

London Borough of Camden
Planning and Building Development
5 Pancras Square
King's Cross
London
N1C 4AG

For the Attention of: Chris Smith

Our ref: GBR/BNEA/U0013161

Your ref: PP- 13730525

31 January 2025

Dear Sir,

88 & 100 Gray's Inn Road and 127 Clerkenwell Road, WC1X 8AL
Town and Country Planning Act 1990 (As Amended)
Non-Material Amendment Application to Planning Permission Reference 2022/4259/P

We write on behalf of our client, Lawnmist Limited ('the Applicant'), to enclose for your attention and consideration an application to make a non-material amendment to planning permission ref. 2022/4259/P, dated 20 December 2023, at 88 & 100 Gray's Inn Road and 127 Clerkenwell Road, WC1X 8AL.

Background

On 20 December 2023, planning permission was granted (ref. 2022/4259/P) for:

"Demolition of 100 Gray's Inn Road and 127 Clerkenwell Road and the erection of a mixed-use office led (Class E) development comprising a basement, ground plus eight storey building for flexible retail / restaurant / office uses at ground floor and basement (Class E), basement excavation, provision of roof terraces, external plant equipment and enclosures, servicing bay, waste storage, cycle parking, public realm works; partial demolition and extension of 88 Gray's Inn Road for use of the upper floors for housing (Class C3) and ground floor as offices (Class E) with associated external alterations and associated works."

On 24 June 2024, a non-material amendment application was approved (Ref: 2024/0296/P) which granted permission for amendments for:

"Proposed non-material amendments including: relocation of Clerkenwell Road entrance; amendment to 88 Gray's Inn Road entrance, cycle and refuse stores; replacement of ventilation grilles; inclusion of pergolas; and, amendment to wording of Condition 14 regarding waste management and amendment to wording of Condition 15 regarding biosolar/biodiverse roof to mixed-use office-led redevelopment approved under planning permission 2022/4259/P dated 20/12/2023."

Further to the grant of the planning permission, the Applicant has been progressing with design development and has identified minor modifications to the design that are required and do not significantly impact the overall size, scale, or nature of the development. Given the changes proposed and the scale of the overall scheme, it is considered that these constitute non-material amendments.

Therefore, a Non-Material Amendment is therefore sought for the following:

“Proposed non-material amendments including removal of ground floor retail unit and revision of cycle store access; goods lift extension and increase in lift height; simplification of roof crown balustrade design; introduction of new doors to access terraces on level 02 and level 08; and amendment to wording of Condition 2, to mixed-use development approved under planning permission 2022/4259/P dated 20/12/2023.”

Proposals

Piercy & Co, as project architects, has prepared the attached design pack, which summarises the key changes against the permitted position. The changes can be summarised as follows:

1. Removal of ground floor retail unit and revised cycle store access;
2. Goods lift extension and increase of the lift height;
3. Simplification of roof crown balustrade design;
4. Introduction of new doors to access the terrace on level 02 and level 08.

Each of these changes are summarised in further detail below.

1. Removal of Ground floor retail unit and revised cycle store access.

The original cycle entrance door led directly to a flight of stairs to the basement. To improve this, a dedicated cycle entrance lobby has been created and will provide an active frontage. This would improve the experience and convenience for cyclists compared to the previous design, which lacked stopping space.

The small ground floor unit has been removed and has allowed for the introduction of a disabled WC (DWC) at the entrance. Previously, staff and visitors had to take a long route past the security line and through tenanted areas to access toilet facilities. This adjustment complies with updated building regulations and provides a more convenient and secure solution.

The revised ground floor layout changes are necessary for enhancing accessibility and functionality, resolving technical issues, and ensuring a user-friendly and efficient space for all occupants and visitors.

2. Goods lift extension and increase of the lift height

The original design featured a goods lift reaching only the lower levels. The proposal is to extend the goods lift in the secondary lift core to serve Level 09 (roof terrace) to meet the latest UK building regulations and enhance the building's safety, operational efficiency, and compliance.

This amendment would ensure compliance with fire safety standards and with Evacuation and Accessibility Standards. Extending the goods lift to Level 9 would improve evacuation procedures, provide equitable access for all users, enhance the operational efficiency of the building and ensure that the roof terrace can be fully utilised for its intended purpose, without any limitations on access.

3. Simplification of roof crown balustrade design

The new design simplifies the roof crown balustrade by levelling the glass facade at balustrade height, thereby eliminating the previously inclined slope. This adjustment addresses the issue of insufficient height caused by the previous design. The streamlined, level design enhances the visual coherence and comfort of the terrace, eliminates the necessity for multiple layers of glass and doubling up of structural framing creating a more pleasing and unified design.

The lift overrun design has been enhanced to align with the updated balustrade scheme. The former configuration, which resulted in a thicker and heavier balustrade due to its intricate framing, has been modified

to ensure a more cohesive integration with the terrace's overall design, thereby upholding both its functional efficiency and visual appeal.

4. Introduction of new doors to access the terrace on level 02 and level 08

The existing design includes single-sided doors for terrace access. The proposal introduces two new doors on Level 02 and Level 08 to provide additional access points to the terraces. The addition of these new doors is intended to enhance tenant flexibility and convenience by creating multiple entry points, thereby significantly improving ease of access and overall user convenience while maintaining the original privacy standards.

Drawings for Substitution and Approval

As part of this non-material amendment application, the existing "as approved" drawings have been submitted alongside a set of proposed drawings.

A summary of the drawings we request approval for is included in the below Table.

Drawing Title	Existing 'As Approved' Drawing No.	Proposed Drawing No. (i.e. for substitution and approval)
100 Grays Inn Road: Proposed Basement Floor Plan	13636-A-100-B01-00-099-RevB	13636-A-100-B01-00-099-RevC
100 Grays Inn Road: Proposed Ground Floor Plan	13636-A-100-L00-00-100- RevC	13636-A-100-L00-00-100-RevD
100 Gray's Inn Road: Proposed Eighth Floor Plan	13636-A-100-L08-00-108-RevB	13636-A-100-L08-00-108-RevC
100 Gray's Inn Road: Proposed Roof Terrace Floor Plan	13636-A-100-R-00-110-Rev E	13636-A-100-R-00-110-Rev F
100 Gray's Inn Road: Proposed Roof Floor Plan	13636-A-100-R-00-210-RevD	13636-A-100-R-00-210-RevE
100 Gray's Inn Road: Proposed North Elevation	13636-A-100-ZZ-04-200-RevC	13636-A-100-ZZ-04-200-RevD
100 Gray's Inn Road: Proposed East Elevation	13636-A-100-ZZ-04-201-RevC	13636-A-100-ZZ-04-201-RevD
100 Gray's Inn Road: Proposed South Elevation	13636-A-100-ZZ-04-202-RevC	13636-A-100-ZZ-04-202-RevD
100 Gray's Inn Road: Proposed West Elevation	13636-A-100-ZZ-04-203-RevB	13636-A-100-ZZ-04-203-RevC

The substitution of the above drawings would require the wording of condition 2 to be amended to reflect the updated drawing numbers. The existing wording of condition 2 of planning permission ref. 2022/4259/P, as well as the suggested updated wording can be found at Appendix A of this letter.

Application Documentation

In accordance with the validation requirements of the London Borough of Camden, alongside this covering letter, we hereby enclose the following documentation:

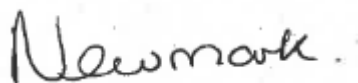
- Completed Application Form; and
- Design Amendments Pack, prepared by Piercy & Co; and
- Approved and Proposed Drawings, prepared by Piercy & Co.

Summary

The requisite application fee of £363.00 (including the £70.00 Planning Portal service charge) has been paid by the Applicant via the Planning Portal.

We look forward to confirmation of the registration and subsequent validation of this application. In the meantime, should you have any queries, please do not hesitate to contact Gary Brook (0755 774 2363) or Belinda Neilson (0203 486 3782) of this office.

Yours faithfully,

**Newmark**

Belinda.Neilson@nmrk.com

Direct tel. +44 742 547 7705

Enc. As above via the Planning Portal

Appendix A – Condition 2 Existing and Proposed Wording

Condition 2 of planning permission ref. 2022/4259/P currently states:

The development hereby permitted shall be carried out in accordance with the following approved plans:

“Existing: 13636-A-ZZ-03-100, 13636-A-ZZ-B01-01-099, 13636-A-ZZ-L00-01-100, 13636-A-ZZ-L01-01-101, 13636-A-ZZ-L02-01-102, 13636-A-ZZ-L03-01-103, 13636-A-ZZ-L04-01-104, 13636-A-ZZ-L05-01-105, 13636-A-ZZ-L06-01-106, 13636-A-ZZ-L07-01-107, 13636-A-100-ZZ-01-200, 13636-A-100-ZZ-01-201, 13636-A-100-ZZ-01-202, 13636-A-100-ZZ-01-203, 13636-A-100-ZZ-01-300, 13636-A-100-ZZ-01-301, 13636-A-88-ZZ-01-200, 13636-A-88-ZZ-01-201, 13636-A-88-ZZ-01-202, 13636-A-88-ZZ-01-300, 13636-A-88-ZZ-01-301

Demolition: 13636-D-ZZ-B01-02-099, 13636-D-ZZ-L00-02-100, 13636-D-ZZ-L01-02-101, 13636-D-ZZ-L02-02-102, 13636-D-ZZ-L03-02-103, 13636-D-ZZ-L04-02-104, 13636-D-ZZ-L05-02-105, 13636-D-ZZ-L06-02-106, 13636-D-ZZ-L07-02-107, 13636-D-ZZ-R-02-110, 13636-D-100-02-200, 13636-D-100-02-200

Proposed: 13636-A-100-B01-00-099-RevB, 13636-A-100-L00-00-100-RevC, 13636-A-100-L01-00-101, 13636-A-100-L02-00-102, 13636-A-100-L03-00-103, 13636-A-100-L04-00-104, 13636-A-100-L05-00-105, 13636-A-100-L06-00-106, 13636-A-100-L07-00-107, 13636-A-100-L08-00-108-RevB, 13636-A-100-R-00-110-RevE, 13636-A-100-R-00-210-Rev D, 13636-A-88-B01-00-099 Rev. B, 13636-A-88-L00-00-100 Rev. B, 13636-A-88-L01-00-101-RevB, 13636-A-88-L0200-102, 13636-A-88-L03-00-103, 13636-A-88-R-00-110, 13636-A-100-ZZ-04-200- RevC, 13636-A-100-ZZ-04-201-RevC, 13636-A-100-ZZ-04-202-RevC, 13636-A-100-ZZ-04-203-Rev.B, 13636-A-88-ZZ-04-200, 13636-A-88-ZZ-04-201, 13636-A 88-ZZ-04-202, 13636-A-88-ZZ-04-203, 13636-A-88-ZZ-04-204, 13636-A-100- ZZ05-300, 13636-A-100-ZZ-05-301-RevB, 13636-A-88-ZZ-05-300, 13636-A 88-ZZ05-301;

Supporting Documents:

Affordable Housing Statement, September 2022
 Air Quality Assessment, September 2022
 Arboricultural Impact Assessment and Method Statement, September 2022
 Archaeological Desk Based Assessment, 30 September 2022
 Biodiversity Net Gain Plan, 29 September 2022
 CIL Form, 30 September 2022
 Circular Economy Spreadsheet 1 & 2, 28 September 2022
 Circular Economy Statement, 30 September 2022
 Construction Management Plan, September 2022
 Contamination and Basement Impact Statement, 27 September 2022
 Covering Letter, 30 September 2022
 Daylight & Sunlight Report, 21 September 2022
 Delivery and Servicing Plan, 28 September 2022
 Design and Access Statement, 30 September 2022
 Drainage Statement and SUDs strategy, 29 September 2022
 Employment and Training Statement
 Energy Spreadsheet, 30 September 2022
 Energy Statement, 30 September 2022
 Energy and Sustainability Comments Responses, 06/03/2023
 Financial Viability Assessment, 9 August 2022
 Flood Risk Assessment, 29 September 2022
 Noise Impact Assessment, 30 September 2022
 Planning Application Form, 30 September 2022
 Planning Statement, 30 September 2022
 Preliminary Ecological Appraisal, 30 September 2022
 Site Waste Management Plan, September 2022
 Statement of Community Involvement, September 2022
 Structural Methodology Statement, 30 September 2022
 Sustainability Statement Spreadsheet
 Sustainability Statement, 30 September 2022
 Transport Assessment, 23 September 2022
 Travel Plan, 28 September 2022
 Ventilation and Extraction Statement, 29 September 2022
 Additional Documents:
 SPT & Cohesion Depth Graph
 Blackheath Point Renders
 Financial Viability Response Note
 Delivery and Servicing Bay Note, 23 March 2023
 Energy and Sustainability Response Note, 6 March 2023
 Fire Statement, 17 March 2023
 Heritage Assets Planning Assessment Note, 12 December 2022
 Metropolitan Police Response Note, 3 February 2023
 SuDS Response Note, 2 March 2023
 Transport Response Note, 17 November 2022
 Rooftop Amendments Note, December 2022
 Delivery and Servicing Note, 23 March 2023
 Townscape, Heritage and Visual Impact Assessment, 20 October 2022”

The proposed wording of condition 2 is as follows with proposed changes shown in red:

Existing: 13636-A-ZZ-03-100, 13636-A-ZZ-B01-01-099, 13636-A-ZZ-L00-01-100, 13636-A-ZZ-L01-01-101, 13636-A-ZZ-L02-01-102, 13636-A-ZZ-L03-01-103, 13636-A-ZZ-L04-01-104, 13636-A-ZZ-L05-01-105, 13636-A-ZZ-L06-01-106, 13636-A-ZZ-L07-01-107, 13636-A-100-ZZ-01-200, 13636-A-100-ZZ-01-201, 13636-A-100-ZZ-01-202, 13636-A-100-ZZ-01-203, 13636-A-100-ZZ-01-300, 13636-A-100-ZZ-01-301, 13636-A-88-ZZ-01-200, 13636-A-88-ZZ-01-201, 13636-A-88-ZZ-01-202, 13636-A-88-ZZ-01-300, 13636-A-88-ZZ-01-301

Demolition: 13636-D-ZZ-B01-02-099, 13636-D-ZZ-L00-02-100, 13636-D-ZZ-L01-02-101, 13636-D-ZZ-L02-02-102, 13636-D-ZZ-L03-02-103, 13636-D-ZZ-L04-02-104, 13636-D-ZZ-L05-02-105,

13636-D-ZZ-L06-02-106, 13636-D-ZZ-L07-02-107, 13636-D-ZZ-R-02-110, 13636-D-100-02-200, 13636-D-100-02-200

Proposed: 13636-A-100-B01-00-099-RevC, 13636-A-100-L00-00-100-RevD, 13636-A-100-L01-00-101, 13636-A-100-L02-00-102, 13636-A-100-L03-00-103, 13636-A-100-L04-00-104, 13636-A-100-L05-00-105, 13636-A-100-L06-00-106, 13636-A-100-L07-00-107, 13636-A-100-L08-00-108-RevC, 13636-A-100-R-00-110-RevF, 13636-A-100-R-00-210-Rev E, 13636-A-88-B01-00-099, 13636-A-88-L00-00-100, 13636-A-88-L01-00-101-RevB, 13636-A-88-L02-00-102, 13636-A-88-L03-00-103, 13636-A-88-R-00-110, 13636-A-100-ZZ-04-200-RevD, 13636-A-100-ZZ-04-201-RevD, 13636-A-100-ZZ-04-202-RevD, 13636-A-100-ZZ-04-203-Rev C, 13636-A-88-ZZ-04-200, 13636-A-88-ZZ-04-201, 13636-A-88-ZZ-04-202, 13636-A-88-ZZ-04-203, 13636-A-88-ZZ-04-204, 13636-A-100-ZZ-05-300, 13636-A-100-ZZ-05-301-RevB, 13636-A-88-ZZ-05-300, 13636-A-88-ZZ-05-301

Supporting Documents:

Affordable Housing Statement, September 2022

Air Quality Assessment, September 2022

Arboricultural Impact Assessment and Method Statement, September 2022

Archaeological Desk Based Assessment, 30 September 2022

Biodiversity Net Gain Plan, 29 September 2022

CIL Form, 30 September 2022

Circular Economy Spreadsheet 1 & 2, 28 September 2022

Circular Economy Statement, 30 September 2022

Construction Management Plan, September 2022

Contamination and Basement Impact Statement, 27 September 2022

Covering Letter, 30 September 2022

Daylight & Sunlight Report, 21 September 2022

Delivery and Servicing Plan, 28 September 2022

Design and Access Statement, 30 September 2022

Drainage Statement and SUDs strategy, 29 September 2022

Employment and Training Statement

Energy Spreadsheet, 30 September 2022

Energy Statement, 30 September 2022

Energy and Sustainability Comments Responses, 06/03/2023

Financial Viability Assessment, 9 August 2022

Flood Risk Assessment, 29 September 2022

Noise Impact Assessment, 30 September 2022

Planning Application Form, 30 September 2022

Planning Statement, 30 September 2022

Preliminary Ecological Appraisal, 30 September 2022

Site Waste Management Plan, September 2022

Statement of Community Involvement, September 2022

Structural Methodology Statement, 30 September 2022

Sustainability Statement Spreadsheet

Sustainability Statement, 30 September 2022

Transport Assessment, 23 September 2022

Travel Plan, 28 September 2022

Ventilation and Extraction Statement, 29 September 2022

Additional Documents:

SPT & Cohesion Depth Graph

Blackheath Point Renders

Financial Viability Response Note

Delivery and Servicing Bay Note, 23 March 2023

Energy and Sustainability Response Note, 6 March 2023

Fire Statement, 17 March 2023

Heritage Assets Planning Assessment Note, 12 December 2022

Metropolitan Police Response Note, 3 February 2023

SuDS Response Note, 2 March 2023

Transport Response Note, 17 November 2022

Rooftop Amendments Note, December 2022

Delivery and Servicing Note, 23 March 2023

Townscape, Heritage and Visual Impact Assessment, 20 October 2022"