
Panther House and 156-164 Grays Inn Road, WC1X

Planning Statement



Prepared for : Panther House Developments Limited

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Contents

1.	Introduction	1
2.	Site and Surroundings	3
3.	The Proposed Development	14
4.	Planning Policy Framework	16
5.	Planning Assessment	18
6.	Conclusion	40

1. Introduction

- 1.1. This Planning Statement has been prepared by Savills on behalf of Panther House Developments Limited (c/o Dukelease Properties Ltd), and is submitted in support of an application for full planning permission for the redevelopment of the site at Panther House (38 Mount Pleasant) and 156-164 Grays Inn Road, WC1X.

Description of Development

- 1.2. Full planning permission is sought as follows:

“Redevelopment of existing buildings to provide part 4 storey and part 7 storey building following partial demolition of existing Panther House and Brain Yard buildings for a mix of Class B1, A1 and A3 uses, provision of new 7 storey building at 156-164 Gray’s Inn Road behind facade from existing building at 160-164 Gray’s Inn Road to provide flexible Class A1/A3 use at ground and basement levels and 13 self contained residential units (4 x 1-bed, 7 x 2-bed and 2 x 3-bed) at upper floor levels.”

- 1.3. Panther House and the Brain Yard buildings are currently in use for a range of Class B1 uses. The buildings are subdivided into multiple small commercial uses accommodating a range of commercial uses although the quality of the accommodation is quite limited in terms of lighting, accessibility and usability. 156 Grays Inn Road is currently a single Class C3 residential unit and 160-164 Grays Inn Road offers Class A1 retail and a Class A3 cafe on the ground floor with Class B1 office on the upper floor.
- 1.4. This application proposes the redevelopment of the site to deliver a mixed use scheme which provides for a range of both commercial and residential uses. Class B1 space will be provided within extended buildings at both Panther House and Brain Yard. A new building will be provided fronting onto Gray’s Inn Road featuring a range of flexible Class A1 and A3 uses at ground and an extended basement level with residential accommodation on the floors above. A total of 13 residential units are proposed.
- 1.5. The development of this site is also intended to provide significant improvements to the local townscape, not only through a general enhancement of the site relative to the existing buildings but also through the introduction of elements such as a new pedestrianised walking route between Gray’s Inn Road and Mount Pleasant.

Pre-Application Discussions

- 1.6. The proposals have been developed in close consultation with key stakeholders including senior officers at the London Borough of Camden over a period of more than eight months. The proposals have evolved and have been further developed in response to the feedback received during this pre-application process, as discussed further later in this Statement.

Supporting Information

- 1.7. This Planning Statement should be read in conjunction with the accompanying plans and drawings submitted as part of the application, as well as the following documents:

- Design and Access Statement prepared by AHMM and accompanying methodology on the production of Verified Views by Hayes Davidson;
- Heritage Assessment prepared by KM Heritage;
- Historic Environment Assessment prepared by MOLA;
- Sustainability and Energy Assessment prepared by MTT;
- Environmental Noise Survey and Noise Impact Assessment prepared by Hann Tucker;
- Daylight and Sunlight Assessment prepared by GIA;
- Air Quality Assessment prepared by Creative Consulting Engineers;
- Structural Report and Basement Impact Assessment prepared by Eckersley O'Callaghan and also incorporating:
 - Geotechnical (BIA) Report prepared by GEA;
 - Ground Movement Assessment prepared by GEA; and
 - Construction Management Plan prepared by Wates;
- Transport Assessment prepared by TTP;
- Draft Workplace Travel Plan prepared by TTP;
- Arboricultural Assessment prepared by DPA;
- Flood Risk Assessment prepared by Robert West; and
- Statement of Community Involvement by London Communications Agency.

1.8. In addition, a Viability Assessment Report has been prepared by Affordable Housing Solutions, and will be submitted separately on a commercially confidential basis.

Structure of the Statement

1.9. The structure of this Planning Statement is set out as follows:

- **Section 2** (Site and Surroundings) provides background to the proposals;
- **Section 3** (The Proposed Development) details the development proposals;
- **Section 4** (Planning Policy Framework) sets out the relevant planning policy framework;
- **Section 5** (Planning Assessment) sets out discussion of the material planning considerations arising from the initial development proposals; and
- **Section 6** (Conclusions) draws our conclusions in respect of the proposals.

2. Site and Surroundings

The Site

- 2.1. The site sits between Gray's Inn Road and Mount Pleasant, and short distance north of the junction with Theobalds Road and Goswell Road. The site can be split into three broad parts, namely Panther House itself which faces onto Mount Pleasant, the smaller 'Brain Yard' building towards the centre of the site and then the buildings at 156 and 160-164 Gray's Inn Road.



An aerial view of the application site. The triangular shape of Panther House, the glass roof of Brain Yard and the low scale of the buildings fronting onto Gray's Inn Road are all noticeable

- 2.2. Panther House is a large brick building that dates from the early Twentieth Century. Although originally built for manufacturing, the building has been in use for a range of Class B1 commercial uses since the mid-Twentieth Century. The building is now subdivided into a large number of small, individual units that are currently occupied for a range of office and light industrial uses.

Panther House and 156-164 Grays Inn Road, WC1X

Planning Statement



The buildings forming Panther House as viewed from Mount Pleasant. The buildings form a triangle around the small courtyard accessed via the gate at the centre of the image

- 2.3. The building effectively forms a triangle contained between surrounding buildings and the road on Mount Pleasant that forms an approximate 45 degree angle relative to Gray's Inn Road and Elm Street. A courtyard sits at the centre of the building, accessible from the corner of Panther House on Mount Pleasant.
- 2.4. Behind Panther House is the Brain Yard building. Effectively a warehouse building in appearance, it provides a single storey open internal space with a number of sub-divided Class B1 commercial units at both ground and a partial mezzanine level. the building stands two storeys in height, constructed in brick and with a glass roof over.



The Brain Yard building (glazed roof) as viewed from the rear of 156 Gray's Inn Road and with the rear of 160 Gray's Inn Road visible on the left of the image

- 2.5. On Gray's Inn Road, two separate buildings form part of the site and are divided by the vehicular access route through to Brain Yard behind. 156 Gray's Inn Road currently includes a single class C3 residential unit, although it was historically constructed as accommodation for a supervisor to the tramway sub-station.
- 2.6. 160-164 Gray's Inn Road is a two storey building with two Class A1 retail units and a Class A3 cafe situated at ground floor with Class B1 office accommodation on the first floor above. As a two storey building, this property is considerably smaller in scale than all others within the Gray's Inn Road streetscape.

Panther House and 156-164 Grays Inn Road, WC1X

Planning Statement



The buildings, from left to right, at 164, 162, 160 and 156 Gray's Inn Road. The access to Brain Yard is visible between the red shop frontage and the separate brick building of 156 Gray's Inn Road to the right hand side of the image

- 2.7. There are also existing basement levels below both Panther House and the Brain Yard building.
- 2.8. In terms of formal planning designations for the site, the following are noted within relevant planning documents:
- Designated view 6A.1 Blackheath Point to St Paul's Cathedral – Right Lateral Assessment Area
 - Archaeological Priority Area – London Suburbs; and
 - Central London Area (Clear Zone Region) CLA
- 2.9. Additionally, the site is located within the Hatton Garden Conservation Area. The Conservation Area Statement (1999) for this area describes its key characteristics as follows:
- The area contains few open spaces
 - The emphasis is on the streetscape
 - There is a degree of enclosure in most streets and the appearance of high urban density

- The construction of 19th century roads resulted in clear block boundaries with tall buildings of 4-6 storeys high fronting the street
 - The character and special interest of the area is defined largely by the quality and variety of buildings and uses and the unique pattern of streets. The character is not dominated by one particular period or style of building but rather by the combination of styles that makes the area of special interest. It is often the case that buildings of different periods, architectural styles and functions exist together in the same street creating contrast in scale and character
 - Building types which make a particular contribution to the character and appearance of the conservation area include late 19th century and early 20th century residential blocks.
- 2.10. None of the buildings on the site are statutorily or locally listed, and the site does not adjoin any listed or locally listed buildings. 160 Gray's Inn Road is identified as a shop front of merit, and Panther House (38 Mount Pleasant) is identified as an unlisted building which makes a positive contribution to the special character of the area.
- 2.11. The site has a PTAL rating of 6b, which is the highest possible score and indicates an excellent level of public transport accessibility. It is located approximately 800 metres north west of Farringdon National Rail and Underground Station and 535 m to the north of Chancery Lane Underground Station, and 940 m to the north east of Holborn Underground Station. A number of bus services also operate along Gray's Inn Road.
- 2.12. There are no trees located within the boundary of the application site although there are some street trees in Gray's Inn Road immediately in front of the site.

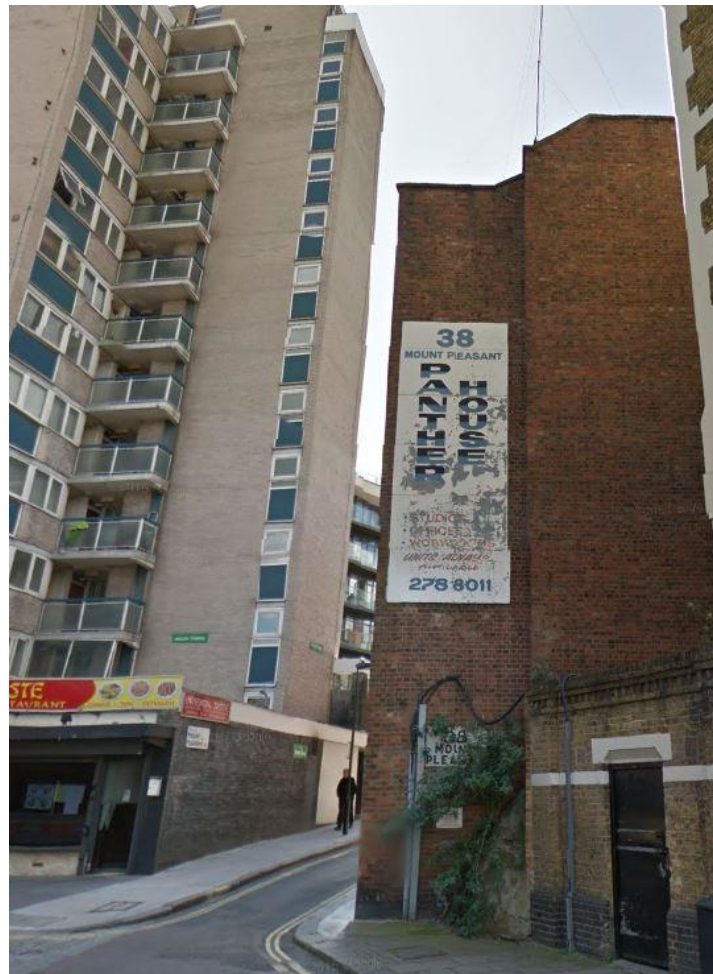
Surrounding Area

- 2.13. The surrounding area is varied in terms of architectural style, height and massing. However, overall this is a dense location with a mix of residential, commercial and retail uses.
- 2.14. On Gray's Inn Road the site lies between Dulverton Mansions to the north and Dawlish Mansions to the south. Both of these buildings rise to between five and seven storeys in height, considerably greater than the two storey height of 160-164 Gray's Inn Road currently. The imposing flank wall and chimney stack of Dawlish Mansions is visible over the rooftop of the existing properties at 160-164 Gray's Inn Road.



The flank wall of Dawlish Mansions that is visible over the lower facade of 160-164 Gray's Inn Road

- 2.15. When viewed in the context of the length of Gray's Inn Road over a longer distance, the low scale of the current building at 160-164 Gray's Inn Road is an anomaly compared to the five, six and seven storey buildings that otherwise form a continuous street elevation.
- 2.16. Many buildings in Gray's Inn Road also feature retail and other similar 'active' uses at ground floor level with either commercial or residential accommodation above.
- 2.17. To the rear, Mount Pleasant is very much a 'back route', providing a narrow connecting route between the busier streets of Gray's Inn Road and Elm Street / Gough Street / Laystall Street. Immediately adjacent to the application site are the Mount Pleasant Studios, a site offering short to medium term accommodation to vulnerable adults who are under the supervision of the Council. The opposite side of Mount Pleasant is predominantly residential and incorporates the larger blocks of Mullen Tower and the rear of the 1-94 Gray's Inn Buildings.



Viewed from the north looking into Mount Pleasant, the brick form of Panther House with existing residential buildings facing across the road

- 2.18. To the north, the site is enclosed by the further residential accommodation that forms Holsworthy Square, extending from Dulverton Mansions along Elm Street. The rear of Panther House faces into the courtyard to the rear of the main Holsworthy Square block.
- 2.19. Further analysis of the surrounding area and the application site's relationship with adjoining buildings is set out within the Design & Access Statement that forms part of this submission.

Planning History

- 2.20. A review of the Council's online planning history records has identified some planning history in relation to the site, as set out below. Although a range of applications have been made over an extended period of time to develop both Panther House and the other buildings facing into Gray's Inn Road, in most cases these have been withdrawn without any formal decision being made.

Panther House and 156-164 Grays Inn Road, WC1X

Planning Statement



2.21. The relevance of previous planning history is therefore considered to be relatively limited given the lack of conclusive decisions over an extended period of time – the uses that have been long-established across the site continue to the current day and no formal changes to the land uses on the site have been established.

Panther House

LPA Reference	Description	Decision	Decision Date
2009/4253/C	Demolition of Nos.156-164 Grays Inn Road and the 'Tramshed' building to rear.	Withdrawn	N/A
2009/2490/P	Erection of a 7 storey building with basement level along the Gray's Inn Road frontage comprising mixed use retail (Class A1), commercial (Class B1) and student accommodation (sui-generis) to provide a combination of self-contained bed-sit units and cluster units, and the erection of a one and two storey roof extensions to Panther house to comprise commercial (Class B1) and student accommodation (sui-generis). following the demolition of Nos.156-164 Grays Inn Road and the 'Tramshed' building to rear.	Withdrawn	N/A
2006/0707/P	Application for a certificate of lawfulness for proposed use as an administrative office for private hire vehicles (Class B1).	Granted	15/02/2006
PSX0204462	Submission of details of elevations and facing materials, and cycle parking pursuant to additional conditions 1 and 2 of Planning Permission dated 12th September 1997 (Reg. no. 9501234R3), as shown on drawing numbers; 11E; 12D; 19D and 2067/D/2/E.	Granted	18/06/2002
PS9705099	Redevelopment for mixed office, retail, leisure and residential purposes, including service and parking access from Mount Pleasant. (ADDITIONAL PLANS SUBMITTED).	Withdrawn	N/A
9501234R3	Refurbishment and extension of existing building, to include new entrance, a third floor addition to the Mount Pleasant block and fourth and fifth floor additions to the rear block, as shown on drawing numbers 2067/D/1A, 2D, 3C, 4D, 5D, 6D, 7C, 8D, 11C, 12B, 14A, 15B, 16 & 19B.	Granted subject to Section 106	12/09/1997
8601710	Renewal of an expired 5 year planning permission dated 21st May 1979 (Reg.No.28004(R)) for internal reorganisation of light industrial and office uses and the erection of an extension to Block A to provide ancillary office accommodation as shown on drawings previously submitted (Reg.No. 28004(R)) numbered 1151/1B 2B & 3 and 1085/1B 2B 3B 4A 5A 6A & 7A. Appeal received against refusal of permission	Refuse	18/12/1986
28004(R)	Internal reorganisation of light industrial and office uses, and the erection of an extension to Block A to provide ancillary office accommodation.	Granted	21/05/1979

Panther House and 156-164 Grays Inn Road, WC1X

Planning Statement



156-164 Grays Inn Road

LPA Reference	Description	Decision	Decision Date
2009/4253/C	Demolition of Nos.156-164 Grays Inn Road and the 'Tramshed' building to rear.	Withdrawn	N/A
2009/2490/P	Erection of a 7 storey building with basement level along the Gray's Inn Road frontage comprising mixed use retail (Class A1), commercial (Class B1) and student accommodation (sui-generis) to provide a combination of self-contained bed-sit units and cluster units, and the erection of a one and two storey roof extensions to Panther house to comprise commercial (Class B1) and student accommodation (sui-generis). following the demolition of Nos.156-164 Grays Inn Road and the 'Tramshed' building to rear.	Withdrawn	N/A
2006/5101/C	Demolition of existing site buildings.	Withdrawn	N/A
2006/5099/P	Demolition of existing 3x buildings and erection of a new 6-storey building with basement comprising a mixed-use of office use (Class B1) at basement level, retail (Class A1) and restaurant (Class A3) use at ground floor level and residential use (Class C3) from first to fifth floors to provide 30x self-contained flats (7x 1-bed, 9x 2-bed, 14x 3+ bed units).	Withdrawn	N/A
2006/2177/C	Demolition of existing site buildings.	Withdrawn	N/A
2006/2173/P	Demolition of existing 3x buildings and erection of a new 6-storey building with basement comprising a mixed-use of retail (Class A1), restaurant (Class A3), gymnasium (Class D2) and nightclub (sui generis) uses at basement to 2nd floor levels, and residential use (Class C3) to provide 13x self-contained flats (2x 1-bed, 5x 2-bed, 6x 3-bedroom flats) on 3rd - 5th floor levels.	Withdrawn	N/A
PS9705099	Redevelopment for mixed office, retail, leisure and residential purposes, including service and parking access from Mount Pleasant. (ADDITIONAL PLANS SUBMITTED).	Withdrawn	N/A

Pre-Application Discussions

- 2.22. As set out above, the proposals have been developed in close consultation over more than eight months with key stakeholders including senior officers at the London Borough of Camden. The proposals have evolved and developed in response to the feedback received during this pre-application process.
- 2.23. In accordance with the Council's normal pre-application discussion procedures, an initial meeting and site visit with officers took place in March 2015. Following this, a Planning Performance Agreement (PPA) was agreed with officers which has provided a timescale for the subsequent range of meeting and design workshops that have taken place prior to the submission of a formal planning application.

- 2.24. A total of seven pre-application meetings / design workshops have taken place between April and November 2015. These meetings focused predominantly upon the principles of development, proposed mixes of land uses and the evolution of the proposed design. Many of these discussions went hand-in-hand with the ongoing consultation with the wider local community (as outlined below).
- 2.25. Additionally, separate meetings were held with highways officers in June 2015 to discuss transport matters and with an economic officer in November 2015 to discuss the detail of the commercial floorspace that could be provided.
- 2.26. This extensive pre-application programme has allowed for a continued evolution of the detail of the proposed development within the general parameters of a commercially-led development that responds and respects the distinctive characters of the existing buildings on the site.
- 2.27. Further details of the design evolution are set out within the Design & Access Statement prepared by AHMM that forms part of this submission.

Community Consultation

- 2.28. The applicant has sought to consult extensively with the wider local community in a process that has been ongoing since June 2015. At this time, existing tenants were contacted individually to make them aware of the intention for development of this site and the general principles of the development being put forward. This initial consultation was partnered with approaches to local ward councillors and an invitation for them to receive an overview of the development proposals.
- 2.29. Prior to formal submission of this application, meetings and/or consultations have taken place with each of the following local interest groups:
- The Mount Pleasant Society (including residents from a number of neighbouring buildings including Holsworthy Square, Tiverton Mansions and Mullen Tower);
 - Origin Housing;
 - Mount Pleasant Studios;
 - The Christopher Hatton Primary School; and
 - The Metropolitan Police's Holborn and Covent Garden Safer Neighbourhoods Team.
- 2.30. Invitations for meetings or consultation have also been extended to other interest groups including the Laystall Court Tenants' and Residents' Association, the Holsworthy Square Tenants' and Residents' Association and the Camden Civic Society.
- 2.31. In addition to these meetings, the applicant has also worked with the local planning authority to present the proposed development within the Council's own consultation processes as follows:
- A Development Management Forum, advertised by the Council and open to the general public, took place in July 2015; and

- A Developers' Briefing, with the proposals presented by planning officers to elected Member of the Development Control Committee, took place in October 2015.
- 2.32. Finally, a public exhibition was held over two days in mid-September 2015. This followed an extensive publicity campaign utilising advertising in local print media, a drop of leaflets to all properties (approximately 2,800 residential and commercial addresses) in the immediate vicinity of the application site and a dedicated website providing details and contact information.
- 2.33. Throughout this process, where possible, the applicant has sought to respond to queries and requests raised and amended the scheme where possible within the limitations and constraints of the development site. Most specifically, significant alterations have been made to the proposed new frontage on Gray's Inn Road as a result of comments made by a range of consultees.
- 2.34. A much fuller overview of the consultation programme is provided by the Statement of Community Involvement prepared by the London Communications Agency which is submitted as a part of this application.

3. The Proposed Development

3.1. As noted, this planning application seeks full planning permission for:

“Redevelopment of existing buildings to provide part 4 storey and part 7 storey building following partial demolition of existing Panther House and Brain Yard buildings for a mix of Class B1, A1 and A3 uses, provision of new 7 storey building at 156-164 Gray’s Inn Road behind facade from existing building at 160-164 Gray’s Inn Road to provide flexible Class A1/A3 use at ground and basement levels and 13 self contained residential units (4 x 1-bed, 7 x 2-bed and 2 x 3-bed) at upper floor levels.”

- 3.2. The proposed development will extend each of the existing buildings at Panther House and Brain Yard following a partial demolition of each. Four of the existing storeys in Panther House will be maintained and upgraded alongside the provision of a maximum of three additional storeys. At Brain Yard, the existing massing of the building will be maintained but following the removal of the roof and the east and west walls two additional storeys will be added.
- 3.3. In both cases, new accommodation will be constructed in a modern style in order to maintain a clear distinction between existing and new fabric. Predominantly, this is a metal and glazed construction to sit distinct from the brick structure of the retained fabric below.
- 3.4. The floorspace within both Panther House and Brain Yard is for Class B1 commercial use and has been designed to be used flexibly. This would allow for the accommodation of a range of small and medium enterprises (SMEs) within at least a proportion of the new space and thus maintaining the character of the current range of users within the building albeit within much higher quality spaces. Allowance has been made for both Class B1(a) office and Class B1(c) light industrial users in terms of the provision of access and lifts that will be suitable for both types of uses.
- 3.5. Moving forward through the site, the existing buildings at 156 and 160-164 Gray’s Inn Road will be demolished but the existing facade of 160-164 Gray’s Inn Road will be maintained as far as is possible with replacement materials and repairs made where necessary. A new building will be constructed behind across the full width of 156 to 164 Gray’s Inn Road, rising predominantly to fifth floor level with two elements reaching sixth floor level in a modern style responding to the typology of the traditional gables on the immediately neighbouring buildings.
- 3.6. At ground floor and within a new basement level, a mix of Class A1 retail and Class A3 restaurant/cafe uses will be provided to maintain an active frontage on Gray’s Inn Road. Above, a total of 13 residential units will be provided in a mix of 1-, 2- and 3-bed units. These would be accessed from Gray’s Inn Road itself via the outer portion of the courtyard.
- 3.7. As with the new elements to Panther House and Brain Yard, the new construction on Gray’s Inn Road will respect the retained elements but also stand distinct from the existing fabric. In this case, a mix of pre-cast concrete and aluminium fenestration will provide a modern reinterpretation of the retained brick and stone elevation at ground and first floor levels.

Panther House and 156-164 Grays Inn Road, WC1X

Planning Statement



- 3.8. The existing access route into Brain Yard will be maintained with the new building bridging over this at second floor level. Where this route is currently a vehicular access to Brain Yard, this will become a pedestrian route only. In addition, an opening up of the existing Brain Yard building will allow for a new off-road and secure pedestrian route to be provided between Gray's Inn Road and Mount Pleasant.
- 3.9. This new pedestrian route will be landscaped and feature considerable planting to ensure that it will be a pleasant and enjoyable new route for pedestrians to use.
- 3.10. The overall intent of this development is to provide for a range of different uses and an enhancement of the existing employment led offer from the site. Where the existing site is relatively closed in character, this development will open the site up and create new connections into, through and out of the site. By maintaining key elements of the existing character of the site in terms of an industrial heritage, but also adding to this with modern accommodation and architecture, this development can create a sense of place and permeability that does not currently exist.

4. Planning Policy Framework

- 4.1. The 2004 *Planning & Compulsory Purchase Act* requires that determination of any planning application must be in accordance with the development plan unless material considerations indicate otherwise.
- 4.2. In this case the development plan comprises;
- *The London Plan (March 2015, consolidated with alterations since July 2011); and*
 - *The London Borough of Camden Core Strategy and Development Policies (both adopted November 2010).*
- 4.3. Other documents of relevance to the application are:
- The National Planning Policy Framework, adopted March 2012;
 - The National Planning Practice Guidance, first published March 2014; and
 - Various *Camden Planning Guidance* documents which offer more detailed advice with regard to specific aspects of development in the Borough.

The National Planning Policy Framework

- 4.4. The development that is the subject of this application has been considered in light of the National Planning Policy Framework (*NPPF*), which provides a direction for planning on a national scale and the expectation that all local planning documents will be in general conformity with the *NPPF*.
- 4.5. One of the most important aspects of the *NPPF* is the ‘golden thread’ of a presumption in favour of sustainable development that runs through all of the policies contained within.
- 4.6. In particular, paragraph 7 of the *NPPF* indicates that there are three dimensions to sustainable development: economic, social and environmental, and that these dimensions give rise to the need for the planning system to perform a number of roles:
- ‘an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
 - **a social role** – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being; and

- **an environmental role** – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.’

4.7. Having regard also to paragraph 14 of the *NPPF*, the second half of this paragraph refers specifically to how the presumption in favour of sustainable development should be seen as a ‘golden thread’ running through decision-taking. Specifically it refers to:

- *‘approving development proposals that accord with the development plan without delay; and*
- *where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:*
 - a. *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
 - b. *specific policies in this Framework indicate development should be restricted.’*

4.8. With regard to the relationship between the *NPPF* and existing local planning policies, paragraph 215 of the *NPPF* set out that where local policies have been adopted since 2004:

‘...due weight should be given to relevant policies in existing plans according to their degree of consistency with this framework [the NPPF] (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given).’

4.9. Although Camden’s Local Plan documents were adopted prior to the publication of the *NPPF*, it is considered that policies relevant to this application are predominantly in accordance with the key principles laid down with the *NPPF*. As such, considerable weight should still be given to these policies in determining this application.

4.10. It is acknowledged that a draft replacement Camden Local Plan was published for consultation in early 2015. However, given the early stage in assessment of this replacement policy document it is not considered necessary to give weight to this at the current time.

5. Planning Assessment

5.1. This section of the Planning Statement assesses the proposals against the national, regional and local planning policy framework set out above.

Principles of a Mixed Use Development

5.2. The proposals will deliver a mix of uses, including flexible retail/cafe use (Class A1/Class A3), office and light industrial uses (Class B1) and residential accommodation (Class C3). These uses are currently all present on site, and the proposals will therefore maintain the overall character of the existing site but increase the floor areas of all uses.

5.3. Policy DP1 requires a mix of uses in development in all parts of the borough. In the Central London Area, where more than 200 sq m (gross) additional floor space is provided, up to 50% of all additional floor space is required as housing and this should be provided on site.

5.4. The overall increase in area generated by the scheme has been measured as 4,409 sq m GEA. Of this, 1715 sq m GEA is additional residential floorspace (all new residential floorspace with the equivalent of the existing Class C3 unit on-site subtracted). As a result, a total of 39% of additional floorspace proposed will be residential.

5.5. DP1 notes that the Council will take into account the following criteria when considering a mix of uses sought and whether it is appropriate to seek the full contribution of new floorspace as residential up to the 50% threshold:

- a) *the character of the development, the site and the area;*
- b) *site size, the extent of the additional floor space, and constraints on including a mix of uses;*
- c) *the need for an active street frontage and natural surveillance;*
- d) *the economics and financial viability of the development including any particular costs associated with it;*
- e) *whether the sole or primary use proposed is housing;*
- f) *whether secondary uses would be incompatible with the character of the primary use;*
- g) *whether an extension to the gross floor space is needed for an existing user;*
- h) *whether the development is publicly funded;*
- i) *any other planning objectives considered to be a priority for the site.*

5.6. In light of these points, there is clear explanation as to why the site should be used for a predominantly employment-led development. This can be broken down into a number of reasons including general land use principles, ensuring amenity, design/townscape matters and promoting heritage assets.



Land Use Principles

- 5.7. The current site is overwhelmingly occupied by employment space. The character of the site and surrounding area is one of mixed use and the focus of this development is as an employment led scheme with a quantum of residential and other, A1/A3 uses. Essentially, the proposed development aims to greatly enhance the site's existing use for employment uses.
- 5.8. Panther House is the largest building on site; it is retained and naturally lends itself towards the provision of business and employment space, as evidenced by its use for at least the last 30 years. A recent survey of the current uses of the units showed that they are as follows:

Use Class	No. of units	Percentage of total
B1(a), (b) and (c)	97	92%
D1	2	2%
Vacant	7	6%
Total	106	100%

- 5.9. The current proposals are to retain and extend Panther House as a flexible employment hub. There is considerable flexibility in how the new spaces being provided could be used – layouts have been deliberately designed such that floorplates can be occupied by a single tenant, or sub-divided for a number of tenant, or potential used as a more open office space shared by a large number of individual workers and/or SMEs and thus retaining some of the employment character of the existing site. It is also intended that a proportion of the floorspace is provided as affordable workspace for a range of individual workers or very small enterprises (this is discussed in more detail later in this statement).
- 5.10. This flexibility in use and the range of different business uses that the site could potentially provide for is strongly linked to the scale and open nature of commercial space proposed. The spaces are not limited by also having to accommodate addition facilities for residential use.
- 5.11. The insertion of a residential use into Panther House would debilitate the ability of the building to provide such floor space. It would also be at odds with other benefits of the development that are proposed such as maintaining and enhancing an active frontage to Gray's Inn Road. New, separate cores would need to be inserted to serve residential floor space and other amenities, such as cycle parking, waste and recyclables storage and amenity space would also use up space that could otherwise provide employment use.
- 5.12. To provide a numerical explanation of the implications of inserting the required cores and services into the employment floorspace within Panther House in order to provide access to potential residential accommodation on upper floor levels, this equates to floorspace that could otherwise provide for 40 employment spaces. This figure does not account for any space 'lost' on the upper floors if the proposed commercial floorspace there was 'transferred' into residential use.
- 5.13. Alongside the intentions of policy DP1, the content of CS8 as follows should be considered:

The Council will secure a strong economy in Camden and seeks to ensure that no one is excluded from its success. We will:

- a. *promote the provision of 444,000 sq m of permitted office floorspace at King's Cross as well as in the range of 70,000 sq m of office provision at Euston with further provision in the other growth areas and Central London to meet the forecast demand of 615,000 sq m to 2026;*
- b. *support Camden's industries by:*
 - *safeguarding existing employment sites and premises in the borough that meet the needs of modern industry and other employers;*
 - *safeguarding the borough's main Industry Area; and*
 - *promoting and protecting the jewellery industry in Hatton Garden;*
- c. *expect a mix of employment facilities and types, including the provision of facilities suitable for small and medium sized enterprises, such as managed, affordable workspace;*
- d. *support local enterprise development, employment and training schemes for Camden residents;*
- e. *recognise and encourage the concentrations of creative and cultural businesses in the borough as well as supporting the development of Camden's tourism sector whilst ensuring that any new facilities meet the other strategic objectives of the Core Strategy; and*
- f. *recognise the importance of other employment generating uses, including retail, markets, leisure, education, tourism and health.*

5.14. As such, the need to deliver additional residential accommodation must be balanced against the requirements to provide and protect the delivery of floorspace to support the economy in Camden.

Ensuring Amenity

5.15. In addition to this, locating residential units into Panther House would result in a less than desirable residential environment, due to the requirement to retain the built form of this unlisted building of merit. The 'wrap around' triangular nature of Panther House around a deep light well precludes all but the very upper levels of the building being used as residential accommodation due to day lighting/sun lighting concerns.

5.16. The upper levels of the building are in close proximity to existing residential units along Elm Street, Grays Inn Buildings and Mullen Tower and therefore there also exists the potential for adverse residential to residential overlooking. For example, the nearest distance to Mullen Tower is approximately five metres with distances to properties in Holsworthy Square between ranging between three and eleven metres. This is especially in respect of any residential accommodation located within Panther House at upper levels which likely to cause adverse impacts in terms of loss of privacy, in addition to the impacts upon the provision of employment floorspace already outlined.

- 5.17. Such impacts are more readily 'designed out' of office type uses where directional windows and obscure glazing can be used if necessary.
- 5.18. Brain Yard consists of basement and ground floor levels with some space within a mezzanine level under the roof. A review of existing tenants in this building has shown that the majority of the units would appear to be in B1(a) employment use and are used by individuals as private offices/studio space. Some units appear to be in B1(c) use, estimated to be five units out of a total of 22 within this building.
- 5.19. The proposals seek to provide replacement floor space on this portion of the site. Brain Yard is enclosed by Panther House to the rear and the Grays Inn Road buildings to the front. Due to the high boundary walls of all surrounding buildings it has limited access to daylight/sunlight and has no outlook – there are no windows at the lower 3 of the five levels and as such would not be suitable for residential accommodation.
- 5.20. Any residential accommodation provided upon this part of the site would be required to be higher than first floor level in order to achieve a daylight/sunlight and outlook. However, the placement of residential accommodation at first/second floor level and above in this location is not desirable in amenity terms and would adversely impact the amenity of the occupiers of properties on Elm Street and within Dulverton Mansions in with regards to loss of privacy.
- 5.21. It would also require a greater quantum of physical development of Brain Yard. Such an approach is not considered to be the most appropriate solution for this part of the site, a design approach that has been broadly agreed with officers following a detailed pre-application process and is discussed further below.

Supporting Good Design and Heritage

- 5.22. At present the design ethos is for a 'lightweight' touch to Brain Yard, retaining its open character and providing a new urban through route which has welcomed by both officers and community representatives (this is discussed in more detail elsewhere in this statement and within the Design & Access Statement that forms part of this submission).
- 5.23. To infill this space in order to provide additional residential accommodation would not be desirable and would undermine many of the other positive benefits that this scheme can deliver. Not least, any proposal to entirely infill the block would mean the loss of the form of the existing buildings.
- 5.24. There are many positive aspects of these buildings in terms of form, appearance and contributing to the setting and character of the immediate local area and streetscape. The proposed design looks to balance the many positive aspects of the existing buildings with the need to deliver additional floorspace for both residential and commercial uses.
- 5.25. The proposed residential floor space will be accommodated within the proposed new buildings along the Grays Inn Road frontage of the site. Residential use is proposed at first to 6th floor levels of 160-164 Grays Inn Road.

- 5.26. It is considered that the scheme has maximised the provision residential floor space along this frontage. The building at this location cannot be any higher than is currently proposed for reasons of maintaining the appropriate townscape in Gray's Inn Road – the building has been designed to respond to the existing buildings found adjacent.
- 5.27. The depth of the building is also limited by the need to maintain appropriate amenity to properties in Holdsworthy Square.

Maintaining an Active Streetscape

- 5.28. Retail floor space currently exists at ground floor level of 160-164 Gray's Inn Road and will be re-provided, the re-provision of this space at this level is considered important to maintain the vitality and viability of the shopping frontage along Gray's Inn Road – indeed, the active frontage is proposed to be extended through the inclusion of 156 Gray's Inn Road which currently does not offer any such activity.
- 5.29. If these uses were not to be re-provided then this would have a negative impact upon Gray's Inn Road through the loss of active uses and the benefits of enlivening the street that these uses bring. A mix of residential over retail also reflects the predominant character of buildings in this part of Gray's Inn Road.
- 5.30. It is also noted that the proposals put forward maximise the massing of the Gray's Inn Road frontage and officers would not support any further built form on this part of the site. Sited between Dulverton Mansions to the north and Dawlish Mansions to the South, residential in this location would continue the traditional street frontage use of retail at ground floor level with residential uppers and is considered to be appropriate.
- 5.31. The scheme offers a range of uses, all of which are considered appropriate to the character of the area. In particular the provision of additional flexible employment floor space accords with the requirements of policy CS8 to safeguard existing employment sites and also enhance the employment offer from the site to meet the needs of a mix of different employment users.
- 5.32. In addition, it is noted under part c) of Policy DP1 that when considering the appropriate mix of land uses it is necessary to consider the need for an active street frontage and natural surveillance. This proposal therefore meets this requirement by re-provisioning and extending the existing retail frontage at ground floor level within Gray's Inn Road to ensure that this remains active and contributes to the vitality of the local area.
- 5.33. The proposals allow for the creation of additional active street level uses along Gray's Inn Road and a new pedestrianised urban route through from Gray's Inn Road to Mount Pleasant. Such a route will assist with natural surveillance in the area encouraging occupiers of the business space to use the retail services provided within the space and creating a set of uses compatible with each other .

Summary of Mixed Use Development

- 5.34. Taking into account both the characteristics of the site as a whole and also the physical constraints and character of each building as set out above, it is considered that the quantum of residential floor space proposed is appropriate in this instance and would conform to policy DP1 noting that this policy specifically states that ‘up to’ 50% should be provided, thereby giving a degree of flexibility in appropriate circumstances.
- 5.35. In summary, in this particular location and for this particular set of buildings an employment led, mixed use development would enliven and enrich this part of the Borough, providing further employment opportunities and a new vibrant space at this end of Gray’s Inn Road. Whilst it is clear that delivering new homes is a key priority for development in general, in striving to deliver this it should not be ignored that it is also a key priority of policy to also deliver increased accommodation for a range of commercial uses.
- 5.36. As put forward, the scheme proposes a significant increase in residential floor space when compared with the existing provision and to force more residential use onto this site in order to achieve the 50% uplift cited by policy DP1 would damage the vision of the scheme and the planning benefits it could otherwise offer.
- 5.37. In assessing the overall land use balance proposed, the many other considerable benefits that this proposal will deliver should be considered.

Provision of Affordable Housing and Affordable Workspace

- 5.38. Policy DP3 sets out that a contribution towards affordable housing is required when 1,000 sq m GEA, or more, of additional residential floorspace is proposed.
- 5.39. Above this threshold, the required contribution towards affordable housing is calculated based upon a ‘sliding scale’, where 10% of additional residential floorspace is required to be affordable where 1,000 sq m GEA is proposed and 50% of additional floorspace is proposed.
- 5.40. Paragraph 3.17 of the Development Polices states:
- “The Council will take a flexible approach to provision of off-site affordable housing for schemes close to the affordable housing threshold, that is between 1,000 sq m (gross) and approximately 3,500 sq m (gross) of additional housing”.*
- 5.41. In this case, the amount of additional floorspace being proposed is 1,715 sq m GEA (when the equivalent of the existing floorspace, which is not liable for an affordable housing contribution, is excluded). This is above the 1000sqm threshold at which a contribution will be sought.
- 5.42. As such, the contribution towards affordable housing will be approximately 17% of the additional floorspace, equating to 291 sq m. This broadly equates to three residential units.

- 5.43. Given the limited scale of the affordable housing that would be provided if built on-site and in light of the detail of Policy DP3 it is considered that a more effective contribution to the provision of affordable housing within the Borough can be achieved through the provision of a financial contribution.
- 5.44. A full viability assessment of the development has been undertaken by Affordable Housing Solutions in order to confirm the appropriate level of affordable housing contribution that this development may deliver. This assessment will be submitted separately.
- 5.45. In addition, the scheme intends to provide a proportion of affordable workspace. Given that this is an employment-led development and in the context of the range of users within the existing building, it would be an entirely appropriate to consider a use of this type within this development.
- 5.46. It is envisaged that the affordable workspace will be in the form of 'shared spaces', that is that either individual workers or those within an SME can work alongside one another and benefit from shared facilities and services and thus reduce costs to all parties concerned. Desks could be available for individual rent, including on very short lease periods, so that individuals and SMEs can obtain the space that they need at only the times that they require it.
- 5.47. It should be noted that this model of B1 accommodation could also be utilised across much larger proportions of the building, depending upon market demand. The Applicant is keen to explore these opportunities and thus the proposal for very flexible floorspace that could equally accommodate both Class B1(a) office type uses and also Class B1(c) light industrial type uses.
- 5.48. Regardless of how the larger part of the Class B1 space would be used, a proportion of it would be maintained at a lower rental rate in order to ensure an element of affordable workspace that is attractive to a range of SME type users. At this time, it is proposed that a minimum of 500 sq m GEA of the proposed floorspace be provided as affordable workspace. This would be available at a rate 20% lower than the average rental level across the rest of the Class B1 space within the site.
- 5.49. It has not been proposed to fix the location of this space at this time. As already noted, the intended strength of this development as a workplace is the flexibility in how the space is used or divided. It is felt that the provision of a minimum area as affordable workspace can be secured through an appropriate legal obligation and is not dependent upon a physical area being defined at this time.
- 5.50. The provision of such affordable workspace will inevitably have an impact upon the overall viability of the proposed scheme and thus also the viability of providing a certain level of affordable housing. This will form part of the general viability report that will be subsequently submitted to the Council for assessment.
- 5.51. But, given the general characteristic of the development as an employment-led development, providing a significant upgrade but maintaining some of the character of the existing buildings and their value to SME type operations, this is considered to be an entirely appropriate form of development that offers considerable benefits to the local economy and the Borough more widely.

Other Proposed Land Uses

- 5.52. Although this development predominantly provides Class B1 commercial floorspace and Class C3 residential units, it is also proposed to provide some other uses, most specifically Class A1 retail and Class A3 cafe/restaurant space. This will mainly be focused into the ground floor level of the new building across the Gray's Inn Road frontage, together with the new basement level proposed immediately below. The space below Brain Yard is also currently proposed for a flexible use across Classes B1, A1 or A3 and thus could make a further contribution to the provision of retail and supporting services.
- 5.53. When considering the provision of retail type uses, with regard to Central London generally Policy CS9 notes retail and leisure uses are part of the offer within a successful Central London. But, Policy CS7 places more emphasis upon directing such uses to specifically designated town centres and shopping frontages.
- 5.54. Although this site is located within the wider Central London area, it site does not fall within one of these more specific retail designations. But clearly, Gray's Inn Road in the vicinity of the application site does currently offer a range of different retail and eating opportunities – indeed, this is exactly what the existing frontage on Gray's Inn Road within the application does with two separate retail units and a cafe.
- 5.55. Therefore, it is intended to re-provide a retail offer within the Gray's Inn Road frontage so as to maintain the existing active frontage at street level. This responds to Policy CS7 which notes that allowance can be made for *limited provision of small shops outside centres to meet local needs*'.
- 5.56. In total, four retail units are proposed with three directly on the Gray's Inn Road frontage and the fourth within Brain Yard and opening onto the new pedestrian through route that will be created as a result of the proposed development. This approach responds to the desire of Policy DP10 to provide for retail uses across a range of different sizes.
- 5.57. Permission is also sought in these spaces for a flexible use across either Class A1 retail or Class A3 restaurant/cafe. The Applicant is open to discussion about the mix of uses and/or whether a commitment to ensuring a minimum amount of floorspace within either class is maintained.
- 5.58. In addition, the Applicant is mindful of the value attributed to the existing Andrew's cafe by many members of the local community and would be willing to consider opportunities to encourage the provision of a similar type of operation within the new development. This would also include discussing with the existing tenants as to whether the new units would meet their requirements in the event that they may wish to return once development is complete.
- 5.59. Overall, the provision of a proportion of retail and restaurant/cafe uses brings many benefits to the scheme not least the maintaining of an active frontage on Gray's Inn Road, the provision of new services to enliven the new pedestrian through-route and also providing services for both the existing local community and the new employees who will be based within the wider development. Such uses should therefore be welcomed as part of the balance between employment space, residential units and service facilities.

Design

- 5.60. *Core Strategy* Policy CS14 states that the Council will require development of the highest standard of design that respects local context and character; and preservation and enhancement of Camden's rich and diverse heritage assets and their settings, including conservation areas.
- 5.61. This is supported by *Development Policy* DP24 which requires all developments to be of the highest standard of design and will expect developments to consider the character, setting, context and the form and scale of neighbouring buildings; the character and proportions of the existing building and the quality of materials to be used.
- 5.62. The implications of this policy should be considered in the context of Section 7 of the National Planning Policy Framework (NPPF). This sets out national guidance on the relevance of design in achieving good planning outcomes.
- 5.63. Of greatest relevance here are Paragraphs 59 and 60 of the NPPF which states that:
- Local planning authorities should consider using design codes where they could help deliver high quality outcomes. However, design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally.*
- Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness.*
- 5.64. The key therefore is not to limit the appearance of a building to a specific design but instead to ensure that it responds, reflects and contributes to the overall character and form of any existing built form and streetscene.
- 5.65. As already noted, the overall design proposal is to maintain existing fabric where this offers a strong character and contribution to the local streetscene and townscape but to also add to this by providing additional and new floorspace in a way that is both distinct from the traditional materials found in a given location but also respects the overall character of a given location. This is particularly prevalent for the new additions to both Panther House and Brain Yard where new accommodation will be predominantly of a metal and glazed construction to sit distinct from the existing 'host' structures below.
- 5.66. As with the new elements to Panther House and Brain Yard, the new construction on Gray's Inn Road will respect the retained elements but also stand distinct from the existing fabric. In this case, a mix of pre-cast concrete and aluminium fenestration will provide a modern reinterpretation of the retained brick and stone elevation at ground and first floor levels. The new facade articulations are derived from the host building below at 160-164 Gray's Inn Road, and retain a similar strong language, but are simplified and modified.

- 5.67. With specific reference to the facade of 160-164 Gray's Inn Road, this element has provided a touchstone for the design proposal for the new construction of the building beside (at No. 156) and above it. Initial inspection has shown that there is a need for the repair, restoration or replacement of a significant number of parts of the stonework elements of this facade.
- 5.68. The proposed massing is commensurate with the scale of the surrounding buildings, and deferential to the attractive gable atop Dulverton Mansions along the Gray's Inn Road frontage. On a more practical level, massing has been chosen so as to minimise the effects upon existing neighbouring buildings (this is discussed further later in this Statement).
- 5.69. The 'gable roof' responds to the vertical articulations of Gray's Inn Road, and sits in harmony with adjacent mansion blocks to create a coherent roofline along the street. This is in contrast to the existing situation where the two storey nature of 160-164 Gray's Inn Road differs markedly from the height and form that predominates along the street. This development would help to tie the surrounding streetscape together by removing this anomalous element of lower scale built form.
- 5.70. The entrance to Brain Yard and the open courtyard area it leads to references an important characteristic of this part of the conservation area. The small passageway between 156 and 160 Gray's Inn Road creates a break in the building frontages and is a pleasing feature which adds to the street scene.
- 5.71. Taken together, the proposed design pays due respect to the local character and existing design treatments but also utilises a modern approach to provide a significant enhancement relative to appearance of the existing buildings in their current form. To this end, the proposals respond positively to the requirements of both Policy DP24 and paragraphs 59 and 60 of the NPPF.
- 5.72. A much more detailed overview of all design matters is provided within AHMM's Design & Access Statement which forms part of this submission.

Heritage and Archaeology

- 5.73. Policy DP25 makes clear that any development which has the potential to impact upon a heritage asset must take into account the quality, character and value of that asset when considering the design of a new building.
- 5.74. The National Planning Policy Framework (NPPF) provides further guidance as to how development affecting existing heritage assets should be assessed. In general terms, the expectation is to protect the positive contributions that existing heritage assets contribute but to also consider the potential additional benefits that new development may make to the character and distinctiveness of local character.
- 5.75. Further, Paragraph 128 of the NPPF states (in part) that:

'In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted'

- 5.76. To this end, a Heritage and Townscape Appraisal has been prepared to KM Heritage. This provides a comprehensive review of the relevant heritage assets and how the proposed development will respond to these. To reiterate, the relevant heritage asset in this case is the Hatton Garden Conservation Area in which the site is located. Reference should also be made to the presence of the neighbouring Bloomsbury Conservation Area and some listed buildings found on Gray's Inn Road (though not in the immediate vicinity of the application site).
- 5.77. When proposing development that relates to heritage assets there may be opportunities for a contemporary approach, but in our view this must be rooted in a contextualised approach to development, having full and proper regard to the architectural styling and typology that defines this Conservation Area and the designated individual assets, as described above.
- 5.78. The key test set down within local policy and the NPPF is to ensuring that the significance of the relevant heritage asset is not harmed as a result of the proposed development. This does not mean that development relating to heritage assets cannot take place but instead that any proposal should respond to, reflect and where possible enhance the significance of the heritage asset to which it relates.
- 5.79. KM Heritage's Appraisal confirms how the proposed development of each of the buildings on the application site responds to this need to maintain and potentially enhance their contribution to the Conservation Area. With reference to the Gray's Inn Road buildings:
- 5.80. The new building above 156 and 160-164 Gray's Inn Road draws upon the rhythm of the plots below and the scale and profile of the eastern street wall of Gray's Inn Road at this point. It is a direct response to its context, in a contemporary style that does not seek to pretend as to how the site has evolved - the contrast of new and old creates a legible and honest expression of change at the site and in Gray's Inn Road.

'The new building 'knows its place' - it holds itself above the retained 160-164 Gray's Inn Road, allowing the latter to read as the 'privileged' existing occupant of the site, while the new element defers to its symmetrical composition in the ordering of its bays.'

- 5.81. Turning to the Brain Yard building, it is noted that:

'The proposal for the Brain Yard shed places a new, contemporary structure within the walls of the shed, preserving the masonry shape and profile of the structure while creating new accommodation in what are quite difficult structural circumstances. The result is something similar to the proposal for Gray's Inn Road - an extension whose scale and impact is strongly mitigated by the way in which the new volume responds to its host structure.'

- 5.82. Finally, in considering the proposals for Panther House it is noted:

'Where the extension emerges above the existing Mount Pleasant elevation of the building, the use of the host building's structural grid is evident. This extension is set back from the existing parapets of the building...The solution for Panther House is familiar from other schemes involving former factory or warehouse buildings - it is a powerful and robust industrial building that is more than capable of being extended in a contemporary fashion to provide improved and additional work space. The glass and metal additional storeys and infill will provide a simple, modern counterpoint to the heavy red brick masonry, clearly reading as subservient to the host structure.'

- 5.83. Given the enhancements to each of the individual buildings, KM Heritage are able to offer the following overall conclusion on the proposed development:

'The scheme is sensitive and responsive to its context. It proposes urban form that is appropriate for the site and its context... It is well designed and provides high-quality commercial and residential accommodation in a scheme that responds carefully and intelligently to its specific location to its surroundings. It enhances the Hatton Garden Conservation Area and the setting of the listed buildings on Gray's Inn Road, and helps to create a sense of place that will help to regenerate the broader area.'

- 5.84. In proposing to not only respond to the existing buildings and their setting but also deliver wider ranging enhancements to an element of the Conservation Area that has otherwise been closed and with only very limited public benefits, this development clearly meets the expectations of both the NPPF and Policy DP25 to make a contribution to the value of the relevant heritage assets.
- 5.85. As noted previously, the site does fall within an Archaeological Priority Area. With reference to this an initial Historic Environment Assessment has been undertaken by MOLA to consider the archaeological potential of the existing ground within the site. This assessment concludes that the general archaeological potential for the site is lower with some higher potential for post-medieval remains. However, the assessment also concludes that the overall significance of any potential remains is likely to be low.
- 5.86. Appropriate conditions to ensuring a continuing assessment of archaeological conditions takes place at the relevant stages of site development can be considered.

Subterranean Development

- 5.87. There is an existing basement under the Brain Yard building currently on the application site. It is proposed to expand and enhance this space in order improve the quality of the accommodation that can be provided in this location.
- 5.88. Any proposal for subterranean development must be considered in the context of Policy DP27 and CPG4 and specifically for the provision of an assessment of any such development's impact upon drainage, groundwater conditions and structural stability.



- 5.89. To this end, a Structural Report and Basement Impact Assessment (BIA) has been prepared by Eckersley O’Callaghan (with input from GEA on ground movement and geotechnical matters) and has been submitted as part of this application. The BIA assesses all of the key matters set out above as required. A full flood risk assessment prepared by Robert West is also provided.
- 5.90. As such, the proposed subterranean level is an appropriate form of development in the context of both the surrounding area and the proposed new buildings proposed. The BIA confirms that all relevant geotechnical and structural matters will be achieved to ensure the protection of drainage, groundwater and stability matters in accordance with the requirements of Policy DP27 and CPG4.

Mix and Quality of Residential Accommodation

- 5.91. Policy DP5 sets out a series of priorities for the Council in terms of delivering a mix of differently sized residential units within all new development. Specifically, Table 5.2 of the Camden Development Policies provides a Dwelling Size Priority Table, highlighting preferred dwelling sizes within new developments as below:

Dwelling Size Priorities Table					
	1-bedroom (or studio)	2-bedrooms	3-bedrooms	4-bedrooms or more	Aim
Social rented	lower	medium	high	very high	50% large
Intermediate affordable	medium	high	high	high	10% large
Market	lower	very high	medium	medium	40% 2-bed

- 5.92. Overall, 13 self-contained market residential units are proposed in a mix of 4 x 1-bed, 7 x 2-bed and 2 x 3-bed. With a focus upon 2-bed units but with some provision of both 3-bed and 1-bed units as well, this mix accords with that set out within the dwelling sizes priorities table noted above that forms part of Policy DP5.
- 5.93. In terms of the quality of the proposed residential units, relevant internal space standards (both local and national) have been adhered to so as to ensure that all residents will enjoy a high quality of accommodation.

Amenity

- 5.94. When proposing any development, it is necessary to assess the proposals in the context of any impact upon both existing neighbouring residents and also new occupants that may move into the development proposed.

a) Noise

- 5.95. DP28 sets out standards for noise and vibration that all new developments in Camden will need to meet. This relates not only to the noise that new development may create (that is, the impact of new development upon existing uses, particularly nearby residential uses) but also whether the existing noise environment is appropriate to allow the use being proposed to operate.
- 5.96. An assessment of both the existing background noise environment and the proposed plant equipment that would be installed as part of this development has been undertaken by Hann Tucker Associates. This assessment should be considered in full but the broad conclusion is that, subject to appropriate methods of mitigation such as glazing specifications and acoustic screening, the proposed development can be undertaken whilst maintaining an appropriate level of amenity to both existing and proposed residents.
- 5.97. With specific reference to any noise that may arise from plant equipment, this can be limited to the Council's normally maximum levels through the use of appropriately worded conditions requiring the confirmation of additional information prior to the use of any such equipment commencing.
- 5.98. The same point is applicable to the proposed commercial uses on the site. It is not uncommon for a mix of office, retail and restaurant uses to be situated in proximity to residential accommodation in a dense urban location such as this. Both technical and practical solutions to ensure that the noise impacts of such uses are minimised can be accounted for through the use of appropriate conditions to confirm relevant details prior to any specific use commencing.

b) Daylight/Sunlight

- 5.99. The Council's approach to daylight and sunlight assessment is set out in Camden Planning Guidance 6 (CPG6). This document applies the requirements of the BRE's '*Site layout planning for daylight and sunlight: A guide to good practice*'.
- 5.100. The policy also seeks to ensure that appropriate living conditions are delivered not only for new residents of buildings but also for those already living in adjacent properties. As such, a daylight and sunlight assessment of all relevant surrounding buildings has been undertaken by GIA and their formal report has been submitted as a part of this application.
- 5.101. This development is proposed in what is a dense urban environment and the design and nature of some of the existing neighbouring buildings is such that there are some pre-existing shortfalls in daylighting relative to the normal BRE Standards. For example, some windows are located underneath walkways and as such they already experience relatively lighting.
- 5.102. Considerable effort has been made to ensure that the proposed development and the significant wider benefits that it delivers does not result in a material worsening of these conditions. In the majority of cases where the existing levels of daylighting are relatively low, although the percentage loss of daylighting sometimes falls below the normal BRE Standards the absolute change in the level of daylighting received is negligible.

- 5.103. It should be reiterated that the vast majority of the windows surveyed will still meet all relevant BRE standards following completion of the proposed development. Of those windows that do not fully comply, the majority of the windows are only slightly below the normal BRE standards.
- 5.104. Specific attention has also been paid to improving the lighting conditions to the Mount Pleasant Studios through the use of a light coloured finish to the proposed development of the Brain Yard building to significantly enhance the 'radiance' benefits in this area. Initial assessment confirms that this simple design element could have significant positive benefits for the neighbouring property.
- 5.105. In terms of overall design, this drive to minimise daylighting losses to neighbouring properties has led to significant cutbacks in the proposed massing on all of the new built elements. The final proposal provides the minimum impact upon daylight/sunlight matters whilst also delivering a scheme that is viable not only in the amount of commercial floorspace provided to the local economy but also a level of additional residential accommodation.

c) Outlook and Privacy

- 5.106. CPG6 also sets out the Council's approach to assessing outlook. The Council seeks to ensure that the proximity and massing of any buildings do not have an overbearing effect on neighbouring residents and new development should enable occupiers to have a pleasant outlook. Simply put, this means not building too close to neighbouring buildings or creating oppressive or overbearing relationships.
- 5.107. Again, as with matters relating to daylight and sunlight, considerable attention has been paid to maintaining outlook and privacy to existing neighbouring residents as far as possible. This has resulted in a number of cutbacks to the proposed buildings, as well as limiting new residential accommodation to only the Gray's Inn Road building so that overlooking is not created to those properties directly adjacent to Panther House and Brain Yard.
- 5.108. As noted previously, by not proposing residential accommodation at any location that is directly adjacent to existing residential accommodation then the potential effects upon neighbouring residents are immediately reduced. Additionally, considerable attention has been given to the northernmost corner of Panther House to ensure that sky views from properties in Holsworthy Square are maintained. Whilst additional massing in this location was assessed to not be materially harmful in terms of impacts upon daylight/sunlight matters, a clear design decision was taken to minimise any build up in this location in order to ensure that appropriate outlook is maintained for the existing neighbouring residents.

d) Air Quality

- 5.109. It has been noted already in this statement that this site falls within the Central London Area (Clear Zone Region) CLA. As such, in accordance with the requirements of Policy DP32 an Air Quality Assessment of the proposed development has been prepared by Create Consulting Engineers and has been submitted as a part of this application.

- 5.110. The Assessment considers the proposed development with reference to all relevant national, London-wide and local planning policy and guidance. Although the detail of the Assessment should be considered in full, it reaches a broad conclusion that the proposed development will not result in a deterioration of the existing air quality environment in the local areas and as such can be classed as being 'air quality neutral'.
- 5.111. The Assessment also provides some commentary with regard to energy solutions on-site and these can be accounted for as part of the formal sustainability assessment of the development that would be undertaken as part of the construction process. Finally, further advice with relation to mitigating the effects of construction have also been put forward and accounted for as part of the draft Construction Management Plan that has been prepared.
- 5.112. Overall, and also taking account of the development being 'car free' and thus not having any material impact upon traffic movement in the local area, this proposal responds to each of the requirements of Policy DP32.

e) Managing Construction Impacts

- 5.113. The applicant is conscious of the importance of ensuring that all effects of the proposed construction programme are properly managed and minimised wherever possible.
- 5.114. As recommended within *CPG6 Amenity*, given that this development proposes subterranean development then a draft Construction Management Plan has been prepared. This is intended to provide details of how the construction programme will be managed in a range of factors including the movement of vehicles to and from the site, minimising and attenuating noise and other emissions including dust that may arise from demolition and also the general operation of the site.
- 5.115. In drafting the Construction Management Plan full reference has been made to the Council's minimum requirements. The draft submitted demonstrates that the effects on construction can be managed to ensure that impacts upon neighbouring residents during this time can be kept to a minimum.
- 5.116. It is assumed that the completion of a final Construction Management Plan will be secured through the use of an appropriately worded planning obligation with a finalised Plan approved prior to the commencement of works on-site.

Sustainability and Energy

- 5.117. As set out under Policy DP22, all new development in Camden is expected to be sustainable and achieve energy efficiencies with a series of defined targets and criteria which new development should meet whether this is for residential, non-residential, new build or refurbished accommodation.

- 5.118. Following the Deregulation Act 2015, which received Royal Assent on 26th March 2015, Code for Sustainable Homes is no longer be enforceable by Local Authorities on new planning permissions for residential development. From 1st October 2015 existing planning policies on access, internal space and water efficiency should be interpreted to the nearest equivalent new national technical standards (Building Regulations). Reference must also be given to the London Plan which continues to require significant sustainability approvals.
- 5.119. In light of the removal of the Code for Sustainable Homes from formal assessment, the Council has offered further guidance with regard to continuing to achieve sustainability improvements in terms of reducing water and energy usage.
- 5.120. Specifically:
- *With regard to water, new residential development will be required to demonstrate that the development is capable of achieving a maximum internal water use of 105 litres per person/day, with an additional 5 litres person/day for external water use*
 - *With regard to reducing energy usage, The Code Level 4 equivalent in carbon dioxide emissions reduction below part L Building Regulations 2013 is 20%. New residential dwellings will be required to demonstrate how this has been met by following the energy hierarchy in an energy statement.*
- 5.121. This therefore sets out the current minimum expectations for any residential development that may be delivered and has formed the basis of assessment of this element of sustainable development.
- 5.122. With regard to non-residential development, improved sustainability is measured through either BREEAM New Construction or BREEAM Non-Domestic Refurbishment as relevant to whether or not development is new build. Current policy requirements are to achieve a 'very good' rating, increasing to 'excellent' from 2016 and encouraging zero carbon by 2019.
- 5.123. The Council also sets out further detailed guidance in terms of Supplementary Planning Guidance. CPG 7 "Sustainability" sets a number of additional targets relating to energy and resource use issues, including a target for developments to seek a 20% reduction in carbon dioxide emissions from on-site renewable energy technologies.
- 5.124. Although achieving reductions in carbon dioxide emissions through the use of on-site renewable technologies is strongly encouraged and expected to be used wherever possible, in line with London Plan guidance there is an allowance to make a financial contribution to off-set any shortfall in carbon dioxide reductions. Based upon a fixed annual cost per tonne extrapolated over a period of 30 years, this contribution equates to £2,700 per tonne of carbon that falls short of the 20% reduction target.
- 5.125. With reference to the above, a Sustainability and Energy Report has been prepared by MTT and fully assesses the intent of the development. This report also provides a detailed assessment with reference to the Mayor's Energy Hierarchy of '*be lean, be clean, be green*'.

- 5.126. In terms of on-site renewable energy, the most appropriate solution is the use of photovoltaic panels, intended to be placed upon the main residential building fronting onto Gray's Inn Road. It is also proposed to make a financial contribution towards carbon dioxide reduction in accordance with London Plan guidance.
- 5.127. For the commercial floorspace, a BREEAM Pre-Assessment has been undertaken which confirms that a 'Very Good' rating can be achieved. The proposed development therefore responds appropriately to the requirements of both Policy DP22 and relevant guidance within both the London Plan and national advice.

Cycle Parking, Car Parking and Servicing

- 5.128. A Transport Statement and Draft Workplace Travel Plan has been prepared by TTP Consulting which addresses a range of matters including parking and servicing. The relevant statement should be considered in full but the key points are summarised below. In addition, the Workplace Travel Plan could be subject to further review and amendment alongside the formal implementation of any approved development.

a) Cycle Parking

- 5.129. The Applicant is aware that all new developments are expected to meet or exceed minimum standards in terms of the provision of capacity to store cycles. As such, ensuring appropriate standards of capacity have formed part of the design process for this development.
- 5.130. For the residential areas, the recently updated London Plan standards have been applied, requiring secure and enclosed cycle storage at a rate of one space per 1-bed unit and 2 spaces for 2-bed or larger units.
- 5.131. In total, 30 cycle parking spaces have been provided which can only be accessed from behind the communal entrance to the residential building.
- 5.132. For the commercial B1 use, the Council's own standard of one space for each 250 sq m (or part of) for staff and one space at the same rate for visitors has been adhered to. Indeed, a total of 131 spaces are proposed which is far in excess of the minimum requirements. Appropriate changing facilities will also be provided to further encourage those working within the building to cycle.
- 5.133. These new cycle facilities are in addition to the extensive on-street cycle parking facilities and cycle hire docking points that are in close proximity to the site.

b) Car Parking

- 5.134. With regard to car parking, Policy DP18 states that:

- *The Council will seek to ensure that developments provide the minimum necessary car parking provision. The Council will expect development to be car free in the Central London Area, the town centres of Camden Town, Finchley Road / Swiss Cottage, Kentish Town, Kilburn High Road and West Hampstead, and other areas within Controlled Parking Zones that are easily accessible by public transport.*
 - *Development should comply with the Council's parking standards, as set out in Appendix 2 to this document. Where the Council accepts the need for car parking provision, development should not exceed the maximum standard for the area in which it is located.*
- 5.135. Appendix 2 as referenced in the policy here sets maximum parking standards for residential developments at a maximum of 0.5 spaces/dwelling in 'Low Parking Provision Areas' and 1 space/dwelling in the rest of the borough. Supporting paragraph 18.2 to Policy DP18 defines a Low Parking Provision Area as '*the Central London area, our town centres and other areas with high public transport accessibility*'.
- 5.136. Supporting paragraph 18.4 states that '*Provided that parking controls are in force, the Council will expect car-free development where public transport accessibility is equivalent to levels in our town centres, and will strongly encourage it elsewhere*'.
- 5.137. CPG7: Transport states "highly accessible areas" are considered to be areas with a PTAL of 4 and above.
- 5.138. Given the location of the application site and the very high rates of public transport accessibility, no off-street residential car parking is proposed and it is noted that the ability of residents to apply for an on-street parking permit will be restricted via legal obligation.
- c) *Servicing*
- 5.139. With regard to servicing, most particularly of commercial uses, the Transport Statement also considers the servicing regime for the proposed development and the following points are relevant.
- 5.140. The existing Grays Inn Road/ Brains Yard buildings rely on on-street servicing or for light vans to reverse in to or out of Brain Yard whilst Panther House currently relies solely on Mount Pleasant for servicing requiring vehicles to block the carriageway or mount the footway.
- 5.141. The proposed redevelopment connects the two addresses and creates a convenient route leading from Grays Inn Road to Panther House.
- 5.142. The servicing needs of the development are therefore proposed to be undertaken from the Grays Inn Road frontage. The Statement considers the nature of the flexible uses applied for and concludes that in the order of 35 to 45 deliveries might be expected daily. By reference to survey data collected at a similar development on Old Street the deliveries will comprise predominantly of light panel vans with cycles, motorbikes, vans and 7.5t vehicles also evident.

- 5.143. It is proposed to create a length of double yellow line or a loading cage on Grays Inn Road in order to provide a dedicated opportunity for unloading to take place and in accordance with the principles discussed with Camden officers at the pre-application meeting in June. A delivery and servicing plan may be secured by condition or Section 106 Agreement and its content will be a response to the nature of the tenants occupying the flexible space applied for. At Panther House a concierge is proposed in order to receive deliveries and to minimise the dwell time of vehicles at the road side.
- 5.144. Separate waste storage areas will be provided for the residential, office and A1/A3 uses with Eurobins collected at a frequency to be determined by the needs of the end users, but expected to be daily or every other day in order to minimise the dwell time of the vehicle.
- 5.145. Further details of all of these matters are set out within the Transport Statement that has been prepared by TTP Consulting and submitted as part of this application.

Community Infrastructure Levy

- 5.146. Following the adoption of Camden's local Community Infrastructure Levy in April 2015, this development will be liable for both this and the Greater London Mayoral CIL. In accordance with the relevant regulations, in the event that planning permission is granted then CIL would be liable to be paid upon implementation of that permission.
- 5.147. When assessing the total contribution towards CIL that any development is required to make, as set out within the *Community Infrastructure Levy Regulations 2010* (as amended) it is usually possible to discount the equivalent of the existing floorspace on a site in some circumstances. Of most relevance in this case is that where existing floorspace has been in continuous use for a period of six months in the thirty-six months preceding the grant of planning permission then the equivalent of this floorspace can be excluded from the liable floorspace within the new development. Effectively, the area of floorspace that is liable for CIL is the net uplift in floorspace from the existing to the proposed buildings.
- 5.148. In this case, all of the buildings on this site are being occupied, at least in part, at the point of the formal submission being made. Such occupation is expected to continue until at least the date upon which any planning permission would be granted. As a result, in accordance with the CIL Regulations it is assumed that only the 'uplift' in floorspace will be used to calculate the appropriate CIL contributions in this case.

S106 Obligations

- 5.149. Given the adoption of a local CIL, it is not expected that any significant further financial contributions will be requested through S106 legal obligations, other than any contribution towards the provision of affordable housing discussed above.
- 5.150. However, discussions have been ongoing with officers through pre-application discussions about further improvements immediately around the site in order to enhance the overall setting of the new development.

- 5.151. Additionally, during pre-application consultations officers have noted that the following S106 obligations may be required:
- Contribution to secure the reinstatement of highways and pavements around the application site that are damaged as a result of construction processes;
 - Provision of a Construction Management Plan to control the construction process;
 - Securing the residential units as 'car free' development by removing the ability of residents to apply for on-street car parking permits;
 - Defining and securing minimum standards for sustainability and energy efficiency;
 - Encouraging aspects of local employment and training during construction; and
 - A Servicing Management Plan for all commercial elements of the proposed development.
- 5.152. The applicant is not averse to meeting these obligations and it is proposed that an appropriate legal agreement is prepared in the event that a recommendation to grant planning permission for the proposed development is forthcoming.
- 5.153. In addition to the specific requirements noted above, the applicant is supportive of providing further enhancements to the immediate local area in order to improve the appearance of the local environment and provide some further benefits to those living and working locally as a result of the proposed development.
- 5.154. For example, with regard to Mount Pleasant itself there is significant scope for the improvement of the highway beyond just restoring the highway to its existing form post-construction. Given that restoration of the highway immediately outside the site may be required once construction is complete, this may offer an opportunity to also enhance the public realm immediately adjacent to the application site as a part of integrating both the buildings and the new pedestrian thoroughfare into the existing streetscape.
- 5.155. The principle of the use of shared and/or raised surfaces has been discussed with both planning and highway officers with all parties expressing the view that adopting such treatments could be positive for the overall streetscape environment in the immediate local area. There may also be benefits to highways safety in the immediate vicinity of the Christopher Hatton Primary School.
- 5.156. Any such enhancements would also link with the new off-road pedestrian route between Mount Pleasant and Gray's Inn Road that would be provided as a part of these proposals, creating a much improved walking route between these roads.

- 5.157. Secondly, there have been discussions with the operators of the Mount Pleasant Studios about enhancing the appearance, accessibility and quality of the narrow space between the buildings on the application site and the adjacent Studios. Where this is currently an inaccessible 'dead' space with limited quality to all parties in terms of outlook and environmental quality, by tidying up this space and potentially introducing a new access directly from Mount Pleasant it could provide a significant enhancement to the amenity of those resident within the Studios. The applicant would be happy to provide for these improvements to their immediate neighbour which could be the subject of a separate planning application if considered appropriate.
- 5.158. At the simplest level, the treatment of the exterior of the Brain Yard building where it faces the Mount Pleasant Studios to introduce a lighter colour could improve the quality of daylighting received to this adjacent building through a simple process of improved 'radiance' compared to the existing darker treatment as noted within the Daylight / Sunlight assessment that has been submitted. This treatment is included as a part of the current proposals relating to the development of the existing Brain Yard building.
- 5.159. Finally, through discussions with key representatives of the Christopher Hatton Primary School there is a clear potential for a contribution to be made to improve their facilities or operation in some form. The applicant is very willing to consider what contribution they could make and the appropriate form in which this can be provided. The applicant prefers for the detail of this arrangement to be private but with the principle of such a contribution forming part of an appropriate legal agreement.

6. Conclusion

- 6.1. It is proposed to redevelopment the existing buildings at Panther House (38 Mount Pleasant), Brain Yard, 156 Gray's Inn Road and 160-164 Gray's Inn Road as follows:

“Redevelopment of existing buildings to provide part 4 storey and part 7 storey building following partial demolition of existing Panther House and Brain Yard buildings for a mix of Class B1, A1 and A3 uses, provision of new 7 storey building at 156-164 Gray's Inn Road behind facade from existing building at 160-164 Gray's Inn Road to provide flexible Class A1/A3 use at ground and basement levels and 13 self contained residential units (4 x 1-bed, 7 x 2-bed and 2 x 3-bed) at upper floor levels.”

- 6.2. The site currently offers a range of employment uses together with some retail uses on the Gray's Inn Road frontage and a single unit of residential accommodation. However, the overall quality of the accommodation is limited in terms of the usability and flexibility of spaces, the levels of lighting received and the overall 'feel' of the buildings in terms of a location to work.
- 6.3. Additionally, the site is predominantly closed to the general public and offers no contribution to permeability and connectivity between Gray's Inn Road and Mount Pleasant. This is not an open space and instead is access only by those who work within one of the buildings on-site.
- 6.4. The proposed development will offer significant enhancements to the existing buildings. It will also make contributions to the wider townscape by opening up the site and tying the development into the public routes in both Gray's Inn Road and Mount Pleasant. Where the site is currently a blocked route between these neighbouring streets, this development will allow much improved access.
- 6.5. The following key planning and regeneration benefits that would result from the proposed development should be noted:
- Additional employment floorspace to enhance the existing employment offer from the site and subsequent benefits to the local economy;
 - The provision of flexible workspace that is fit for modern use, is able to be used by a range of different B Class uses and is also able to sub-divided or combined across the different floorplates depending upon specific demands over time;
 - The provision of a proportion of the new employment space as affordable workspace, with rents at a level below normal market rates and the space accessible to either individual workers or the smallest of SMEs who would be able to use limited number of workspaces for only short periods of time;
 - The provision of thirteen new residential units with a mix of 1-, 2- and 3-bedroom units proposed;
 - A contribution towards the provision of affordable housing within the Borough;
 - A design that combines both the quality and value of the existing buildings with new architecture that respects its immediate local setting but also offers a modern design that sits distinct from the

heritage elements of the existing site;

- A design that both respects and enhances the values and qualities of the Hatton Garden Conservation Area;
- A new pedestrianised route providing a connection between Mount Pleasant and Gray's Inn Road which introduces permeability and accessibility to a site that has otherwise been closed to all but those working immediately within the site;
- Provision of new usable open spaces between Gray's Inn Road, Brain Yard and Panther House;
- The extension of an active frontage on Gray's Inn Road and the provision of enhanced retailed and restaurant/cafe facilities that can meet local needs; and
- Significant contributions towards the provision of local infrastructure and facilities through the local and Mayoral Community Infrastructure Levy.

6.6. This Planning Statement has assessed the material considerations arising from the proposals against the prevailing planning policy framework, and has demonstrated that the scheme complies with the detailed objectives of planning policy guidance set out in the NPPF, the London Plan, and policies contained within the adopted and emerging local planning policy and supporting documents.

6.7. In this context, and when also read alongside the range of supporting documents that also form part of this application, a planning case in support of the proposals in the context of relevant national and local planning policy has been clearly made.