

# *CITY JUNIOR SCHOOL*

## *4 Gray's Inn Place, Holborn, WC1R 5DX*

### **Planning Statement**

July 2021



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# 1 Introduction

## Background

- 1.1 This Planning Statement has been prepared by the Jones Lang LaSalle ('JLL') Planning, Development and Heritage Team on behalf of City Junior School (CJS) ('the applicant'), to support an application for full planning permission for the proposed development at 4 Gray's Inn Place, Holborn WC1R 5AH (hereinafter referred to as 'the site').
- 1.2 Planning permission is sought for:
- "Lower ground floor extension, replacement plant and associated works for existing three storey building for educational use (Use Class F1)"*
- 1.3 This Planning Statement provides an assessment of the proposed development against the provisions of the Statutory Development Plan, National Planning Policy and other material considerations. This Planning Statement is submitted in support of the application and must be considered alongside the other documents, set out below, forming and supporting the planning application.
- 1.4 The site lies within the administrative boundary of the London Borough of Camden (LB Camden).

## City Junior School (CJS)

- 1.5 City Junior School (CJS) are seeking to expand in order to continue to provide first-rate, sector leading education in the heart of the City of London.
- 1.6 The current City of London School for Girls, located in the heart of the city at the Barbican, remains under pressure to deliver the school's educational aspirations. The City of London School is located on the North bank of the Thames.
- 1.7 Both the City of London School for Girls and the City of London School are looking to expand with a combined relocation and converting their current prep school into a joint junior school on a satellite site.
- 1.8 The potential satellite site has been found at the old College of Law in Gray's Inn (4 Gray's Inn). The chosen site will need to be remodelled and refurbished to suit primary education and the requirements of the City Junior School (CJS).
- 1.9 The intention is for pupils to be enrolled into the new junior school in September 2022.

## Format of Submission

- 1.10 This application comprises the following supporting documents:

Document	Author
Application Form	JLL
Certificates of Ownership and Agricultural Holdings	JLL
CIL Form	JLL
Planning Statement	JLL
Design and Access Statement	LSI architects
Application drawings	LSI architects
Acoustic Report	Stroma

1.11 This Planning Statement is set out as follows:

- **Section 2** - The Site and Surrounding Area
- **Section 3** - Planning History
- **Section 4** - The Proposal
- **Section 5** - Planning Policy Context
- **Section 6** - The Case for Permission
- **Section 7** - Conclusions

## 2 Site and Surroundings

2.1 This section describes the site and surroundings to set the context for the development proposals.

### **The Site**

2.2 The site is located at 4 Gray's Inn Place, Holborn WC1R 5AH. The site is located within the administrative boundary of the London Borough of Camden.

2.3 The site was previously used as the premises for The City Law School, which vacated the property at the end of 2020.

2.4 The application site extends to approximately 1762 sqm in area.



*Figure 1.1: Site Location. Source: Google Maps 2021*

### **Existing Buildings**

2.5 The site is currently occupied by one building. The building comprises a basement, ground and three upper floors. The building is divided at ground floor level into the east and west sides but connects via the upper floors. A passenger lift serves the building.



- 2.6 Internally the property has been sub-divided and was formerly used as library, IT room, offices, classrooms, WC facilities etc. for use as a university. The property is currently in good condition, however internal remodelling will be required to suit the needs of a junior school.

### **Flood Risk**

- 2.7 The Environment Agency Flood Map data indicates that the site is within Flood Zone 1 and thus is considered to have a low probability of flooding.

### **Heritage**

- 2.8 The main building is unlisted but is located adjacent to three grade II listed buildings. The closest being numbers 7 and 8 Warwick court, and attached railings, list entry number 1379127, first listed on 24<sup>th</sup> October 1951 which adjoins directly to the south of the building. The second is 5 Field Court, Gray's Inn and railings, list entry number 1322144, first listed on the 14<sup>th</sup> May 1974. While the third is 2 Field Court, Gray's Inn, and attached railings, list entry number 1113074, first listed on 24<sup>th</sup> October 1951.
- 2.9 The site is adjacent to Gray's Inn Gardens, a grade II\* listed park and garden, list entry number 1000351. The garden description is stated as:

*"Gray's Inn Gardens, South Square and Gray's Inn Square, in total c 4ha, are located to the west of Gray's Inn Road and north of Holborn, within the Holborn district of the London Borough of Camden. The gardens and squares are surrounded by the barristers' chambers and other offices within Gray's Inn. The squares are enclosed by the surrounding buildings and the gardens are enclosed by the surrounding buildings to the west (Raymond Buildings, 1825) and east (Verulam Buildings, 1803-11) and by cast-iron railings to the north (early C19, listed grade II), south (mid C20, listed grade II with the gates), and south-west (early C19, listed grade II). The ground in the squares is level and that in the gardens levelled into terraced walks and lawns"*

### **Conservation Area**

- 2.10 The site is located within the Bloomsbury Conservation Area, as identified on the Camden Policies Map (January 2021 3.0). The Bloomsbury Conservation Area covers an area of approximately 160 hectares extending from Euston Road in the north to High Holborn and Lincoln's Inn Fields in the south and from Tottenham Court Road in the west to King's Cross Road in the east. Bloomsbury is widely considered to be an internationally significant example of town planning. The original street layouts, which employed the concept of formal landscaped squares and an interrelated grid of streets to create an attractive residential environment, remain a dominant characteristic of the area.
- 2.11 Owing to the size and complexity of the Conservation Area, it has been sub-divided into a series of character areas that generally share common characteristics to assist in defining those features that contribute to the area's special interest
- 2.12 The site is located within sub area 9 of the Bloomsbury Conservation Area: Lincoln's Inn Fields / Inns of Court.

- 2.13 The whole area has a private, internalised feel, hidden from view from the main surrounding streets except at key locations where there are glimpse views into the larger gardens.
- 2.14 Gray's Inn has a smaller number of listed buildings, owing to the loss of historic buildings resulting from World War II bomb damage and subsequent rebuilding. However, a sizeable number of buildings make a positive contribution to the character and appearance of this part of the Conservation Area, particularly in the vicinity of the narrow passageways and mews on the south and west sides.

### **Access**

- 2.15 The main entrances are located at the middle of the building and can be accessed from Warwick Court, which runs north to south through the site, and field court which runs along the northern perimeter of the site east to west.
- 2.16 Currently there is no existing vehicle access to the site as all adjoining streets are pedestrianised.
- 2.17 However, there is a motorcycle parking bay located on Jockey's Fields to the north west of the site.
- 2.18 The site has a PTAL rating of 6b, the best rating achievable, meaning the site has excellent public transport links.
- 2.19 The site is well connected via rail, with Chancery Lane underground station, located approximately 340m from the site and Farringdon underground and overground station located approximately 811m from the site.
- 2.20 The nearest bus stop is Gray's Inn Road Chancery Lane, located approximately 230m from the site, which serves routes 46, 17, 45 and 341. While Chancery Lane bus station is located approximately 300m for the site and serves bus routes 8, 521, 242 and 25.

### **The Surrounding Area**

- 2.21 The site is bound to the north by Field Court and to the east by Fulwood Place. The South of the site is bordered by neighbouring properties and to the west is a wall preventing access through to Jockey's Field.
- 2.22 Beyond Field Court the northern surrounding area comprises of office premises, predominantly law firms, chambers and legal services, and Greys Inn Park and Gardens. While south of the site is comprised of adjoining properties.

### 3 Planning History

- 3.1 JLL has researched the statutory planning history register held by LB Camden. This section summarises the history of the planning applications pertaining to the site.

#### Summary

- 3.2 A desk-based planning history search for the application site was undertaken using the Council's online statutory records, the results of which are shown below.

Application Ref	Description of Development	Decision
2020/3273/P	Change of use from existing education facility (Use Class D1) to flexible use office space (B1(a)) and use class D1 (education).	Awaiting decision
2016/4751/A	Display of non-illuminated fascia sign above the walkway (facing Warwick Court).	Granted Sep 30 2016
2006/2834/A	Display of non-illuminated fascia sign above the walkway (facing Warwick Court).	Granted July 12 2006

- 3.3 The above planning history demonstrates that there have been few alterations to the site.



## 4 The Proposal

- 4.1 This section outlines the details of the development proposal. Further detail is set out within LSI Architects Design and Access Statement and on the planning application drawings.

### **Description of the development**

- 4.2 The proposed scheme seeks planning permission for:

*“Lower ground floor extension, replacement plant and associated works for existing two storey building for educational use (Use Class F1)”*

### **Lower ground floor extension**

- 4.3 In order to create a larger hall space for the school, it is proposed that the external building line of the lower ground floor is extended to align with the external walls above, creating approximately 25 sqm GIA in additional floorspace.
- 4.4 The school hall is intended for school assemblies, indoor sports and occasional evening events.
- 4.5 The extension respects the existing façade pattern whilst proposing a modern finish to differentiate the extension from the original building.

### **Pedestrian Access**

- 4.6 There are two access points to the extension. One is an external staircase which is closed off by a gate and managed by the school and also accessible via the lift at the west wing entrance.
- 4.7 The ground floor of the existing building is split into east and west wings, with entrances that are not currently aligned with each other. The door into the east wing is a single leaf entrance door and has limited wheelchair manoeuvring space to enter the lift. The proposed amendment to the east entrance door is to relocate the entrance door to the south, and replace the single entrance door with a double entrance door to match the west wing. This will result in a more prominent entrance and better visibility across both wings. With regards to accessibility, wheelchair manoeuvrability to the lift is significantly improved.

### **Materials**

- 4.8 The existing building is predominantly red brick with exposed concrete panel and banding elements which have a warm tone. The existing windows are a neutral light silver/ white hue.
- 4.9 The proposed lower ground floor extension pays respect to the existing pattern of the facade, whilst still proposing a modern finish to differentiate the extension from the original building. The design employs the use of white glazed brick to keep the materiality of the facade whilst achieving a modern look and feel.

- 4.10 Medium buff mortar will be used to create a warmth to match the concrete panel. With regards to the curtain walling elements, a beige/bronze coloured metal frame is proposed to create a warm, yet modern look and feel to the facade.
- 4.11 A green living wall is proposed on the western wall and visible from the public realm.

### **Noise**

- 4.12 A ventilation strategy using MVHR units is proposed and an acoustic assessment has been undertaken by Stroma Built Environment Ltd. which outlines the relevant acoustic standards, room classifications and internal sound insulation.
- 4.13 Measured noise levels are such that indoor ambient noise levels set out in Section 1 of Building Bulletin 93 (BB93) which form the basis of the acoustic requirements for new school buildings, are predicted to be met with the existing façade construction and the proposed new double glazed windows are due to be submitted under a separate planning application.
- 4.14 For the external plant created as part of the proposals more details can be found in the proposed roof plan and second floor plan. The roof plant elements have been introduced on the east roof to serve the classrooms on the third floor. The plant equipment all sit below the highest point of the existing chimney flue.

## 5 Planning Policy Context

- 5.1 The following section summarises the national and local planning policy framework that is relevant for the determination of this application.

### Statutory Considerations

- 5.2 The National Planning Policy Framework (NPPF) (revised 2019) is a material consideration and sets out the national governmental planning policy, alongside associated planning practice guidance.
- 5.3 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that applications for development must be determined in accordance with the development plan unless material considerations indicate otherwise. In this context, the statutory development plan for the London Borough of Camden comprises the following:
- London Plan (2021);
  - Camden Local Plan (2017); and
  - Camden Policies Map (2021).
- 5.4 Other material considerations which should be taken into account including the NPPF (2019), NPPG, Supplementary Planning Documents (SPDs), Supplementary Planning Guidance (SPGs) and emerging planning policy where relevant.

### **NPPF 2019**

- 5.5 The NPPF was published by the Government updates in February 2019. It replaces the previous version adopted in March 2012. The Policy Framework is considered fundamental to Government reforms to promote economic, social and environmental growth and make the planning system more accessible.
- 5.6 The NPPF sets out the Government's overarching economic, environmental and social planning policies in England and how these are expected to be applied. The NPPF does not change the statutory status of the Development Plan as the starting point for decision making however, it is a material consideration for local planning authorities in the determining of planning applications.

## **NPPF (2019) Relevant Policies**

### *Educational Facilities*

5.7 **Paragraph 94** states that *“it is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities... should:*

- a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and*
- b) work with schools promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.”*

### *Design and Heritage*

5.8 **Paragraph 124** states that *“the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.”*

5.9 **Paragraph 127** states that *“planning decisions should ensure that developments:*

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
- f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”*

- 5.10 **Section 8** of the NPPF relates specifically to promoting healthy communities. It recognises the importance of planning in facilitating social interaction and creating healthy, inclusive communities.

### **Policy Statement - Planning for School Development**

- 5.11 In August 2011, the Department for Communities and Local Government published a policy statement on the role of the planning system in supporting schools. This statement demonstrates that the Government is firmly committed to ensuring that there is sufficient provision to meet growing demand for state-funded school places, increasing choice and opportunity in state-funded education and raising educational standards.

### **London Plan (2021) Relevant Policies**

- 5.12 The London Plan is the spatial development strategy for Greater London. It sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. London Boroughs' Local Plans should be in general conformity with the London Plan and its policies guide decisions on planning applications by Councils and the Mayor.
- 5.13 Chapter 3 (Design), Chapter 5 (Social infrastructure) and Chapter 7 (Heritage and Culture) of the London Plan are of most relevance to this proposal.

#### *Design*

- 5.14 Within chapter 3, Policy D4 (Delivering good design) emphasises the importance of maintaining design quality and the design quality of development should be retained through to completion.
- 5.15 Policy D5 (Inclusive design) states "*Development proposal should achieve the highest standards of accessible and inclusive design.*" Proposals should:
- 1) *"be designed taking into account London's diverse population*
  - 2) *provide high quality people focused spaces that are designed to facilitate social interaction and inclusion*
  - 3) *be convenient and welcoming with no disabling barriers providing independent access without additional undue effort, separation or special treatment*
  - 4) *be able to be entered, used and exited safely, easily and with dignity for all*
  - 5) *be designed to incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building."*

- 5.16 Policy D11 (Safety, security and resilience to emergency) requests development proposals maximise building resilience and minimise potential physical risks, including those arising as a result of extreme weather, fire, flood and related hazards. Development should include measures to design out crime that – in proportion to the risk – deter terrorism, assist in the detection of terrorist activity and help mitigate its effects. These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area.
- 5.17 Policy D12 (Fire safety) requires all development proposals achieve the highest standards of fire safety to ensure the safety of all building users.

#### *Social infrastructure*

- 5.18 Chapter 5 includes policy S3 (Education and childcare facilities) aims to ensure there is a sufficient supply of good quality education and childcare facilities to meet demand and offer educational choice. Boroughs should:

#### **B**

*Development proposals for education and childcare facilities should:*

- 1) *locate facilities in areas of identified need*
- 2) *locate facilities in accessible locations, with good public transport accessibility and access by walking and cycling*
- 3) *locate entrances and playgrounds away from busy roads, with traffic calming at entrances*
- 4) *link to existing footpath and cycle networks to create healthy routes to schools, and other education and childcare facilities, to enable all children to travel actively to school (walk, cycle or travel by public transport)*
- 5) *maximise the extended or multiple use of educational facilities for community or recreational use, through appropriate design measures*
- 6) *encourage the shared use of services between schools, colleges, universities, sports providers, and community facilities, and between early years and health and social care providers*
- 7) *ensure that new developments are accessible and inclusive for a range of users, including disabled people, by adopting an inclusive design approach*
- 8) *ensure that facilities incorporate suitable, accessible outdoor space*
- 9) *locate facilities next to parks or green spaces, where possible*

#### **C**

*Development proposals should ensure that there is no net loss of education or childcare facilities, unless it can be demonstrated that there is no ongoing or future need. Any proposed loss of sport or recreation land (including playing fields) should be considered against the requirements of Part C of Policy S5 Sports and recreation facilities.”*



- 5.19 The supporting text within chapter 5 notes the importance of the design of education and childcare facilities with paragraph 5.3.11 stating *“The design of education and childcare facilities is critical to the creation of a good learning environment. Education and childcare facilities should be in locations that are easily accessible on foot, by cycling or using public transport. The design of entrances to schools and playgrounds is important in ensuring that children are encouraged to walk and cycle to the school gate and can do so safely. Facilities should be located away from busy roads, with traffic calming at entrances, to benefit from reduced levels of air pollution, noise and road danger. Where possible, natural features such as trees, greenery, forest schools and spaces for food growing should be incorporated into playgrounds and school sites, recognising both the health and educational benefits these can provide. Healthy and safe routes to education and childcare facilities, should be considered through the design process.”*

#### *Heritage conservation and growth*

- 5.20 Within chapter 7, Policy HC1 (Heritage conservation and growth) requires that development proposals affecting heritage assets and their settings, should conserve their significance, by being sympathetic to the assets’ significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid causing harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

### **Camden Local Plan (2017) Relevant Policies**

#### *Community Facilities*

- 5.21 Paragraph 4.21 defines the term “community facilities” as referring to a wide range of social infrastructure providing a service to the community. This includes childcare, education, adult learning and training.
- 5.22 Policy C2 (Community facilities) states the Council will work with its partners to ensure that community facilities and services are developed and modernised to meet the changing needs of our community and reflect new approaches to the delivery of services.

#### The Council will:

- a. seek planning obligations to secure new and improved community facilities and services to mitigate the impact of developments.*
- b. expect a developer proposing additional floorspace in community use, or a new community facility, to reach agreement with the Council on its continuing maintenance and other future funding requirements;*
- c. ensure that facilities provide access to a service on foot and by sustainable modes of travel;*

- d. facilitate multi-purpose community facilities and the secure sharing or extended use of facilities that can be accessed by the wider community, except for facilities occupied by the emergency services due to their distinct operating needs;*
- e. support the investment plans of educational, health, scientific and research bodies to expand and enhance their operations, taking into account the social and economic benefits they generate for Camden, London and the UK. In assessing proposals, the Council will also balance the impact proposals may have on residential amenity and transport infrastructure...*

### *Safety and Security*

5.23 Policy C5 (Safety and security) seeks to make Camden a safer place. The policy states the council will:

- a. “work with our partners including the Camden Community Safety Partnership to tackle crime, fear of crime and antisocial behaviour;*
- b. require developments to demonstrate that they have incorporated design principles which contribute to community safety and security, particularly in wards with relatively high levels of crime, such as Holborn and Covent Garden, Camden Town with Primrose Hill and Bloomsbury;*
- c. require appropriate security and community safety measures in buildings, spaces and the transport system;*
- d. promote safer streets and public areas;*

*Where a development has been identified as being potentially vulnerable to terrorism, the Council will expect counter-terrorism measures to be incorporated into the design of buildings and associated public areas to increase security.”*

### *Access*

5.24 Policy C6 (Access for all) states: “The Council will seek to promote fair access and remove the barriers that prevent everyone from accessing facilities and opportunities. We will:

- a. expect all buildings and places to meet the highest practicable standards of accessible and inclusive design so they can be used safely, easily and with dignity by all;*
- b. expect facilities to be located in the most accessible parts of the borough;*
- c. expect spaces, routes and facilities between buildings to be designed to be fully accessible;*
- d. encourage accessible public transport; and*

- e. *secure car parking for disabled people.*

*The Council will seek to ensure that development meets the principles of lifetime neighbourhoods”*

#### *Design and Heritage*

5.25 Policy D1 (Design) seeks to secure high quality design in development. The Council will require that developments:

- a. *“a. respects local context and character;*
- b. *preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;*
- c. *is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;*
- d. *is of sustainable and durable construction and adaptable to different activities and land uses;*
- e. *comprises details and materials that are of high quality and complement the local character;*
- f. *integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage;*
- g. *is inclusive and accessible for all;*
- h. *promotes health;*
- i. *is secure and designed to minimise crime and antisocial behaviour;*
- j. *responds to natural features and preserves gardens and other open space;*
- k. *incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping,*
- l. *incorporates outdoor amenity space; m. preserves strategic and local views;*
- m. *for housing, provides a high standard of accommodation; and*
- n. *carefully integrates building services equipment.*

*The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.”*

5.26 Policy D2 (Heritage) seeks to preserve and, where appropriate, enhance Camden’s rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.

5.27 Policy D2 expands to specify requirements within Conservation area, stating the council will:

- e. *“require that development within conservation areas preserves or, where possible, enhances the character or appearance of the area;*
- f. *resist the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area;*
- g. *resist development outside of a conservation area that causes harm to the character or appearance of that conservation area; and*
- h. *preserve trees and garden spaces which contribute to the character and appearance of a conservation area or which provide a setting for Camden’s architectural heritage.”*

#### *Protecting amenity*

5.28 Policy A4 (Noise and vibration) seeks to ensure that noise and vibration is controlled and managed, stating that developments should have regard to Camden’s Noise and Vibration Thresholds. Permission for noise generating development, including any plant and machinery, will only be granted if it can be operated without causing harm to amenity.

5.29 Policy A4 also seeks to minimise the impact on local amenity from deliveries and from the demolition and construction phases of development.

#### *Sustainability and climate change*

5.30 Policy CC1 (Climate change mitigation) 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. An energy statement is only required for non-residential developments that are creating 500sqm or more of additional floorspace.

5.31 Policy CC2 (Adapting to climate change) advises that BREEAM assessments are only required for non-residential developments that are creating 500sqm or more of additional floorspace.

#### **Camden Policies Map (2021)**

5.32 The site has the following designations as identified in the Camden Policies Map:

- Central London Area
- Conservation area

- Partially within a growth area
- Within a viewing lateral assessment area

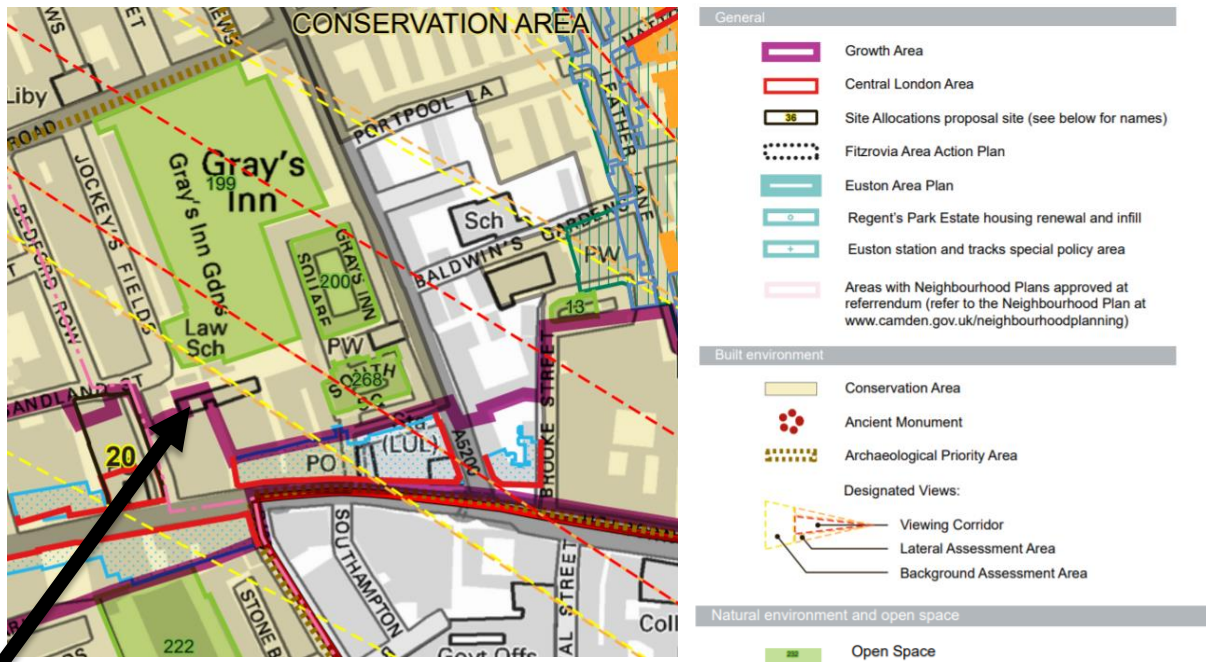


Figure 2.2: Proposals Map. Source: Camden Planning Policy Map 2021

**Application Site**

## 6 Case for Permission

6.1 This section considers the key planning issues relating to the planning application, taking into account the relevant planning policies as well as other material considerations. We note that the application is of a limited nature with no change of use proposed.

6.2 The following issues are relevant and are considered in turn below:

- Principle of Educational Use;
- Design and Amenity;
- Heritage;
- Energy and Sustainability;
- Noise and Amenity.

### **Principle of Educational Use**

6.3 The existing site comprises of existing educational buildings and therefore the use (Use Class F1) has already been established on the site.

6.4 City Junior School (CJS) is seeking to expand in order to continue to provide first-rate, sector leading education in the heart of the City of London. The proposals are sought as both the City of London School for Girls and the City of London Schools are looking to expand with a combined relocation and converting their current prep school into a joint junior school.

6.5 The site was previously used as the premises for The City Law School however it vacated at the end of 2020. Although within the same the use class (Use Class F1) the proposals require remodelling and refurbishment to suit primary education and the requirements of the CJS with the intention to open in September 2022.

6.6 Paragraph 94 of the NPPF states that the Government places a strong emphasis on ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Therefore, weight is placed upon the need for expanding existing schools and relocating schools that require additional space.

6.7 This is echoed in the London Plan at Policy S3 and Local Plan Policy C2 which seek to ensure a sufficient supply of good quality education and facilities to meet demand and offer educational choice. These policies also advise that all school facilities and sites are located near a number of public transport links and the site chosen is a highly sustainable location with PTAL rating of 6b.

6.8 It is therefore considered that the proposed development meets relevant national policies, the requirements of the London Plan and Local Plan policies T1 and C2.



## Design and Amenity

- 6.9 The proposed scheme will provide high quality teaching facilities for the expansion of the City Junior School. Internal alterations are proposed with a school hall intended for school assemblies, indoor sports and occasional evening events involving parents.
- 6.10 A main part of the proposals is the lower ground floor where the proposed extension of approximately 25 sqm in GIA floorspace; this will align with the external walls above. The courtyard wall is also proposed to be refurbished to create a welcoming space for the school.
- 6.11 The external façade of the building is in line with the surrounding buildings at Gray's Inn, with a predominately brick façade accentuated by a repeated pattern of windows. The lower ground floor extension proposes a modern finish to differentiate it from the original building. White glazed brick is proposed to keep the materiality of the façade and a medium buff mortar is proposed to match the concrete panel. Additionally, a bronze frame is proposed to the curtain walling elements.
- 6.12 A green living wall will also be incorporated on the western wall to inject colour and brightness to the courtyard. This will be visible from the public realm and considered to be a major benefit of the proposals.
- 6.13 Another part of the proposals is to amend the entrance on the east wing. The proposals relocate the entrance door to the south and replace the single entrance door with a double entrance door to match that on the west. This will not only result in a more prominent entrance with better visibility but also improve accessibility and wheelchair manoeuvrability. This complies with London Plan policies D4 (Delivering good design) and D5 (Inclusive Design) by maintaining design quality and achieving a high standard of accessible and inclusive design.
- 6.14 Several roof plant elements have been introduced to the east roof to serve the classrooms on the third floor. The plant equipment is necessary but has been kept to minimal to ensure there is no impact on views. The proposed plant at roof level all sit below the highest point of the existing chimney flue.
- 6.15 Overall, the proposals comply with London Plan policies D4 and D5 and Local Plan policy D1.

## Heritage

- 6.16 The main building is unlisted but is located adjacent to three Grade II listed buildings and this includes numbers 7 and 8 Warwick Court, 5 Field Court and 2 Field Court, Gray's Inn. The site is also adjacent to Gray's Inn Gardens, a grade II\* listed park and garden.
- 6.17 Alongside these listed buildings, the site is located within the Bloomsbury Conservation Area and specifically within sub area 9: Lincoln's Inn Fields / Inns of Court. This is detailed in the context of the Bloomsbury Conservation Area as having a unique character. Much of the sub area has a secluded and peaceful ambience, with a collegiate feel derived from the courtyard elements.

- 6.18 The proposals have been designed to respect the Bloomsbury Conservation Area with a modest extension at lower ground floor level. The external façade is in line with its surrounding buildings, as it reduces the lower ground lightwell to a more modest expanse, in keeping with and therefore more respectful of the immediate local context. A modern finish on the lower ground floor differentiates the extension from the original building with the white glazed brick proposed keeping the materiality of the façade.
- 6.19 The proposals have been sensitively designed with limited changes to the external appearance apart from the ground floor extension. The plant equipment to be installed is lower than the highest point of the existing chimney flue. A separate application by the landowner seeks alterations to the windows. The proposals therefore comply with the relevant policies which include London Plan Policy HC1 and Local Plan Policy D2.
- 6.20 In summary, the site will successfully accommodate the proposals. As such, it has been found that the proposals are in accordance with the statutory duties as set out in the Planning (Listed Buildings and Conservation Areas) Act 1990 and the 2004 Act, national policy set out in the NPPF (2019) and relevant local policy and guidance, including the Camden Local Plan (2017). It is considered that the implementation of the proposals would preserve the significance of the Bloomsbury Conservation Area, with the reduction in the scale of the lower ground lightwell to a more traditional ratio with the parent building and the street width potentially enhancing it.

### **Energy and Sustainability**

- 6.21 The proposed development has sought to enhance the building envelope specification to minimise the overall energy demand, through adopting the 'Be Lean, Be Clean' principles.
- 6.22 As the proposals are creating under 500 sqm of additional floorspace it is not required to provide a BREEAM assessment or energy statement.
- 6.23 It is therefore considered that the proposed development more than meets relevant national and local planning policy in regard to energy and sustainability, specifically policies CC1 and CC2 of the Local Plan.

### **Noise and Amenity**

- 6.24 An acoustic assessment has been undertaken by Stroma Built Environment Ltd. and outlines the relevant acoustic standards, room classifications and internal sound insulation.
- 6.25 All noise sensitive rooms within the scheme have been classified according to Section 1 of Building Bulletin 93 (BB93) which forms the basis of the acoustic requirements for the scheme. The guidance in BB93 defines standards for new school buildings and also schools formed from a material change of use.
- 6.26 A ventilation strategy using MVHR units is proposed; the noise from these units should be designed to achieve the indoor ambient noise level requirements and the windows are to be replaced with double glazing as part of a separate application.

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6.27 It is therefore considered that the proposed development meets relevant national and local planning policy in relation to amenity and noise, specifically Policy A4 of the Local Plan.

## 7 Conclusions

7.1 This Planning Statement has been prepared by the Jones Lang LaSalle ('JLL') Planning, Development and Heritage Team on behalf of the City Junior School (CJS), to support an application for full planning permission for the proposed development at 4 Gray's Inn Place, Holborn WC1R 5AH.

7.2 Planning permission is sought for:

*"Lower ground floor extension, replacement plant and associated works for existing three storey building for educational use (Use Class F1)"*

7.3 The proposed development will provide modern teaching accommodation to ensure the City Junior School can expand and relocate to the building at 4 Gray's Inn Place, and ensures pupils have access to a high-quality teaching environment.

7.4 The proposed development accords with the relevant development plan and the NPPF. It is considered that the application should be treated favourably as it will help provide high-quality teaching accommodation which meets an identified need within the wider area.

7.5 The scheme will secure:

- **High-quality education provision**- CJS will provide a high-quality teaching environment for pupils in the heart of the City of London.
- **Meeting an identified need**- Increasing the capacity and space for the School where there is a pressure for increasing the school's facilities with a new satellite site.
- **Improved facilities**- Upgrading the internal layout and remodelling to suit the needs of a junior school.
- **High Quality Design and Layout** - as outlined in the accompanying Design and Access Statement, the development will deliver a high-quality design using quality materials which have been designed to reflect the needs of pupils.
- **Respecting the Bloomsbury Conservation Area** – The design and modern extension respects the character of the surrounding area.
- **Local employment**- providing a number of local employment opportunities for staff and support team.
- **Local Economic Boost** - new students, parents and employees at the site will generate spending which will feed directly into the local economy.

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