



**Panther House and
156-164 Grays Inn Road**

Panther House
Developments Limited

Planning Statement

August 2019

Quality Assurance	
Project title	Panther House and 156-164 Grays Inn Road WC1X
Document title	Planning Statement
Client	Panther House Developments Ltd
Checked by Project Runner	AP
Approved by Project Director	JR
Project number	5702
Location of file on server	TPUD - Main/Job Server/5702 Panther House/5702 4.0 Design Work/5702 4.4 Reports & Output/5702 4.4 indd

Revision History		
Revision	Date	Status
1	15-08-2019	Draft
2	20-08-2019	Draft
3	30-08-2019	Final

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Contents

1	Introduction and Background	2
2	Application Site and surroundings	4
3	Relevant Planning history and background	7
4	Pre-Application Discussions	9
5	The proposed development	10
6	Planning Policy Framework	12
7	Planning Assessment	15
8	Principle of development, the proposed mix of uses and quantum of development	16
9	Residential development (mix and quality)	19
10	Non-residential development (type and amount)	22
11	Design, townscape and heritage	24
12	Impact on amenity of neighbouring occupiers	27
13	Transport, parking and servicing	32
14	Sustainability and energy	33
15	Other environmental considerations	34
16	Planning Obligations and Community Infrastructure Levy (CIL)	36
17	Conclusion	37

1 Introduction and Background

1.1 This Planning Statement has been prepared by Tibbalds Planning and Urban Design on behalf of Panther House Developments Limited (hereafter 'the Applicant') in support of a Full Planning Application (the Application) for development at Panther House (38 Mount Pleasant) and 156-164 Grays Inn Road, WC1X.

1.2 The Application site (the Site) incorporates a series of existing buildings:

- Panther House (38 Mount Pleasant)
- Brain Yard and the Tramshed (158 Grays Inn Road)
- 156 Grays Inn Road
- 160-164 Grays Inn Road

1.3 The Application proposes the retention and refurbishment of Panther House and the introduction of new build extensions, the retention and refurbishment of the Tramshed, the demolition of the Grays Inn Road buildings and their replacement with a new seven-storey building and the delivery of a commercially led mixed-use scheme providing new and replacement commercial floorspace (Class B1 uses), replacement retail floorspace (Class A1/A3 uses) and new and replacement residential uses (Class C3).

1.4 The Site is subject to an extant planning consent granted in November 2017, due to lapse in November 2020, which took a different approach to the site (reference number: 2015/6955/P). The Applicant has decided to revisit the permitted scheme in order to deliver a different type of workspace than was originally envisaged by the extant consent. There is an aspiration to create a more innovative working environment to meet the changing pattern of working and living in London. The Panther House project presents an opportunity to provide unique and creative working environment which has the potential to be marketed at individuals and small and medium sized businesses. The creation of this type of innovative working environment meets the changing needs of the workplace through focusing on networking, community and collaboration. It is recognised that this type of business space has a growing role and importance in London's economy.

1.5 The extant consent envisaged a greater amount of demolition in order to deliver large floorplate office space, designed for occupation by major commercial organisations. On further review the unique environment on offer within

the existing buildings of Panther House and the Tramshed buildings were felt to be worthy of retention as part of a new proposal. The Applicant has been working collaboratively with an established creative workspace provider over the last 18 months to develop revised planning application proposals. It is currently envisaged that this provider will occupy and manage some or all of the commercial space (B1, A1 and A3) upon completion of the development.

1.6 The description of development for the planning application is:

'Redevelopment of the site to include retention, refurbishment and part 2, part 3 storey roof extensions of Panther House; retention and refurbishment of the Tramshed at Brain Yard; demolition of 156 and 160-164 Grays Inn Road and replacement with a 7 storey building to deliver 6,642sq.m (GIA) of employment (B1) uses across Panther House, the Tramshed and two levels of Grays Inn Road, 229sq.m of A1/A3 uses at the ground floor level of Grays Inn Road and 7 residential units (C3) equating to 949sq.m of GIA at the upper floors of the Grays Inn Road building.'

Aims and objectives of revised scheme

1.7 In revisiting the proposals for the Site, the following aims and objectives have been used to guide the design team in preparing a new scheme:

- To retain as much of the historic fabric and character of the site as possible. The existing Panther House and the Tramshed buildings are to be retained and refurbished to create unique workspaces.
- New buildings and extensions are to be of the highest design quality and sensitively designed to take into account the historic character of the Site and its context. The new build elements will enhance the overall character of the Site and contribute to the wider townscape context.
- To retain the existing courtyard spaces within the Site and integrate these as usable parts of the development.
- Where existing buildings are proposed for demolition along Grays Inn Road, they are to be replaced by a building of an exceptionally high-quality design, which will be unique, distinctive and a complementary architectural addition to Grays Inn Road.
- To provide a mix of uses that complements the existing character of site and the wider area.

Supporting information

1.8 The planning application has been put together by a team of specialist consultants and in addition to this Planning Statement is accompanied by a comprehensive set of supporting documents:

- Design and Access Statement
- Air Quality Assessment
- Arboricultural Report
- Archaeological Assessment
- Construction Management Plan
- Contaminated Land Assessment
- Daylight and Sunlight Assessment
- Delivery and Servicing Management Plan
- Energy Statement
- Flood Risk Assessment and Drainage Strategy
- Heritage and Townscape Statement
- Noise and Vibration Impact Assessment
- Preliminary Ecological Appraisal
- Statement of Community Involvement
- Structural Report
- Sustainability Statement (and BREEAM pre-assessment)
- Transport Statement
- Travel Plan
- Utilities Report

1.9 This Planning Statement has been prepared in order to explain the relevant context and background to the proposals and to provide an assessment of the scheme in relation to current and emerging planning policy.

2 Application Site and surroundings

2.1 The Site sits between Grays Inn Road to the west and Mount Pleasant to the east within the London Borough of Camden (LB Camden). The Site is located a short distance north of the junction with Theobalds Road and Goswell Road. Access into the Site is from Grays Inn Road via a small cobbled street and from Mount Pleasant into the courtyard enclosed by the Panther House buildings.

2.2 The northern boundary of the site is shared with an existing housing estate (Dulverton Mansions and Holsworthy Square) and the southern boundary with Mount Pleasant Studios which provides accommodation and support services for single homeless people with support needs. The Site boundary measures 0.54Ha in area.

2.3 The Site can be split into three broad parts, namely Panther House itself which faces onto Mount Pleasant, the 'Brain Yard' and Tramshed building that sits towards the centre of the Site and is accessed from Grays Inn Road, and then the buildings at 156 and 160-164 Grays Inn Road.

2.4 Panther House is a large brick building that dates from the late nineteenth century. It comprises three interlinked wings arranged around a central courtyard.

2.5 Although historically used for industrial purposes, the building has, since the mid-twentieth century, been in use for a range of Class B1 commercial uses. The building is now subdivided into a large number of small, individual commercial units. The building is currently vacant and is occupied by live-in guardians for the Site's security.

2.6 Behind Panther House is the Tramshed building that sits within Brain Yard. This was originally constructed as a tram substation to serve the London County Council (LCC) tram network. 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 steel pitched roof, which is partly covered with corrugated sheeting with a glass roof lantern running centrally through the building. Panther House and the Tramshed have existing basement levels.

2.7 Fronting Grays Inn Road, two separate buildings form part of the Site and are divided by a cobbled access route through to Brain Yard behind. 156 Grays Inn Road currently includes a single class C3 residential unit, although

it was historically constructed as accommodation for a supervisor to the tramway substation.

2.8 160-164 Grays Inn Road is a two-storey building built in the early twentieth-century. Two Class A1 retail units and a Class A3 cafe occupy the ground floor of the building. Class B1 office accommodation exists on the first floor, over the shops. As a two-storey building, this property is considerably smaller in scale than the prevailing character along Grays Inn Road, with buildings typically rising to five and six storeys in height.

2.9 The existing buildings are currently in B1 use except for 156 Grays Inn Road, which is a single C3 residential unit and the ground floor of 160-164 Grays Inn Road which consists of A1/A3 uses. The existing areas by use class are set out below:

	GIA (sq.m)	GEA (sq.m)
B1 office space	5,286	6,041
A1/A3 space	352	365
C3 residential space	129	162
Total	5,767	6,568

Surrounding area

2.10 The surrounding area is varied in terms of its architectural style, height and massing. However, overall this is a dense, urban location with a mix of residential, commercial and retail uses.

2.11 On Grays 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. The imposing flank wall and chimney stack of Dulverton Mansions is visible over the rooftop of the existing properties at 160-164 Grays Inn Road. A faded Gillette advertising sign is visible on the flank wall of Dulverton Mansions.

2.12 When viewed in the context of the length of Grays Inn Road over a longer distance, the low scale of the current building at 160-164 Grays Inn Road is an anomaly compared to the five, six and seven storey buildings that otherwise form a continuous street elevation.

2.13 Many buildings on Grays Inn Road feature retail and other similar 'active' uses at ground floor level with either commercial or residential accommodation above.

2.14 Holsworthy Square, another residential mansion block built in the 1880s, is located to the rear of Dulverton Mansions, immediately to the north of the Site.

2.15 On the opposite side of Mount Pleasant sits Mullen Tower (12 storeys in height) and the rear of the 1-94 Grays Inn Buildings. Mullen Tower is regarded within the Hatton Garden Conservation Area Appraisal as a building which has a negative impact on the character and appearance of the conservation area.

2.16 Further analysis of the surrounding area, the existing townscape and the application Site's relationship with its surroundings is set out within the submitted Design and Access Statement and heritage statement.

Site designations

2.17 The application site is subject to the following formal site-specific planning designations:

- Archaeological Priority Area
- Central London Area
- Designated view 6A.1 Blackheath Point to St Paul's Cathedral - Right Lateral Assessment Area
- Hatton Garden Conservation Area

2.18 The Conservation Area Statement describes the key characteristics of the Hatton Garden Conservation Area as follows:

"It's historic character derives largely from its many robustly detailed industrial, commercial and residential buildings of the late nineteenth to mid twentieth centuries, combined with an intricate street pattern that is overlaid on undulating topography. This character is closely related to the history of metal working and other industries that have been carried out here. At the heart of the district is Hatton Garden, well known as the focus of London's jewellery trade".

2.19 The Site falls within the character area identified as Rosebery Avenue within the Conservation Area Appraisal. The key characteristics of this area are highlighted as follows:

- Its spatial character is one of a dense pattern of short, narrow, hilly streets contained within the framework of Grays Inn Road, Rosebery Avenue and Clerkenwell Road;
- The architectural character is strongly defined and derives from its large and impressive late nineteenth-century housing blocks, as well as its several large industrial buildings of a similar or later date, including Panther House, grouped around a secluded courtyard off Mount Pleasant;
- Panther House, 156-158, 160-164, 166-170 and 174-190 Grays Inn Road are identified as buildings which make a positive contribution to the character of the conservation area; and
- Shopfronts at Nos. 160 (occupied by Andrew's Restaurant) and 162 (occupied by Adana) are identified as Shopfronts of Merit, based on quality or level of intactness, preserving the essential framework around door and windows.

2.20 The existing buildings on the Site are not statutorily or locally listed and the site does not adjoin any listed or locally listed buildings. However, as referenced above, Panther House, the 'Brain Yard' and 156-164 are identified in the Conservation Area Appraisal as buildings which make a positive contribution to the character and appearance of the conservation area.

2.21 The Bloomsbury Conservation Area abuts the boundary of the Hatton Garden Conservation Area along Grays Inn Road and the application Site lies within the setting of this conservation area.

2.22 The closest listed buildings to the site are on the western side of Grays Inn Road, directly opposite the site. No.55 Grays Inn Road is Grade II listed and, further to the north, numbers 63-69 are Grade II listed. To the south of the site, on the north-west corner of Grays Inn Road and Theobalds Road, is the Grade II listed Yorkshire Grey Pub.

3 Relevant Planning history and background

3.1 The most relevant planning history is the 2017 planning consent (2015/6955/P) which is still extant (until 2020). Under this permission, consent was granted for the following development:

“Redevelopment of the site following partial demolition of Panther House and Brain Yard buildings, partial demolition of 160-164 Grays Inn Road and demolition of 156 Grays Inn Road. Proposals would result in part 4 storey, part 7 storey (plus plant and basement) buildings at Panther House and Brain Yard for predominantly employment (B1) uses (including 1450sq.m of subsidised workspaces) and a new 7 storey (plus plant and basement) building at 156-164 Grays Inn Road behind the retained facade of 160-164 Grays Inn Road to provide flexible retail/restaurant (A1/A3) uses at ground and basement levels with 15 self-contained residential units (C3) (including 3 Intermediate Rent flats) at the upper levels. Associated landscaping, plant and public realm works.”

3.2 The permission envisaged extensive demolition of the existing buildings with only certain elements of the buildings retained and no building retained in full:

- Panther House – reconfigured internally, new extensions proposed into the central courtyard and at roof level. Removal of brickwork to the courtyard elevations and a number of other architectural features such as loading bay doors, windows, ironmongery and chimney stacks.
- Tramshed – north and south end walls retained, western flank wall demolished and reinstated using salvaged material. New two-storey addition above existing height of the Tramshed.
- 160-164 Grays Inn Road front façade retained, building behind demolished and 156 Grays Inn Road complete demolition.
- Basement excavation under Grays Inn Road and the Tramshed and new 7 storey building proposed for Grays Inn Road frontage.

3.3 Historic England objected to the scheme on the basis that the proposed works of demolition and new build/extension were considered to cause ‘significant harm to the character and appearance of the Hatton Garden Conservation Area’.

3.4 The permission contained the same mix of uses (A1/A3/B1/C3) as the current planning application and included the following quantum of floorspace:

	GIA (sq.m)	GEA (sq.m)	Uplift in GIA (sq.m)	Uplift in GEA (sq.m)
B1 office space	7,619	8,560	2,333	2,519
A1/A3 retail / café space	706	766	354	401
C3 residential space	1,698	1,921	1,569	1759
Total	10,023	11,247	4,256	4,679

3.5 Of the overall uplift in floorspace, 36.9% of the uplift was delivered as residential when measured by GIA and 37.6% when measured by GEA.

3.6 The consented scheme, in addition, established a number of key principles that are relevant to this planning application, namely:

- that the only suitable location for residential development is above ground floor on Grays Inn Road;
- that an employment-led scheme is appropriate given the character of the development and the existing site conditions are taken into consideration;
- that, whilst not being supported by Historic England, the extent of demolition proposed was viewed as being acceptable when considered alongside the public benefits that the scheme delivered; and
- the bulk, height and massing of the proposed development was found to be acceptable in terms of their impact on the amenity of the existing properties surrounding the Site.

3.7 Prior to the 2017 consent being granted, a range of planning applications had been made over an extended period of time to develop both Panther House and the other buildings on Grays Inn Road. In most cases the applications were withdrawn without any formal decision being made. The relevance of the planning history prior to the 2017 grant of planning consent is therefore limited given the lack of conclusive decisions.

3.8 A summary of the planning history is set out in the below table:

Application Ref	Proposal	Decision
2009/4253/C	Conservation Area Consent for the Demolition of Nos.156-164 Grays Inn Road and the 'Tram shed' building to rear.	Withdrawn
2009/2490/P	Erection of a 7 storey building with basement level along the Grays 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 Gray's Inn Road and the 'Tram shed' building to rear	Withdrawn
2006/5101/C	Conservation Area Consent for the Demolition of existing site buildings (156-164 Grays Inn Road)	Withdrawn
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
2006/2177/C	Conservation Area Consent for the Demolition of existing site buildings (156-164 Grays Inn Road).	Withdrawn
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
PS9705099	Redevelopment for mixed office, retail, leisure and residential purposes, including service and parking access from Mount Pleasant.	Withdrawn
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.	Approved
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.	Allowed on appeal
28004(R)	Internal reorganisation of light industrial and office uses, and the erection of an extension to Block A to provide ancillary office accommodation.	Approved

■ 4 Pre-Application Discussions

4.1 The revised proposals have been developed through an extensive design and consultation process involving a number of key stakeholders including planning, design, conservation, highways and environmental health officers, Historic England and the local community. The proposals have been presented to London Borough of Camden's Design Review Panel in addition to the following meetings and workshops:

- 8 pre-application meetings and workshops with LB Camden planning and design officers
- 2 meetings with LB Camden Highways and Refuse teams
- 2 pre-application meetings with Historic England
- A series of exhibitions and meetings with key stakeholders in the local community

5 The proposed development

5.1 The planning application seeks full planning consent for:

'Redevelopment of the site to include retention, refurbishment and part 2, part 3 storey roof extensions of Panther House; retention and refurbishment of the Tramshed at Brain Yard; demolition of 156 and 160-164 Grays Inn Road and replacement with a 7 storey building to deliver 6,642sq.m (GIA) of employment (B1) uses across Panther House, the Tramshed and two levels of Grays Inn Road, 229sq.m of A1/A3 uses at the ground floor level of Grays Inn Road and 7 residential units (C3) equating to 949sq.m of GIA at the upper floors of the Grays Inn Road building.'

5.2 The proposed development would provide a mixed-use employment-led development comprising of the following proposed areas:

	GIA (sq.m)	GEA (sq.m)	Uplift in GIA (sq.m)	Uplift in GEA (sq.m)
B1 office space	6,642	1,356	7434	1393
A1/A3 space	229	-123	238	-127
C3 residential space	949	820	1048	886
Total	7,820	2,053	8,720	2,152

5.3 This results in the following uplift in floorspace and split of residential to non-residential uses:

	GIA			GEA		
	Resi (sq.m)	Non-resi (sq.m)	Total (sq.m)	Resi (sq.m)	Non-resi (sq.m)	Total (sq.m)
Existing	129	5638	5767	162	6406	6568
Proposed	949	6871	7820	1048	7672	8720
Uplift	820	1233	2053	886	1,266	2152
% split between residential and non-residential uses	40%	60%	100%	41%	59%	100%

Design approach

5.4 An alternative approach to the site has been taken with the new application, with the following key principles driving the architectural concept:

- Retention of as much of the historic fabric and architectural character of the site as possible. Brain Yard, the Tramshed and Panther House are all retained with the intention to bring them back into productive use.
- Sensitive roof top additions are proposed to Panther House designed to complement and enhance the industrial Victorian warehouse character of this building.
- The existing Grays Inn Road buildings are proposed for demolition and replacement with a new high quality and innovative building, the design of which has been informed by the wider context and the townscape and architectural character of the Hatton Garden Conservation Area.
- The historic layout of the buildings is retained on site by retaining the Brain Yard and Panther House courtyards and integrating them positively into the development.

5.5 It is also relevant to note that the extant consent results in a significantly larger scheme with an uplift in floor area of 4,256sqm (GIA), compared with a 2,053sqm GIA in the current proposals. This helps illustrate the implications of taking more sensitive and contextual approach to the site.

5.6 Some of the key differences between this approach and the extant planning consent are set out in the table below:

	Extant consent	Current proposals
Historic buildings	<ul style="list-style-type: none"> ■ Panther House – significant demolition and remodelling proposed. Courtyard infilled. ■ 160-164 Grays Inn Road - façade retained, remainder of building demolished. ■ Tramshed - north and south end walls retained, remainder demolished. ■ 156 Grays Inn Road - demolished. ■ Gillette sign – flank wall not demolished but sign no longer visible within the scheme. 	<ul style="list-style-type: none"> ■ Panther House - retained with minimal intervention. Rooftop extensions proposed that allow for retention of interesting rooftop features such as chimneys and roof lights. ■ 160-164 and 156 Grays Inn Road - demolished. ■ Tramshed - retained and refurbished. ■ Gillette sign – retained and incorporated as part of the residential core design.
Height and massing	<p>The approach to the proposals and the integration of large floor plate commercial floors resulted in a proposal of significant bulk and massing at Panther House and the Tramshed.</p> <p>The Grays Inn Road building is of a similar scale to the adjacent properties.</p>	<p>The retention of Panther House and the Tramshed and the use of rooftop extensions means that the proposals are less bulky with the courtyards retained to provide some relief in the built form.</p> <p>The proposals have been designed to stay broadly within the parameters set by the existing consent except in two small areas where the impact is deemed to be acceptable.</p> <p>On Grays Inn Road the proposals are for a similar scale and mass to the consented scheme with a different approach to the roofscape.</p>
Basements	<p>New excavation proposed:</p> <ul style="list-style-type: none"> ■ Excavation under 160-164 GIR, Brain Yard and Tram Shed space to provide single basement level. ■ Further excavation under the Tram Shed to provide a second storey of basement accommodation. 	<p>No excavation proposed.</p>
Courtyards and public routes	<p>Provision of small courtyard spaces to the rear of proposed residential core and at the entrance to Panther House.</p> <p>Demolition of historic Tramshed building meant provision of a new public route through the site was possible.</p>	<p>Retention of Panther House courtyard and reinstatement of Brain Yard as high quality, active, usable and multi-functional spaces.</p> <p>Retention of historic Tramshed building means that it is not possible to provide a public route through the site.</p>
Split of residential to non-residential floorspace	<p>37.6% residential</p>	<p>40.0% residential</p>

6 Planning Policy Framework

6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan, unless material considerations indicate otherwise.

6.2 The Development Plan for this site comprises:

- The London Plan (2016); and
- Camden Local Plan (2017).

6.3 Other documents that are material considerations include the National Planning Policy Framework (NPPF) and other Supplementary Planning Documents and Guidance produced by LB Camden and the Greater London Authority (GLA).

6.4 The Draft London Plan was published in December 2017 for consultation and is currently undergoing Examination in Public (EiP). The Draft London Plan - Consolidated Suggested Changes Version was published in 2019. This document does not form part of the Development Plan until formally adopted but is a material consideration in planning decisions and is therefore referenced below.

6.5 The site is not allocated with the LB Camden Site Allocations Plan.

The London Plan (2016)

- Policy 3.3 Increasing Housing Supply
- Policy 3.4 Optimising Housing Potential
- Policy 3.5 Quality and Design Housing Development
- Policy 3.6 Children and Young People's Play and Informal Recreation Facilities.
- Policy 3.8 Housing Choice
- Policy 3.9 Mixed and Balanced Communities
- Policy 3.12 Negotiating Affordable Housing on Individual Private Residential and Mixed Use Schemes
- Policy 3.16 Protection and Enhancement of Social Infrastructure
- Policy 3.18 Education Facilities
- Policy 3.9 Sports Facilities

- Policy 4.8 Supporting a Successful and Diverse Retail Sector and Related Facilities and Services
- Policy 5.1 Climate Change Mitigation
- Policy 5.2 Minimising Carbon Dioxide Emissions
- Policy 5.3 Sustainable Design and Construction
- Policy 5.6 Decentralised Energy in Development Proposals
- Policy 5.7 Renewable Energy
- Policy 5.9 Overheating and Cooling
- Policy 5.10 Urban Greening
- Policy 5.11 Green Roofs and Development Site Environs
- Policy 5.12 Flood Risk Management
- Policy 5.13 Sustainable Drainage
- Policy 5.15 Water Use and Supplies
- Policy 6.1 Strategic Approach to Transport
- Policy 6.2 Providing Public Transport Capacity and Safeguarding Land for Transport
- Policy 6.3 Assessing Effects of Development on Transport Capacity
- Policy 6.9 Cycling
- Policy 6.10 Walking
- Policy 6.13 Parking
- Policy 7.1 Lifetime Neighbourhoods
- Policy 7.2 An Inclusive Environment
- Policy 7.3 Designing Out Crime
- Policy 7.4 Local Character
- Policy 7.5 Public Realm
- Policy 7.6 Architecture
- Policy 7.7 Location and Design of Tall and Large Buildings
- Policy 7.8 Heritage Assets and Archaeology
- Policy 7.14 Improving Air Quality
- Policy 7.15 Reducing and Managing Noise, Improving and Enhancing the Acoustic Environment and Promoting Appropriate Soundscapes

- Policy 7.18 Protecting Open Space and Addressing Deficiency
- Policy 7.19 Biodiversity and Access to Nature
- Policy 7.21 Trees and Woodlands

The Draft London Plan – Consolidated Suggested Changes Version (2019):

- Policy D1 - Design
- Policy D2 - Delivering good design
- Policy D3 - Inclusive Design
- Policy D4 - Housing Quality and Standards
- Policy D5 - Accessible Housing
- Policy D6 - Optimising housing density
- Policy D7 - Public realm
- Policy H1 - Increasing Housing Supply
- Policy H5 - Delivering Affordable Housing
- Policy H6 - Threshold approach to applications
- Policy H7 - Affordable housing tenure
- Policy H12 - Housing size mix
- Policy E1 - Offices
- Policy E2 - Low cost office space
- Policy E3 - Affordable workspace
- Policy E9 - Retail, markets and hot food takeaways
- Policy HC1 - Heritage conservation and growth
- Policy HC3 - Strategic and Local Views
- Policy SI1 - Improving air quality
- Policy SI2 - Minimising greenhouse gas emissions
- Policy SI3 - Energy infrastructure
- Policy SI4 - Managing heat risk
- Policy SI7 - Reducing waste and supporting the circular economy
- Policy SI13 - Sustainable drainage

- Policy T1 - Strategic approach to transport
- Policy T2 - Healthy Streets
- Policy T3 - Transport capacity
- Policy T4 - Assessing and mitigation transport impacts
- Policy T5 - Cycling
- Policy T6 - Car parking
- Policy T7 - Freight and servicing

Camden Local Plan (2017):

- Policy A1 - Managing the impact of development
- Policy A2 – Open Space
- Policy A3 – Biodiversity
- Policy A4 – Noise and Vibration
- Policy A5 – Basements
- Policy C6 – Access for All
- Policy D1 – Design
- Policy D2 – Heritage
- Policy D3 – Shopfronts
- Policy E1 – Economic Development
- Policy E2 – Employment Sites and Premises
- Policy H1 – Maximising Housing Supply
- Policy H2 – Maximising the Supply of Self-Contained Housing from Mixed-Use Schemes
- Policy H4 – Maximising the Supply of Affordable Housing
- Policy H6 – Housing Choice and Mix
- Policy H7 – Large and Small Homes
- Policy T1 – Prioritising walking, Cycling and Public Transport
- Policy T2 – Parking and Car-Free Development
- Policy T4 – Sustainable Movement of Goods and Materials
- Policy TC1 – Quantity and Location of Retail Development

- Policy TC2 – Camden’s Centres and Other Shopping Areas
- Policy TC3 – Shops outside of Centres
- Policy TC4 – Town Centre Uses
- Policy TC5 – Small and Independent Shops
- Policy CC1 – Climate Change Mitigation
- Policy CC2 – Adapting to Climate Change
- Policy CC3 – Water and Flooding
- Policy CC4 – Air Quality
- Policy CC5 – Waste
- Policy DM1 – Delivery and Monitoring

Other documents:

- CPG Air Quality (March 2019)
- CPG Amenity (March 2018)
- CPG Design (March 2019)
- CPG Developer Contributions (March 2019)
- CPG Employment sites and business premises (March 2018)
- CPG Interim Housing (March 2019)
- CPG 2 Housing (March 2019)
- CPG Town Centres & Retail (March 2018)
- CPG Transport (March 2019)

7 Planning Assessment

7.1 In the context of the above planning policies and the specifics of the scheme the main planning considerations relevant to this planning application are:

- Principle of development, the proposed mix of uses and quantum of development;
- Design, townscape and heritage;
- Residential development (mix and quality);
- Non-residential development (type and amount);
- Impact on amenity of neighbouring occupiers;
- Transport, parking and servicing;
- Sustainability and energy;
- Other environmental considerations; and
- Planning Obligations and Community Infrastructure Levy (CIL)

7.2 Each of these issues is discussed in the subsequent chapters of this statement.

8 Principle of development, the proposed mix of uses and quantum of development

8.1 The NPPF sets out that there should be a presumption in favour of sustainable development and advances a set of core land use principles for planning. Of particular relevance in the context of the application proposals is a desire to encourage the effective use of land, particularly previously developed land; the promotion of mixed-use development, supporting local strategies to improve health, social and cultural wellbeing and delivering sufficient community facilities to meet local needs.

8.2 The proposals will deliver a mix of uses, including flexible café/retail use (A1/A3), office (B1) and residential accommodation (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 overall floor areas.

8.3 Policy H2 of the Camden Local Plan (2017) aims to maximise the supply of self-contained housing from mixed-use schemes. In the Central London Area where development involves additional floorspace of 200sq.m (GIA) the Council will require 50% of additional floorspace to be provided as self-contained housing subject to the following considerations:

- a. the character of the development, the site and the area;
- b. site size, and any constraints on developing the site for a mix of uses;
- c. the priority the Local Plan gives to the jewellery sector in the Hatton Garden area;
- d. whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use and other nearby uses; and
- e. whether the development is publicly funded or serves a public purpose.

8.4 The existing planning consent established that the site is a suitable location for the provision of self-contained housing. Through the previous planning consent and pre-application discussions on the current proposals it is agreed that the only suitable location for residential accommodation within the site is the first floor and above of the Grays Inn Road frontage and not within Panther House.

8.5 Policy H2 goes on to state that in considering the most appropriate mix of housing and other uses, the Council will take into account the following criteria:

- f. the need to add to community safety by providing an active street frontage and natural surveillance;
- g. the extent of any additional floorspace needed for an existing user;
- h. the impact of a mix of uses on the efficiency and overall quantum of development;
- i. the economics and financial viability of the development including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors such as build-to-let housing; and
- j. whether an alternative approach could better meet the objectives of this policy and the Local Plan.

8.6 The existing and proposed floor areas, as well as the uplift and split between proposed residential and non-residential floor space are set out in the table below:

	Residential GIA (sq.m)	Non-residential GIA (sq.m)	Total GIA (sq.m)
Existing	129	5,638	5,767
Proposed	949	6,871	7,820
Uplift	820	1,233	2,053
% split between resi / non-resi uses	40.0%	60.0%	100%

8.7 As demonstrated in the above table the proposed scheme fall slightly short of the target 50/50 split between residential and non-residential uses. In order to hit the 50% split between residential and non-residential uses set by Policy H2, 206.5sqm of proposed uplift in employment floorspace would need to be converted to residential floorspace.

8.8 As stated above, the only appropriate part of the Site considered suitable for the accommodation of residential use is within a new, replacement Grays Inn Road building. This is due to the fact that Panther House was purpose built for employment purposes, does not lend itself to residential conversion by reason of its design and layout

and any loss of potential employment space would impact on the economic objectives of the proposed scheme.

8.9 As was set out in the Officer's report to Committee on the extant consent the provision of residential accommodation in Panther House would result in a poor standard of accommodation for future users due to the wrap-around triangular nature of the building around a deep lightwell, with only the upper floors able to access adequate levels of daylight, sunlight and outlook. By introducing residential uses to the upper floors of the existing Panther House buildings or extended floors, the scheme would introduce new amenity issues for neighbouring properties, including overlooking and loss of privacy.

8.10 The ground floor of the Grays Inn Road building is proposed for retail use and the third floor upwards is already proposed as residential. Therefore, only the first and second floors of the building, which are proposed for employment purposes, could be converted into residential use.

8.11 However, there are a number of practical reasons why it is not feasible to increase the residential accommodation on the first and second floors of this block.

8.12 The proposed Grays Inn Road building currently only provides 437.5sqm (GIA) of B1 floorspace. If 206.5sqm of this space is converted to residential floorspace it does not make economic sense to service the office space that would remain with a separate core and lift. It would also severely compromise the design of the employment space proposed for the Grays Inn Road frontage. This would mean that, in reality, the whole of the first and second floors of the Grays Inn Road block would need to be converted to residential accommodation.

8.13 If this change were to be made to the scheme it would affect the balance of uses proposed and the development would swing from an employment-led scheme to a residential-led scheme, with a residential provision of 61% of the total development. The underlying objective of the revised proposals is to deliver a high-quality employment led workspace development that complements the character of the existing site and the wider context. The proposals have been designed to provide a variety of unique workspaces in each building that forms part of the site to provide maximum flexibility to users and occupiers and to meet the economic objectives of Camden's Local Plan.

Making this change would affect the ability of the proposals to achieve these objectives.

8.14 In addition, increasing the amount of residential floorspace would affect the design of the group of buildings and spaces on Grays Inn Road. The lower floors of the Grays Inn Road building, Brain Yard courtyard and the Tramshed have been designed to work together as a series of interlinked functions and spaces that will not only announce the presence of the overall workspace development onto Grays Inn Road but will provide the opportunity for the development to interface with the wider public. The spaces have been designed to intentionally blur the lines between public and private space. The proposed courtyard space at Brain Yard is an integral part of this concept and has been designed as a multi-purpose space. It is intended that members of the public will be able to access the space by using the café on Grays Inn Road and that the space will also provide an attractive and secure area for visitors to arrive and congregate; and an external area for workers within the offices to use.

8.15 It is also intended that the Tramshed will be used for events such as talks and other health and well-being activities such as yoga and meditation, which will be made available to the wider public (by invitation) as well as occupiers of the employment development. Thus the interface of workspace, the treatment of Brainyard and its relationship with the Tramshed is considered to be an integral part of the development's design rationale.

8.16 There are a number of design features that have been included to ensure that the courtyard functions as a high-quality multi-functional space:

- Care has been taken to ensure that there are limited obstructions within the retail and cafe units to allow for a visual connection from Grays Inn Road to the courtyard space and Tram Shed beyond.
- The courtyard will be treated with a light ETFE covering to ensure that it is weatherproof but is otherwise treated as an external open space. The covering is aligned with the third-floor slab level and the parapet of the existing Tramshed building to provide an attractive triple-height, flexible, active and highly usable courtyard space that interfaces with the employment uses at first and second floors.

- The triple-height nature of the space will allow for significant planting to be provided within the courtyard and in design terms will give the space a sense of grandeur and gravitas that lowering the cover would not provide.
- The ETFE roof aligns with the bottom of the residential floors ensuring that activity within the courtyard space will not affect the amenity of residential units above in terms of noise and disturbance for residents but at the same time will allow the workspaces at floors one and three to interact with and feel part of the Brainyard/Tramshed set piece.

8.17 Converting all floors above ground level to residential uses would result in significant design changes to the Grays Inn Road building and the Brain Yard courtyard design. The residential core would move back to a central position in the plan as within the existing consented plans. This would mean that the retention of the Gillette sign would no longer be possible and that the visibility through the retail units could no longer be maintained. These changes would mean that the courtyard would not be as usable, without compromising the residential amenity of the proposed units.

8.18 In addition, no additional floors could be provided within the Grays Inn building in order to make up the uplift deficit in residential floorspace as the overall design of the building has been subject to careful and lengthy design development to ensure that it fits within the existing townscape context, without causing harm to heritage assets or adjoining neighbouring properties. Any increase in the height, mass and bulk of the building fronting Grays Inn Road would be unacceptable in design and heritage terms.

8.19 Policy H2 acknowledges in criteria (h) and (j) that the impact that a mix of uses will have on the efficiency of the development and whether alternative approaches could better meet the objectives of the policy should be considered when assessing the balance of uses on site.

8.20 It is felt that both of these criteria are relevant in this case as incorporating additional residential floorspace would have a significant impact on the efficiency and primary employment purpose of the development, as well as the opportunity being taken for this Site to deliver new economic activity.

8.21 Overall, it is considered that the marginal deficit of residential floorspace is acceptable when balanced with the provision of very high-quality and innovative workspace, which has the potential to support business of all size, in particular start-ups and SMEs, and which has been designed to comfortably sit within the Site's context. The proposals are therefore considered to accord with the overall objectives of policies E1 and E2 of the Local Plan.

9 Residential development (mix and quality)

9.1 The existing site currently contains one residential unit at 156 Grays Inn Road which measures 129sqm GIA. The application proposals include a total of seven residential units equating to 949sqm GIA which results in a residential uplift of 820sqm delivering the following mix and size of units:

Unit no.	Unit type	Habitable rooms	NIA (sq.m)	External amenity space (sq.m)	Access	Tenure
1	1b2p flat	48.01	66.61	6.40	M4(3)	Market
2	4b8p maisonette	85.33	138.00	11.90	M4(2)	Market
3	4b8p maisonette	85.56	139.80	11.80	M4(2)	Market
4	2b4p flat	58.77	84.50	6.40	M4(2)	Market
5	3b6p maisonette	70.46	121	9.30	M4(2)	Market
6	3b6p maisonette	69.07	119.20	9.20	M4(2)	Market
7	3b6p maisonette	68.16	121.70	9.10	M4(2)	Market

9.2 Policy H1 of the Local Plan aims to secure a sufficient supply of homes in the borough to meet the needs of existing and future households and seeks to exceed the target for additional homes by regarding self-contained housing as the priority land-use in the Local Plan; and where sites are underused or vacant, expect the maximum reasonable provision of housing that is compatible with any other uses needed on the site. The principle of providing residential development on the site is therefore strongly supported in policy terms.

Housing mix

9.3 The proposals deliver the following mix of residential units and sizes:

Unit type (market):	1 bed	2 bed	3 bed	4 bed	Total
No of units:	1 (M4(3))	1	3	2	7

9.4 Policy H6 of the Local Plan aims to create mixed, inclusive and sustainable communities by seeking high-quality accessible homes to suit a variety of existing and future households, having regard to household type, size, income and any particular needs. The policy requires 90% of new build self-contained homes in each development to be accessible and adaptable in accordance with Building

Regulation M4(2); and 10% of new build self-contained homes in each development to be suitable for occupation by a wheelchair user or easily adapted for occupation by a wheelchair user in accordance with Building Regulation M4(3).

9.5 As shown in the table above the proposals deliver 1 M4(3) wheelchair adaptable unit equating to 14% provision exceeding the policy target of 10%. The remainder of the units are designed to meet the requirements of Part M4(2). As such the proposals comply with policy in respect of accessibility.

9.6 Policy H7 of the Camden Local Plan seeks a mix of dwelling sizes (large and small homes) in order to secure homes in a range of sizes that will contribute to the creation of mixed, inclusive and sustainable communities. The Dwelling Size Priority Table seeks the following unit sizes for different tenures:

	1-bedroom (or studio)	2-bedroom	3-bedroom	4-bedroom (or more)
Social-affordable rented	lower	high	high	medium
Intermediate affordable	high	medium	lower	lower
Market	lower	high	high	lower

9.7 The mix of unit sizes proposed within this application provide a range of unit sizes and are broadly in accordance with the mix sought for market sale units within the Dwelling Size Priority Table. The mix of unit sizes and their design have been discussed with a development advisor to ensure that they are attractive to the residential market. The proposals therefore comply with the requirements of Policy H7 in terms of the mix of unit sizes.

Housing quality

9.8 The NPPF, London Plan and Camden's Local Plan policy H6 contain a number of standards in relation to promoting housing quality in terms of unit sizes, design, wheelchair housing and environmental standards.

9.9 Policy H6 of the Local Plan requires residential development to provide an acceptable standard of accommodation in terms of providing functional, adaptable and accessible spaces and all new homes are expected to meet the nationally described space standard.

9.10 Policy A1 of the Local Plan seeks to ensure that the amenity of communities, occupiers and neighbours is protected. The factors that are considered in terms of the quality of the proposed residential development include: visual privacy and outlook; internal daylighting levels; noise and vibration levels; air quality and microclimate.

9.11 In accordance with these policy objectives, it is confirmed that:

- All units will meet the minimum nationally described space standard for dwellings of different sizes
- All units have private amenity space that meets the standard for units of that size
- 90% of units will conform to M4(2) standard for wheelchair accessible and adaptable dwellings. 10% of new homes will be conform to M4(3) standard for wheelchair user dwellings.
- All units benefit from a good level of privacy and outlook, with the majority of the units being dual aspect. Apartments 1 and 4 being dual aspect with one side of their aspect looking onto and receiving light from the shared access corridor.
- There are no single aspect north facing units and the proposed layouts meet the design standards set in relation to flat layouts, orientation and access.
- In terms of daylight and sunlight levels, an internal daylighting assessment has been undertaken of the proposed units using the BRE methodology. The assessment demonstrates that all the development performs very well in terms of daylight and sunlight levels for this urban location. 21 out of 24 of the habitable rooms will meet or exceed recommended values, with two

kitchen/dining/living rooms falling marginally short of the recommended levels for a room with a kitchen, whilst exceeding the recommended levels for a living room. The rooms also receive very good levels of sunlight.

9.12 For the above reasons, the residential aspect of the proposal is in accordance with the objectives of policies H6 and A1 of the Local Plan.

Affordable housing

9.13 Policy H4 of the Local Plan aims to maximise the supply of affordable housing and aims for an appropriate mix of affordable housing types to meet the needs of households unable to access market housing. The policy states that the Council will expect a contribution to affordable housing from all developments that provide one or more additional homes and involve a total addition to residential floorspace of 100sqm GIA or more.

9.14 The policy sets out that targets for affordable housing are based on an assessment of development capacity where 100sq.m GIA of residential floorspace is generally considered to create capacity for one home. A sliding scale target applies to developments that provide one or more additional homes and have capacity for fewer than 25 additional homes starting at 2% and increasing by 2% for each home added to capacity. Where developments have capacity for fewer than 10 additional dwellings, the Council will accept a payment-in-lieu of affordable housing; for developments with capacity for 10 or more additional dwellings, the affordable housing will be sought on-site. Where affordable housing cannot practically be provided on site or provision would create a better contribution (in terms of quantity and/or quality), the Council may accept provision of affordable housing off-site in the same area, or exceptionally as a payment in-lieu.

9.15 For mixed use schemes the affordable housing target is based on the sites capacity for residential development were it to deliver a 50/50 scheme in terms of the total uplift in floorspace rather than the quantum of residential floorspace the scheme actually delivers.

9.16 Based on the total uplift in floorspace of 2,053sq.m the capacity of the site for residential development is deemed to be 1,026.5sq.m which equates to a site capacity of 10 units (100sq.m GIA per unit). This means that the affordable housing target for this site would be 20% of the capacity of the site for residential development (205.3sq.m GIA).

9.17 In reality the scheme is only delivering 7 residential units in a good mix of larger and smaller homes that will help to attract a range of different buyers from the market. If the residential element were to be assessed in isolation it would not trigger the requirement for on-site

affordable housing. Further, for practical, management and maintenance reasons it is difficult to provide a small number of affordable units on-site. It is unlikely that a single/two units of affordable would attract Registered Providers prepared to manage and maintain such a provision. In addition the unit(s) would be subject to a service charge that is likely to be unaffordable to affordable housing providers. This situation has been confirmed by advice given to the Applicant by their residential advisors, CBRE.

9.18 It is considered that a financial contribution to provide affordable housing off-site would make a better contribution in this case. Using the payment-in-lieu guidance provided within the Interim Housing CPG (March 2019) the affordable housing contribution would be £680,056. The payment is calculated by converting the target affordable floorspace GIA to GEA by multiplying it by 1.25. A cost per square metre of £2,650 is then applied to the GEA floorspace target as per the below calculations:

- Target GEA floorspace: $205.3\text{sq.m} \times 1.25 = 256.6\text{sq.m}$.
- Financial contribution: $256.6\text{sq.m} \times \text{£}2,650 = \text{£}680,056$.

10 Non-residential development (type and amount)

Office (B1) space

10.1 Policy E1 of the Local Plan sets out the council's approach to economic development and states that the Council will support business of all sizes, in particular start-ups, small and medium sized enterprises.

10.2 Policy E2 of the Local Plan encourages the provision of employment premises and sites in the borough including higher intensity redevelopment, provided that: the level of employment floorspace is increased or at least maintained; the redevelopment retains existing business on the site as far as possible; it is demonstrated to the Council's satisfaction that any relocation of businesses supporting the CAZ or the local economy will not cause harm to the CAZ functions or local economy and will be in a sustainable location; the proposed premises include floorspace suitable for start-ups, small and medium sized enterprises, such as managed affordable workspace; the scheme would increase employment opportunities for local residents, including training and apprenticeships; and the scheme includes other priority uses, such as housing, affordable housing and open space, where relevant and where this would not prejudice the continued operation of businesses on the site.

10.3 This scheme is driven by its employment-led nature. The existing site accommodates a total of 5,286sqm of B1 employment floorspace. Under this application a total of 6,642sqm (GIA) is proposed, resulting in an uplift of 1,393sqm (GIA) of B1 employment space when compared to the existing. Not only is additional employment floorspace being provided but the floorspace that is being retained will be upgraded to a high standard and vacant space will be brought back into effective employment use.

10.4 The Applicant intends to provide workspace within an innovative working environment, providing unique and creative workspace to suit a range of occupiers, and has the potential to be marketed at start-ups, individuals, small and medium businesses, charities, and public sector and third sector organisations.

10.5 The creation of this innovative working environment would contribute to the changing needs of work through focusing on networking, community and collaboration. This type of business has a growing role and importance in London's, and specifically Camden's, economy.

10.6 As required under policy E2, the proposal would also include other priority uses including housing, and an affordable housing payment.

10.7 The upgrade of existing and provision of additional B1 employment floorspace in this location is acceptable in this location and in accordance with the objectives of policies E1 and E2 of the Local Plan.

A1/A3 space (Andrews café relocation and other retail)

10.8 Policy TC1 of Camden's Local Plan concerns quantity and location of retail development and sets out Camden's focus for new shopping and related uses in designated growth areas and existing centres. Where new retail floorspace is provided outside of these designated areas, the Council will apply a sequential approach to retail in assessing whether such locations are appropriate.

10.9 Policy TC2 of the Local Plan concerns Camden's centres and other shopping areas and seeks to promote successful and vibrant centres throughout the borough.

10.10 Policy TC3 of the Local Plan concerns existing shops outside of centres, seeking to avoid their loss.

10.11 Policy TC4 of the Local Plan concerns Town Centre uses and sets out Camden's objective of ensuring that development of retail and other related uses do not cause harm to the character, function, vitality and viability of a centre, local area of amenity of neighbours.

10.12 A total of 352sqm of retail space currently exists at the ground floor of 160-164 Grays Inn Road, accommodating three separate units. These units include a café (Andrew's Restaurant), a convenience store (Retail 24) and a printing/card shop (Adana).

10.13 No.160-164 is to be demolished as part of the proposal. However, an area of retail floorspace is to be re-provided at ground level in this location measuring 229sqm. This would result in a modest reduction of 123sqm of retail floorspace compared the existing offer, however the new space would be of a higher quality and would be better integrated into the wider redeveloped site, and providing a strong visual link between Grays Inn Road and the Brain Yard. The retail space will be flexible in that it could be

provided either as a single unit or multiple units, the latter being in the Applicant's preference.

10.14 The re-provision of this retail space at ground floor level of the Grays Inn Road building will ensure that the active frontage along Grays Inn Road is maintained, protecting the viability and vitality of the shopping frontage and wider street. As was highlighted under the extant planning permission, the arrangement of ground floor retail uses with residential/ commercial over reflects the predominant character of buildings in this part of Grays Inn Road.

10.15 Flexible A1/A3 uses are proposed for the retail units, which reflects the extant scheme and ensures that a range of potential occupiers could accommodate the retail space.

10.16 The re-provision of the retail floorspace at ground floor level will ensure that the prevailing mixed-use character of the street is maintained. As no new retail floorspace is being provided, the sequential approach is not relevant. The proposals are therefore in accordance with policies TC1, TC2, TC3 and TC4 of Camden's Local Plan.

11 Design, townscape and heritage

11.1 The Government's commitment to design excellence is a key theme of the NPPF. High quality and inclusive design is seen to go beyond just aesthetic considerations, with plan-making and decision-making required to "address connections between people and places and the integration of new development into the natural, built and historic environment"

11.2 In determining applications, the NPPF gives weight to achieving outstanding or innovative designs, which help raise the general standard of design. Paragraph 65 states that LPAs should not refuse planning permission for buildings or infrastructure, which "promote high levels of sustainability because of concerns about incompatibility with an existing townscape, if those concerns are mitigated by good design"

11.3 A key objective of both the London Plan and LBC policy is to promote high quality, sustainable design and exemplar development. This relates not just to the aesthetic appearance of the environment, but also about enabling an improved quality of life and economic growth. Policy also advises that development should reduce opportunities for anti-social behaviour and contribute to a sense of security.

11.4 Local Plan Policy D1 expresses the council's desire to secure high quality design which respects local character and context, preserves and enhances the historic environment and heritage, is sustainable, integrates with the surrounding streets, is inclusive and accessible, and preserves significant and protected views.

11.5 The proposals have benefitted from extensive pre-application discussions and a presentation to the Design Review Panel and as a result have been developed in response to the advice received.

11.6 In response to the policy aims and objectives, site specific requirements and pre-application advice, the Design and Access Statement sets out the vision and design proposals for this site, including how these proposals have evolved since the extant scheme was approved.

11.7 The proposals increase the height of the Grays Inn Road building, when compared to the existing condition, by five storeys and the Panther House buildings by two/three storeys. The design response in both cases is considered appropriate and respects the historical setting of the Site. The additional massing increase can be accommodated

within the local townscape without detracting from the historical setting within which the site sits as well as views up and down surrounding streets.

11.8 A strong and innovative building facade will be introduced to the Grays Inn Road frontage, made up of a background layer of coloured concrete with additional layers of Corten mesh panels set in front of the 'frameless' glazing which therefore appear to 'float' on the facade. The elevation is further articulated with projecting planters, which each have a built-in irrigation and drainage system to ensure the ongoing maintenance and management of the proposed planting. The colours and proportions of the facade reference the character and appearance of the neighbouring architecture.

11.9 Verified key views of the proposed development have been produced and are contained within the submitted Design and Access Statement. These illustrate views from Grays Inn Road looking north, Grays Inn Road looking south, Mount Pleasant looking north, Laystall Court looking south and key views from opposite the site. The views show that the increased massing and articulated facades of the extended and replacement buildings offer an acceptable response to the site and, in the case of Grays Inn Road, 'repair' the gap in the townscape currently established by the two-storey buildings, something of an anomaly.

11.10 The application site is located within Hatton Garden Conservation Area and are considered to be buildings of merit. Nos. 160-162 Grays Inn Road have been identified as having 'shopfronts of merit'. In addition, the site forms part of the setting of several Grade II listed buildings, including Nos.75-81 Grays Inn Road, Nos.63-69 Grays Inn Road, 55 Grays Inn Road and the Yorkshire Grey Public House at the corner of Grays Inn Road and Theobalds Road.

11.11 Dulverton Mansions and Dawlish Mansions on Grays Inn Road, Holsworthy Square on Elm Street, Grays Inn Buildings on Rosebery Avenue and Nos.52-54 Mount Pleasant are all regarded as positive contributors to the Hatton Garden Conservation Area within its Conservation Area Appraisal.

11.12 Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) imposes a statutory duty upon local planning authorities to have 'special regard to the desirability of preserving

listed buildings, their settings or any features of special architectural or historic interest which they possess' and to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas'.

11.13 The NPPF requires local authorities to identify and assess the particular significance of heritage assets that may be affected by a development proposal. In assessing proposals consideration should be given to the significance of the designated asset and an assessment of any harm to the asset including the degree of harm (substantial or less than substantial).

11.14 Where a development proposal will lead to 'less than substantial harm' to the significance of a designated heritage asset, the NPPF requires that this harm is weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

11.15 Policy D1 of Camden's Local Plan requires that development preserves or enhances the historic environment and heritage assets in accordance with Policy D2. Policy D2 requires that developments in conservation areas will preserve, or where possible enhance, the character of the area and generally resist development which results in the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a Conservation Area.

11.16 Policy D3 of the Local Plan sets out the Council's desire to retain original shopfronts where they are of architectural or historic value in whole or substantial part.

11.17 As set out earlier within this planning statement, the extant scheme would result in the significant demolition and remodelling of Panther House, including the infilling of its courtyard, the demolition of the majority of the Grays Inn Road buildings (aside from the facade of Nos. 160-164), the retention of only the north and south end walls of the Tramshed, the excavation of substantial basement space and the obscuring of the Gillette advertisement on the flank wall of the adjacent Grays Inn Road building.

11.18 The proposed scheme retains the majority of Panther House with minimal interventions, including the erection of rooftop extensions that retain existing chimneys and rooflights, the retention of the Tramshed in its entirety, no basement excavations and the retention of the Gillette

advertisement which would remain visible as a core design feature. Nos.160-164 would be demolished as previously, but also to include the facade.

11.19 The extant planning consent was deemed by Historic England to cause significant harm to the character and appearance of the Hatton Garden Conservation Area and they were unable to support the proposals. However, the Local Authority's assessment of the scheme deemed that the harm caused was less than substantial and that the package of public benefits accompanying the scheme outweighed the harm. The public benefits for the extant consent included:

- 15 residential units of which 3 were offered on an intermediate rent basis.
- Additional employment space including 1,450sq.m of subsidised workspace.
- A new pedestrian route between Gray's Inn Road and Mount Pleasant
- Significant contributions towards the provision of local infrastructure and facilities through CIL, financial obligations secured via s106 and public realm improvements to Mount Pleasant, upgrading of external space for Mount Pleasant Studios and landscaping at Christopher Hatton School.

11.20 As set out, a fundamentally different approach has been taken to the revised scheme in terms of the historic buildings on the site. The driving principal of the revised scheme has been to retain as much of the historic environment as possible whilst creating a high quality and efficient scheme. Where retention of the buildings on Grays Inn Road would be tokenistic, resulting in the preservation of just the façade, a high quality replacement building is proposed.

11.21 Historic England have been consulted as part of the pre-application process and their response acknowledges that the proposals are significantly different to those previously approved. Their response states that whilst they are still of the view that the proposed demolition of the Grays Inn Road buildings will cause a significant level of harm to the character and appearance of the Hatton Garden

Conservation Area, on balance the 'proposed harm caused through the loss of these buildings is considered to be 'less than substantial' and should therefore only be considered acceptable if there are clear and convincing public benefits'.

11.22 The revised proposals seek a less commercial approach to the site than the extant consent, providing a significantly smaller overall development. The extant consent has a significantly greater uplift in floor area than the current proposals and a much greater impact on the historic buildings. For this reason, it is not appropriate to directly compare the public benefits of the current proposals with those delivered by the extant consent.

11.23 The public benefits of the current scheme can be summarised as:

- Repair, refurbishment and beneficial reuse of the three blocks which form Panther House;
- Repair, refurbishment and beneficial reuse of the Tramshed. The use of the Tramshed as a meeting space would also increase people's awareness and appreciation of this historic building, which has been closed off for many years;
- New retail floorspace, animating Grays Inn Road;
- The provision of good quality employment floorspace to support business and the local economy;
- The delivery of a high quality replacement mixed-use building fronting onto Grays Inn Road.
- The provision of seven residential units and a financial contribution to provide affordable housing offsite; and
- A CIL contribution and other financial contributions to be secured through the S106, providing significant public benefits.

11.24 A full assessment of significance has been undertaken and is set out within the submitted Heritage and Townscape Statement. This acknowledges that Nos. 160-164 makes a modest positive contribution to the conservation area in terms of materials and detailing, including parts ground floor shopfronts. However, it is concluded that the building is not remarkable in the context of the wider streetscene.

11.25 It is also acknowledged that whilst the shopfronts have been identified within the conservation area appraisal

as 'shopfronts of merit', these have only limited interest in the wider context. The loss of this building, including its facade, when balanced with the public benefits to be gained from the scheme, is considered to be consistent with national, regional and local planning policy in respect of heritage.

11.26 A structural report has been submitted in support of the application which confirms that the Panther House buildings can support the proposed extensions.

11.27 Taking the above into account, whilst the demolition of 156 and 160-164 Grays Inn Road and the alterations to the retained buildings on the site would have an impact on the conservation area, this impact is considered to cause 'less than substantial' harm. It is further considered that the public benefits to be gained as a result of the proposal would outweigh this harm.

11.28 The proposed replacement building on Grays Inn Road has been designed to make a positive contribution to the character and appearance of the Hatton Garden Conservation Area through the careful consideration of its design including form, height, bulk and mass and the attention given to the proposed to the materials palette of the new building and extensions. Views into Brain Yard and the courtyard of Panther House from surrounding streets are preserved and the Tram Shed would be given a new use, including greater access, allowing its greater appreciation and an enhancement to the industrial character of the site.

11.29 In conclusion, the proposals aim to support the sustainable development of the conservation area by providing new architecture which responds to its historical context alongside refurbished and extended historical buildings. The proposals would bring significant investment to the buildings and provide public benefits in the form of new retail, employment and residential uses in a preserved historical setting. The proposals are considered to form a significant improvement over the extant scheme in terms of the impact on the historic environment and accord with the objectives of the NPPF and policies D1, D2 and D3 of Camden Local Plan.

12 Impact on amenity of neighbouring occupiers

12.1 Policy A1 of the Local Plan and CPG (Amenity) seeks to protect the quality of life of occupiers and neighbours of developments, including the impact on visual privacy, outlook, sunlight, daylight, overshadowing, transport impacts, noise and vibration levels, odours, fumes and dust, contaminated land and water and wastewater infrastructure. The Council will expect development to avoid harmful effects on the amenity of existing and future occupiers and nearby properties or, where this is not possible, to take appropriate measures to minimise potential negative impacts.

12.2 The proposed buildings are surrounded by a variety of building typologies including a high volume of residential units and some commercial units, typically at lower levels. The site is separated from neighbouring developments to the west by Grays Inn Road itself and partially to the south by Mount Pleasant.

Daylight/Sunlight

12.3 A daylight/sunlight assessment has been carried out to determine the acceptability of the proposed development upon the amenity of surrounding occupiers. This assessment includes two scenarios. Scenario 1 assesses the impact of the proposed scheme against the existing site condition and Scenario 2 includes an assessment on the impact of the proposal on neighbouring properties when compared to the consented scheme (the extent of change).

12.4 As was the case under the extant permission, the development is proposed in 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. Given the nature of the site and surrounding buildings, it would be difficult to develop the site without resulting in some transgressions in BRE guidance and an appropriate degree of flexibility needs to be applied when using these guidelines. LB Camden acknowledged this point under the extant permission.

12.5 The daylight/sunlight assessment uses the Vertical Sky Component (VSC) and No Sky Line (NSL) methods to analyse the effects of the proposed scheme on the surrounding properties. Further explanation of these methods is set out within the submitted daylight and sunlight assessment. For sunlight, the Annual Probable Sunlight Hours (APSH) was used.

12.6 The daylight/sunlight assessment includes the review of: Mullen Tower (to the east of the site), Nos 1-18, 19-20, 21-53, 54-76 and 77-94 Grays Inn Road Buildings (to the south east of the site); Nos 47, 49, 51-53, 55 and 57 Grays Inn Road (to the south west of the site); 140, 144-148 Grays Inn Road (to the south of the site); Dulverton Mansions (to the north of the site); Holsworthy Square buildings (to the north of the site); 52-54 Mount Pleasant (to the south of the site); and 59 Mount Pleasant (to the north east of the site). A summary of the assessment results is set out below, with full details within the submitted assessment.

Daylight

Mullen Tower

12.9 A total of 131 windows serving 112 rooms have been tested against the VSC and NSL daylight assessments. 20 windows experience breaches of the recommended VSC target value. Where transgressions occur, these are either minor or are exacerbated by existing architectural features of the property itself, such as the rear projection facing the site and projecting balconies, which limit daylight availability.

12.10 There would be no additional material effect upon the daylight amenity of these neighbouring properties over and above that caused by the consented scheme. A total of 66 windows (50%) will experience no change in daylight levels when compared with the consented scheme (scenario 2) and 35 windows (27%) actually see an improvement in VSC values when compared.

Nos 1-18, 19-20, 21-53, 54-76 and 77-94 Grays Inn Road buildings

12.12 A total of 175 windows serving 136 rooms have been tested against the VSC and NSL daylight assessments. 19 windows serving rooms within nos.19-20 experience transgressions of the VSC criteria. Where transgressions occur, they are either minor or are exacerbated by existing architectural features of the property or existing neighbouring properties, such as the rear projection facing the site and projecting balconies at nos.19-20, which limit daylight availability.

12.13 The proposed scheme will have no additional material impact upon the daylight amenity of properties over and above that caused by the consented scheme. A total of 46 windows (29.7%) will experience no change in daylight levels and 55 windows (35.5%) see an improvement in VSC values when compared.

Nos 47, 49, 51-53, 55 and 57 Grays Inn Road buildings

12.15 A total of 72 windows serving 36 rooms have been tested against the VSC and NSL daylight assessments. 34 windows will experience transgressions of the VSC criteria. The majority of these (27) will experience only minor transgressions of between 20.3% and 29.4% which are not considered to be material, being only marginally beyond the 20% BRE threshold. Where transgressions occur, they

are minor and acceptable daylight levels are retained for an urban location such as this.

12.16 The proposed scheme will have no material impact upon the daylight amenity over and above that caused by the consented scheme. 70 windows assessed will experience only small absolute VSC changes of between 0% and 0.4% when compared, which are negligible.

140 & 144-148 Grays Inn Road

12.13 A total of 28 windows serving 26 rooms have been tested against the VSC and NSL daylight assessments. 3 windows experience a transgression of the VSC criteria. Where transgressions occur, they are minor and acceptable daylight levels are retained, with no harm to amenity.

12.14 The proposed scheme will have no material effect upon the daylight amenity over and above that caused by the consented scheme, when compared.

Dulverton Mansions

12.15 A total of 101 windows serving 79 rooms have been tested against the VSC and NSL daylight criteria.

12.16 12 windows experience a transgression of the VSC recommendations. Of these, 8 serve bedrooms and others are obstructed by the property itself as they are situated adjacent and in front of the rear projection of the building.

12.17 The proposed scheme will have no material effect upon the daylight amenity over and above that caused by the consented scheme. A total of 41 windows (40.6%) will experience no change in daylight levels in scenario 2 and 11 windows (10.9%) see an improvement in VSC values when compared.

Holsworthy Square

12.18 A total of 253 windows serving 126 rooms have been tested against the VSC and NSL daylight criteria. Of these, 94 windows experience a transgression of the VSC target values, 39 experience only negligible absolute losses of less than 3% in the proposed scenario. On this basis it is not considered that a noticeable loss of light will occur to these windows. A further 25 windows experience only minor percentage reductions of between 20.4% and 29.2% and 16 of these serve rooms which are served by at least two additional unaffected windows.

12.19 Where transgressions occur, they are due to windows and rooms being heavily obstructed by existing architectural features of the property itself, including overhanging balconies and walkways in most cases, which triggers disproportionately large percentage reductions as a result of the proposed scheme. Additionally, many windows experience percentage losses beyond the BRE recommendations which equate to only small absolute losses which will not have a material effect on daylight and sunlight amenity to properties.

12.20 The proposed scheme will have no additional material effect upon the daylight amenity of properties in the Holsworthy Square development over and above that caused by the consented scheme. A total of 66 windows (26.1%) will experience no change in daylight levels in scenario 2 and 81 windows (32%) see an improvement in VSC values when compared.

52-54 Mount Pleasant

12.21 A total of 76 windows serving 43 rooms have been tested against the VSC and NSL daylight criteria. Of the 46 windows which experience transgressions of the VSC criteria, 18 experience only small absolute VSC losses of less than 3% which is widely accepted to be an unnoticeable level.

12.22 Where transgressions beyond the BRE target values, they are either minor, or equate to small absolute losses which would not be noticeable in most cases. A number of bedrooms experience large percentage reductions, although this is not considered to cause unacceptable harm to overall amenity given the nature of their use.

11.23 It is acknowledged that the current proposal would have a greater impact on daylight levels to 52-53 Mount Pleasant compared with the consented scheme. However, this is considered to have only a minor effect upon the daylight amenity of this property overall, as highlighted above.

59 Mount Pleasant

12.24 A total of 33 windows serving 21 rooms have been tested against the VSC and NSL daylight criteria. Of the 5 windows which experience a percentage loss beyond the BRE recommendations, 4 experience only minor reductions of between 20.2% and 28.3%, which are not considered

to cause adverse harm to overall daylight amenity. The one remaining window experiences a moderate relative reduction of 36.8%, however this only equates to a small absolute loss of 1.4%. This small quantum of absolute loss is considered to be negligible, thereby having no real effect on daylight amenity.

12.25 The proposed scheme will have no additional material effect upon the daylight amenity of over and above that caused by the consented scheme. A total of 14 windows will experience no change in daylight levels in scenario 2 and 7 windows see an improvement in VSC values when compared.

Overall

12.26 Overall, the daylight and sunlight assessment shows that the properties surrounding the site will experience a very high level of compliance within the daylight and sunlight criterion in scenario 1 (existing site conditions). Where breaches of guidance do occur, these are either minor, or equate to small absolute reductions, generally caused by low existing light levels.

12.27 Additionally, overhanging balconies, walkways and existing building design have triggered some windows and rooms to experience large relative percentage losses by cutting out light and sky visibility from the top part of the sky. These windows and rooms are particularly sensitive to even modest additional massing on the application site, and therefore it is expected that percentage reductions will occur beyond the BRE numerical guidelines. This is considered acceptable in this highly urban setting.

12.28 In scenario 2 (comparison with the consented scheme), there is excellent BRE compliance. It is concluded that the proposed scheme will have no material effect on the daylight and sunlight to neighbouring residential accommodation or the hostel at 52-54 Mount Pleasant when compared to the consented scheme and in many cases, forms an improvement.

Sunlight

12.29 As mentioned above, the Annual Probable Sunlight (APSH) method has been used to assess the impact of the development on sunlight levels experienced by neighbouring properties.

Mullen Tower

12.30 There is 100% compliance with the APSH criteria for both annual and winter sunlight. When compared with the consented scheme, there would be no change in annual and winter sunlight for all 23 windows tested.

Nos 1-18, 19-20, 21-53, 54-76 and 77-94 Grays Inn Road buildings

12.31 Of the windows tested, one window experiences a minor reduction of annual sunlight of 22.7%, which is only slightly beyond the target value of 20% and is considered negligible.

12.32 There would be no material change in sunlight levels as a result of the proposed scheme when compared to the consented scheme. A total of 20 windows (64.5%) experience either no change or an improvement in APSH levels when compared.

Nos 47, 49, 51-53, 55 and 57 Grays Inn Road buildings

12.33 Of the windows relevant for testing, these meet the required BRE target values for sunlight and there would be no change in annual and winter sunlight either as a result of the proposed scheme or when compared with the consented scheme.

140 & 144-148 Grays Inn Road

12.34 As no site-facing windows are oriented within 90 degrees of due south, no windows in this development are deemed relevant for sunlight assessment.

Dulverton Mansions

12.35 All tested windows meet the required BRE target values for sunlight and there would be no change in annual and winter sunlight either as a result of the proposed scheme or when compared with the consented scheme.

Holsworthy Square

12.36 A total of 195 site-facing windows are oriented within 90 degrees of due south and are therefore relevant for assessment. A total of 55 windows fall short of the recommendations for sunlight. Of these, 32 serve bedrooms, which as have a lower requirement for sunlight than other habitable rooms due to the nature of their use. .

14 windows are heavily obstructed by overhanging balconies and walkways which limit the available sunlight to the tested windows in any case. 9 windows located on the ground, first and second floors of nos.61-72 experience percentage reductions in annual and winter sunlight over 40%.

12.37 When compared with the consented scheme, 14 windows experience absolute reductions in sunlight levels, however these are minor reductions and are still considered to be acceptable in amenity terms. A total of 42 windows (21.5%) will experience no change in annual and winter sunlight levels, 68 windows (34.8%) see an improvement in annual sunlight values and 54 windows (27.7%) see an improvement in winter sunlight.

52-54 Mount Pleasant

12.38 All tested windows meet the BRE target values for annual and winter sunlight and there would be no change to sunlight levels when compared with the consented scheme.

59 Mount Pleasant

12.39 Of the windows tested, two fall short of the BRE recommendations for sunlight. One window, located on the ground floor, serves a room with three additional windows which meet the criteria. As such, it is not considered that harm will be caused to the overall sunlight amenity in this room. In addition, this window meets the recommendation for annual sunlight which indicates that a good overall sunlight level will be achieved. The one remaining window falls just short of the annual sunlight guidelines, achieving 24% APSH which is marginally below the target value of 25%. This window exceeds the winter sunlight recommendations and on this basis there would be no material harm to overall sunlight amenity as a result of the proposal.

12.40 There would be no material difference on sunlight levels when comparing the proposed scheme with the consented scheme.

Overall

12.41 Technical analysis shows that the surrounding properties will experience a very high level of compliance within the sunlight criterion. Where breaches of guidance do occur, these are either minor, or equate to small absolute reductions, generally caused by low existing light levels, which would be acceptable in this highly urban location. The proposal is therefore in accordance with the objectives of policy A1.

Overlooking/Privacy

12.42 In terms of overlooking, residential development would be limited to the Grays Inn Road frontage. The residential windows fronting Grays Inn Road would face onto properties opposite. This would form a typical cross-street relationship, as is already the case for properties along the remainder of Grays Inn Road and the extant scheme. Windows serving the east side of the residential units would look out onto the commercial uses of the site.

12.43 Additional storeys would be constructed above the existing Panther House buildings. An existing relationship of mutual overlooking exists between Panther House and the adjoining residential properties. For this reason, and by reason of the commercial, rather than residential, nature of the extended buildings, typically used during working hours when residents are not at home, it is considered that the relationship would be acceptable and in line with the extant permission.

Outlook

12.44 In terms of outlook, an acceptable cross-street relationship would again exist in relation to properties location on the west side of Grays Inn Road, with no unacceptable harm to outlook. As with the extant scheme, the height, footprint and depth of the replacement Grays Inn Road building would be similar to the existing building on ground and first floors and as such neighbouring properties would not experience any change at this level. The upper levels of the replacement Grays Inn Road building would extend up in line with the blank gable ends of the adjacent buildings (Dulverton Mansions and 154 Gray's Inn Road). However, there would be no unacceptable impact to the outlook of these neighbouring properties.

12.45 The rooftop extensions to the Panther House buildings would be positioned directly above the footprint of the existing buildings. By virtue of their location relevant to the windows of neighbouring properties, there would be no unacceptable loss of outlook to neighbouring properties as a result of these additions.

12.46 The proposals are in accordance with the objectives of policies A1 of the Local Plan.

13 Transport, parking and servicing

13.1 Policy T1 of the draft London Plan sets of the Mayor's strategic approach to transport in London, including the need to reduce car dependency in favour of increased walking, cycling and public transport.

13.2 Policy T2 of the draft London Plan sets out the Healthy Street Approach which aims to improve health and reduce health inequalities, reduce car dominance, ownership and use, road danger, severance, vehicle emissions and noise, increase walking, cycling and public transport, improve street safety, comfort, convenience and amenity.

13.3 Policy T5 of the draft London Plan promotes greater cycling, including the need to ensure that appropriate levels of cycle parking are provided within developments.

13.4 T1 of Camden's Local Plan prioritises walking, cycling and public transport and seeks to ensure that contributions are made towards connected, high quality convenient and safe cycle routes, that accessible secure cycle parking facilities exceeding minimum standards are provided and that of other high-quality facilities such as changing room and showers are provided for cycle users.

13.5 Policy T2 of the Local Plan concerns parking and car-free development and aims to limit the availability of parking and require all new developments in the Borough to be car-free.

13.6 Policy T4 of the Local Plan sets out the Councils approach to sustainable movement of goods and materials and seeks to minimise the impact freight movement via road, to accommodate goods vehicles on site and to provide Construction Management Plans, Delivery and Servicing plans and Transport Assessments where appropriate. Policy A1 (Managing the impact of development) states that Construction Management Plans should be secured to demonstrate how a development will minimise impacts from the movement of goods and materials during the construction process (including any demolition works).

13.7 In the context of these policies and the existing conditions on the site, the applicant has developed a site-specific transport strategy for the development. This is set out within the submitted Transport Statement, Travel Plan, Delivery and Servicing Plan and draft Construction Management Plan.

13.8 The site benefits from a PTAL level rating of 6B, demonstrating that it has an 'excellent' level of accessibility, located 500m from Chancery Lane Station and 800m from Farringdon Station. As a result of this excellent public transport access and close proximity to other amenities and services, the significant majority of trips are expected to be made by public transport or active modes (walking and cycling). The proposed development is accordingly car-free with cycle parking and facilities provided in line with draft London Plan standards.

13.9 For the office uses, cycle parking will be provided at basement level and accessed via Mount Pleasant via a platform lift providing step-free access from street level. Showers, changing facilities and lockers will be provided alongside this secure parking area. Cycle parking for the retail units will be provided at ground floor level and residential cycle parking will be accessed from the residential core at the northern end of the building.

13.10 It is assumed that as part of Section 106 Agreement negotiations, that parking permit restrictions will apply to all future residential and commercial users of the site.

13.11 Servicing activity including deliveries and refuse collections will be undertaken on-street from Grays Inn Road and on adjacent roads. An on-site servicing opportunity will be retained and accessed from Mount Pleasant. It is confirmed within the submitted transport statement that the proposed level of activity indicates that the servicing arrangement can be accommodated without detriment to the operation of the local road network.

13.12 The proposals are in accordance with the objectives of policies T1, T2 and T5 of the London Plan and T1, T2 and T4 of the Local Plan.

14 Sustainability and energy

14.1 Policy S12 of the draft London Plan requires all major development to contribute to reducing carbon emissions in accordance with the energy hierarchy, with non-residential development required to achieve a minimum reduction of 35% below Part L of the Building Regulations 2013 (supplemented by a carbon offset payment if necessary), with an aim of achieving a zero-carbon target.

14.2 Policy CC1 of the Local Plan requires all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation.

14.3 An energy assessment and sustainability assessment have been submitted in support of the application, which set out how the proposed development achieves the required reduction in CO₂ emissions and other criteria required by the above policies.

14.4 It has been demonstrated that through the energy hierarchy, the proposed development would achieve a 60% reduction in CO₂ emissions over Part L Building Regs (2013). This would be achieved through the use of passive and energy efficient measures, supplemented by the provision of PVs and air source heat pump technology.

14.5 It is anticipated that for the residential element of the scheme to meet the zero carbon standard, the development would need to offset emissions through an in lieu payment towards LB Camden's Carbon Offset Fund. This would be based upon a charge of £1800/tonne of CO₂ emissions not saved on site. This is estimated as: £11,543.

14.6 Policy CC1 also promotes the use of decentralised energy networks, requiring all major developments to assess the feasibility of connecting to an existing decentralised energy network, or where this is not possible, establishing a new network.

14.7 The submitted energy assessment sets out the approach taken in considering the potential to connect the site to an existing decentralised energy network, and where not possible the consideration of establishing a new network. It concludes that LB Camden have previously identified a potential future network linking to Great Ormond Street, however it has been confirmed that this has not been progressed. There are no further heat networks proposed or in development close to the Panther House site. The

assessment further concludes that a site-wide heat network is not suitable for the site.

14.8 Policy CC2 also expects non-domestic developments of 500sqm of floorspace or more to achieve "Excellent" in BREEAM assessments and encourages zero carbon in new development from 2019.

14.9 Following the BRE Guidance, a BREEAM Pre-Assessment has been carried out for the commercial aspects of the proposed development. Following BRE Guidance, two BREEAM Pre-Assessments have been carried out for the two aspects of the development: Grays Inn Road (which incorporates a new build element) and Panther House (predominantly refurbishment).

14.10 The pre-assessments have been undertaken for both elements with the following targets: BREEAM NC 2014 - Office: 73.48%, BREEAM 'Excellent', with a further 12.13% potentially available; and BREEAM RFO 2014 - Office: 74.22%, BREEAM 'Excellent', with a further 11.86% potentially available.

14.11 The proposals are therefore in accordance with the objectives of policies S12, CC1 and CC2.

15 Other environmental considerations

Air Quality

15.1 Policy CC4 of the Local Plan concerns Air Quality and requires that the impact of development on air quality is mitigated and ensures that exposure to poor air quality is reduced in the Borough.

15.2 An air quality assessment is submitted in support of this application. This assessment was undertaken following discussions with LB Camden air quality officers.

15.3 The assessment demonstrates that traffic and building emissions associated with the development are below the relevant benchmarks required in the GLA Sustainable Design and Construction Supplementary Planning Guidance document, meaning that the development is considered to be air quality neutral and no mitigation measures are required in that respect.

15.4 The assessment also demonstrates that the impacts of traffic emissions on future occupants of the residential properties fronting Grays Inn Road are determined to be 'not significant'.

15.5 The proposal is therefore in accordance with the objectives of policy CC4.

Drainage and flooding

15.6 London Plan policy encourages development to utilise sustainable urban drainage systems (SUDS) and to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible.

15.7 Policies CC1 and CC2 of the Local Plan require development to adopt appropriate climate change adaptation measures such as not increasing, and wherever possible reducing, surface water runoff through increasing permeable surfaces and use of SUDS and incorporating bio-diverse roofs.

15.8 The site is an area of a low risk of flooding (Flood Zone 1)

15.9 A flood risk assessment and drainage strategy has been prepared and submitted in support of the planning application. The flood risk assessment demonstrates that the proposed development has a low probability of flooding from fluvial flooding, sewer flooding, groundwater flooding and artificial sources. The risk of pluvial flooding is low with

appropriate management through the provision of a new drainage system which will be designed to store rainfall generated by events up to a 100 year return period, including allowance for climate change.

15.10 Limited SUDS interventions are proposed by reason of the largely retained nature of the buildings on the site, with only the Grays Inn Road building being redeveloped. It is proposed to retain existing drainage arrangements in the eastern catchment of the site and provide and improved attenuation measures in the west of the site.

15.11 These features are such that the proposal meets the objectives of both London Plan and LB Camden planning policies.

Noise and vibration

15.12 London Plan policy D13 requires development to manage noise by: avoiding significant adverse noise impacts on health and quality of life; reflecting the Agent of Change principle; mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise generating uses; improving and enhancing the acoustic environment and promoting appropriate soundscapes; and separating noise sensitive development from major noise sources, or where not possible mitigating or controlling development through the application of good acoustic design principles.

15.13 Policy A4 of the Local Plan requires that developments assess their noise and vibration impacts on surrounding occupiers to ensure that such impacts are controlled and managed.

15.14 An Environmental Noise Survey and Plant Noise Assessment Report is submitted in support of the planning application. This assessment indicates that acceptable internal noise levels in residential units would be achieved with windows closed, using uprated thermal double glazed windows, alongside acoustically attenuated ventilation. Acoustic enclosures have also been recommended within the assessment to mitigate potential plant noise.

15.15 Subject to the implementation of the above mitigation measures, the proposal is in accordance with the objectives of policies D13 and A4.

Open space and trees

15.16 Policy A2 of the Local Plan seeks to protect enhance and improve access to Camden's open spaces and other green infrastructure.

15.17 An arboricultural report has been prepared and submitted in support of this planning application. This report assesses trees relevant to the proposals in accordance with best practice guidance and planning policy.

15.18 The assessment acknowledges that it will not be necessary to remove any trees in order to facilitate the proposed development and sets out a number of recommendations in relation to the works to ensure that the trees adjacent to the site and suitably protected. Such recommendations include the need to have the two street trees on Grays Inn Road pruned to provide clearance for scaffolding and demolition/construction operations.

15.19 However, the proposal would have a minimal impact on the trees and is therefore in accordance with the objectives of policy A2.

Nature Conservation and biodiversity

15.20 A preliminary ecological appraisal report has been submitted in support of the application. This reviews the report originally submitted in support of the extant permission which confirmed that the site had negligible potential for roosting bats, low potential for foraging bats and low potential for nesting birds. The report concludes that the development will have a positive impact on the biodiversity value of the site and local area.

15.22 The proposal is in accordance with the objectives of policy A3 of the Local Plan.

Contamination

15.24 A report is submitted in support of this application which sets out the contaminative history of the site and ground investigation works which have been carried out, together with a set of recommendations.

15.25 The report states that site investigation and risk assessment which identified potential risks to commercial end users is such that remedial measures are unlikely

to be required due to the relatively low sensitivity of the receptors, the low concentrations of contaminants identified across the site and the fact that the site is to be completely covered with hardstanding upon redevelopment. However, given the potentially contaminative history of the site, recommendations are set out, including the maintenance of a watching brief. It is expected that these will be secured by condition.

16 Planning Obligations and Community Infrastructure Levy (CIL)

16.1 Major developments are expected to contribute to the management of development impacts as governed by Section 106 of the Town and Country Planning Act 1990 (as amended) and by Regulation 122 and 123 of the Community Infrastructure Levy (CIL) Regulations 2010 (as amended).

16.2 The proposals will be liable for Mayoral and Camden CIL and the relevant CIL form has been provided as part of this application submission.

16.3 In line with Camden's guidance on planning contributions, the development is anticipated to make contributions via S106 agreement to the following:

- Affordable housing (in-lieu payment)
- Construction/Demolition Management Plan
- Car-free development
- Local employment, skills and local supply plan, including contribution towards employment and skills opportunities
- Highways contribution
- Travel Plan
- Sustainability Plan
- Carbon offset contribution of £11,543.

17 Conclusion

17.1 In respect of this development, this planning statement demonstrates that:

- The principle of development is acceptable
- The proposal will comprise a high quality design that will take account of the existing form, character, appearance, detailing and material palette of the local area
- The proposals will deliver new housing and an off-site affordable housing contribution
- The housing mix, tenure and quality is acceptable
- The proposals comply with the adopted car and cycle parking standards and objectives of transport policies
- The proposal will reduce carbon emissions as far as possible in line with strategic and local targets
- The scheme will not have an unacceptable impact upon the amenity of neighbours

17.2 The proposals are considered to be consistent with the planning policies of the NPPF, London Plan and Camden Local Plan, and should be approved without delay.



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