Section of this Statement.

Policy and Statutory Context

- 10.3 Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) states that in considering whether to grant planning permission for development which affects a listed building or its setting, the decision maker shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
- 10.4 Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of conservation areas.
- 10.5 The need to apply this test was reiterated by the Court of Appeal in the case of *Catesby Estates Ltd v Steer and Secretary of State for Communities and Local Government v Steer* [2018] EWCA 1697 sets out three general principles to be applied when considering the setting of a Listed Building. The Judgement sets out at paragraphs 28 to 30, inter alia that:
- 1) It is necessary for the decision maker to understand what the setting of a listed building encompasses even if its extent is difficult to delineate exactly, and whether the proposed development is within the setting, or related to it in some way;

- 2) There is no single approach to identify the extent of a listed building's setting and how one experiences a listed building within its changing surroundings are not limited only to sight; and
 - 3) Where, when and how the setting of a Listed Building is perceived and any harm caused to it should be considered in line with the planning balance by the decision maker, both in terms of the NPPF and the presumption in favour of sustainable development.
- 10.6 The Judgement is clear that the setting of a Listed Building is not limited to how one visually experiences a heritage asset through sense of sight; in judging the impact development may have on the significance of a Listed Building and its setting, regard should be given to its physical surroundings and how that informs the relevant "experience" of that heritage asset.
- 10.7 The Government has attached great importance to conserving and enhancing the historic environment at Chapter 16 of the NPPF.
- 10.8 Paragraph 192 of the NPPF sets out that local planning authorities should maintain or have access to a historic environment record containing up to date evidence to assess the significance of heritage assets and the contribution they make, and predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future.
- 10.9 Paragraph 194 of the NPPF states that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. 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.
- 10.10 As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

10.11 Paragraph 197 of the NPPF states that in determining planning applications, local planning authorities should take account of:

- The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- The positive contribution that conservation of heritage assets can make to sustainable communities including their economic viability; and
- The desirability of new development making a positive contribution to local character and distinctiveness.

10.12 Paragraph 199 states that, 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 (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

10.13 Paragraph 202 of the NPPF states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

10.14 The NPPG on Conserving and Enhancing the Historic Environment provides further guidance in assessing the impact of development proposals which effect heritage assets. It sets out that "significance" derives not only from a heritage asset's physical presence, but also from its setting. It sets out that "Public Benefits" may follow from many developments and could be anything that delivers economic, social, or environmental objectives as described at Paragraph 8 of the NPPF.

10.15 London Plan Policy HC1(A) should develop evidence that demonstrates a clear understanding of London's historic environment. This evidence should then be utilised in identifying, understanding, conserving, and enhancing the historic environment and heritage assets, as well as improving access to heritage assets.

- 10.16 London Plan Policy HC1(B) states that development plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings.
- 10.17 The policy goes on to state in HC1(C) that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. In turn, development proposals should avoid harm and identify enhancement opportunities encouraging heritage considerations early in the design process.
- 10.18 London Plan Policy HC1(D) makes it clear that development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes.
- 10.19 London Plan Policy HC3, in relation to strategic and local views, notes that development proposals must be assessed for their impact on a designated view if they fall within the foreground, middle ground or background of that view. Supporting paragraph 7.3.1 continues by saying development can make a positive contribution to the views and this should be encouraged, but where development is likely to compromise the setting or visibility of a key landmark should be resisted.
- 10.20 This policy goes on in HC4, noting development proposals should not harm, and should seek to make a positive contribution to the characteristics and composition of Strategic Views and their landmark elements. They should also preserve and where possible enhance views.
- 10.21 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. In respect of designated heritage assets, the Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage assets unless the public benefits of the proposal convincingly outweigh that harm.

Heritage Impact

- 10.22 The HTVIA, prepared by The Townscape Consultancy concludes that there is no harm caused to the setting of any nearby heritage assets and the Conservation Area. The HTVIA concludes that the existing building is a detractor to the Conservation Area, and the proposed development would preserve and enhance the Bloomsbury Conservation Area and its setting.
- 10.23 In the event that the decision makers take a different view, it is considered that any harm caused would be at the lower end of less than substantial harm. The public benefits flowing from the development are significant and in line with paragraph 202 of the NPPF, where the level of harm is assessed to be of less than substantial harm, this harm should be outweighed by the public benefits of the proposals. The public benefits arising from the proposals are significant and set out below.

Environmental Benefits

- 10.24 The positive impacts that will be delivered as a result of the Proposed Development will greatly improve the local environment by:
- Re-using and adapting the existing structure;
 - Providing a highly sustainable new building which uses recycled and low carbon materials;
 - Improving the townscape and street scene by creating a new, coherent building of a high-quality design;
 - Delivering a building which achieves a BREEAM score of “Excellent” as a minimum for the office element at pre-assessment stage with aspirations for “Outstanding”;
 - Achieving a 63% improvement over the Building Regulations Part L 2021 Target Emission Rate.
 - Creating a car free development and removing the existing parking to the rear of the site;
 - Promoting sustainable modes of travel with a focus on cycling and end of trip facilities;
 - Promoting urban greening in the external courtyard to the rear of the site and along the proposed terraces to provide biodiversity and ecology benefits;

- Targeting an increase in the current EPC rating of G to A for both the domestic and commercial aspects of the Proposed Development;
- Installation of new plant equipment to make the building more energy efficient;
- Installation of photovoltaic (PV) panels at roof level to supplement the electrical energy generation; and
- Introduction of blue and green roofs with SuDs benefits.

Economic Benefits

10.25 The Proposed Development makes a number of economic contributions to Camden through:

- Providing new high-quality office accommodation (4,356 sqm total) to support the ecosystem of Camden's Knowledge Quarter;
- Shell and core design to allow flexible adaptation of the office floorspace for future tenants;
- Increasing the employment density of the site as a result of more efficient floorplates and plant equipment;
- Increasing the footfall within the area, in turn supporting local businesses;
- Optimising the use of the land to maximise the office floorspace and provision of residential units;
- Providing seven new high quality homes to meet the Boroughs housing targets;
- Investment in the Camden economy through local procurement during construction; and
- Providing opportunities for local jobs and construction apprenticeships through the construction phase of the development.

Social Benefits

10.26 The Proposed Development makes a contribution to social well-being in Camden through:-

- Reducing crime and antisocial behaviour through design improvements and increasing natural and passive surveillance on Gray's Inn Road and Acton Street;
- Pedestrian and cycling improvements through removal of the crossover on Acton Street and new cycle parking;
- Opportunities for local people to undertake construction apprenticeships;

- Introduction of seven residential units to the area which are high quality with private amenity space;
- Sustainable office space for workers with a focus on wellbeing;
- Provision of outdoor amenity space of the officer occupiers; and
- Providing level access to all users of the building and accessible features within the external courtyard.

Townscape Impacts

- 10.27 It was agreed during pre-application engagement with Camden Officers that 14 AVR's would be prepared to inform the impact of the Proposed Development on the townscape. These include a mix of wireline and fully rendered AVRs to assess the townscape impacts of the proposals.
- 10.28 The HTVIA concludes that the Proposed Development is of a height appropriate for its location, and will enhance the Site's position at this transitional point in the townscape. Its form, scale and detailed architectural design are well considered and respond to the immediate and wider context. It will enhance the townscape character of the area, in particular by contributing to wayfinding from the east by replacing a stark blank frontage with a human scaled and well-articulated architecture of high quality materials and detailing.
- 10.29 If the decision maker was to disagree with this assessment, it is considered that any harm is very much at the lower end of "less than substantial" and is clearly outweighed by the economic, social and environmental benefits of the proposals.
- 10.30 The Proposed Development is therefore considered to comply with the statutory tests within the NPPF, London Plan Policy HC1 and Local Plan policy D2.

11 Energy and Sustainability

- 11.1 This section considers the Proposed Development against relevant planning policy regarding energy and sustainability.
- 11.2 At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.
- 11.3 The NPPF contains the Government’s policy on climate change. Paragraph 149 states that local planning authorities are required to adopt proactive strategies to mitigate and adapt to climate change. Paragraph 152, states that to support the move to a low carbon future, local planning authorities should plan for new development in locations and ways that reduce greenhouse gas emissions; such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government’s policy for national technical standards.
- 11.4 Policy SI2 of the London Plan states that major development should be net zero carbon by achieving reductions in greenhouse gases in operation and through the energy hierarchy of; “be lean, be clean, be green, be seen”. Part C of the policy sets out that a minimum on site reduction of 35% is required for major development, 15% of which should be achieved through energy efficiency measures for non-residential development.
- 11.5 Policy SI3(A) of the London Plan relates to energy infrastructure, as boroughs and developers should engage at an early stage with relevant energy companies and bodies to established the future energy and infrastructure requirements arising from large-scale development proposals.
- 11.6 Policy SI7 of the London Plan supports reducing waste and supporting the circular economy to support resource efficiency.
- 11.7 In July 2019, Camden declared a climate emergency and subsequently published a Climate Action Plan setting out how the Council will work towards zero carbon by 2020.
- 11.8 Policy CC1 of the Local Plan sets out that the Council will require all developments to minimise the effects of climate change and encourage all developments to meet the highest feasible

environmental standards that are financially viable during construction and occupation by promoting zero carbon development, requiring all development to reduce carbon dioxide emissions through the London Plan energy hierarchy and to promote sustainable travel.

- 11.9 Part E of the policy requires all proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building. The supporting text at paragraph 8.17 of the Plan states that all proposals for substantial demolition and reconstruction should be fully justified in terms of the optimisation of resources and energy use, in comparison with the existing building. Paragraph 8.19 of the Plan states that the Council will expect developers to consider the service life of buildings and their possible future uses to optimise resource efficiency.
- 11.10 Policy CC2 of the Local Plan requires all development to be resilient to climate change by promoting sustainable design and construction measures. Developments involving conversions of over 500sqm should achieve BREEAM “Excellent” non-domestic buildings. The Energy Efficiency CPG sets out minimum requirements for 60% of all Energy and Water BREEAM credits and 40% of all Material BREEAM credits being achieved.
- 11.11 Policy CC3 of the Local Plan seeks to reduce flood risk and maximise water efficiency through the use of Sustainable urban Drainage Systems (SuDS) to achieve greenfield runoff rates where feasible.
- 11.12 The Water and Flooding CPG published in March 2019 sets out detailed standards for promoting water efficiency including rain water harvesting, recycling water through grey water systems and SuDS.
- 11.13 London Planning Guidance Camden Planning Guidance have also been considered in respect of energy and sustainability matters.

Assessment

- 11.14 A suite of documents have been prepared and submitted with the application regarding sustainability. The Design and Access Statement, prepared by Haptic Architects, Sustainability, Energy and Overheating Assessment prepared by GDP including the

Sustainability and Energy Camden Proforma and the BREEAM Pre-Assessment, and the Sustainable Drainage Strategy prepared by Elliot Wood should all be read alongside this Statement.

- 11.15 Sustainability is a key aspect of the Proposed Development in all manners, not only in terms of BREEAM and life-time carbon reduction but in its operational phase in terms of health and wellbeing.
- 11.16 The Proposed Development seeks to retain the existing frame and provide a low carbon two storey extension. The Proposed Development seeks to minimise demolition, maximise retention and reuse of the existing building. Materials with low embodied carbon and water will be used and the design will optimise the durability and lifespan of the building. All timber products will be sourced from accredited Forest Stewardship Council or Programme for the Endorsement of Forestry Certification sources.
- 11.17 The submitted Sustainability, Energy and Overheating Assessment, prepared by GDM sets out that through the application of the GLA energy hierarchy, the Proposed Development is set to achieve an overall 63% reduction in carbon dioxide emissions over Part L 2021 using SAP 10 carbon factors. The commercial component is designed to achieve a 60% reduction over Part L 2021 and the residential component is designed to achieve a 76% reduction over Part L 2021. A £45,151 Carbon Offsetting Contribution would be provided to offset the remaining amount to achieve net zero, and be secured by Section 106 Obligation.
- 11.18 A BREEAM pre-assessment has been prepared by Twin and Earth which concludes the Proposed Development will achieve a minimum score of 75.55% “Excellent” for the office component of the Proposed Development with aspirations for “Outstanding” with a further 25.97% of potential credits identified in the pre-assessment. The minimum 60% of credits for energy and water and 40% for materials have been met.
- 11.19 The development would feature a mixed mode ventilation system to minimise energy demand in temperate periods with openable vented panels for the office and residential elements of the building. This will minimise the demand and need for mechanical cooling systems.

- 11.20 The Proposed Development is targeting a reduction in water consumption of 50% against the BRE Baseline and ensuring 110 litres per person per day (including 5 litres for external water use) is achieved for the Residential Developments. The Proposed Development will also provide attenuation and blue/green roofs to achieve a greenfield runoff rates.
- 11.21 The Energy Strategy for the building proposes an all-electric solution with no gas or CHP boilers to minimise greenhouse gas emissions. The proposals are seeking for 15% of on-site generation to come from renewable sources. PV panels are incorporated into the design on flat roofs. Air Source Heat Pumps are provided for heating and cooling.
- 11.22 The proposed floor to ceiling heights are the same continuously throughout the floorplates of the commercial component to ensure that the building is adaptable for alternative uses in the future.
- 11.23 The highly efficient glazing proposed on all elevations is almost floor to ceiling which maximises the amount of natural light to minimise energy usage and promote wellbeing, without causing overheating to building users. This would enable the use of the building to change in the future with minimal interventions to the Proposed Building.
- 11.24 The Proposed Development will be highly sustainable and fully accord with the NPPF and the presumption in favour of sustainable development, London Plan Policy SI2, SI3 and SI7, Local Plan Policies CC1-CC3, the Energy Efficiency CPG and Water and Flooding CPG.

12 Other Material Considerations

12.1 This section provides an assessment of other relevant material considerations including; daylight, sunlight and amenity, ecology and landscaping; transport, car and cycle parking; deliveries, servicing and waste; and noise and air quality.

Daylight, Sunlight and Amenity

12.2 Paragraph 127 of the NPPF refers to securing a good standard of amenity for all existing and future occupants of land and buildings.

12.3 Policy D13 of the London Plan introduces the Agent of Change principle which seeks to manage noise and other potential nuisances through good design and locating uses in appropriate locations.

12.4 Policy A1 of the Local Plan sets out how the Council will manage the impact of development to protect the quality of life of occupiers and neighbours. The policy states that planning permission will be granted unless it causes unacceptable harm to residential amenity. To protect residential amenity, the Council will consider:

- Visual privacy and outlook;
- Sunlight, daylight and overshadowing;
- Artificial lighting levels;
- Transport impacts;
- Construction phase impacts
- Noise and vibration levels;
- Odour, fumes and dust;
- Microclimate;
- Contaminated land; and
- Impact upon water and wastewater infrastructure.

Assessment

- 12.5 The Proposed Development has been assessed in terms of its potential for impact on the amenity of the surrounding sensitive receptors. A Daylight, Sunlight and Overshadowing Report has been prepared by Point 2 Surveyors which has been submitted as part of the planning application.
- 12.6 In respect of daylight and sunlight to neighbouring residential properties, where appropriate, the BRE Guidelines allow for the use of alternative target values. This approach is supported within the London Plan and Camden's Housing SPG (March 2016). Point 2 have selected five locations and have produced six sections to establish the angles of obstruction that exist within the streets surrounding the site. This process identified obstruction angles of between 35° - 49°, which produces an average corresponding Vertical Sky Component (VSC) value of 17%. This demonstrates that VSC's in the mid-teens is not uncommon within this locality. This figure has served as an alternative VSC target throughout their assessment.
- 12.7 In total, 21 neighbouring residential properties have been considered for daylight (Vertical Sky Component and No Sky line) and sunlight (Annual Probable Sunlight Hours). Climate Based Daylight Modelling (CBDM) has been completed to assess the daylight within the new residential accommodation.
- 12.8 13 of the neighbouring properties comply with the BRE Guidelines for VSC, NSL and APSH. The remaining eight properties which experience reductions beyond the BRE guidelines are:-
- 64, 66, 68 and 70 Acton Street;
 - 298 Gray's Inn Road; and
 - 68, 70 and 72 Frederick Street.
- 12.9 These eight properties are discussed in more detail within the Daylight, Sunlight and Overshadowing Report, prepared by Point 2. In summary, the majority of the remaining eight properties will experience minor percentage alterations in VSC and retain VSC levels in line with or above the alternative target value of 17%. The exception to this are windows located on the lower ground or ground floors along Frederick Street and two rear windows serving 298 Gray's Inn Road. These reductions are to windows with low levels of existing light, which means small reductions lead to disproportionately high percentage reductions. This is

common when developing a site in central London, particularly where properties are in close proximity to one another.

- 12.10 The alterations to NSL are slightly more noticeable however, the majority of the rooms are either bedrooms or retain a view of the sky to over half of the working plane within the room, Point 2 consider this to be a reasonable level of daylight distribution for an urban environment. Overall, the effects upon daylight amenity are generally considered to be minor to moderate adverse in nature, particularly in the context of a central London location.
- 12.11 Overall, 87% of the windows assessed will adhere to BRE guidelines for VSC and 89% of the rooms will adhere to BRE criteria for NSL.
- 12.12 Alterations in sunlight are isolated and limited to winter sunlight only, the annual APSH for all properties remains in excess of the BRE 25% recommendations. In terms of sunlight, 95% of the rooms assessed will adhere to the BRE Guidelines for APSH.
- 12.13 On balance, whilst some of the windows experience reductions for VSC, NSL and ASPH in excess of BRE guidance for some windows within the seven properties, the existing daylight levels are low and therefore the actual reduction in daylight levels is relatively low.
- 12.14 With regards to internal daylight within the proposed residential units, Point 2 have been liaising with the architect throughout the design process to refine the internal layouts and glazing design to maximise the availability of daylight within properties wherever possible. 84% of the proposed rooms meet the suggested median lux levels for their room use.
- 12.15 Point 2 have prepared a comprehensive analysis which concludes that the light losses to neighbouring properties will not alter how any of the most impacted rooms are used. The report sets out that there is a good level of daylight amenity within the Proposed Development which is commensurate in many cases, higher than what one would ordinarily see for a residential development within central London. Internal daylight of the proposed residential uses is considered to be acceptable.
- 12.16 The Proposed Development is therefore considered to comply with Local Plan Policy A1.

Ecology and Landscaping

- 12.17** Policy G5 of the New London Plan states that major development proposals should contribute to urban greening and sets a target urban greening factor score of 0.3 for predominantly commercial development.
- 12.18 Policy A2 of the Local Plan seeks to protect, enhance and improve access to parks, open space and green infrastructure. The Council will seek to secure new and enhanced open space provision through Section 106 Contributions and the Community Infrastructure Levy by applying a standard of 9sqm per residential occupier, and 0.74 sqm per commercial occupier. If there is no realistic means of direct provision, the Council may accept a financial contribution in lieu of on site or off site provision.
- 12.19 Policy A3 of the Local Plan sets out how the Council will protect and enhance sites of nature conservation and biodiversity, including by assessing developments against their ability to realise benefits for biodiversity through layout, design and materials used in the built structure and landscape elements. Paragraph 6.65 of the Local Plan and the Biodiversity CPG require ecology surveys as part of major developments to understand potential.

Assessment

- 12.20 In terms of urban greening, a 243 sqm blue/green roof is proposed at roof level in addition to the transforming of the existing hardstanding courtyard at ground floor into a landscaped amenity space of the office occupiers. This results in an Urban Greening Factor score of 0.31, in line with London Plan targets.
- 12.21 No public open space is proposed on the Site given the constraints. In line with the public open space CPG a payment of £36,225 would be secured via Section 106 Agreement on the basis of 7 new residents and 56 new office workers, assuming a 1:10sqm split on 557sqm of GIA uplift, resulting in a public open space requirement of 175 sqm.
- 12.22 A Preliminary Ecology Appraisal, prepared by Chevron Green Consultancy was conducted in April 2023 which found no vegetative habitats or off-site. It found low potential for roosting bats and its key recommendations for mitigating potential impacts will be developed through

the design phase and may include measures such as sensitive lighting design, pollution control, green roofs and incorporation of bird and bat boxes.

- 12.23 The Proposed Development would enhance biodiversity and ecology in the Borough through new urban greening measures. It is considered the Proposed Development would fully comply with London Plan policy G5, policy A2 and A3 of the Local Plan and the Biodiversity CPG.

Transport, Car and Cycle Parking

- 12.24 Chapter 9 of the NPPF sets out the Government's policies with regards to Transport. The overall aims are to promote solutions that support a reduction in greenhouse gas emissions and reduce congestion and will contribute to wider sustainability and health objectives. The NPPF outlines aims for a transport system balanced in favour of sustainable transport modes, in order to give people a real choice about how they travel. It also encourages solutions which support reductions in greenhouse gas emissions and reduce congestion.

- 12.25 Paragraph 110 of the NPPF states it should be ensured that:

- Appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
- safe and suitable access to the site can be achieved for all users;
- any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

- 12.26 Policy T1 of the London Plan examines the strategic approach to transport. Development Plans and proposals should facilitate the delivery of the Mayor's strategic target of 80% of all trips in London to be made by foot, cycle or public transport by 2041. Part B of the policy goes on to state that all development should make the most of effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes.

12.27 Policy T5 of the London Plan sets out minimum cycle parking standards for new developments. Table 10.2 requires:

- For office (Class B1) uses, one space per 75 sqm GEA for long stay cycle parking, for short stay cycle parking, the requirements are 1 space per 500sqm GEA for the first 5,000sqm, and thereafter 1 space per 5,000sqm GEA.

12.28 For residential (Class C3) uses, two spaces per dwelling (for dwellings larger than 1 bedroom) for long stay cycle parking, and two spaces for between 5 and 40 dwellings for short stay;

12.29 In accordance with Policy T6 of the London Plan, car-free development should be the starting point for all development proposals in places that are (or are planned to be) well connected by public transport.

12.30 Policy T1 of the Local Plan seeks to promote sustainable transport by prioritising walking, cycling and public transport in Camden by supporting public realm improvements and the pedestrian environment, promoting cycling and providing high quality parking and end of trip facilities in developments. Policy T2 of the Local Plan requires all new development in the Borough to be car free. Policy T4 of the Local Plan requires developments over 2,500sqm to provide Construction Management Plans, Delivery and Servicing Management plans and Transport Assessments.

12.31 The Transport CPG published in March 2019 provides detailed guidance relating to deliveries and servicing, cycle parking and end of trip facilities.

Assessment

12.32 Cycle parking will be provided in line with the London Plan and the London Cycle Design Standards, resulting in a significant improvement to the existing building.

12.33 In terms of long stay cycle parking, four accessible racks, two Sheffield stands, four foldable bike racks (a total of 18 cycle parking spaces) and four lockers will be provided for the commercial bike storage internally at ground floor level. A further 18 two-tier bike racks will be located within the commercial cycle store within the external courtyard (a total of 36 cycle

parking spaces). An additional 22 vertical bike racks (a total of 22 bikes) and 69 lockers can be access via the stairs in the external courtyard leading to the basement.

- 12.34 Separate male and female changing facilities are provided at basement level. Shower and locker facilities will be provided in line with Camden Councils planning policy, equating to 7 showers and 1 accessible shower, and 73 lockers.
- 12.35 Short stay cycle parking requirements would be delivered on street through a contribution to pedestrian, cycling and environmental improvements and secured via Section 106 obligation.
- 12.36 By providing a car free development and promoting the use of walking and cycling as the main modes of travel to / from the Site and public transport nodes, this proposal accords with national, regional and local policies.
- 12.37 The Proposed Development includes the removal of an air vent on the footway along Acton Street in order to create a uniform building line. A stopping up plan is provided at Appendix F of the Transport Statement, prepared by Caneparo. This area will require Stopping Up and will form part of a Section 278 Agreement with Transport for London/Camden Council.

Delivery, Servicing and Waste

- 12.38 Policy T7 of the London Plan sets out that development proposals should facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible. Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments. Developments should be designed and managed so that deliveries can be received outside of peak hours and in the evening or night-time.
- 12.39 Policy D3 of the London Plan states that development should facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on the environment, public realm and vulnerable road users.

12.40 Local Plan Policy A1 sets out that the Council will seek to resist development that fails to adequately assess and address transport impacts affecting communities, neighbours and the existing transport network, through looking at and considering Transport Assessments, Travel Plans and Delivery and Servicing Management Plans.

Assessment

12.41 The Proposed Development seeks to remove the existing off street servicing area, which is considered unsafe due to the lack of turning space and instead will service on-street via Acton Street. Whilst the Council promote off-street servicing in developments, it is considered that on balance this would have a detrimental impact on the useable space at ground floor level and would prejudice active uses and frontages, and providing separate meaningful access to the new residential and commercial uses, particularly on Acton Street.

12.42 The Development will utilise a new 15m shared-use loading bay on Acton Street allowing loading for up to 20 minutes between 10:00-16:00 Monday to Saturday, anytime between 19:00-08:00 overnight Monday to Saturday and at all times on Sunday. Where possible, deliveries will be undertaken by small to medium sized vehicles (e.g. bicycles, motorbikes, and vans) and electric or hybrid vehicles.

12.43 The existing crossover providing access to the off-street servicing area would be removed to create a continuous pavement line along Acton Street, this would form part of a Section 278 Agreement with Camden and Transport for London.

12.44 The shared-use loading bay will also allow for short-term disabled parking. This would form part of a Section 278 Agreement with Transport for London.

12.45 Internal access to the waste store will be provided via the residential lobby and a back of house area for residents. A separate on-street access will be provided from Acton Street, giving direct access for the Council's waste collection personnel to transport bins between the store and the waste collection vehicle on Acton Street.

12.46 Waste collection vehicles will continue to stop of Acton Street as per the existing situation. Waste storage for the Proposed Development has been designed in line with Camden Councils waste storage specifications, including allowance for both recyclable material and

residual waste. The waste store will be provided at ground level, accessed from Acton Street, for both the commercial and residential tenants.

12.47 The Transport Statement concludes that the Proposed Development will result in an increase of total person trips with majority undertaken by sustainable modes of transport. The removal of the existing car parking spaces within the building, combined with a minor increase in servicing trips is considered to lead to a negligible change in vehicular traffic to the Site overall which is considered to be acceptable

12.48 The delivery and servicing proposals have been prepared to ensure the successful operation of servicing activity and refuse collection at the Site on a day-to-day basis. It ensures that there are limited opportunities for conflict with pedestrians and other vehicles and that the servicing of the Development would not affect the free flow or environmental condition of the highway. The proposed delivery, servicing and waste strategies have been discussed with both Transport for London and Camden Council Highways Officers. The development proposals accord with national, regional and local policies.

Noise

12.49 The NPPF contains guidance on noise management in planning decisions. Paragraph 185 states that decisions should aim to avoid noise giving rise to significant impacts on quality of life as a result of development and mitigate noise impacts.

12.50 London Plan Policy D13 states the 'Agent of Change' principle places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development. Part D notes that development proposals should manage noise and other potential nuisances by:

- Ensuring good design mitigates and minimises existing and potential nuisances generated by existing uses and activities located in the area;
- Exploring mitigation measures early in the design stage, with necessary and appropriate provisions including ongoing and future management of mitigation measures secured through planning obligations; and

- Separating new noise sensitive development where possible from existing noise generating businesses and uses through distance, screening, internal layout, sound-proofing, insulation and other acoustic design measures.

12.51 Policy D14 of the London Plan notes that development proposals should manage noise by avoiding significant adverse noise impacts on health and quality of life.

12.52 Policy A4 of the Local Plan sets out that noise and vibration in developments will be managed, and planning permission will only be granted for noise generating equipment (including plant and machinery) if it can be operated without causing harm to amenity. Detailed standards are set out in Appendix 3 of the Local Plan.

Assessment

12.53 An Acoustic Report has been prepared by Auricl and has been submitted with the application. An assessment has been carried out into the environmental noise levels that will affect the development facades, the noise impacts associated with the proposed new commercial terraces and the background noise levels at the nearest noise sensitive properties to the south/east and west of the site. An unmanned noise survey was carried out over a 24-hour period between 30 May 2022 and 31 May 2022.

12.54 The analysis concludes that the Camden Council LOAEL internal noise levels should be achievable in the proposed residential dwellings through the use of suitable external façade constructions. It was noted that there was no significant change to noise levels as a result of the Proposed Development, due to the dominant nearby noise sources of Gray's Inn Road and Acton Street.

12.55 An assessment of noise intrusion has also been undertaken for the scenario when windows are open to control overheating. It was concluded that open windows would be acoustically acceptable means of controlling overheating on the southern and eastern façades. However, the assessment concluded that open windows would not be acoustically acceptable means of controlling overheating on the northern and western façades.

- 12.56 The building services plant design will be sufficiently flexible to ensure that suitably quiet, non-tonal plant can be procured and where necessary mitigation options can be included to ensure the noise limits are not exceeded.
- 12.57 The impact of the commercial terraces at eighth and ninth floor levels has been assessed by Auricl as part of their Acoustic Report. The conclusions set out that the noise generated by the office terraces is not likely to be noticeable or cause nuisance to the nearest sensitive receptors based on the background noise survey.

Air Quality

- 12.58 In relation to Air Quality, London Plan Policy SI1(A) states that Development Plans, through relevant strategic, site-specific and area-based policies should seek opportunities to identify and deliver further improvements to air quality and should not reduce air quality benefits that result from the Mayor's or boroughs' activities to improve air quality.
- 12.59 London Plan Policy SI 1(B) aims to tackle poor air quality, protect health and meet legal obligations by ensuring development proposals should not:
- A) Lead to further deterioration of existing poor air quality;
 - B) Create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits; and
 - C) Create unacceptable risk of high levels of exposure to poor air quality.
- 12.60 In order to meet the requirements as a minimum:
- A) Development proposals must be at least air quality neutral;
 - B) Development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality in preference to post-design or retrofitted mitigation measures; and
 - C) Major development proposals must be submitted with an Air Quality Assessment. Air quality assessments should show how the development will meet the requirements of B1 Development proposals in Air Quality Focus Areas or that are likely to be used by large numbers of people particularly vulnerable to poor air quality, such as children or

older people, which do not demonstrate that design measures have been used to minimise exposure should be refused.

- 12.61 Policy CC4 of the Local Plan sets out that the Council will ensure the impact of development on air quality is mitigated, requiring Air Quality Assessments where developments are likely to have an impact on Air Quality and provide mitigation measures for residential uses.

Assessment

- 12.62 The submitted Air Quality Impact Assessment, prepared by Air Quality Consultants has been based on pre-pandemic activity and emissions forecasts, to ensure a worst-case assessment.
- 12.63 The Proposed Development is therefore shown to meet the London Plan's requirement that new developments are at least 'air quality neutral' in accordance with Policy SI 1 of the London Plan and Policy A1 of the Local Plan.
- 12.64 The Assessment concludes that during the construction works, a range of best practice mitigation measures will be implemented to reduce dust emissions and the overall effect will be 'not significant'. Appropriate measures have been set out within the Air Quality Impact Assessment, prepared by Air Quality Consultants.
- 12.65 Air quality conditions for future residents of the Proposed Development have been shown to be acceptable, with concentrations below the air quality objectives throughout the site, even when applying the highly conservative modelling assumptions required within the Camden Air Quality CPG.
- 12.66 The Assessment noted that PM_{2.5} concentrations may continue to marginally exceed the GLA target in the opening year, however this is widespread across London and will likely be addressed by a package of measures, such as extending the ULEZ, implemented by the GLA.
- 12.67 A number of best practice measures have been included within the design of the Proposed Development to reduce the impact of the Proposed Development on air quality. This combined with the removal of the existing car parking space within the development, result in the Proposed Development having a negligible effect on local air quality.

- 12.68 The overall operational air quality effects of the Proposed Development are therefore judged to be 'not significant'. As the impacts of the Proposed Development are not significant, additional mitigation measures are not required.
- 12.69 Six receptor locations at multiple heights have been identified within the new development, which represent exposure to existing sources at each floor level with residential use. The results demonstrate that modelled concentrations of NO₂ and PM₁₀ are below the criteria adopted by LB Camden in its Air Quality CPG of 38 µg/m³ for NO₂ and 20 µg/m³ for PM₁₀ in 2026, even when assuming no reduction in emissions or background concentrations. However, the adopted PM_{2.5} criteria of 10µg/m³ is exceeded at all modelled receptors. This is in part due to the conservative background PM_{2.5} concentrations used within the assessment which are above 10 µg/m³ in both 2022 and 2026 and is based on measured concentration from a roadside monitor rather than a background monitor as a worst-case.
- 12.70 Given the number of national, regional and local measures being implemented to achieve the WHO PM_{2.5} guideline by 2036, concentrations of PM_{2.5} are only likely to be above the guideline in the first few years of the development.
- 12.71 It is considered that the Proposed Development fully accords with London Plan policy S11, Local Plan policy CC3 and the Air Quality CPG.

13 Planning Obligations and the Community Infrastructure Levy

- 13.1 Under Section 106 of the Town and Country Planning Act 1990, as amended, local planning authorities have the power to enter into planning obligations with any person interested in land in their area for the purpose of restricting or regulating the development or use of the land.
- 13.2 The NPPF states that planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition. It repeats the tests set out above and then states that where planning obligations are being sought or revised, local planning authorities should take account of changes in market conditions over time and, where appropriate, be sufficiently flexible to prevent planned development being stalled (paragraphs 54-57).
- 13.3 Policy DM1 of the Local Plan sets out that Council will use planning obligations, where appropriate to (i) support sustainable development, (ii) secure the infrastructure, facilities and services to meet the needs generated by development and (iii) mitigate the impact of development.

Community Infrastructure Levy

- 13.4 Since 2012, all developments in London which result in the addition of over 100sqm GIA floorspace (with some exceptions including affordable housing) have been eligible to pay Mayoral CIL. In February 2019 the Mayor adopted a new charging schedule (MCIL2). MCIL2 came into effect on 1 April 2019 and supersedes MCIL1 and the associated Crossrail Funding SPG. The relevant MCIL2 rates are as follows:
- Office – £185 per sqm (Central London); and
 - Residential – £80 per sqm.
- 13.5 Camden CIL came into effect on 30 October 2020. The CIL tariff for sites located within Central Camden (i.e. Zone A) are charged at the following rates:
- Office - £110 per sqm; and
 - Residential (below 10 dwellings or 1,000 sqm) - £644 per sqm.

Developer Contributions CPG (March 2019)

- 13.6 The CPG sets out how the Council will use Section 106 Contributions and CIL to fund infrastructure in the Borough. It states that financial contributions will be sought in respect of affordable housing, open space, infrastructure to address the site specific and related impacts of development which may include financial, and non-financial contributions. Detailed guidance for calculating specific financial obligations is set out within the relevant CPGs.

Draft Heads of Terms

- 13.7 The Applicant's solicitor, Knight's Solicitors, have prepared draft heads of terms which have been sent under a separate cover.
- 13.8 At this stage, it is anticipated that the following of Section 106 contributions and obligations involved with this development could include:
- Affordable Housing Contribution;
 - Carbon Offset Contribution;
 - Travel Plan monitoring;
 - Employment and local procurement;
 - Construction Apprenticeships and Apprenticeship support fee;
 - Section 278 Highway works;
 - Delivery and Servicing Management Plan;
 - Energy, Renewable Energy Efficiency and Sustainability Plans;
 - Construction Management Plan and CMP implementation support;
 - Pedestrian Cycling and Environmental Contribution;
 - Public Open Space Contribution;
 - Travel Plan Monitoring Contribution; and
 - Processing and monitoring charges (£572 per head as of October 2018).

14 Summary and Conclusions

- 14.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004, requires proposals to be determined in accordance with the statutory development plan unless material considerations indicate otherwise. This Town Planning Statement has assessed the Proposed Development against the development plan and other relevant planning policy and guidance at national, regional and local policy level.
- 14.2 This application is submitted following pre-application engagement with both Camden Council Officers through entering into a Planning Performance Agreement, and the local community and other key stakeholders as described in the Statement of Community Involvement, prepared by London Communications Agency and at Section 5 of this Statement.
- 14.3 During this process, there have been alterations to the scheme in terms of the building massing, and fenestration demonstrating that the design team have responded positively to feedback received.
- 14.4 The Proposed Development has been designed to an exemplary standard by Haptic Architects, supported by a full design team to create an iconic building in an exciting area of growth and change. The Proposed Development would secure the delivery of high-quality modern workspace and new homes for Camden.
- 14.5 A contextual, responsive and highly sustainable design approach would turn the Site into a positive contributor to the Bloomsbury Conservation Area, replacing the existing building which is poor quality and unable to be let due to its poor Energy Performance.
- 14.6 The Applicant has a strong track record of delivering projects in central London, and funding is in place to deliver the Proposed Development.
- 14.7 The Proposed Development would see the delivery of social, environmental and economic benefits including the creation of 4,342 sqm of new, modern grade A flexible workspace with a focus on wellbeing, seven new homes of varying sizes with high quality residential amenity, provide new jobs during construction and in use, deliver highly sustainable retrofit development with approximately 90% of the existing structure retained, delivery carbon

dioxide reductions in response to the climate emergency, remove all fossil fuel sources from the building and deliver new landscaping and urban greening.

14.8 The Site benefits from excellent public transport accessibility and would optimise the use of land on a previously developed Site in an area allocated for commercial and residential growth.

14.9 As set out in this Statement, the Application complies with the relevant statutory tests, policies within the NPPF, the London Plan, the Camden Local Plan, relevant emerging planning policy and the principles of the presumption in favour of sustainable development. From this Statement, it is concluded that there are no material considerations of sufficient weight to determine that these applications are other than in accordance with the Development Plan, on this basis, planning permission should be granted accordingly.

Appendix A – Planning History Schedule

Date Received	Reference No.	Type of Application	Description	Decision	Date of Decision
26/04/2012	2012/2165/P	Full Planning Permission	Change of use of 5th floor from office (Class B1a) to flexible use comprising office (Class B1a) and Health Clinic (Class D1).	Granted	15 June 2012
22/03/2000	PSX0004173	Full Planning Permission	The change of use of basement, ground and part first floor from health screening unit (D1) to B1 (office) use, as shown by drawing number 201 (copy of approved 1978).	Granted	16 May 2000
05/06/1986	PL/8600995	Full Planning Permission	Change of use of the first floor from showrooms and offices to a health screening unit.	Granted	30 July 1986
22/08/1978	L15/22/A/27076	Full Planning Permission	Erection of a louvred screen at roof level around existing cooling units.	Granted	31 October 1978
21/08/1978	L15/22/A/27087	Full Planning Permission	Erection of a linking passageway at ground level, use of part of the basement for 'X' ray screening, darkroom and inspection purposes and use of part of the first floor as an exhibition and showroom area and seminar room in connection with B.U.P.A services.	Granted	31 October 1978

Date Received	Reference No.	Type of Application	Description	Decision	Date of Decision
11/10/1977	L15/22/A/25366	Full Planning Permission	Use of the ground floor as a women's health screening clinic with ancillary storage in the basement area.	Granted	16 January 1978
11/12/1973	L15/22/A/18511	Full Planning Permission	The redevelopment of the site by the erection of a basement, part 7 storey and part 3 storey building comprising basement plant and storage, ground floor showrooms, first floor showrooms and offices, second floor offices and residential and third to sixth floors as offices	Granted	30 August 1974