

# 100 & 88 Gray's Inn Road and 127 Clerkenwell Road

Local Planning Authority: Camden

Local Planning Authority reference 2022/4259/P

**Strategic planning application stage 2 referral**

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

**The proposal**

Demolition of 100 Gray's Inn Road and 127 Clerkenwell Road and the construction of an office-led mixed use development, together with the partial demolition and extension of 88 Gray's Inn Road for use of the upper floors for housing, and ground floor as offices.

**The applicant**

The **Global Holdings Management Group** and the architect is **Piercy&Company**

**Key dates**

**GLA pre-application meeting:** 29 June 2021 and 22 July 2022

**GLA stage 1 report:** 5 December 2022

**LPA Planning Committee decision:** 4 May 2023

**Strategic issues summary**

**Land use principles:** Office-led mixed use development within the CAZ including affordable workspace, affordable housing and ground floor commercial uses accords with the London Plan.

**Affordable housing:** 100% affordable housing is proposed, with a 60:40 mix between LAR and intermediate rent. The affordability levels are acceptable and have been secured.

**Urban design, heritage and strategic views:** The design quality of the scheme is strongly supported. Harm to heritage assets is clearly and convincingly outweighed by public benefits in this instance, which have been secured. The impact on LVMF strategic views is acceptable.

Other issues relating to **transport, climate change** and **urban greening** have been resolved.

**The Council's decision**

In this instance Camden Council has resolved to grant permission subject to planning conditions and conclusion of a Section 106 legal agreement.

**Recommendation**

That Camden Council be advised that the Mayor is content for the Council to determine the case itself, subject to any action that the Secretary of State may take, and does not therefore wish to direct refusal, or direct that he is to be the local planning authority.

## Context

1. On 28 October 2022 the Mayor of London received documents from Camden Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. This was referred to the Mayor under the following category of the Schedule to the Order 2008:
  - *Category 1C: “Development which comprises or includes the erection of a building of...more than 30 metres high and is outside the City of London.”*
2. On 5 December 2022 the Deputy Mayor for Planning, Regeneration and Skills, acting under delegated authority, considered planning report GLA/0777/01 (link to report [here](#)) and subsequently advised Camden Council that, whilst the scheme was generally supported, the application did not yet comply with the London Plan for the following reasons:
  - **Land use principles:** The land use proposals are strongly supported. Office-led mixed use development of the site would result in a quantitative increase and qualitative improvement in office floorspace within the CAZ, alongside affordable workspace and affordable housing.
  - **Housing and affordable housing:** The scheme proposes 100% affordable housing with a 60:40 tenure mix by habitable room comprised of London Affordable Rent and intermediate rent. The affordability of the intermediate rent homes is acceptable. The affordable housing provision is policy compliant.
  - **Urban design and heritage:** The layout, design, height and massing, architectural and materials quality is strongly supported. The residential quality is acceptable. The impact on LVMF strategic views could be considered acceptable, however, further rendered views are required. Less than substantial harm would be caused to the Grade II\* listed Gray’s Inn Gardens, a number of the listed buildings within Gray’s Inn and the Bloomsbury Conservation Area. This requires clear and convincing justification and needs to be outweighed by public benefits associated with the proposed scheme.
  - **Transport:** Further discussion is required on a number of transport issues including the trip generation assessment and modal split; cycle parking design; cycle safety; deliveries and servicing; and the impact on bus infrastructure. Financial contributions towards cycle hire docking station capacity improvements are required.
  - **Climate change and environment:** The applicant’s energy and urban greening strategies are generally acceptable subject to further information. The whole life cycle carbon analysis of different options testing which has been undertaken including retention and refurbishment options should be provided for assessment. A revised WLC assessment should be provided as priority for the Council and GLA further review prior to Stage 2.
3. The essentials of the case with regard to the proposal, the site, case history, strategic planning issues and relevant policies and guidance are as set out therein, unless otherwise stated in this report.

4. On 4 May 2023 Camden Council decided that it was minded to grant permission for the application subject to planning conditions and conclusion of a Section 106 agreement, and on 19 September 2023 it advised the Mayor of this decision. Under the provisions of Article 5 of the Town & Country Planning (Mayor of London) Order 2008 the Mayor may allow the draft decision to proceed unchanged; direct Camden Council under Article 6 to refuse the application; or, issue a direction to Camden Council under Article 7 that he is to act as the Local Planning Authority for the purposes of determining the application and any connected application. The Mayor has until 2 October 2023 to notify the Council of his decision and to issue any direction.
5. The decision on this case, and the reasons, will be made available on the City Hall website: [www.london.gov.uk](http://www.london.gov.uk)

## **Response to neighbourhood consultation**

6. Camden Council publicised the application by issuing 14 site notices and a digital site notice on its website. The relevant statutory bodies were also consulted. Copies of all responses to public consultation, and any other representations made on the case, have been made available to the GLA.
7. Following the neighbourhood consultation process Camden Council received a single objection to the scheme from a resident in the Bourne Estate. The objection raised the following concerns:
  - loss of light and overshadowing caused by the increased massing.
  - loss of privacy due to the proposed roof terraces.

## **Responses from statutory bodies and other organisations**

### Historic England

8. Provided the following comments:
  - We have identified additional harm that would be caused to the setting and significance of Gray's Inn Gardens, Verulam Buildings and the Bloomsbury Conservation Area.
  - It is therefore our view that the proposals do not conserve, enhance or better reveal the significance of the affected heritage assets.
  - In accordance with policies set out in the NPPF, such harm should be justified and where possible, that harm should be avoided or mitigated in the first instance.
  - We would recommend exploring further options for massing and elevational design of the proposed building.
  - Should the Council be minded to approve the application, we would remind you of the requirement to weigh the proposed harm against any public benefits of the proposals, in accordance with paragraph 202.

#### Greater London Archaeological Advisory Service (GLAAS):

9. The site lies in a Tier II archaeological priority area. The proposed development, namely the extension of the basement, is very likely to impact upon archaeological remains. A two-stage archaeological condition could provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation.

#### Thames Water

10. No objection. Recommended standard conditions and informatives.

#### Metropolitan Police

11. No objection. Recommended conditions to ensure secure by design accreditation is achieved.

#### Health and Safety Executive (Planning Gateway One):

12. No comment. The proposed development is not in scope for consultation as the residential block is not over 18m in height.

### **Representations to the Mayor**

13. The Mayor has not received any written representations on the application.

### **Response to public consultation - conclusion**

14. Having considered the local responses to public consultation, Camden Council has secured various planning obligations and conditions in response to the issues raised. GLA officers have had regard to the above statutory and non-statutory responses to the public consultation process, where these raise material planning issues of strategic importance.

### **Update**

15. Since consultation stage GLA officers have engaged in joint discussions with the applicant, the Council and TfL officers with a view to addressing the above matters. Furthermore, as part of the Council's draft decision on the case, various planning conditions and obligations have been secured. An update against the issues raised at consultation stage is set out below, having regard to responses to the public consultation.

### **Relevant policies and guidance**

16. Since consultation stage the following London Plan Guidance documents have now been finalised and published and are now a material considerations:
  - London Plan Guidance: Air Quality Neutral LPG; Air Quality Positive LPG; Circular Economy Statements LPG; Be Seen Energy Monitoring LPG; Whole

Life Carbon LPG; Urban Greening Factor LPG; Walking and Cycling LPG; Housing Design Standards LPG.

- Draft Affordable Housing LPG

## **Land use principles**

17. The proposed office-led, mixed use redevelopment would result in a quantitative increase and qualitative improvement in office floorspace within the Central Activities Zone, as well as providing affordable workspace and affordable housing. This was strongly supported at Stage 1.
18. Overall, 10% of the proposed overall employment floorspace would be provided as affordable SME workspace (326 sq.m.). This would be at ground floor level within the retained 88 Gray's Inn Road building. This is equivalent to 12% of the net uplift in employment floorspace which is proposed.
19. The affordability of the proposed affordable workspace has been confirmed. The affordable SME workspace would be discounted at 50% of market rents for a 10-year period and would be secured via S106 agreement. The submission and approval of an affordable SME workspace strategy prior to implementation has also been secured via the S106 agreement. This is acceptable.
20. The land use approach is therefore strongly supported and is in accordance with London Plan Policies SD4, SD5, E2 and H1.

## **Housing**

21. 100% affordable housing is proposed comprised of six residential flats. These would be located within the retained 88 Gray's Inn Road building to the rear of the site. This block is accessed via an arched walkway on Gray's Inn Road. A 60:40 tenure mix by habitable room is proposed, comprised of London Affordable Rent (LAR) and intermediate rent weighted towards LAR. This was strongly supported at Stage 1.
22. The low cost rent accommodation would be secured at the Mayor's LAR benchmarks in the S106 agreement, with flexibility for this to be provided at social rent if required.
23. The affordability of the intermediate rent homes is acceptable and in line with the London Plan1. The intermediate element comprises two 2 bedroom 4 person homes. These homes have been secured at Camden Living Rent levels, so would be subject to a maximum rent level of £323 per week (£1,400 per calendar month). This is same as the London Living Rent level for the ward (Holborn and Covent Garden). Overall housing costs, including rent and service charge would not exceed 40% of net household income. Eligibility for the intermediate housing would be for households below £60,000 in line with the London Plan.
24. The affordable housing provision is policy compliant and accords with the London Plan. Issues relating to residential quality and play space provision were assessed at Stage 1 and was considered acceptable. The application therefore complies with the housing policies in the London Plan.

## Urban design, heritage and strategic views

25. The design, layout and architectural and materials quality of the scheme was strongly supported at Stage 1.
26. GLA officers concluded at Stage 1 that the proposed development would not comprise a tall building for the purposes of London Plan Policy D9, taking into account the factors set out in paragraphs 42 to 47 of the Stage 1 report.
27. The proposed height and massing proposed was considered to be acceptable in strategic planning terms, subject to the issues relating to heritage impact and strategic views being concluded acceptably in line with the London Plan and NPPF.

### LVMF strategic view 6A.1 - London Panorama from Blackheath Point

28. At Stage 1, GLA officers considered that the proposed building is unlikely to have a detrimental intrusive, unsightly or prominent impact on this strategic view based on the wireline view provided as part of the applicant's Heritage Townscape and Visual Impact Assessment (HTVIA). However, GLA officers requested an additional rendered accurate visual representation for LVMF strategic view 6A.1 prior to Stage 2. This sought to enable GLA officers to more fully assess the appearance and colour of the visible elements of the building in this view to ensure that it would not have a detrimental intrusive, unsightly or prominent impact. This took into account site's close proximity to St Paul's in this view which is the strategic landmark and the criteria set out in the LVMF SPG, as well as the terracotta tone and appearance of the proposed building.
29. This additional rendered accurate visual representation has been provided and has been reviewed by GLA officers. In addition, GLA officers have visited the LVMF view point at Blackheath to consider the potential impact of the proposals in situ based on the human eye perspective given the distances involved.
30. GLA officers have concluded that the proposed building would not have any discernible harmful impact on the view of St Pauls or the ability to appreciate the strategic landmark (St Paul's Cathedral) or any of the other landmarks in the view. The application accords with London Plan Policy HC4 and the LVMF SPG.

### Heritage

31. GLA officers concluded at Stage 1 that the application would cause less than substantial harm to the significance of the following designated heritage assets, as summarised below and set out in more detail at paragraph 57 to 65 of the Stage 1 report.
32. As less than substantial harm has been identified, the application would not comply with London Plan Policy HC1. The harm identified should be given considerable importance and weight. The less than substantial harm caused by the development requires clear and convincing justification and should be outweighed by the public benefits of the proposal.

Heritage assets	Category of harm	Extent / scale	TVIA view
Grade II* listed Gray's Inn Registered Park and Gardens	Less than substantial	Low to medium	5W, 5AW
Grade II listed Verulam Buildings Nos. 1-5	Less than substantial	Low to medium	5W, 5AW
Grade II listed Raymond Buildings 1 to 6	Less than substantial	Low to medium	5W, 5AW
Grade II* listed 1, 6, 7 and 8 Gray's Inn Square	Less than substantial	Low to medium	5W, 5AW
Bloomsbury Conservation Area	Less than substantial	Low to medium	5W, 5AW

33. In this instance, GLA officers consider that the harm identified would be outweighed by public benefits in this case. This includes:

- Affordable housing related public benefits: comprised of 6 affordable homes within 88 Gray's Inn Road, comprising 4 low cost rent homes and 2 intermediate rent homes. The housing provision on site is a planning policy requirement of the Camden Local Plan mixed use policy (H2) and contributes towards London Plan Policy H4.
- Economic and employment related public benefits: The proposed development would also deliver an uplift of 2,721 sq.m. GIA of office floorspace, as well as a further 814 sq.m. GIA of flexible Class E floorspace at ground level. The office-led, mixed use redevelopment of the site would result in a quantitative increase and qualitative improvement in office floorspace within the Central Activities Zone. This is in accordance with London Plan Policies SD4, SD5 and E2.
- Affordable workspace: 326 sqm GIA of affordable SME workspace is proposed within the 88 Gray's Inn Road building which is secured at a 50% discount relative to market levels for 10 years.
- Design quality / heritage: the proposals result in the demolition of 100 Gray's Inn Road. The building detracts from the character and appearance of the Hatton Garden Conservation Area as noted Hatton Garden Conservation Area Appraisal and Management Plan. In contrast, the architectural and design quality of the proposed new office building is of a high standard and the appearance and tone responds positively to the Gray's Inn Buildings and Cavendish Mansions opposite. The provision of a high quality new corner building at this important corner location within the conservation area would enhance the character and appearance of the Hatton Garden Conservation Area. This is a heritage related public benefit, albeit it is noted that the height and massing does harm the Bloomsbury Conservation Area and other listed buildings and assets within it which are noted above.

### Fire Safety

34. A Fire Statement prepared by a suitably qualified third-party assessor was submitted with the application. Sprinklers would be provided within the new office

and retail building at 100 Gray's Inn Road. It would be served by two escape stair cores serving all floors including the roof terrace and basement areas. Both buildings would be served by fire evacuation lifts.

35. The residential element at the retained 88 Gray's Inn Road building would have a single staircase. It is below the 18-metre threshold in terms of the recent proposed changes to Building Regulations with respect to second staircases on residential buildings.
36. The replacement 100 Gray's Inn Road building which would be in office and commercial use would be constructed from cross-laminated timber (CLT) for the main structure, with concrete cores and the external fabric comprised of precast concrete. The use of CLT structure as opposed to steel has benefits in terms of its carbon footprint, compared to steel and concrete frame.
37. The Health and Safety Executive (HSE) was consulted but it confirmed that the proposed development does not fall within the scope of planning Gateway 1 and therefore have not commented on this application.
38. A further technical analysis of its fire safety will be required by a specialist consultant prior to the commencement of construction works and this has been secured by condition. A detailed fire statement including an appropriate fire engineering analysis would be secured by condition in line with the London Plan Policy D12.

## **Transport**

39. Several transport related issues were raised at Stage 1 which needed to be addressed. In terms of active travel, Camden Council has secured a financial contribution to improve safety and active travel on the local network which is welcomed. In addition, it is noted that the colonnaded design of the building would create extra pedestrian capacity at a busy junction which is supported.
40. As requested, a £60,000 cycle hire contribution has been secured via S106 to mitigate additional demand.
41. Other matters including a Construction Management Plan, Delivery and Servicing Plan (with off peak servicing), cycle parking, travel plan and permit free agreement are secured through section 106 or condition as appropriate. The application is therefore considered to be in general accordance with the transport policies of the London Plan.

## **Climate change**

42. Since Stage 1, a number of elements of the proposed energy strategy have been subject to further discussion and consideration, including the potential for further energy efficiency related carbon savings, the potential to connect to surrounding district heat networks and the potential to increase solar pv provision on the available roof top spaces. GLA officers are satisfied that these potential issues have all been fully explored and resolved at this stage.



43. The Bloomsbury and Gower Street District Energy Network is within 1,000 metres of the site but it has been demonstrated that connection to this heat network is not currently feasible. The S106 agreement secures the future proofing of the scheme so that it could be connected to a District Heat Network should this be possible in the future. This is acceptable.
44. The minimum expectations set out in the energy strategy have been secured by S106 obligation, which were detailed at Stage 1. A condition has been included to further explore the potential for additional pv provision prior to commencement. This is acceptable.
45. As the scheme falls short of the zero carbon standard, a carbon offset payment is required. This has been calculated at £95 per tonne of carbon for 30 years which equates to £123,690 and has been secured in the Section 106 agreement.
46. Whole life-cycle carbon
47. The retention and refurbishment of 88 Gray's Inn Road and the proposal for a light-weight cross laminated timber (CLT) structure within the new build office element was supported at Stage 1, given the benefits in terms of embodied carbon. However, further information was required by GLA officers on the applicant's Whole Life Cycle Carbon (WLC) Assessment to evaluate the environmental impact of the proposed development during its life cycle in line with Policy SI2 of the London Plan.
48. The WLC assessment compares the proposed development against alternative designs that were considered at pre-application stage. As part of this assessment, three options were tested:
  - a) Major refurbishment and extension of the current buildings and an upwards extension to 100 Gray's Inn Road and 127 Clerkenwell Road.
  - b) Part demolition and extension – major refurbishment of 127 Clerkenwell Road and partial demolition of 100 Gray's Inn Road to enable an upwards extension from level 4 to 11.
  - c) New build - full demolition and redevelopment to provide a new build office-led mixed use development as proposed in the application.
49. The modelling undertaken demonstrates that the proposed development (Option C – new build) would perform better in terms of whole life cycle carbon usage than any of the other options tested. This accounts for both the WLC operational carbon emissions and WLC embodied carbon emissions, as illustrated below.
50. The applicant's WLC assessment has been assessed by the Council's independent assessors who concluded that the WLC does demonstrate that the proposed option (New Build) is justified by the whole life cycle comparison and viability, with the options examined adequately. GLA officers agree with this conclusion. The application therefore complies with London Plan Policy SI2.
- 51.
- 52.



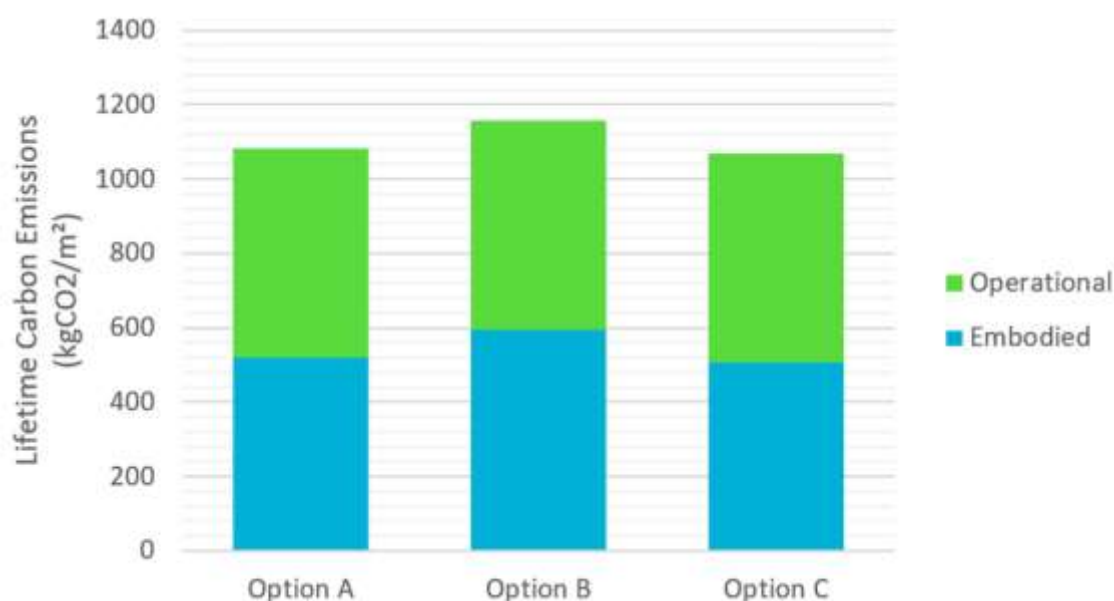
OPTION A  
MAJOR REFURBISHMENT & EXTENSION



OPTION B  
PART DEMOLITION & RE-BUILD



OPTION C  
NEW BUILD



53. Other qualitative factors and wider public benefits are also relevant material planning considerations as summarised below.
54. The existing office space is no longer suitable for modern business needs with low ceiling heights, low quality cladding and outdated service arrangements. The floorspace in Number 100 Gray's Inn Road is relatively dated, with low floor to ceiling heights and inadequate / non-compliant lift and toilet facilities. Number 127 Clerkenwell Road is more recent in its construction and has relatively good floor to ceiling heights but has small windows for an office and has a constrained deep and narrow floorplan with blank flank walls. Consequently, the office has very poor internal daylight levels, as well as a poor net to gross ratio. This has been demonstrated sufficiently at pre-application stage through site photographs and a fly through video.
55. The redevelopment of 100 Gray's Inn Road and 127 Clerkenwell Road would provide high-quality modernised 'Grade A' office space constituting flexible and adaptable employment facilities that are a significant improvement on the existing situation, which is in line with London Plan Policies SD4, SD5 and E2 which relate

to offices and the CAZ. The proposal would result in a significant uplift in the quantum and quality of flexible and adaptable office space at the site.

56. The new build option C is the only option which would deliver affordable workspace and affordable housing which are important public benefits.
57. 100 Gray's Inn Road which is a building that makes a negative contribution to the Hatton Garden Conservation Area, as set out in the Conservation Area Appraisal and Management Plan. As noted above, the architectural and design quality of the proposed new office building is of a high standard and the materiality and tone responds positively to the Gray's Inn Buildings and Cavendish Mansions opposite. The provision of a high quality new corner building at this important corner location within the conservation area would enhance the character and appearance of the Hatton Garden Conservation Area.
58. Improvements to the public realm in the form of an active ground floor and changes to the building line. The existing building line on Clerkenwell Road would be realigned to create a consistent slightly curved facade. This would remove the existing pinch-point on the pedestrian / footway which is created by the projection of the existing office building at 127 Clerkenwell Road. Additional pavement space for pedestrians, with the building line more in keeping with the historic urban form ensuring clearer sight lines and improved desire lines along the footway. An increase in the pavement width from 3-metres to 6-metres is proposed. These public benefits would not be achievable with retained buildings.

#### Circular Economy

59. A Circular Economy Statement (CES) has been submitted was considered acceptable at Stage 1. The CES includes a pre-demolition audit of 100/88 Gray's Inn Road and 127 Clerkenwell Road. This audit addresses the potential for reusing and recycling components and materials from the buildings. It is estimated that 99% of the total waste materials can be recycled, of which, 80% would be concrete and 10% brick. Recycling of this material has been secured by condition. Compliance with the CES has been secured by condition, including alongside a post-construction monitoring report. This is acceptable and in line with London Plan Policy SI7.

#### Urban Greening

60. The applicant has undertaken an Urban Greening Factor (UGF) assessment which demonstrates that the scheme would achieve an overall UGF score of 0.35. This exceeds the benchmark in the London Plan Policy G5. The urban greening proposals have been secured by condition. The application therefore complies with London Plan Policy G5.
61. As requested at Stage 1, a condition has been included to ensure that the London Plane trees which surround the site on Clerkenwell Road and Gray's Inn Road are not adversely impacted by the demolition and construction of the scheme, in line with London Plan Policy G7.
62. A biodiversity net gain of 4326% would be achieved. The biodiversity improvements have been secured by condition. This high score reflects the fact

that there is no existing biodiversity on site. The application complies with London Plan Policy G6.

63. The drainage strategy was considered acceptable and in accordance with the London Plan. This has been secured by condition.
64. As such, the application complies with the energy and climate change policies in the London Plan.

## **Section 106 agreement**

65. The Section 106 agreement will include the following provisions:

### Financial contributions:

- Carbon offset contribution – £123,690
- TfL cycle hire docking station contribution – £60,000
- Highways contribution – £52,690
- Public open space contribution - £87,588
- Pedestrian, cycling and environmental improvements contribution – £125,000
- Employment and training contribution - £83,895
- Travel Plan monitoring contribution - £10,392
- Construction Management Plan implementation support contribution - £28,520
- Construction Management Plan bond - £30,000

### Affordable workspace:

- 10% floorspace as affordable SME workspace.
- Affordable SME workspace at 50% of market value for 10 years.
- Submission and approval of an affordable SME workspace strategy prior to implementation.

### Affordable housing:

- Affordable housing in line with the size mix by tenure.
- Low cost rent as either London Affordable Rent or social rent
- Intermediate housing in line with the London Plan and Camden Planning Guidance
- Eligibility in line with the London Plan income threshold (£60,000).
- Housing costs including rent and service charge to not exceed 40% net household income.

### Design:

- Project architect retention scheme

### Transport:

- Delivery, servicing and waste operational management plan
- Construction management plan
- Travel Plan
- Restriction on any new residents obtaining or holding CPZ car parking permits

### Climate change:

- Energy efficiency and renewable energy plan
- Post construction monitoring of actual energy performance in line with the London Plan Be Seen criteria.
- Landscape and ecology management plan

## **Legal considerations**

66. Under the arrangements set out in Article 5 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor has the power under Article 6 to direct the local planning authority to refuse permission for a planning application referred to him under Article 4 of the Order. Mayor also has the power under Article 7 to direct that he will become the local planning authority for the purposes of determining the application. The Mayor may also leave the decision to the local authority. In directing refusal the Mayor must have regard to the matters set out in Article 6(2) of the Order, including the principal purposes of the Greater London Authority, the effect on health and sustainable development, national policies and international obligations, regional planning guidance, and the use of the River Thames. The Mayor may direct refusal if he considers that to grant permission would be contrary to good strategic planning in Greater London. If he decides to direct refusal, the Mayor must set out his reasons, and the local planning authority must issue these with the refusal notice. If the Mayor decides to direct that he is to be the local planning authority, he must have regard to the matters set out in Article 7(3) and set out his reasons in the direction.

## **Financial considerations**

67. Should the Mayor direct refusal, he would be the principal party at any subsequent appeal hearing or public inquiry. Government guidance emphasises that parties usually pay their own expenses arising from an appeal.
68. Following an inquiry caused by a direction to refuse, costs may be awarded against the Mayor if he has either directed refusal unreasonably; handled a referral from a planning authority unreasonably; or, behaved unreasonably during the appeal. A major factor in deciding whether the Mayor has acted unreasonably will be the extent to which he has taken account of established planning policy.
69. Should the Mayor take over the application he would be responsible for holding a representation hearing and negotiating any planning obligation. He would also be responsible for determining any reserved matters applications (unless he directs the Council to do so) and determining any approval of details (unless the Council agrees to do so).

## **Conclusion and planning balance**

70. The application complies with the London Plan policies on the CAZ, offices, retail use, housing, affordable housing, urban design, strategic views, transport, climate change and urban greening. However, as less than substantial harm has been identified, the application would not comply with London Plan Policy HC1. The less than substantial harm identified has been given considerable importance and

weight, in line with the statutory and planning policy tests. However, in this instance, GLA officers consider that it would be outweighed by public benefits in this case. These are summarised in paragraph 33.

## Recommendation

71. The strategic issues raised at consultation stage with respect to land use principles, affordable housing, urban design, strategic views, heritage, fire safety, transport, climate change and urban greening have been addressed. Having regard to the details of the application, the matters set out in the committee report and the Council's draft decision, and considering the material planning considerations of strategic importance raised in responses to the public consultation, the application is supported in strategic planning terms, and there are no sound planning reasons for the Mayor to intervene in this case. It is therefore recommended that Camden Council is advised to determine the case itself, subject to any action that the Secretary of State may take.

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For further information, contact GLA Planning Unit (Development Management Team):

**Andrew Russell, Principal Strategic Planner (case officer)**

email: [andrew.russell@london.gov.uk](mailto:andrew.russell@london.gov.uk)

**Connaire OSullivan, Team Leader – Development Management**

email: [Connaire.OSullivan@london.gov.uk](mailto:Connaire.OSullivan@london.gov.uk)

**Allison Flight, Deputy Head of Development Management**

email: [alison.flight@london.gov.uk](mailto:alison.flight@london.gov.uk)

**John Finlayson, Head of Development Management**

email: [john.finlayson@london.gov.uk](mailto:john.finlayson@london.gov.uk)

**Lucinda Turner, Assistant Director of Planning**

email: [lucinda.turner@london.gov.uk](mailto:lucinda.turner@london.gov.uk)

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