

P08895/FA
02nd August 2023

London Borough of Camden,
2nd Floor, 5 Pancras Square,
Town Hall, Judd Street,
London,
WC1H 9JE

Dear Sir/Madam

37 Gray's Inn Road, London, WC1X 8PQ

Town and Country Planning Act 1990 (As Amended)
Full Planning Application for the installation of 1 no. dry riser, at ground floor, to the front façade of 37 Gray's Inn Road.

Planning Portal Ref: PP-12356417

On behalf of the applicant, Rodell Properties Ltd, please find enclosed a full planning application for the installation of 1 no. dry riser, at ground floor level, located on the front façade of 37 Gray's Inn Road.

To assist the council in the determination of the application, please find enclosed the following information which has been submitted electronically via the planning portal:

- Planning Application Forms – prepared by Rolfe Judd Planning
- Community Infrastructure Levy: CIL Form 1 – prepared by Rolfe Judd Planning
- Site Location Plan
- Elevations as existing (20102/P04 Rev. B)
- Elevations as proposed (20102/P04 Rev. D) prepared by TD-RE

The requisite application fee of £298 has also been paid via the planning portal.

Planning History

Through a search of Camden's online planning database, the following planning history is of relevance to this application:

- 2019/2097/P: Change of use from retail at part basement and part ground floor levels and office use at part basement, part ground and first, second and third floors to retail use (Class A1) at basement and ground floor levels, and residential use (Class c3) on levels 1,2,3 and 4 (creation of 3 x 2-bed self-contained flats and 1 x 1-bed self-contained flat); alterations to shopfront; alterations to fenestration on front elevation; increase in height of front wall and erection of mansard roof extension above; demolition of rear elevation and erection of rear extension to ground, 1st, 2nd and 3rd floor levels. Approved 22nd January 2020.
- 2014/3356/P: Erection of 4th floor mansard roof extension with terrace and 3rd floor rear extension, following change of use of 1st, 2nd and 3rd floors from offices (Class B1) to 2 x 2 bed flats and 1 x 3 bed maisonette (Class C3). Approved 24th November 2014.

- 2013/2634/P: Change of use of existing 1st, 2nd & 3rd floor offices (B1a) to create 3x self-contained flats (2x 2 Bedroom and 1x 1 Bedroom) (Class C3). Approved 26th July 2013.
- N15/7/2/30664: Certificate granted on 28th January 1981 for lawful use of the first, second and third floors as offices. Approved 12th June 1980.

Site Location and Context

The site is located on the western side of Gray's Inn Road and consists of a five storey Victorian building. The site is located between the established commercial hubs of Holborn to the south, Farringdon to the east, and Kings Cross to the north. The site is not listed, however lies within the Bloomsbury Conservation Area.

The site's locality is characterised by a mix of use, comprising predominantly retail at the ground floors and commercial office or Residential use on the upper floors.

Proposal

This full planning application seeks the installation of 1 no. dry riser located at ground floor on the front façade of 37 Gray's Inn Road. The dry riser is required for building regulation and fire safety purposes for the residential uses approved under application LPA ref. 2019/2097/P. The dry riser is shown on the proposed front elevation drawing, an extract of which is shown in Figure 1 below.

Figure 1



Elevations as proposed Ref: 20102/P04 Rev. D

Conservation Area Setting

As previously mentioned, the site is located within the Bloomsbury Conservation Area. The Bloomsbury Conservation Area was designated in 1968. The Bloomsbury Conservation Area Appraisal and Management Strategy (April 2011) recognises 37 Gray's Inn Road as a positive contributor to the conservation area. The conservation area appraisal also states that:

'alterations and extensions to buildings can have a detrimental impact either cumulatively or individually on the character and appearance of the conservation area.'

Heritage, Design and Access Statement

It is not considered that the proposed installation of the dry riser will have a detrimental impact either cumulatively or individually on the character and appearance of the conservation area given its scale. Rather its installation will provide firefighters with a way to transport water to higher floors in the event of a fire. It is considered that this use will improve the buildings safety for future residents and secure its long-term beneficial use.

Planning Policy

The application proposes the installation of 1no. dry riser, at ground floor, to the front façade of 37 Gray's Inn Road. This is required to enhance the buildings safety and compliance with Building regulations. The proposed works are considered supportive of the national, strategic, and local planning policies.

Principle of external alterations to buildings in a conservation area.

National Planning Policy Framework (NPPF) Paragraph 208 states that Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies, but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.

Policy HC1 of the London Plan (Heritage conservation and growth) states 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. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

Policy D1 (Design) states that the council will require that development a. respects local context and character; b. preserves or enhances the historic environment and heritage assets; e. comprises details and materials that are of high quality and complement the local character; m. preserves strategic and local views; o. carefully integrates building service equipment.

Policy D2 (Heritage) of the Camden Local Plan states that:

Designated heritage assets

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

- a. *the nature of the heritage asset prevents all reasonable uses of the site;*
- b. *no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;*
- c. *conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and*
- d. *the harm or loss is outweighed by the benefit of bringing the site back into use.*

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

Conservation areas

The Council will:

- e. *require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;*
- f. *resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;*
- g. *resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and*
- h. *preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which provide a setting for Camden's architectural heritage.*

As shown on drawing Ref: 20102/P04 Rev. D, the proposed dry riser will be installed at ground floor level between 400mm -600mm from the finished floor level. This drawing also shows that the dry riser will be small in scale. It is not considered that the installation of the dry riser will lead to any harm within the conservation area as it will be carefully integrated and positioned on the building's façade. Notwithstanding this, the Dry Riser is required as a safety measure to provide firefighters with a way to transport water to higher floors in the event of a fire and is required for building regulation purposes.

It is therefore considered that the proposal is compliant with the relevant criteria under Policy D1 and D2 of the Camden Local Plan.

Summary

This Full Planning Application seeks to install 1 no. dry riser, at ground floor, to the front façade of 37 Gray's Inn Road. The dry riser is required for firefighting and building regulation purposes.

The proposal is minor in nature and is considered acceptable on heritage, amenity, and design grounds.

We trust you have sufficient information to determine this application positively; however, should you require any further information please do not hesitate to contact the undersigned.

Yours faithfully

Femi Akindede

For and on behalf of
Rolfe Judd Planning Limited
02 August 2023