

Planning statement

88 Gray's Inn Road, WC1X 8AA

1908 Property Holdings Limited

May 2015

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1.0 Introduction

- 1.1 This planning statement, prepared by Maddox Associates, considers the planning policy framework that supports a full planning application to the London Borough of Camden on behalf of our client, 1908 Property Holdings Limited. The full planning application proposes the reconfiguration of the existing office premises, which includes the demolition of the existing two-storey extension to the rear and replacement with a four-storey extension, the demolition of the existing single-storey roof extension and its replacement with a new single-storey roof extension. As part of the development, a series of refurbishment works will also be undertaken which includes the provision of a new lift and double glazing throughout at 88 Gray's Inn Road, WC1X 8AA.

The application

- 1.2 This statement has been informed by a comprehensive set of planning application documents and plans, as set out below. The statement should therefore be read in conjunction with these submission documents, which will provide further information on the points summarised and assessed against planning policy in this report.

1. Application plans and drawings;
2. Daylight and sunlight assessment;
3. Design and access statement;
4. Geotechnical investigation; and
5. Planning application form and certificates.

Key benefits

- 1.3 The application delivers a series of key benefits, as set out below:
1. Increase in high quality office floorspace, supported by London Borough of Camden's strategic policies and London Plan policy;
 2. Refurbishment of the building to bring it up to modern standards;
 3. Making efficient use of the land available on site by rationalising the internal layout of the building; and
 4. Adding design interest to a building with little architectural significance.

Pre-application advice

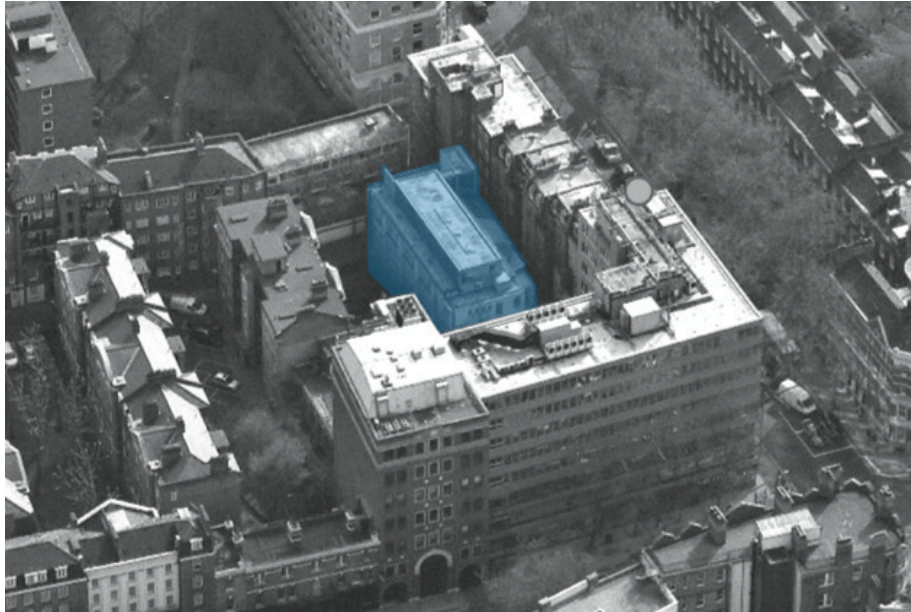
- 1.4 Pre-application advice was received from London Borough of Camden for the proposal, dated 13/03/2015 (ref: 2015/0657/PRE). The advice concludes that the principle of the development is considered acceptable, subject to design and amenity considerations. In terms of design, the advice notes that the development is of an appropriate scale in the context of the conservation area. The advice also notes that the proposal is unlikely to cause issues relating to loss of outlook and daylight/sunlight, but a full application would need to be supported by a daylight/sunlight assessment. Overall, the advice is supportive of the development, subject to detailed design and impacts on amenity.
- 1.5 The pre-application advice has been fully considered and the remainder of this statement is structured as follows:

- Section 2 examines the site and its surroundings;
- Section 3 examines the relevant planning history relating to the site;
- Section 4 provides details of the proposed development;
- Section 5 sets out the relevant planning policies against which the proposal should be assessed;
- Section 6 provides an assessment of the proposal against the relevant planning policies and material considerations; and
- Section 7 concludes that planning permission should be granted in light of the foregoing.

2.0 Site and area description

- 2.1 The 0.5 ha site is located at 88 Gray's Inn Road, London, WC1X 8AA. The site is located to the rear of properties located on Gray's Inn Road, and is bound by buildings on all sides. The aerial image below indicates the site shaded in blue.

Image 1: Image of the site



- 2.2 The site is in use as offices (Use Class B1), with a number of occupiers located across four levels. The existing building is three-storeys in height, with a single-storey roof extension and basement level. The property also has a two-storey extension to the rear. There are no trees located on the site.
- 2.3 The site is accessed via Gray's Inn Road at the front through an alleyway. The site has a PTAL rating of 6b (excellent), with Chancery Lane underground station within a five-minute walk of the site, and Holborn and Farringdon both located within a ten-minute walk. There are a number of bus stops located along Gray's Inn Road, and cycle hire docking stations within a short walk.
- 2.4 The site is located within the Hatton Gardens conservation area and falls within the designated view from Blackheath Point to St Paul's Cathedral. The site also lies within an Archaeological Priority Zone and the designated Central London Area (Clear Zone Region). The site lies within Flood Risk Zone 1 as identified by the Environment Agency flood risk maps, and is also not identified as an area at risk of flooding according to Map 2 (flood risk) of the adopted Camden Development Policies (November 2010).
- 2.5 In terms of the wider area, there is a mix of residential and commercial uses in the surrounding area. Along Gray's Inn Road properties generally have active retail uses at ground floor level. Building heights in the surrounding area vary from four to eight storeys.
- 2.6 There are single yellow lines in operation on Gray's Inn Road directly outside the site.

3.0 Relevant planning decisions

- 3.1 There are no any previous planning decisions that are of relevance to this application.

4.0 Proposed development

- 4.1 The application is for full planning permission for the reconfiguration of the existing office premises which includes the demolition of the existing two-storey extension to the rear and replacement with a four-storey extension, the demolition of the existing single-storey roof extension and its replacement with a new single-storey roof extension. As part of the development, a series of refurbishment works will be undertaken which includes the provision of a new lift and double glazing throughout at 88 Gray's Inn Road, WC1X 8AA. The submitted design and access statement provides a detailed overview of the proposed development. The below is intended to provide a summary of the design and layout principles and should be read in conjunction with the submitted design and access statement.

Land use

- 4.2 The existing building is already in use as offices (Use Class B1), consisting of 1,275 sq m of office floorspace across four floors. The proposal leads to an increase of office floorspace of 251 sq m through the provision of a more efficient layout and replacement of the extensions to the rear and at roof level.

Layout

- 4.3 It is proposed to demolish the existing two-storey rear extension and replace it with a four-storey rear extension. It is also proposed to demolish the existing single-storey roof extension and replace it with a new single storey roof extension.
- 4.4 The proposal will link the newly created extension to the main building to drastically improve the efficiency of the building. The reconfigured layout will generate larger floor plates designed to meet modern business needs. A summary of the proposed floorspace is shown in the table below.

4.5 **Table 1: Floorspace schedule**

Level	Existing office floorspace (m ²)	Proposed office floorspace (m ²)	Increase in office floorspace (m ²)
Basement	147	173	26
Ground floor	365	365	12
First floor	341	358	17
Second floor	287	346	59
Third floor (roof level)	119	256	137
TOTAL:	1,259	1,498	251

Scale and massing and appearance

- 4.6 The overall height of the building would remain the same as existing (four storeys). The existing two-storey rear extension would be increased in height by two-storeys to match the main part of the building. The existing roof extension would be replaced with a new extension, with the height kept the same.
- 4.7 The new roof extension has a contemporary design with a stepped elevation, which is proposed to mitigate issues of overlooking to neighbouring occupiers. The new rear extension would be finished to match the existing building, and the new roof extension would be finished with high quality black

standing seam zinc cladding and translucent channel glazing.

Access

- 4.8 The access to the site would remain as existing, with access provided via Gray's Inn road to the front of the site. The proposal includes the installation of a lift that provides access to the staff facilities located in the basement, improving the overall accessibility of the building.

Cycle parking and facilities

- 4.9 The proposal also includes 18 new cycle parking spaces, which would be located in the basement. A series of improved staff facilities will be provided, including new showers, changing facilities, lockers and accessible bathrooms that are necessary to meet modern business needs.

5.0 Development plan policy and guidance

- 5.1 To the extent that development plan policies are material to an application for planning permission the decision on an application must be taken in accordance with the development plan unless there are material considerations that indicate otherwise (section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004).

National planning policy framework

- 5.2 The National Planning Policy Framework ('the Framework') was published on 27 March 2012 and sets out the Government's planning policies for England and how these are expected to be applied. The National Planning Policy Framework stresses the importance of having a planning system that is genuinely plan-led. Where a proposal accords with an up-to-date development plan it should be approved without delay, as required by the presumption in favour of sustainable development at paragraph 14 of the National Planning Policy Framework.
- 5.3 Where the development is absent, silent or the relevant policies are out of date, paragraph 14 of the National Planning Policy Framework requires the application to be determined in accordance with the presumption in favour of sustainable development unless otherwise specified.

Local planning policy

- 5.4 The local development plan comprises the Camden Core Strategy (2010-2025), Camden Development Policies (2010-2025) and the relevant supplementary planning guidance.

Camden Core Strategy (2010)

- 5.5 The following Core Strategy policies are considered to be of relevance to the planning application:
- CS1 – Distribution of growth;
 - CS3 – Other highly accessible areas;
 - CS5 – Managing the impact of growth and development;
 - CS8 – Promoting a successful and inclusive Camden economy;
 - CS9 – Achieving a successful Central London; and
 - CS14 – Promoting high quality places and conserving our heritage.
- 5.7 The key policies in respect of the proposed development are CS1, CS3, CS5 and CS14.
- 5.8 CS1 aims to ensure that growth is focussed in the most sustainable locations, and manage it to make sure that we deliver its opportunities and benefits and achieve sustainable development. This includes the aim of promoting the most efficient use of land and buildings in Camden by:
- Seeking development that makes full use of its site, taking into account quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the site;
 - Resisting development that makes inefficient use of Camden's limited land; and
 - Expecting high density development in Central London, town centres and other locations well served by public transport.

- 5.9 As policy CS3 notes, the Council promotes appropriate development in highly accessible locations, including the Central London area. The Council will aim to ensure that development in these locations is suitable in scale and character for the area.
- 5.10 CS5 notes that the Council will manage the impact of growth and development in Camden, with particular consideration given to:
- a) Providing uses that meets the needs of Camden's population and those who work in and visit the borough;
 - b) Providing the infrastructure and facilities needed to support Camden's population and those who work in and visit the borough;
 - c) Providing sustainable buildings and spaces of the highest quality; and
 - d) Protecting and enhancing our environment and heritage and the amenity and quality of life of local communities.
- 5.11 CS5 also states that the Council will protect the amenity of Camden's residents and those working in and visiting the borough by:
- e) Making sure that the impact of developments on their occupiers and neighbours is fully considered;
 - f) Seeking to ensure development contributes towards strong and successful communities by balancing the needs and characteristics of local areas and communities; and
 - g) Requiring mitigation measures where necessary.
- 5.12 Policy CS14 seeks to ensure that Camden's places and buildings are attractive, safe and easy to use by:
- a) Requiring development of the highest standard of design that respects local context and character;
 - b) Preserving and enhancing Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, schedules ancient monuments and historic parks and gardens;
 - c) Promoting high quality landscaping and works to streets and public spaces;
 - d) Seeking the highest standards of access in all buildings and places and requiring schemes to be designed to be inclusive and accessible; and
 - e) Protecting important views of St Paul's Cathedral and the Palace of Westminster from sites inside and outside the borough and protecting local views.

Camden Development Policies (2010)

- 5.13 The following development policies are considered to be of relevance to the application:
- DP13 – Employment sites and premises;
 - DP16 – The transport implications of development;
 - DP22 – Promoting sustainable design and construction;
 - DP24 – Securing high quality design;
 - DP25 – Conserving Camden's heritage; and

- DP26 – Managing the impact of development on occupiers and neighbours.

5.14 The key policies in respect of the proposal are DP24, DP25 and DP26.

5.15 DP24 states that the Council will require all developments to be of the highest standard of design and will expect developments to consider:

- a) Character, setting, context and the form and scale of neighbouring buildings;
- b) The character and proportions of the existing building, where alterations and extensions are proposed;
- c) The quality of materials to be used;
- d) The provision of visually interesting frontages at street level;
- e) The appropriate location for building services equipment;
- f) Existing natural features, such as topography and trees;
- g) The provision of appropriate hard and soft landscaping including boundary treatments;
- h) The provision of appropriate amenity space; and
- i) Accessibility.

5.16 To maintain the character of Camden's conservation areas, DP25 states that the Council will:

- a) Take account of conservation area statements, appraisals and management plans when assessing applications in conservation areas;
- b) Only permit development within conservation areas that preserves and enhances the character and appearance of the area;
- c) Prevent the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area where this harms the character or appearance of the conservation area, unless exceptional circumstances are shown that outweigh the case for retention
- d) Not permit development outside of a conservation area that causes harm to the character and appearance of that conservation area; and
- e) Preserve trees and garden spaces which contribute to the character of a conservation area and which provide a setting for Camden's architectural heritage.

5.17 DP26 seeks to protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity. This includes consideration of the following:

- a) Visual privacy and overlooking;
- b) Overshadowing and outlook;
- c) Sunlight, daylight and artificial light levels;
- d) Noise and vibration levels;
- e) Odour, fumes and dust;
- f) Microclimate; and
- g) The inclusion of appropriate attenuation measures.

5.18 DP26 also requires developments to provide:

- a) An acceptable standard of accommodation in terms of internal arrangements, dwelling and room sizes and amenity space;
- b) Facilities for the storage, recycling and disposal of waste;
- c) Facilities for bicycle storage; and
- d) Outdoor space for private or communal amenity space, wherever practical.

Supplementary planning guidance documents

5.19 The relevant supplementary planning guidance documents include the following:

- CPG 1 Design;
- CPG 3 Sustainability;
- CPG 5 Town centres, retail and employment;
- CPG 6 Amenity; and
- CPG 8 Planning obligations.

5.20 The Hatton Garden Conservation Area Statement is also of relevance to the proposal. The statement provides an overview of the character of the area, as well as providing guidelines for development in the area.

Regional planning policy

5.21 A number of documents prepared by the Mayor of London also form the suite of relevant development plan documents and guidance notes that are of relevance to the application. These include:

- Further Alterations to the London Plan (2015);
- The Mayor's air quality strategy;
- Accessible London: achieving an inclusive environment SPG;
- Sustainable design and construction SPG;
- The Mayor's climate change adaptation strategy; and
- The Mayor's climate change mitigation and energy strategy.

Further Alterations to the London Plan

5.22 The following London Plan policies are considered to be of relevance to the application:

- 1.1: Delivering the strategic vision and objectives for London;
- 4.1: Developing London's economy;
- 4.2: Offices;
- 5.3: Sustainable design and construction; and
- 7.6: Architecture; and
- 7.8: Heritage assets and archaeology.

Planning policy assessment

5.23 Drawing on the various supporting documents submitted with the application, the remainder of the

document assesses the proposals against the Development Plan and other relevant material considerations. The policy assessment addresses the following topic areas:

- Principle of development;
- Design and impact on heritage assets;
- Amenity including daylight/sunlight considerations; and
- Contamination.

6.0 Key issues and considerations

- 6.1 As noted above, this section provides an assessment of the proposal against a series of considerations, drawing on the conclusions of the submitted supporting reports.

Principle of the development

- 6.2 The site is already in use as offices. The proposal delivers 251 sq m of additional high quality office floorspace in a highly accessible central location. The proposal makes efficient use of the space available on site, and rationalises the internal configuration of the building. As such, the proposal is in line with the aims of Policy CS1, which aims to ensure that growth is focused in the most sustainable locations and promotes the most efficient use of land and buildings. The proposal is also in accordance with Policy CS3, which supports appropriate development in highly accessible locations, including Central London. The pre-application advice (dated 13.03.2015, ref: 2015/0657/PRE) also stated that the principle of the development is considered to be acceptable, subject to design and amenity considerations.

Design and impact on heritage

- 6.3 Core Strategy Policy CS14 and Development Policy DP25 seek to preserve and enhance the character and appearance of conservation areas, requiring development to be of the highest standard of design. As the site is located within the Hatton Garden Conservation Area, impact on heritage is a key consideration.
- 6.4 As noted previously, the site is bound by buildings on all sides and therefore is barely visible from the street. The proposed development includes a four-storey replacement extension to the rear, and a replacement single-storey roof extension. The rear extension is designed to be in keeping with the appearance of the existing building. The proposed roof extension has a contemporary design and is finished with high quality materials (black standing seam zinc cladding and translucent channel glazing). As the proposed development does not result in an increase in the overall height of the building and would barely be visible from the street, it is not considered that the proposal would cause harm character or appearance of the conservation area.
- 6.5 As such, it is considered that the proposed development would preserve the character of the conservation area, in accordance with policies CS14 and DP25. The pre-application advice also noted that the proposed roof extension "...respects the proportions and architectural treatment of the host building." As the current design of the roof is broadly similar to that proposed at the pre-application stage, it is considered that this advice is applicable.

Amenity including daylight/sunlight considerations

- 6.6 Policies CS5 and DP26 are concerned with managing the impact of growth and development on neighbouring and future occupiers. As noted in the pre-application advice, it is not considered that the proposal would result in harm to the amenity of neighbouring occupiers by way of overlooking, as the overall height of the building will not increase and the building is sited well away from neighbouring buildings.
- 6.7 In terms of impacts on access to daylight/sunlight, the planning application is accompanied by a daylight and sunlight report carried out by consultants GL Hearn. The purpose of the report was to determine the impacts of the proposed development on the daylight and sunlight amenity to the

surrounding properties. A summary of the findings for each of the affected properties is set out below:

- 1-17 Shene Building (Shene House) will retain daylight access in compliance with BRE guidance. The report shows that some windows will experience some minor transgression in terms of sunlight amenity. However, the study shows that transgressions, where they occur, are minor and the windows will be just marginally below the level specified in the guidance.
- Redman House complies with BRE guidance in terms of daylight amenity. The windows were not tested for sunlight amenity as it is not required in accordance with the guidance.
- 88-94 Gray's Inn Road was not tested for sunlight amenity, in line with BRE guidance. In terms of daylight amenity, the report notes that the majority of the windows would be in compliance with BRE guidance (15 out of the 20 windows). Transgressions were found for three kitchen/dining/living rooms, and two bedrooms. The BRE Report considers daylight amenity to bedrooms to be of a lesser significance than main living spaces. Although some transgressions are noted, the report notes that Appendix F of the BRE guidance provides alternative daylight targets for urban locations and where buildings take an unfair share of their light from neighbouring land. In the context of this alternative guidance, the report concludes that the daylight distribution values are considered to be in line with expectations for the building.
- 96-98 Gray's Inn Road was not tested in terms of impacts on sunlight, in line with BRE guidance. In terms of the impact on daylight amenity, the report found that 12 of the 21 windows tested would comply with the BRE guidance. Transgressions are concentrated at first and second floor levels where the windows are heavily reliant on the daylight amenity available across the site. As noted above, Appendix F of the BRE guidance provides alternative guidance for daylight targets in urban locations. Taking account of this alternative guidance, it is considered that the daylight amenity levels are in keeping with the expectations within an urban area such as this.

- 6.8 The report concludes that the analysis demonstrates that the proposed development at 88 Gray's Inn Road would have an impact in keeping with expectations for such an urban area. Where transgressions do exist the retained daylight and sunlight amenity values are normal or above the levels often seen in urban locations such as this. Therefore, the proposal is considered to be in accordance with Camden's policies CS5 and DP26.

Contamination

- 6.9 The application is accompanied by a report that documents the geotechnical site investigation, completed by Pam Brown Associates. The purpose of the investigation was to determine the ground conditions and to provide recommendations in respect of the geotechnical matters for the development. The report concludes that it is considered that 'mild' harm could arise to sensitive receptors from contamination (if any), resulting from historic on and off site uses. It is considered 'unlikely' to 'low' for most of the pollutant pathways to be established that could affect future users of the proposed scheme. Overall, based on the magnitude of harm and the likelihood of a pollutant pathway being established, it is considered that there is a low to moderate risk that harm could arise to human health and/or environmental receptors from contaminative issues, arising as a result of the previous site use and off-site activities.

8.0 Conclusions

- 8.1 In conclusion, this statement demonstrates that the proposal is in accordance with the policy within the adopted development plan and there are not material considerations that weigh in favour of planning permission not being granted.
- 8.2 In summary, the key points in relation to this proposal are noted below:
- Delivery of 251 sq m of additional high quality office floorspace in a highly accessible Central London location;
 - The proposal rationalises the internal layout of the building and makes efficient use of the land available on site;
 - Adding design interest interest to a building with little architectural significance; and
 - Improving the existing office facilities to bring them up to modern standards and improving accessibility though provision of a new lift and cycle parking.