

ROLFE JUDD
/ PLANNING

/ 289 Gray's Inn Road

PLANNING STATEMENT

4 November 2024

/ 289 Gray's Inn Road

289 Gray's Inn Road, London, WC1X 8QH

P09045
34 November 2024

On behalf of Trans-World Investments Limited

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APPENDICES

Appendix 1 – Pre-Application advice (ref: 2024/3355/PRE)

01. INTRODUCTION

01.1 SUMMARY

01.1.1 This planning statement has been prepared by Rolfe Judd Planning on behalf of Trans-world Investments Limited (“the Applicant”). It is submitted in support of an application for planning permission to the London Borough of Camden (“the Council”) for works to the property at 289 Gray’s Inn Road, London, WC1X 8QH. The application seeks permission for the change of use of the basement and ground floors to flexible Class E use, a three storey rear extension and roof extension to the Site, the conversion of the upper floors to either a 1x studio and 1x two-bedroom units (Class C3) or a 5-bed HMO (Class C4) and the associated works.

01.1.2 This application seeks planning permission for the following:

Full Planning application for the change of use of the basement and ground floors to flexible Class E use, a three-storey rear extension and mansard roof extension for flexible Class C3/C4 use of the upper floors and the associated works at 289 Gray’s Inn Road, London, WC1X 8QH

01.1.3 The site comprises a mid-terrace three-storey (plus basement and loft level) mixed-use (Sui Generis and residential) building located on the west side of Gray’s Inn Road, at the junction with Britannia Street. The building is vacant and was previously used at basement and ground floors as a laundrette (Sui Generis use) , with the upper levels subdivided into undersized studios(Class C3).

01.2 PLANNING STATEMENT

The purpose of this statement is to examine the planning issues raised by the current development proposals for the application site. In particular, this statement identifies and describes the key opportunities presented by the proposed redevelopment of what was a mixed-use but now derelict site for a sustainable residential development.

01.2.1 The statement also provides a comprehensive analysis of the relevant planning policy framework at national, strategic and local levels. As such, our planning statement is structured as follows:

- Section 1: Introduction
- Section 2: The Application Site and Surrounding Area – sets the context the current proposal and provides a detailed description of the application site and its previous uses;
- Section 3: The Proposal – describes the proposed development;
- Section 4: Policy Context – summarises the planning policy relevant to this proposal at national, strategic and local levels;
- Section 5: Planning Considerations – reviews the proposal in terms of the relevant policy context and other material considerations; and
- Section 6: Conclusion

01.3 SUPPORTING APPLICATION DOCUMENTS

01.3.1 This planning statement should be read in conjunction with the following additional documents, which accompany the application:

- / Existing and Proposed Drawings – prepared by Fresson and Tee
- / Photographic Survey – prepared by Fresson and Tee
- / Environmental Noise Survey and Noise Impact Assessment – prepared by Hann Tucker
- / Air Quality Assessment – prepared by the Property, Energy and Sustainability Company (PES)

02. THE APPLICATION SITE AND SURROUNDING AREA

02.1 SITE DESCRIPTION & LOCATION

02.1.1 The Site is located on the northern end of Gray's Inn Road, and forms part of a continuous terrace of nine similar properties (251-309 Gray's Inn Road), all of which comprise single-storey roof level extensions. The site is vacant, , the Site was last in use as a launderette ('sui generis') at ground and basement floor levels, with residential (Class C3) floorspace at the upper floors.

02.1.2 The site has been subject of building works, the ground floor is boarded up at rear and street frontages with security hoarding.

02.1.3 The Site is situated c. 200 metres south of King's Cross and St. Pancras Railway Stations, circa 130 metres east of Argyle Square Gardens and c.900 metres south-east of Euston Railway Station.

02.1.4 The property is not listed; however, is located within the King's Cross St Pancras Conservation Area.

02.2 SURROUNDING AREA

02.2.1 The property is surrounded by a number of four storey terraces properties of the same style with all of them benefiting from single storey roof extensions added at a later date. Gray's Inn Road is characterised by retail and services (Class E) at ground floor level, with either office or residential located on upper floors. This section of the road is characterized by 3-5 Storey buildings that range from traditional 18th Century terraced properties to more contemporary 20th Century developments.



Image 1: The Site (red) in the context of Gray's Inn Road.

- 02.2.2** It is noted that there are several properties within the same block of terraced properties with 2/3 storey rear extensions in place (i.e 285, 291 and 295). Similarly, the identified Site is the only property within its terrace without a roof level extension. (shown in image 1 above)

02.3 RELEVANT PLANNING HISTORY

- 02.3.1** There is a limited planning history for the application site available on LB Camden's portal. The

REFERENCE	DESCRIPTION OF DEVELOPMENT	DATE
2021/5856/P	Retention of a single storey, ground floor rear extension.	Approved 6th May 2022

- 02.3.2** The above planning application sought retrospective approval for the demolition and subsequent reconstruction of a rear ground floor extension at the Site. It is clear from google street view (Image 1) and recent site visits have confirmed that this extension has since been demolished. The approval of application ref. 2021/5856/P is however, considered to demonstrate the acceptability of a rear extension at the Site.

02.4 PRE-APPLICATION ENGAGEMENT

- 02.4.1** The final proposal of this scheme follows extensive pre-application discussions with the Council officers under Pre-application reference: 2024/3355/PRE.

02.4.2 A pre-application meeting was held on the 22nd August 2024 with the LB Camden case officer on site. The initial proposal was presented to the officer and the feedback received is summarised below:

- / Support for the loss of the laundrette due to a number of factors, including the length of time that the facility had not been operational, the provision of other similar facilities in close proximity and the fact that the laundrette is to be replaced with a commercial unit (Class E) and the change of use would therefore not result in any loss of jobs/employment opportunities.
- / Support for the loss of the existing undersized residential units and conversion to two residential units which comply with the national space standards.
- / Support for the standard of accommodation to be provided as both units would be dual aspect, facing both east and west, and would be provided with suitable levels of accommodation including daylight/sunlight, outlook, GIA, and efficient internal layouts. Only the studio unit is provided with private outdoor amenity area at the rear, which given the central London location and constraints of the site, was considered acceptable in this instance.
- / Guidance was provided about additional technical reports required to support a future planning application with noise and air quality assessments required.
- / Support for the three storey (ground to second floor) rear extension.
- / Support for the removal of the exiting loft level and replacement mansard roof extension, to bring the property in line with its neighbours along Gray's Inn Road.
- / Further development was required for the new shopfront which would be required to more closely match other shopfronts in the conservation area. Agreement was made to condition the design and materiality of the new shopfront.

02.5 THE PROPOSAL

02.5.1 This application seeks planning permission for a number of extensions and refurbishment works to improve the property at 289 Gray's Inn Road, along with the change of use of the ground floor unit from laundrette (Class Sui Generis) to flexible Class E and the flexible residential use of the upper floors to provide either a 1x studio and 1x two-bedroom units (Class C3) or a 5-bed HMO (Class C4).

02.5.2 The description of development is as follows:

Full Planning Application for the change of use of the basement and ground floors to flexible Class E use, a three storey rear extension and mansard roof extension for flexible Class C3/C4 use of the upper floors and the associated works at 289 Gray's Inn Road, London, WC1X 8QH

02.5.3 The application seeks the following changes to the building:

- / The change of use of the ground and basement floors from a laundrette ('Sui Generis') to flexible Class E floorspace;
- / The construction of a single-storey roof level extension,
- / The construction of a three storey (ground floor to second floor level) rear extension.
- / The creation of either two residential (Class C3) units (one 1b2p, one 2b3p); or the use as a single 5-bed HMO (Class C4)
- / The installation of an extract duct to the rear second floor level roof, measuring at 600m x 600m.

03. RELEVANT PLANNING POLICIES

03.1 INTRODUCTION

03.1.1 The legal framework for determining planning applications is set out in section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004. These state that a local planning authority must have regard to the provisions of the development plan and other relevant material considerations when considering an application for planning permission; and that determination of the application must be in accordance with the development plan unless material considerations indicate otherwise.

03.1.2 The core guidance and planning policy context considered to be directly relevant to the current development application scheme are summarised below. This comprises three levels of adopted policy and guidance at national, regional and local levels. This Planning Statement refers to policy requirements within each section of the detailed planning considerations where they are relevant.

03.1.3 The key policies pertinent to the determination of this application are outlined below.

03.2 NATIONAL PLANNING POLICY FRAMEWORK

03.2.1 The National Planning Policy Framework (NPPF) has a presumption in favour of sustainable development (Paragraph 11). It requires that, in assessing and determining development proposals, local planning authorities should apply the presumption in favour of sustainable development. This means that development which is sustainable and accords with the up to date plan should be approved without delay.

03.2.2 The NPPF recognises that sustainable development should support the three overarching objectives of; the economy, society and the environment. These objectives give rise to the need for the planning system to perform a number of roles, which are mutually dependent and should not be undertaken in isolation

- / an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- / a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- / an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy

- 03.2.3** The NPPF requires that Councils apply a presumption in favour of sustainable development with regards to planning decisions by approving development proposals that accord with an up-to-date development plan without delay.

03.3 THE DEVELOPMENT PLAN

- 03.3.1** For the purpose of section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan for the London Borough of Camden comprises:

- / The London Plan (adopted March 2021)
- / The Camden Local Plan (adopted July 2017)
- / Draft Camden Local Plan (Emerging)

03.4 THE LONDON PLAN

- 03.4.1** The London Plan is the Spatial Development Strategy for Greater London and outlines the framework for how London and grow over the next quarter of a century.

- 03.4.2** The London Plan forms a part of the statutory development plan for the Capital, meaning that the policies in the Plan should inform decisions on planning applications across the capital. Each Borough's Local Plans must be in 'general conformity' with the London Plan, ensuring that the planning system for London operates in a joined-up way and reflects the overall strategy for how London can develop sustainably, which the London Plan outlines.

- 03.4.3** An overview of the key policies that relates to this application are outlined below:

- / GG2: Making the best use of land
- / SD4: The Central Activities Zone (CAZ)
- / SD5: Offices, other strategic functions and residential development in the CAZ
- / SD6: Town centres and high streets
- / H2: Small Sites
- / H10: Housing Size Mix
- / HC1: Heritage conservation and growth
- / SI1: Improving Air Quality

- / D14: Noise
- / T5: Cycling
- / T6.1: Residential parking

03.5 THE CAMDEN LOCAL PLAN

03.5.1 The Camden Local Plan was adopted in July 2017 and acts as a borough wide planning and regeneration strategy that sets out Camden's planning policies, and vision for development in the borough up to 2031.

03.5.2 The relevant policies in the Camden Local Plan are outlined below:

- / G1: Delivery and location of growth
- / H1: Maximising housing supply
- / H4: Maximising the supply of affordable housing
- / H6: Housing choice and mix
- / H7: Large and small homes
- / A1: Managing the impact of development
- / A4: Noise and Vibration
- / D1: Design
- / D2: Heritage
- / C2: Community Facilities
- / E1: Economic development
- / E2: Employment premises and sites
- / T1: Prioritising walking, cycling and public transport
- / T2: Parking and car-free development
- / CC1: Climate change mitigation
- / CC2: Adapting to climate change

- / CC4: Air Quality
- / CC5: Waste
- / DM1: Delivery and monitoring

03.6 THE DRAFT CAMDEN LOCAL PLAN

03.6.1 The Council published a new Draft Camden Local Plan for consultation (DCLP). The DCLP is a material consideration and can be taken into account in the determination of planning applications which has limited weight at this stage. The weight that can be given to it will increase as it progresses towards adoption.

03.6.2 The relevant policies in the Draft Camden Local Plan are outlined below:

- / CPG (Amenity)
- / CPG (Design)
- / CPG (Developer's Contributions)
- / CPG (Employment sites and business premises)
- / CPG (Energy efficiency and adaptation)
- / CPG (Community Uses, Leisure Facilities, and Pubs)
- / CPG (Housing)
- / CPG (Sustainability)
- / CPG (Air Quality)
- / CPG (Transport)

03.7 OTHER RELEVANT GUIDANCE

03.7.1 Other relevant adopted guidance relevant to this application includes the Kings Cross St Pancras Conservation Area Appraisal and Management Strategy (Adopted 2003).

04. PLANNING CONSIDERATIONS

04.1 OVERVIEW

04.1.1 This section summarises the key planning policy considerations which are relevant to the determination of the planning application.

04.1.2 As detailed in section earlier in this statement, the planning application has been prepared following detailed pre-application discussions with the LB Camden. The application scheme has factored in these discussions.

04.1.3 In considering the merits of the Proposed Development, this Planning Statement will consider the following key considerations relating to the proposal:

/ Principle of Development

/ Residential Accommodation

/ Design and Heritage

/ Air Quality

/ Noise

/ Transport

04.2 PRINCIPLE OF DEVELOPMENT

PRINCIPLE OF THE CHANGE OF USE

04.2.1 The Site is vacant. It was previously in use as a laundrette (Class Sui generis) at ground and basement floor levels, with residential accommodation (c.70m²) at the upper floors. The application scheme proposes the change of use of the ground and basement floor levels to flexible Class E use, as well as the extension and reconfiguration of the upper floors (including a single storey roof level extension, and a ground to second floor rear extension) to provide two larger residential (Class C3) units or a 5 bed HMO (Class C4)

04.2.2 Policy GG2 of the London Plan seeks for those involved in planning and development to make the best use of land, through the intensification of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, and amenities. London Plan Policy SD4 relates to the Central Activities Zone and states that the nationally and internally significant office functions of the CAZ should be supported and enhanced, including the intensification and provision of sufficient space to meet demand for a range of types and sizes of occupier and rental values.

04.2.3 London Plan Policy SD6 (Town Centres and High Streets) states that the vitality and viability of London's town centres should be promoted and enhanced by encouraging strong, resilient, accessible and inclusive hubs with a diverse range of uses that meet the needs of Londoners. In line with this, Camden Local Plan Policy E1 relates to economic development and states that the Council will secure a successful and inclusive economy by supporting businesses of all sizes, in particular start-ups, small and medium-sized enterprises. Further, the Policy states that the Council will direct new office development to the growth areas, Central London, and the town centres.

04.2.4 London Plan Policy SD5 (Offices, other strategic functions and residential development in the CAZ) states that in areas where offices and other strategic CAS functions are given greater or equal weight relative to new residential proposals, mixed use office or residential proposals should be supported where there is an equivalent or net increase in floorspace.

04.2.5 Local Plan policy E1 seeks to support local business of all sizes by retaining a stock of premises that are suitable for a variety of business activities. Local Plan policy E2 strengthens the Council's position and states that the Council will resist development of business premises and sites for non-business use unless it is demonstrated to the Council's satisfaction that the site or building is no longer suitable for its existing business use and that the possibility of retaining, reusing or redeveloping the site or building for similar or alternative type and size of business use has been fully explored over an appropriate period of time.

04.2.6 Policy C2 of the Local Plan seeks to ensure that there is provision of community facilities to meet the needs of a growing population and safeguard against the loss of viable community facilities. The term "community facilities" refers to a wide range of social infrastructure that provides a service to the local community which includes laundrettes. CPG 'Community Uses, Leisure Facilities and Pubs' outlines that where there is a loss of a laundrette proposed, the Council will ensure that the impact on local residents is assessed, in particular the effect of the reduction in laundrette facilities on the community.

04.2.7 In the case of the application site, there are a number of reasons that support the Class E use at ground and basement levels.

- / The laundrette facility has not been operational for over two years with the site currently vacant.
- / The former business principally served as a dry-cleaning business, not the typical coin operated laundrette that is protected by Local Plan Policy C2 and the emerging CPG.
- / The facility is located along a major road and serves a larger commercial area, rather than a specific neighbourhood or housing estate where the loss would have a greater impact on local residents;
- / The provision of other laundrette facilities within walking distance (including laundrettes at 114 Cromer Street (WC1H 8BS), and 100 Caledonian Road (N1 9DN) which are all located within 500m of the application site.

- / The facility will be replaced with a commercial unit (Class E), retaining employment on the site and active frontages to the parade.

04.2.8 Local Plan polices E1 (Economic Development) and E2 (Employment premises and sites) both resist the loss of loss of existing employment sites and supports development that retains existing employment sites and provides a range of different sizes of employment space within the borough. It should be noted that this proposal does not propose the removal of any employment space, and the change of use to Class E would not undermine the availability of jobs, particularly as the site is currently vacant.

04.2.9 As outlined above, the proposed change of use would not result in any reduction or addition of employment space but is simply a change of use. Therefore, there would not necessarily be any loss of jobs or employment opportunities as a result of the proposed change of use, particularly as the launderette has already ceased and the former provider stopped operating. The proposal would therefore be in accordance with Policies E1 and E2 of the London Borough of Camden Local Plan

PRINCIPLE OF FLEXIBLE RESIDENTIAL (CLASS C3/C4)

04.2.10 The London Plan sets out a ten-year housing target of 10,380 homes for the London Borough of Camden. The results of the 2022 Housing Delivery Test (published December 2023) place the borough under a presumption in favour of housing. Local Plan Policy H1 seeks to maximise the supply of housing within the Borough. The supporting text for the policy (3.30) states that where vacant or underused sites are suitable for housing in terms of accessibility and amenity, and free of physical and environmental constraints, that would prevent residential use, the Council will expect them to be developed for housing.

04.2.11 In line with this, Local Plan Policy H2 (Maximising The Supply Of Self-Contained Housing From Mixed-Use Schemes) states that where non-residential development is proposed the Council will promote the inclusion of self-contained homes as part of a mix of uses

04.2.12 In consideration of the above policies, the application scheme seeks to revitalise an underutilised well-connected Site within the Central Activities Zone. The change of use at the ground and basement levels would increase the flexibility of the unit, and in line with the aims set out within Local Plan Policy E1, allow the site to be suitable for a range of business needs. Whilst the upper floors are already within residential use, the application scheme proposes the extension of the existing residential units to provide larger floorplates – thus complying with nationally prescribed space standards. The development would increase the commercial attractiveness of the Site, allowing it to compete effectively within its locality, as well as form a contribution towards the Council's housing targets.

04.3 NEED FOR HOUSING

04.3.1 It is noted that Policy H4 (Maximising the supply of affordable housing) of the Local Plan requires all residential development that provides on or more additional homes at the Site, an involve a total addition of 100sqm GIA or more of residential floorspace. Whilst the full details of the Site's previous condition are unavailable, it is assumed that the Site currently comprises 70sqm of residential floorspace at the upper

floors. As such, the application scheme proposes an uplift of 44sqm GIA (which is below the threshold identified in Policy H4) and would therefore not be eligible to make a contribution towards affordable housing.

- 04.3.2** London Plan Policy H2 relates to small sites, and states that boroughs should proactively support well-designed new homes on small sites (below 0.25 ha in size). This sentiment is reiterated in Local Plan Policy H7 (Large and small homes) which identifies that the Council will seek to secure a range of homes of different sizes that will contribute to the creation of mixed, inclusive and sustainable communities and reduce mismatches between housing needs and existing supply.
- 04.3.3** Policy H6 (Housing Choice and Mix) further states that they will seek to secure high quality accessible homes in all developments including housing. In order to do this, the Council will encourage design of all housing to provide functional adaptable and accessible spaces, and expect all self-contained homes to meet the nationally prescribed space standard. The current configuration of the Site limits the Applicant's ability to implement accessible measures, however, the proposed residential units would be of high-quality design, and would comprise flexible, open plan layouts allowing them to adapt to a range of needs. In addition, the Site is conveniently connected to the amenities along Gray's Inn Road, and to the public transport connections at Kings Cross and St. Pancras Stations.
- 04.3.4** Overall, the redevelopment of the residential floorspace at the Site would support the creation of mixed and inclusive communities, through the provision of high-quality and flexible residential units, in a well-connected and desirable Central London location that would contribute towards the Council's housing targets.

FLEXIBLE RESIDENTIAL USES

- 04.3.5** The applicant is seeking flexibility on the upper floors. The location of the site would support either a larger HMO or two apartments. The Applicant is therefore seeking permission for flexibility under Part 3, Class V of Schedule 2 of the GPD (England) Order 2015. This would enable the upper floors to change between Class C3 (2 apartments) and a HMO single dwelling (Class C4) for a period of 10 years without further planning permission being required. It is accepted by the application that after 10 years the use at that time will become the authorised use.

04.4 AFFORDABLE HOUSING

- 04.4.1** Local Plan Policy H4 (maximising affordable housing) requires a contribution to affordable housing from all developments that provide one or more additional homes and involve a total addition to residential floorspace of 100sqm GIA or more. The policy states that where developments have a capacity for fewer than 10 additional dwellings, the Council will accept a payment in lieu of affordable housing.
- 04.4.2** The site currently comprises 70sqm of residential floorspace on the first, second, and loft levels. The current proposal includes an uplift of 44sqm of residential floor area, being below the threshold to provide an affordable housing contribution.

04.5 DESIGN AND HERITAGE

- 04.5.1** Policy D2 of the Local Plan relates to Heritage and states that the Council will require that development within conservation areas that preserves, or where possible, enhances the character or appearance of the area. The policy also states that the Council will not permit the loss or substantial harm to a designated asset, including conservation areas, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. This sentiment is reiterated in London Plan Policy HC1 (Heritage Conservation and Growth).
- 04.5.2** Policy D1 (Design) of the Local Plan states that the Council will seek to secure high quality design in development by requiring that development respects local character and context, preserves or enhances the historic environment and heritage assets, in accordance with Policy D2 (Heritage), is sustainable in design and construction, of sustainable and durable construction and adaptable to different activities and land uses and provides a high standard of accommodation.
- 04.5.3** The King's Cross/St. Pancras Conservation Area Audit (CAA) notes the previous uniformity in building heights along Gray's Inn Road, and notes that there have been significant changes to the roof line of the terrace (279-295) has been significantly altered with steep mansard rooves. The CAA further states that the shopfronts within the terrace are of poor design quality and detract from the appearance of the terrace. The development proposals would not cause any harm to the Kings Cross/St Pancras Conservation Area, through the single-storey roof level extension, the proposals would reinstate the uniformity of the roof line along Gray's Inn Road – thus enhancing the character of the conservation area. The change of use of the ground floor level unit to flexible Class E use is anticipated to attract new tenants to the Site, which would facilitate the introduction of a new shopfront prior to trading, aesthetically benefitting the conservation area. Both the proposed residential units meet nationally prescribed space standards, and would be of high quality design, and utilise sustainable materials where possible.

04.6 NEIGHBOURING AMENITY

- 04.6.1** Policy A1 (Managing the impact of development) of the Local Plan highlights that the Council will seek to protect the quality of life of occupiers and neighbours, and that the Council will refuse any proposals that would cause unacceptable harm to amenity where it relates to: visual privacy and outlook, sunlight, daylight and overshadowing, artificial lighting levels, transport impacts, noise and vibration, and odour, fumes and dust. The proposed scheme is not anticipated to cause any detrimental effects on the amenity of the Site's neighbourhoods.
- 04.6.2** During the pre-application discussions, officers recognised that the proposals were unlikely to impact neighbours from an amenity perspective. In their formal written response, officers stated at paragraph 11 that:

Given the existing mix of adjacent uses (commercial and residential), it is not anticipated the change of use from Sui Generis to commercial nor the rear extension/mansard roof to provide expanded residential units would give rise to any amenity impacts with regards to loss of light, outlook, privacy, or noise.

04.7 NOISE

- 04.7.1** Local Plan Policy A4 is specific to noise and vibration and sets out that permission will not be granted for development that is likely to generate unacceptable noise and vibration impacts. London Plan Policy D14 also concerns noise and similarly seeks to ensure that development avoids significant adverse impacts on health and quality of life.
- 04.7.2** An Environmental Noise Survey and Noise Impact Assessment (prepared by Hann Tucker) is submitted with this application.
- 04.7.3** Hann Tucker undertook a noise survey between September 20th and 23rd on site. The baseline measurement positions were chosen to be representative of the acoustic environment in the vicinity of the application site, second floor overlooking Gray's Inn Road and overlooking the rear lightwell. The report includes both an assessment of the baseline conditions and whether mitigation is required for these to fall within acceptable limits for residential use and operational noise levels associated with the ground floor commercial unit.
- 04.7.4** The report concludes that suitable target internal noise levels can be achieved using conventional methods of mitigation.
- 04.7.5** Plant noise emission criteria have been recommended based on the results of the noise survey and with reference to the Local Authority's advice requirements. Recommendations have been included for the plant noise emission based on the nearby residential noise receptors.
- 04.7.6** Full details of the background noise levels, plant and attenuation requirements are set out in the Noise Assessment submitted in support of the planning application.

04.8 AIR QUALITY

- 04.8.1** The potential air quality constraints on the proposed development site have been reviewed and summarised within the report prepared by the PES Ltd, and they have concluded that overall the construction and operational air quality effects of the Proposed Development are not significant.
- 04.8.2** An assessment of the potential impacts during the construction phase has been carried out in accordance with the latest Institute of Air Quality Management guidance; this has shown that releases of dust and PM10 are likely to occur during site construction activities. The risk of dust soiling impacts at neighbouring properties has been assessed as high, with the risk to human health assessed as potentially low. Through good site practice and the implementation of suitable mitigation measures, the impact of dust and PM10 releases may be effectively mitigated, and the resultant impacts are considered to be negligible. The modelling indicates that short term air quality standards are well within the targets set by the Air Quality Standards Regulations 2010

04.8.3 The site has also been assessed as air quality neutral with respect to traffic-related emissions in line with the latest London Plan Guidance and due to Heat/hot water being supplied to the whole development through zero emission electrically driven systems is also air quality neutral in this regard by default.

04.8.4 Full details of the Air Quality Assessment are detailed in the full report submitted as part of this application.

04.9 TRANSPORT

04.9.1 Policy T2 of the Local Plan relates to parking and car-free development and identifies that the Council will require all new development in the borough to be car-free. This is in-line with the guidance contained within Policy T6.1 (Residential Parking) of the London Plan. In line with policy the application scheme will be car-free.

04.9.2 London Plan Policy T5 (cycling) sets out the minimum cycle parking provisions for all development. In accordance with Policy T5, the application scheme would have to provide 3 long-stay cycle parking spaces. It is anticipated that the long-stay spaces will be facilitated internally.

05. CONCLUSION

- 05.1.1** The scheme has been considered in the context of the current planning policy framework, including the LB Camden Local Plan, Emerging Camden Local Plan, London Plan and NPPF and adopted supplementary planning guidance. The principle of the ground floor change of use and use as residential accommodation on the upper floors is wholly consistent with national, regional and local planning policy.
- 05.1.2** The redevelopment of the application site seeks the following alterations to the building:
- / The change of use of the ground and basement floors from a laundrette ('sui generis') to flexible Class E floorspace;
 - / The construction of a single-storey roof level extension,
 - / The construction of a three storey (ground floor to second floor level) rear extension;
 - / The creation of either two residential (Class C3) units (one 1b2p, one 2b3p); or the use as a single 5-bed HMO (Class C4)
 - / The installation of an extract duct to the rear second floor level roof, measuring at 600m x 600m.
- 05.1.3** To conclude, this Planning Statement provides a detailed assessment of the Proposed Development measured against the adopted planning policy detailed above. The Proposed Development accords with the development plan and will contribute to the delivery of much needed housing in a highly accessible part of the Borough and should therefore be granted planning permission in accordance with Section 38(6) of the Town and Country Planning Act (1990) and the presumption in favour of sustainable development expressed in Paragraph 11 of the National Planning Policy Framework. Planning permission should therefore be granted for the Proposed Development

APPENDIX 1 - PRE-APPLICATION ADVICE (REF: 2024/3355/PRE)



Planning Solutions Team
Planning and Regeneration
 Culture & Environment
 Directorate
 London Borough of Camden
 2nd Floor
 5 Pancras Square
 London
 N1C 4AG

www.camden.gov.uk/planning

Date: 19/09/2024
Our ref: 2024/3355/PRE
Contact: Daren Zuk
Direct line: 020 7974 3386
Email: Daren.Zuk@camden.gov.uk

Rolfe Judd Planning
 Old Church Court
 Claylands Road
 London
 SW8 1NZ

Dear Ben Church,

Re: 289 Gray's Inn Road, London, WC1X 8QF

Thank you for submitting a pre-planning application enquiry for the above property. The required fee of £4,562.50 was received on 14/08/2024. A site meeting was held with the Planning Officer on 22/08/2024.

1. Proposal

Proposed change of use of basement and ground floor levels from launderette (Sui Generis) to commercial (Class E); erection of three-storey rear extension at ground, first, and second floor levels; erection of mansard roof extension at roof level; installation of new shopfront; and conversion of the existing four self-contained residential dwellings into two self-contained units.

2. Site Description

The site comprises a mid-terrace three-storey (plus basement and loft level) mixed-use (Sui Generis and residential) building located on the west side of Gray's Inn Road, at the junction with Britannia Street. The basement and ground floors are currently in Sui Generis use as a launderette, with the upper levels comprising four undersized studio residential units (Class C3). The building is currently vacant.

The site is not statutorily or locally listed but is located within the Kings Cross St Pancras Conservation Area.

3. Relevant Planning History

2021/5856/P – Retention of a single storey, ground floor rear extension. **Granted**
06/05/2022

4. Relevant Policies and Guidance

The National Planning Policy Framework 2023

The London Plan 2021

Camden Local Plan 2017

- G1 Delivery and location of growth
- H1 Maximising housing supply
- H4 Maximising the supply of affordable housing
- H6 Housing choice and mix
- H7 Large and small homes
- A1 Managing the impact of development
- A4 Noise and Vibration
- D1 Design
- D2 Heritage
- C2 Community Facilities
- E1 Economic development
- E2 Employment premises and sites
- T1 Prioritising walking, cycling and public transport
- T2 Parking and car-free development
- CC1 Climate change mitigation
- CC2 Adapting to climate change
- CC4 Air Quality
- CC5 Waste
- DM1 Delivery and monitoring

Draft Camden Local Plan

The Council has published a new Draft Camden Local Plan (incorporating Site Allocations) for consultation (DCLP). The DCLP is a material consideration and can be taken into account in the determination of planning applications which has limited weight at this stage. The weight that can be given to it will increase as it progresses towards adoption (anticipated 2026).

Camden Planning Guidance (2021)

- CPG (Amenity)
- CPG (Design)
- CPG (Developer's Contributions)
- CPG (Employment sites and business premises)
- CPG (Energy efficiency and adaptation)
- CPG (Community Uses, Leisure Facilities, and Pubs)
- CPG (Housing)
- CPG (Sustainability)
- CPG (Air Quality)
- CPG (Transport)

Kings Cross St Pancras Conservation Area Appraisal and Management Strategy 2003

5. Assessment

The planning considerations material to the determination of this application are as follows:

- | | |
|-----------------------------|----------------------------|
| • Land Use | • Sustainability |
| • Dwelling Mix | • Air Quality |
| • Affordable Housing | • Transport |
| • Standard of Accommodation | • Refuse and Recycling |
| • Design & Heritage | • Planning Obligations/CIL |
| • Amenities | |

6. Land Use

Loss of Laundrette (Sui Generis)

Policy C2 of the Local Plan seeks to ensure that there is provision of community facilities to meet the needs of a growing population and safeguard against the loss of viable community facilities. The term “community facilities” refers to a wide range of social infrastructure that provides a service to the local community which includes laundrettes. CPG ‘Community Uses, Leisure Facilities and Pubs’ outlines that where there is a loss of a laundrette proposed, the Council will ensure that the impact on local residents is assessed, in particular the effect of the reduction in laundrette facilities on the community.

In this specific instance, the loss of the laundrette facility can be supported due to multiple factors including:

- a) That the facility has not been in operation for at least two years with the site currently sitting vacant;
- b) The former facility primarily served as a dry-cleaning business, not the typical coin operated laundrette that is protected by Policy C2 and the CPG;
- c) The location of the facility along a major road serving a larger commercial area and not a specific neighbourhood or housing estate where its loss would have a greater impact on local residents;
- d) The provision of other laundrette facilities within walking distance; and
- e) That the facility will be replaced with a commercial unit (Class E).

Policies E1 and E2 both aim to ensure that the Council supports development that retains existing employment sites and provides a range of different sizes of employment space within the borough. It should be noted that this proposal does not propose the removal of any employment space, and the change of use to Class E would not undermine the availability of jobs, particularly as the site is currently vacant.

As stated above, the proposed change of use would not result in any removal or addition of employment space but is merely a change of use. Therefore, there would not necessarily be any loss of jobs or employment opportunities as a result of the proposed use, particularly as the laundrette use has already ceased and the former provider stopped operating. The proposal would therefore be in accordance with Policies E1 and E2 of the London Borough of Camden Local Plan.

Loss of Undersized Residential Units

Policy H3 outlines that the Council will resist development that would involve the net loss of two or more homes unless they enable sub-standard units to be enlarged to meet residential space standards. All four of the existing self-contained flats currently do not meet residential space standards for one-person, one-bedroom studios.

Therefore, the conversion of the existing four self-contained flats which will result in the net loss of two residential units, is considered acceptable and in compliance with Policy H3 given that the existing units are substandard and do not meet minimum national space standards.

7. Dwelling Mix

The Council requires development to contribute to the creation of mixed and inclusive communities by containing a mix of large and small homes. Policy H7 of the Local Plan includes a Dwelling Size Priorities Table as set out below:

	<i>1-bedroom (or studio)</i>	<i>2-bedroom</i>	<i>3-bedroom</i>	<i>4-bedroom</i>
Social-affordable rented	Low	High	High	Medium
Intermediate affordable	High	Medium	Low	Low
Market	Low	High	High	Low

Policy H7 seeks to ensure that all housing development:

- a. contributes to meeting the priorities set out in the Dwelling Size Priorities Table; and
- b. includes a mix of large and small homes.

The proposal includes the provision of 1x studio and 1x two-bedroom units. The studio unit is regarded as a low priority, while the two-bedroom unit is regarded as a high priority. On balance, the proposed unit mix is considered acceptable, meeting the needs identified in the table above.

8. Affordable Housing

Policy H4 (maximising affordable housing) requires a contribution to affordable housing from all developments that provide one or more additional homes and involve a total addition to residential floorspace of 100sqm GIA or more. The policy states that where developments have a capacity for fewer than 10 additional dwellings, the Council will accept a payment in lieu of affordable housing.

The site currently comprises 70sqm of residential floorspace on the first, second, and loft levels. The current proposal includes an uplift of 44sqm of residential floor area, being below the threshold to provide an affordable housing contribution.

9. Standard of Accommodation

Policy H6 outlines how the Council will seek to secure high quality accessible homes in all developments that include housing. We will:

- a) Encourage design of all housing to provide functional, adaptable, and accessible spaces; and
- b) Expect all self-contained homes to meet the nationally described space standards.

The proposal includes the provision of two self-contained residential units with a mix of 1x studio and 1x two-bedroom units. Both units meet the minimum GIA for their respective unit types, as outlined in the national technical housing standards.

Unit No.	Unit Type	Minimum GIA	Provided GIA
1	1-bedroom, 1-person	39	43
2	2-bedroom, 2-person	70	71

Both units would be dual aspect, facing both east and west, and would be provided with suitable levels of accommodation including daylight/sunlight, outlook, GIA, and efficient internal layouts. Only the studio unit is provided with private outdoor amenity area at the

rear, which given the central London location and constraints of the site, is considered acceptable in this instance. Concerns are raised due to air quality concerns, which are discussed later in this document.

10. Design and Conservation

The Council's design policies are aimed at achieving the highest standard of design in all developments, including where alterations and extensions are proposed. Policy D1 of the Local Plan requires development to be of the highest architectural and urban design quality which improves the function, appearance, and character of the area. The Council welcomes high quality contemporary design which responds to its context. Camden's Local Plan Document is supported by Supplementary Planning Guidance CPG (Design).

Camden's Design CPG emphasises Camden's commitment to design excellence and expects development schemes to consider:

- The context of a development and its surrounding area;
- The design of the building itself;
- The use and function of buildings;
- Using good quality sustainable materials; and
- Opportunities for improving the character and quality of an area.

Rear Extension

The proposal includes the erection of a three-storey rear extension at the rear, from ground to second floor levels.

At the ground floor, the existing rear garden is to be fully infilled to create an enlarged commercial unit. Most buildings along this side of Gray's Inn Road have infilled their rear gardens, thus the principle of the extension at this level is accepted.

The principle of an extension at first and second floor levels is also considered acceptable as many neighbouring properties have highly altered rear elevations. Although the extension is full width, in this specific context it is considered to be of an appropriate size and scale to read as subservient to the host building, being set down from the rear parapet. The extension would be finished in matching London stock brick and windows and doors to match the historic character of the host building. The submitted drawings note the new windows and door will be UPVC, which are not supported on environmental and heritage grounds. Any new windows and doors should be timber framed, although aluminium could also be acceptable if located along rear elevations.

It is considered that given the lack of visibility of the extension from any public views, the rear extension will not have a material impact on the character or setting of the wider Kings Cross St Pancras Conservation Area.

Mansard Roof Extension

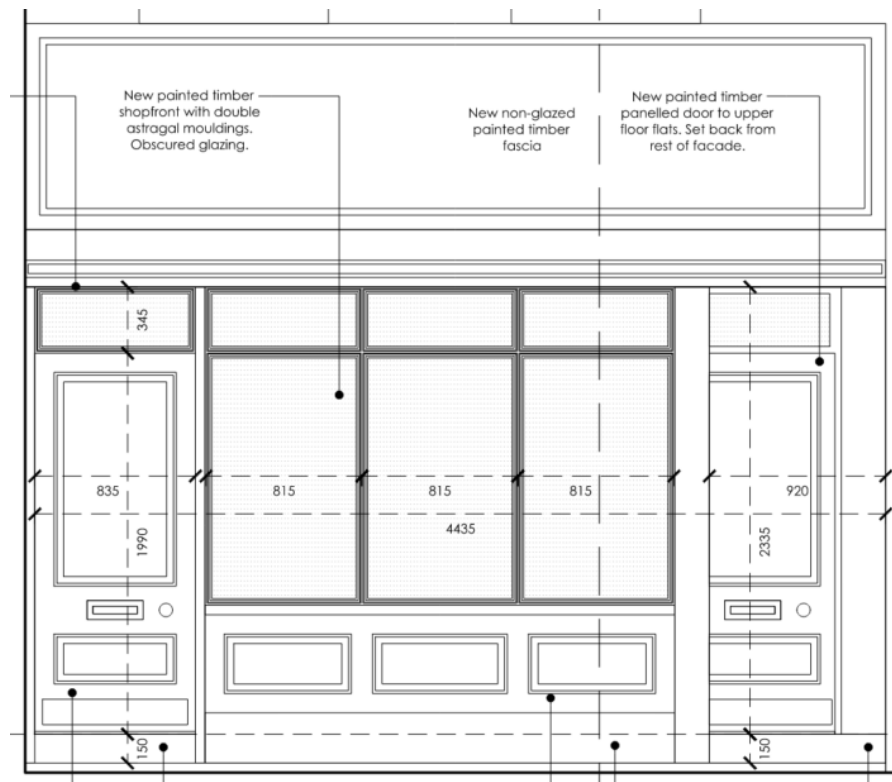
The existing loft level is not original and of poor quality, thus its loss and replacement with a new mansard roof is acceptable in principle. The new mansard roof is considered to be acceptable in scale, height, materiality, and design, and is similar to neighbouring approved mansard roof extensions. The four dormers (two at front and two at rear) would align with the fenestration on the lower levels and be finished with windows to match the historic character of the host building. The submitted drawings indicate the mansard roof would be finished with hanging slate tiles which is acceptable, however, no further material details of the

dormers have been shown. The dormers should feature lead coping and cheeks to ensure a cohesive and matching design to the historic host building, as well as enhancing the character and setting of the wider Conservation Area.

New Shopfront

The proposed replacement shopfront is considered to lack the level of detail and materiality to be acceptable for use within a Conservation Area. The new shopfront should be in timber and be suitably detailed to reference the historic character of the host building and Conservation Area and include a stall riser, appropriate door design (for both the shop and residential entrances), glazing bars, and fanlights which are consistent with other new shopfronts approved in the immediate area.

There are several positive precedents for similar schemes in the immediate area, most notably at 115 King's Cross Road (ref. 2021/4444/P) which also included a mansard roof extension and replacement shopfront. Please refer to the approval of details application ref. 2024/3394/P (image of replacement shopfront below), which includes details on proposed windows, doors, and a suitable replacement timber shopfront.



11. Amenity

Local Plan Policy A1 seeks to protect the amenity of Camden's residents by ensuring the impact of development is fully considered. It seeks to ensure that development protects the quality of life of occupiers and neighbours by only granting permission for redevelopment that would not harm the amenity of neighbouring residents. This includes privacy, outlook, daylight, sunlight and noise. CPG (Amenity) provides specific guidance with regards to privacy and outlook.

Given the existing mix of adjacent uses (commercial and residential), it is not anticipated the change of use from Sui Generis to commercial nor the rear extension/mansard roof to provide expanded residential units would give rise to any amenity impacts with regards to

loss of light, outlook, privacy, or noise. The outdoor amenity area at first floor level should be sensitively sited to ensure there are no direct views into habitable rooms of any neighbouring residential dwelling. The use of privacy screens (1.8m in height) could be utilised to minimise any impact.

Any future application should include further details of the proposed plant facilities, for either the commercial or residential units. The siting of such plant facilities should be in a sensitive location and screened from public and private views. A noise impact assessment is required to be submitted along with any future application to ensure the noise emitted will not impact and future or neighbouring residential occupier.

12. Sustainability

Policies CC1 (Climate change mitigation) and CC2 (Adapting to climate change) require all developments to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards. The current proposal would result in the retention and of the existing building which is welcomed. The use of air source heat pumps (ASHPs) to heat the commercial and residential units is encouraged; however, the use of air cooling is not supported.

Developments must be designed to be water efficient. This can be achieved through the installation of water efficient fittings and appliances (which can help reduce energy consumption as well as water consumption) and by capturing and re-using rainwater and grey water on-site.

Biodiversity Net Gain (BNG)

BNG is an approach to development, and ensures that habitats for wildlife are left in a measurably better state than they were before the development. Developers must deliver a BNG target of 10%, which means a development will result in more or better-quality natural habitat than there was before development. ***Biodiversity net gain (BNG) is mandatory from 12 February 2024.***

The development may be exempt from BNG if the proposal does not impact a priority habitat and impacts less than 25 square metres (5m by 5m) of on-site habitat. Please see the following link for further information including the documents that would be required to be submitted in the event that BNG is required to be delivered and secured as part of the proposal: <https://www.gov.uk/guidance/understanding-biodiversity-net-gain>

13. Air Quality

The application site is in an area of poor air quality. Local Plan policy CC4 and CPG Air Quality are relevant with regards to air quality. Any future application would require the submission of an air quality assessment.

14. Transport

In line with Policy T1, it is expected that cycle parking be provided in accordance with the standards set out in the London Plan. This would give a requirement for three cycle parking spaces. As there is limited scope to provide cycle parking on site, a S.106 contribution of £2,160 towards the provision of a six-space on-street cycle parking hanger in the vicinity of the site will be required.

In accordance with Policy T2 of the Local Plan, which seeks car free development across the Borough, all new residential units should be secured as on-street residents parking permit (car) free by means of the S.106 Legal Agreement. This will prevent the future occupants from adding to existing on-street parking pressures, traffic congestion and air pollution, whilst encouraging the use of more sustainable modes of transport such as walking, cycling, and public transport.

Given the level of construction involved with the proposals and the location on Gray's Inn Road, it is necessary that the development be subject to a Construction Management Plan (CMP) and associated Implementation Support Contribution of £4,194 and Impact Bond of £8,000 to be secured by means of a S.106 Legal Agreement. This will help ensure that the proposed development is carried out without unduly affecting neighbouring amenity or the safe and efficient operation of the local highway network.

15. Refuse and Recycling

You are advised to design in adequate facilities for recycling and the storage and disposal of waste. Further information can be found in CPG Sustainability. Camden Local Plan Policy CC5 (Waste) and CPG (Design) are relevant with regards to waste and recycling storage and seek to ensure that appropriate storage for waste and recyclables are provided in all developments. Any proposal should demonstrate that the development would include facilities for the storage and collection of waste and recycling, including utilising existing facilities.

16. Planning Obligations/CIL

The following S.106 planning obligations may be required if planning permission were granted:

- Car-Free Development
- Cyle Parking Contribution £2,160
- Construction Management Plan and Implementation Support Contribution £4,194
- Impact Bond £8,000

17. Planning Application Information

Should you choose to submit a planning application which addresses the outstanding issues detailed in this report satisfactorily without resubmitting another pre-application, I would advise you to submit the following for a valid planning application:

- Completed application form
- An ordnance survey-based location plan at 1:1250 scale denoting the site in red
- Floor plans at a scale of 1:50 labelled 'existing' and 'proposed'
- Roof plans at a scale of 1:50 labelled 'existing' and 'proposed'
- Elevation drawings at a scale of 1:50 labelled 'existing' and 'proposed'
- Section drawings at a scale of 1:50 labelled 'existing' and 'proposed'
- Planning Statement
- Design and Access Statement
- Noise Impact Assessment
- Air Quality Assessment
- The appropriate fee
- Please see [supporting information for planning applications](#) for more information

We are legally required to consult on applications with individuals who may be affected by the proposals. We would put up a notice on or near the site and advertise in a local newspaper. The Council must allow 21 days from the consultation start date for responses to be received. You are advised to contact your neighbours to discuss the proposals.

This document represents an initial informal officer view of your proposals based on the information available to us at this stage and would not be binding upon the Council, nor prejudice any future planning application decisions made by the Council.

If you have any queries about the above letter or the attached document, please do not hesitate to contact Daren Zuk on daren.zuk@camden.gov.uk.

Thank you for using Camden's pre-application advice service.

Yours sincerely,

Daren Zuk

**Principal Planning Officer
Planning Solutions Team**

OLD CHURCH COURT
CLAYLANDS ROAD
LONDON
SW8 1NZ

+44 (0)20 7556 1500
info@rolfe-judd.co.uk