
Planning Statement

85 Grays Inn Road, London WC1





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1. Introduction

This Planning Statement has been prepared on behalf of Grays Property Holdings Limited in support of a full planning application in respect of 85 Grays Inn Road, London, WC1X 8TX. Grays Property Holdings Limited is a company set up to invest in the building which is ultimately owned by Clearbell Property Partners III LP, a UK real estate fund managed by Clearbell Capital LLP.

The application development is for works to upgrade the existing building specifically to meet the growing needs of the life sciences sector.



Figure 1: 85 Grays Inn Road (Source: Google Maps, 2021)

In this Planning Statement we describe the site; set out the planning history relevant to the property; provide planning context; and define and assess the application proposal. We demonstrate that an inclusive and integrated approach has been adopted toward the development of the application scheme now submitted for Camden Council's consideration, responding directly to the relevant Planning Policy Framework. Our Statement is structured under the following chapter headings:

- Section 2 – Application Proposal
- Section 3 – Life Sciences and The Knowledge Quarter
- Section 4 – Site Description and Context
- Section 5 – Planning Context
- Section 6 – Planning Assessment
- Section 7 – Planning Conditions and Obligations
- Section 8 – Conclusion

2. Application Proposal

This section describes the planning application scheme. Further consideration is given to the key issues in the Planning Assessment section.

2.1. Application Description

Planning permission is sought from Camden Council for the conversion and minor extension of the existing building to provide offices and dry/wet laboratory accommodation for the Life Sciences Sector. The description of development is:

Alterations and rear extension of building at ground to level 4, installation of fume extract and mechanical plant, front entrance canopy and associated alterations and infrastructure work.

A full description of the application development is provided in the Design & Access Statement, but in summary the scheme comprises the following works, as also shown on the diagram included at Figure 2:

- Extension of east stair core and passenger lift
- Roof terrace
- New shower/cycle facilities
- Dedicated AHU plant for laboratory spaces
- Riser strategy
- Courtyard infill
- Fume extract plant for the safe discharge of exhaust air from speciality laboratory containment devices e.g. fume cupboards
- Heat rejection plant
- Re-design of front entrance and building canopy
- Reconfiguration and additional rooftop plant
- New substation

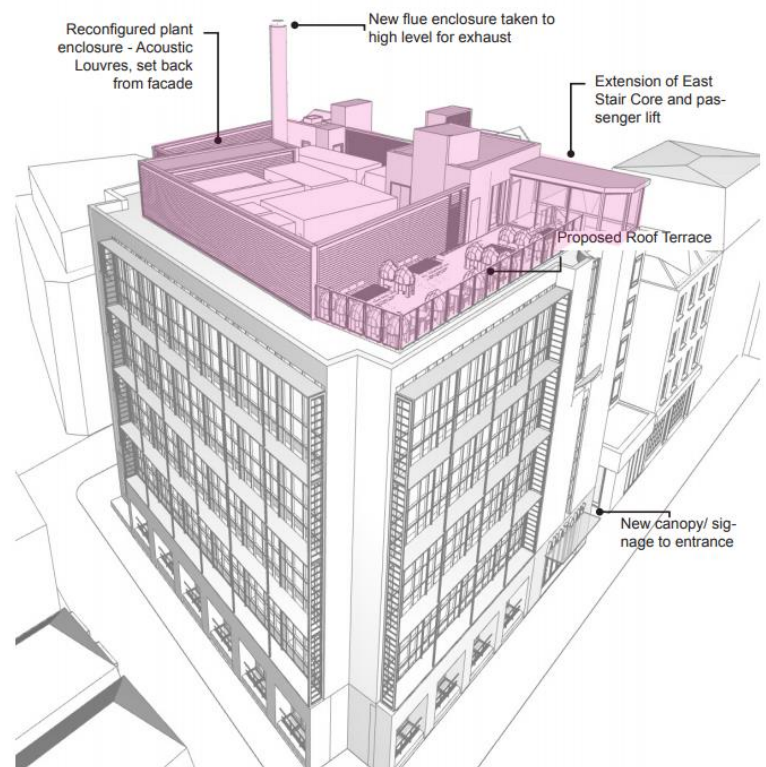


Figure 2: Proposed 3D concept model of scheme (source BMJ Architects, 2021)

2.2. Application Content

This application is for full planning permission and the application is comprised of the following information:

- Completed Application form and Certificate B
- CIL Form
- Statutory application fee
- Planning Statement (Savills)
- Acoustic Report (Hann Tucker Associates)
- Air Quality Assessment (Vanguardia)
- Daylight and Sunlight Assessment (Gordon Ingram Associates)
- Design and Access Statement (BMJ Architects)
- Delivery and Servicing Management Plan covered in DAS (BMJ Architects)
- Heritage Statement (Savills Heritage)
- Sustainability Statement (KJ Tait Engineers)
- Waste Storage and Collection covered in DAS (BMJ Architects)
- Planning Fire Safety Strategy (The Fire Surgery)
- Drawings (BMJ Architects), as follows:

Drawing Reference	Drawing Title	Scale
PA01-BMJ-ZZ-ZZ-DR-A-0002 Rev P02	00 Site Location Plan	1:250 @A3
PA01-BMJ-ZZ-ZZ-DR-A-0001 Rev P03	00 Site –Site Plan	1:500 @A3
PA01-BMJ-ZZ-DR-A-0003 Rev P01	00 Site Plan – Street Plan	1:200 @A3
PA01-BMJ-ZZ-B-DR-A-0001 Rev P03	01 Existing General Arrangement Plans Basement	1:100 @A2
PA01-BMJ-ZZ-00-DR-A-0002 Rev P03	01 Existing General Arrangement Plans Ground Floor	1:100 @A2
PA01-BMJ-ZZ-01-DR-A-0003 Rev P03	01 Existing General Arrangement Plans First Floor	1:100 @A2
PA01-BMJ-ZZ-02-DR-A-0004 Rev P03	01 Existing General Arrangement Plans Second Floor	1:100 @A2
PA01-BMJ-ZZ-03-DR-A-0005 Rev P03	01 Existing General Arrangement Plans Third Floor	1:100 @A2
PA01-BMJ-ZZ-04-DR-A-0006 Rev P03	01 Existing General Arrangement Plans Fourth Floor	1:100 @A2
PA01-BMJ-ZZ-05-DR-A-0007 Rev P03	01 Existing General Arrangement Plans Fifth Floor	1:100 @A2
PA01-BMJ-ZZ-ZZ-DR-A-0401 Rev P03	04 General Arrangement Elevations Proposed North East Elevation	1:200 @A2
PA01-BMJ-ZZ-ZZ-DR-A-0402 Rev P03	04 General Arrangement Elevations Proposed South West Elevation	1:200 @A2
PA01-BMJ-ZZ-ZZ-DR-A-0403 Rev P03	04 General Arrangement Elevations Proposed South East Elevation	1:200 @A2
PA01-DMJ-ZZ-ZZ-DR-A-0404 Rev P02	04 General Arrangement Elevations Proposed North West Elevation	1:200 @A2

PA01-BMJ-ZZ-ZZ-DR-A-0405 Rev P02	04 General Arrangement Elevations Existing North East Elevation	1:200 @A2
PA01-BMJ-ZZ-ZZ-DR-A-0406 Rev P02	04 General Arrangement Elevations Existing South West Elevation	1:200 @A2
PA01-BMJ-ZZ-ZZ-DR-A-0407 Rev P02	04 General Arrangement Elevations Existing South East Elevation	1:200 @A2
PA01-BMJ-ZZ-ZZ-DR-A-0408 Rev P02	04 General Arrangement Elevations Existing North West Elevation	1:200 @A2
PA01-BMJ-ZZ-B-DR-A-1001	10 Proposed General Arrangement Plans Basement	1:100 @A2
PA01-BMJ-ZZ-00-DR-A-1002 Rev P08	10 Proposed General Arrangement Plans Ground Floor	1:100 @A2
PA01-BMJ-ZZ-01-DR-A-1003 Rev P08	10 Proposed General Arrangement Plans First Floor	1:100 @A2
PA01-BMJ-ZZ-02-DR-A-1004 Rev P08	10 Proposed General Arrangement Plans Second Floor	1:100 @A2
PA01-BMJ-ZZ-03-DR-A-1005 Rev P08	10 Proposed General Arrangement Plans Third Floor	1:100 @A2
PA01-BMJ-ZZ-04-DR-A-1006 Rev P08	10 Proposed General Arrangements Plans Fourth Floor	1:100 @A2
PA01-BMJ-ZZ-05-DR-A-1007 Rev P07	10 Proposed General Arrangements Plans Fifth Floor	1:100 @A2
PA01-BMJ-ZZ-XX-DR-A-0301 Rev P03	03 General Arrangement Sections – Section 01	1:200 @A2
PA01-BMJ-ZZ-00-DR-A-0302 Rev P02	03 General Arrangement Sections – Section 02	1:100 @A2
PA01-BMJ-ZZ-00-DR-A-0303 Rev P02	03 General Arrangement Sections – Section 03	1:100 @A2

2.3. Pre-application Consultation

A formal request for pre-application advice was submitted to Camden Council on 21 May 2021. Unfortunately, the authority's pre-app planning advice has not yet been received (and a confirmed date for meeting with Officers was cancelled at short notice by the Council and is yet to be rearranged). Grays Property Holdings Limited and its professional project team are targeted with delivering this project to the property market by Q3 2022. Consequently, programme constraints mean that we cannot hold back any longer from submitting the subject application, albeit we are seeking to establish communication with Officers and look forward to working with the local planning authority.

In the next section we set out some background and key information on the topic of life sciences and the area now known as The Knowledge Quarter.

3. Life Sciences and The Knowledge Quarter

3.1. London's Life Science Sector

London has a long history and prestigious international reputation as a centre for advancement in medicine and biology. Today, alongside the cities of Oxford and Cambridge, London forms the 'Golden Triangle' – a global hub for life sciences. MedCity, a collaboration between London, Cambridge and Oxford Academic Health Science Centres and co-funded by the Mayor, seeks to promote and grow this important life sciences cluster. Mayor Sadiq Khan has given his strong support for different sectors to work together to solve healthcare challenges, including exploring the safe use of health data for research, supporting increased investment to allow innovative life sciences firms to grow, and enabling new life science developments to expand in London¹.

Creative Places is the property leasing agent acting on behalf of Clearbell Capital LLP. Creative Places has reviewed the life sciences market in London and finds that the sector can be broken into clear subsectors: Pharma & Biotech; Medtech; Drug Discovery & Development Services, and Digital Health & Pharmatech. The property consultancy highlights that London has a relatively high proportion of the UK's companies in the sectors of Digital Health & Pharmatech (20%) and Pharma & Biotech (25%)².

Only over the past 5 years has London and the area within a five mile radius from its centre come to the forefront as a key location for Life Science research and development (R&D) activity. Such interest and investment has been driven by the growing importance of data science, open innovation and importantly, the ability in London for companies to be located close to excellent research activity. Significant investments have been made to establish the Francis Crick Institute – a renowned biomedical research institute dedicated to understanding the fundamental biology underlying human health and disease, and the Alan Turing Institute for data science and artificial intelligence, both located at St Pancras. Creative Places note that London has 3 of the top 25 universities for health-related research in the world, while Cambridge and Oxford Universities, each ranked consistently in the world's top 10, are only a short train journey away.

The development and investment interest described above has been embraced by Camden Council – and from a town planning perspective, this is highlighted by the authority's identification of the area as the Kings Cross Innovation District. This designation recognises the importance of encouraging collaboration and knowledge sharing between businesses, the academic research base described and life science companies, together with clinical collaborators, innovators and funders. There are synergies and benefits to be gained from co-location in the geographic zone identified.

¹<https://www.london.gov.uk/what-we-do/business-and-economy/supporting-londons-sectors/supporting-life-sciences-sector>

² Life Sciences Strategy Report, March 2021, Creative Places

The innovation centre in Camden that serves this part of London with wet laboratory space to accommodate start-ups and growing life sciences businesses is the London BioSciences Innovation Centre. It has a total of 2,500 sq m (26,900 sq ft) of space. Creative Places has found that since its initial phase of 850 sq m was opened in 2001 (which filled to circa 80% capacity within a year), other than the years when a phase of development has been added, occupancy levels have consistently been held at over 74% – and indeed, reaching over 84% since 2008. Over this period London BioSciences Innovation Centre has supported over 100 businesses. In 2020, two such businesses ‘graduated’, looking for more accommodation and space equipped with wet laboratories.

At the beginning of 2020, Creative Places considered that the requirements for Life Sciences R&D accommodation in London stood at circa 23,300 – 46,450 sqm (250,000 to 500,000 sq ft). This indicates a clear demand for a combination of wet laboratory space and offices.

3.2. The Knowledge Quarter

Camden has a thriving knowledge economy with world-class academic, cultural, research, scientific and media institutions and organisations. In recent years these institutions and organisations have started to cluster in the area surrounding King’s Cross and St Pancras and Euston Stations. The area has seen tremendous growth owing to the excellent transportation links, highly skilled workforce high-quality office and laboratory floorspace and the enhanced retail, art and leisure offer.

The Knowledge Quarter Partnership was established in December 2014 to recognise and develop Camden’s strength as a thriving knowledge economy with world-class institutions in science and the creative industries. The Partnership is a consortium of many different organisations all actively engaged in disseminating knowledge – currently comprising 100 academic, cultural, research and scientific and media organisations, sharing a collective vision which is described as “*transforming lives through innovation*”³.

The Partnership identifies its four strategic priorities as follows:

- Advocacy - The Knowledge Quarter will increase the area’s profile through advocacy and stakeholder engagement, both nationally and internationally.
- Knowledge exchange - The Knowledge Quarter will facilitate knowledge exchange and identify opportunities for openness, collaboration and networking between its members.
- People - The Knowledge Quarter will work with its members to increase public access to their knowledge, resources and collections, creating opportunities for exchange with local citizens.
- Place - The Knowledge Quarter will work with its members to identify and support work that improves our local environment, creating a great place for people to live, work and visit.

The application scheme for no.85 Grays Inn Road and the refurbishment and building upgrade planned for the existing building has been devised with the above strategic priorities in mind.

³ <https://www.knowledgequarter.london/>

3.3. Life Sciences Vision

The Government recently published its UK Life Sciences Vision (2021) document, setting out a 10 year ambition for the sector to solve some of the biggest healthcare problems of our generation, including cancer and dementia. The document states that *“the human Life Sciences sector is among the most valuable and strategically important in the UK economy, and critical to the country’s health, wealth, and resilience”*.

The sector has been integral, understandably, to steering the response to the COVID-19 pandemic, arguably the greatest challenge of the post-war era. From the development of the Oxford/AstraZeneca vaccine and the partnerships between industry and the Vaccine Taskforce (VTF) that have underpinned the UK’s vaccination programme through to the recovery trial identifying safe and effective therapeutics, the growth of a diagnostics industry that is sequencing emerging COVID-19 variants, it is clear that the UK’s life sciences sector has played a significant role in the global fight against COVID-19. (The global fight continues).

The UK was able to have a leading Life Sciences response to COVID-19 through combining a set of existing strengths, such as:

- a) A world class science base, with expertise from basic science through to clinical research.
- b) The National Health Service (NHS), which had the research focus, capacity, and expertise to run enormous COVID-19 trials while under unprecedented pressure, and the genomic capabilities to track the spread of, and variations in, the virus.
- c) The Medicines and Healthcare Products Regulatory Agency (MHRA), as an independent, sovereign regulator able to act with great agility and a focus on getting vaccines, drugs, and technologies to patients as safely and quickly as possible.
- d) A thriving Life Sciences sector, with two of the world’s largest pharmaceutical companies, a rich array of SMEs and a wide range of medical research charities – which were willing to work together and partner to support the national and global response to the pandemic.
- e) A highly successful Life Sciences strategy that ensured the UK had the infrastructure and connections to mount a rapid, multifaceted response to the many Life Sciences challenges created by the pandemic.

In the next section, we set out the application site description and its context.

4. Site Description and Context

No.85 Grays Inn Road comprises a 6-storey office building, arranged over basement, ground and 4 upper floors, situated on a corner plot of land on the west side of Grays Inn Road. It is was formerly occupied by multi-national mass media and entertainment company, Warner Bros. Entertainment Inc., but is currently vacant. It has a lawful office use (Class E (g) (i)).

The building is located within the Bloomsbury Conservation area and the Knowledge Quarter Innovation District, which spans from Camden Town to Holborn and Covent Garden and is home to a world-class cluster of scientific and knowledge-based institutions. In recent years there has been a marked clustering of R&D activity in the area surrounding King’s Cross and Euston Stations, owing to excellent transportation links, a highly skilled workforce and the high-quality office space in the vicinity.

Brownlow Mews is situated to the west of the site, Roger Street to the south and Grays Inn Road to the east (see Figure 3 below). To the north is an area of predominantly residential properties, up to 5-storeys in height and primarily with commercial/retail uses at ground floor. To the west the closest property is a 3-storey office building located on the opposite side of Brownlow Mews. To the east is a mixture of residential, commercial and retail properties, up to 6-storeys in height, while the ITV Studios building is a large office building of 8-storeys in height. To the south is a 4-storey residential building on the opposite side of Roger Street. The closet residential properties are at nos. 91 and 93 Grays Inn Road and nos. 4-6 Brownlow Mews Buildings.

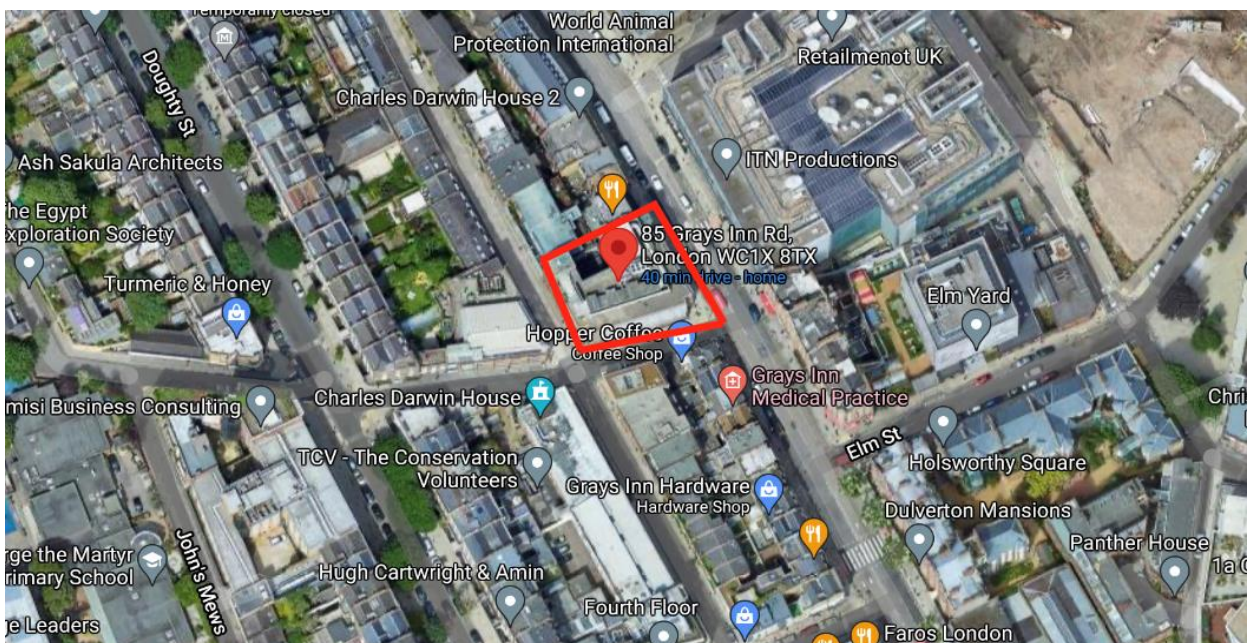


Figure 3: Aerial view of site outlined in red (Google Maps, 2021)

The application site has a PTAL rating of 6b (*Best*), demonstrating that the location has an excellent level of accessibility to public transport – being situated within close proximity to Chancery Lane tube station and Farringdon train station.

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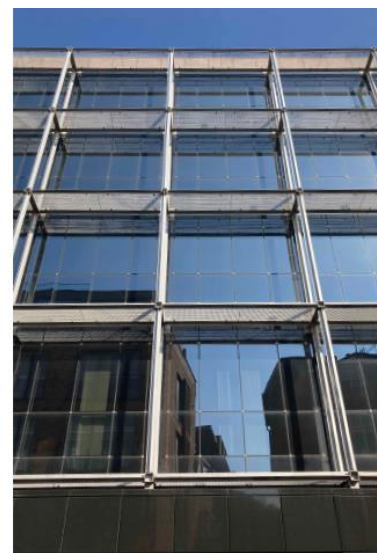
The application building is not statutorily listed. However, there are a number of listed buildings within close proximity to no.85 – including nos. 75 to 81 and 81A (and attached railings) (Grade II); 75-81 Grays Inn Road (Grade II); 63 to 69 Grays Inn Road (Grade II); 8 Northington Street (Grade II); and nos.10 to 20 John Street (Grade II).



Main Entrance



Base of Facade



Upper Levels Facade

Figure 4: Images of 85 Grays Inn Road (source BMJ Architects, 2021)

We set out the planning context for the application development in the next section of our Statement.

5. Planning Context

This section reviews the planning history and summarises relevant planning policy.

5.1. Planning History

A review has been undertaken of Camden’s online planning records. The lawful use of the property is an office, Use Class E and former Use Class B1.

There are many historic planning records for the site dating back to 1950, when consent was granted for the redevelopment of 83-85 Grays Inn Road for use as offices and residential flats. In 1989 an appeal was allowed for the demolition of the existing building to provide a five storey office building at 83-89 Grays Inn Road (app ref: 8800439). There were no restrictive conditions in the report or any reference to a S.106 legal agreement.

A number of subsequent applications were granted for alterations to the building, with the most recent being in 2011 for the retention of air condensing units located in the rear courtyard.

Please see the planning history for the site below:

Reference	Description	Decision	Decision Date
2011/0498/P	Retention of five air condensing units within rear courtyard area of existing offices (Class B1).	Granted	27 May 2011
2010/5044/P	Change of use of basement and ground floor from office (Class B1) to retail (Class A1), with associated alterations including infilling of one window on Brownlow Mews elevation and one window on Roger Street elevation at ground floor level and replacement of window with glazed sliding doors on Grays Inn Road elevation.	Withdrawn	No date available online.
2008/4342/P	Alteration to entrance of existing office including new glazed canopy and creation of B1 floor space at first floor level over existing entrance lobby.	Granted	28 October 2008
9400279	Retention of an air conditioning plant on the roof and 8 condenser units in the courtyard. as shown on drawing no(s) M7945-209/A 7945/AC1 7945/AC2 7945/AC3 as revised on 11.03.94	Granted	29 April 1994
9000079	Approval of amended details and further amendment to elevation details pursuant to condition 03 of the permission granted by D.O.E letter dated 25/05/89 Ref T/APP/X5210/A/88/111848/P2 for the erection of an office building as shown on drawings numbered 2010/[A] 07C 102 and one un-numbered coloured elevation of Grays Inn Road frontage.	Granted	31 January 1990

Reference	Description	Decision	Decision Date
8900472	Approval of details of facing materials and amendment to elevation details pursuant to condition 03 of the permission granted by D.O.E Letter dated 25 th May 1989 for the erection of an office building as shown on drawings numbered 2010/A/07/B/2010/A/08 and revised by letter dated 24 th November 1989.	Granted	10 September 1989
8800439	The erection of a five storey plus basement building as shown on drawing numbers 2010(A)/01-07. Appeal received against the failure to issue their decision within the appropriate period.	Appeal Allowed	25 May 1989
8800438	The erection of a five storey plus basement office building as shown on drawing numbers 2010 (A)/01-07.	Refused	1 February 1989
TP24491/18 829	In outline, the redevelopment of the sites of 83-5, Grays Inn Road, and 1-3, Roger Street, St. Pancras, by the erection a building for use as basement storage with offices and residential flats over, generally as shown on the plan submitted.	Granted	9 June 1950

5.2. Planning Policy

Any application made under the Planning Acts should be determined in accordance with the development plan unless material considerations indicate otherwise⁴. The National Planning Policy Framework 2019 ('NPPF') also holds weight in planning decisions, particularly where the adopted development plan is out of date or conflicts with the NPPF. Planning law requires that where regard is to be had to the development plan, for the purpose of any determination to be made under the Planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise.

The development plan for Camden Council comprises The London Plan (2021), The Camden Local Plan (2017) and Site Allocations Plan (2013). Supplementary planning guidance on Amenity (2018), Design (2019), Employment Sites and Business Premises (2021), Energy Efficiency and Adaptation (2021), Planning for Health and Wellbeing (2021), Transport (2021) and the Bloomsbury Conservation Area Appraisal and Management Strategy (2011) are all material considerations for the decision making process.

Camden Council is in the process of reviewing the Site Allocations Plan (2013) and consultation on the draft Site Allocations Plan concluded 27 March 2020. The Council is currently preparing a statement setting out information about the consultation and the responses received.

The new London Plan (2021) is also supported by guidance, which provides further information about how the London Plan should be implemented. The Greater London Authority has prepared a number of pre-consultation draft guidance for information and which are due to be consulted on in summer 2021. This draft guidance covers, air quality, fire safety, transport land and urban greening factor.

⁴ Section 38(6) of the Planning and Compulsory Purchase Act (2004) and Section 70(2) of the Town and Country Planning Act (1990)

5.3. Planning Designations

The site is subject to the following planning designations (see Figure 5 below):

- Bloomsbury Conservation Area (Policy D2, Camden Local Plan 2017)
- Knowledge Quarter (Policy KQ1)
- Central Activity Zone (CAZ)
- Flood Zone 1

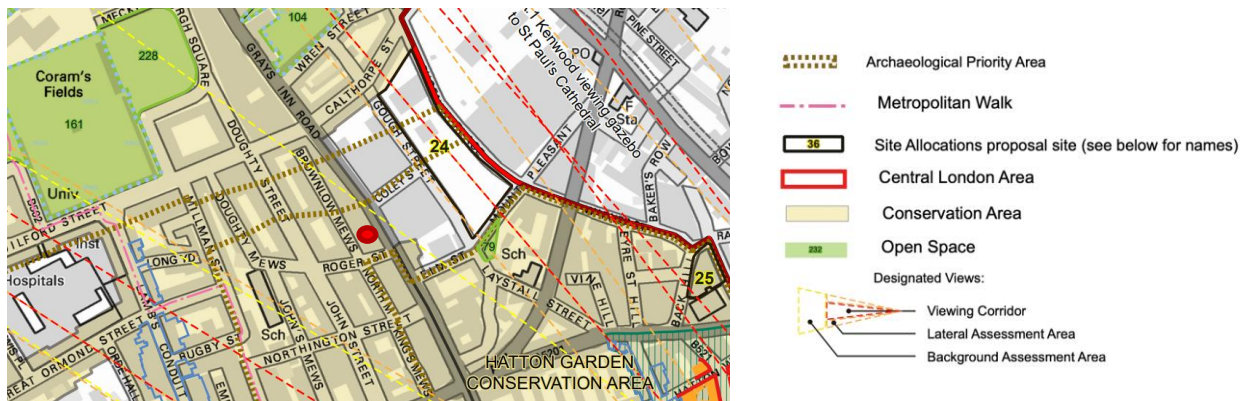


Figure 5: Policies Map (Source, Camden Council 2017)



Figure 6: Map identifying listed buildings (Source: Camden Council, 2021)

There are a number of Grade II listed buildings in the wider vicinity as identified at Figure 4 above. Further along to the south of Grays Inn Road on the west side, are 4 terraced houses no.75-81 and 81A and no. 63-69 all of which are Grade II listed. There are no listed buildings immediately adjacent to the building.

5.4. Development Plan Policy

Policy E1 (Economic Development) within the Camden Local Plan (2017) is a key policy which seeks to secure a successful and inclusive economy by creating the conditions to support economic growth. This should be achieved through encouraging the concentration of professional, technical, creative and science growth sectors in the borough. The council will support the development of Camden's health and education sectors and promote the development of the Knowledge Quarter around Euston and King's Cross.

Policy D1 (Design) & D2 (Heritage) seeks to ensure that all development reflects a high quality design that respects the local context and character of the surrounding area which responds to the respective conservation areas through preservation and enhancement.

Policy CC2 (Adapting to Climate Change) requires development to adopt appropriate climate change adaptation measures such as the wherever possible reducing surface water runoff with Sustainable Drainage systems (SUDS); the incorporation of bio-diverse green/blue roofs and reduction to the impact of urban overheating.

Policy A1 (Managing the impact of development) & A4 (Noise & Vibration) seeks to protect the Quality of life of all occupiers and neighbours by ensuring a high-quality standard of amenity for all. Developments should mitigate impacts where necessary. Noise and vibration should be controlled and managed within a development and have regard to Camden's Noise and Vibration thresholds.

5.5. Bloomsbury Conservation Area Appraisal and Management Strategy (2011)

Grays Inn Road forms part of the eastern edge of the Conservation Area and gives to a noticeably slight rise in land which is the only instance of a significant change in topography for the area. At the beginning of the 20th Century, Grays Inn Road was one of five main north-south routes, which were widened. It is overall, the area's hierarchy of main arterial routes, grids of streets, rear mews spaces and narrow lanes which creates this dynamic spatial character that the Bloomsbury Conservation area seeks to protect. 85 Grays Inn Road is not specifically mentioned within the Bloomsbury Conservation Area Appraisal document.

5.6. Camden Draft Site Allocations Local Plan (February 2020)

The growth of the Knowledge Quarter is identified and supported within the draft Site Allocations Local Plan under Policy KQ1 'supporting growth in the Knowledge Quarter Innovation District'. The Council intends to ensure the sustainable growth and success of the Knowledge Quarter by assessing the following measures within a proposal: demonstrative collaboration with key stakeholders; the type of floorspace provided appropriately reflects current and future demand; and provide a suitable mix of workspaces reflective of current demand.

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Adopted Policy E1 relates to the to the Knowledge Quarter and the science growth sector and states that Camden Council will support the development of these industries and promote the development of the Knowledge Quarter around Euston and King's Cross. However, the Knowledge Quarter has been elaborated much further in the draft Site Allocations Local Plan, with a new section dedicated to the sustainable growth and success of the Knowledge Quarter Innovation District. This is in line with the Governments wider initiatives and the publication of the Life Science Vision which is covered above in section 5.3 of this Statement. In our opinion, significant weight should be afforded to Policy KQ1.



Figure 7: Knowledge Quarter Innovation District Map with a red dot identifying the site (source: Draft Site Allocations, 2020)

5.7. Summary

The building has an existing unrestricted lawful office use (Use Class E(g)(i)) and is located within the Bloomsbury Conservation Area. There is strong planning policy support for institutions and activities that comprise the Knowledge Quarter and science growth sector in Camden. The new London Plan (2021), also seeks to conserve and enhance London's global economic competitiveness by, ensuring London continues to *“provide leadership in innovation, research policy and ideas, supporting its role as an international incubator and centre for learning”* (policy GG5). There is strong support for development of these industries to be promoted in the Knowledge Quarter around Euston and King's Cross.

The scheme proposal would promote the life sciences sector in the Knowledge Quarter and contribute to the Partnership's vision of a 'world class knowledge hub'. The scheme proposals acknowledges the importance of high quality design which respects the character and appearance of the Bloomsbury Conservation Area.

In the next section we provide our planning assessment of the current scheme.

6. Planning Assessment

This section of the Statement provides our assessment of the scheme against planning policy and other material considerations.

6.1. Principle of Development

In the context of the UK's leading research into the contribution that the life sciences sector makes to the economy, the scheme proposals for bringing forward 85 Grays Inn Road for a life science use is set to contribute significantly to the Government's commitment to fostering the UK and London as a global standard-bearer for discovery and advanced manufacturing which will in turn deliver huge benefits to the UK, both at national and local level.

The site is located within the Knowledge Quarter Innovation District and close to Great Ormond Street Hospital, the Royal London Hospital for Integrated Medicine and the National Hospital for Neurology and Neurosurgery, along with the Wellcome Centre for Human Neuroimaging and research hubs including UCL's Queen Square Institute of Neurology, the Institute of Neurology and the Institute of Cognitive Neuroscience. Owing to the site's location amongst this cluster and to the site's excellent access to both national and international transportation hubs, it is ideally suited to a building that seeks to harbour innovation, research and development that will impact not just the lives of local people but will that will nationally contribute to London and the UK as a centre for excellence in leading medical advancements in terms of medicines, vaccines and services.

At paragraph 5.23, the supporting text to Local Plan policy E1 relates specifically to the Knowledge Quarter and the science growth sector and states that Camden Council will support the development of these industries and promote the development of the Knowledge Quarter around Euston and King's Cross. The scheme proposals would contribute significantly to the Knowledge Quarter and will reinforce its overall vision and emerging reputation as a world-class knowledge hub for the 21st Century which seeks to raise awareness and leveraged support for innovation, collaboration and knowledge exchange. This is further emphasised by Policy KQ1 in the draft Site Allocations Local Plan which specifically identifies that Knowledge Quarter and advises that development within the Knowledge Quarter should be promoted.

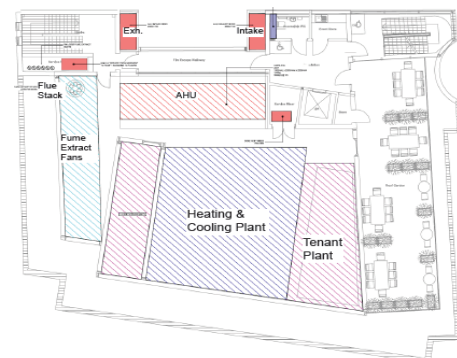
As there are no restrictions on the planning permission for the building, there is no change of use required to convert the building to flexible office/R&D uses. Much of the scheme comprises internal refurbishment work that do not comprise development, as defined under Section 55 of the Planning Acts and require planning consent. This includes improvements to office core facilities such as the reception area and sanitary provision. As the scheme comprises a 50:50 split between labs and offices, there is no intensification in use of the building, as labs have a lower occupational density ratio than offices.

The proposed scheme will contribute to the life science sector and Camden's Knowledge Quarter, whilst accommodating a growing need for suitable buildings to facilitate life science uses. Significant weight is placed on emerging policy KQ1 which seeks to ensure the sustainable growth and success of the Knowledge Quarter. There is a need to bring forward this building as quickly as possible to be ready for market by Q3 2022 as there is a lack of suitable spaces for wet and dry labs in the borough. The site is close proximity to King's Cross and at the same time is located in a district where there are anchors and potential spin-out creators in the life sciences sector.

6.2. Proposed Roof Plant

The application proposal includes the installation of additional plant machinery located on the roof of the building in order to accommodate the laboratory facilities. The existing roof plant has a tired plant enclosure and plant room housing the lift motors. Modern day laboratories are highly serviced and environmentally controlled spaces driven by science which requires significant air change rates to provide the safety levels required and protection to the scientists and building users. Ensuring key mechanical plant is a key aspect in bringing forward the building for life science and this will require large amounts of plant and area allocation to provide the following:

- dedicated AHU plant for laboratory spaces;
- access for regular maintenance;
- heat rejection plant; and
- fume extract plant for the safe discharge of exhaust air from specialist laboratory containment devices e.g. fume cupboards.



For the level of plant required to service a laboratory building, not all of the plant can be accommodated at roof level and to do so would be detrimental to the massing of the building. The design team have taken this into consideration – and the application scheme seeks to accommodate the majority of the plant at roof level, with additional plant to be located in each level of the courtyard infill .

To meet the capability demands of future tenants of the building, individual fume cupboard extracts are to be provided for each floor which will be required to exhaust at high level into the atmosphere and meet dispersion requirements. The flue heights are estimated to be circa 9-10m above plant enclosure roof level. An architectural housing for a combined flue enclosure is proposed to be in the west section of the plant enclosure, towards Brownlow Mews. The height of the flues is indicative at this stage (based on similar building types) and fume dispersal analysis. Further analysis will be carried out at a later design stage that will determine the required heights and performance of the flues. RWDI engineers have recommended to have the new fume exhaust to the west has to avoid interference with air flows associated with and circulating around the ITN Building.

The proposed roof plant has been sensitively designed, taking into consideration the character and appearance of the Bloomsbury Conservation Area. The proposed plant enclosure is comparatively similar to the existing enclosure in terms of overall height and the extent of the plant area. It will remain set back from the building edge to minimise impact and the new acoustic louvre system will improve the external appearance. The proposed plant enclosure has been designed to ensure appropriate attenuation measures are incorporated, so detrimental harm is not caused to amenity in terms of noise and outlook. This is considered to be compliant with Local Plan Policies A1 and A4.

South East Views

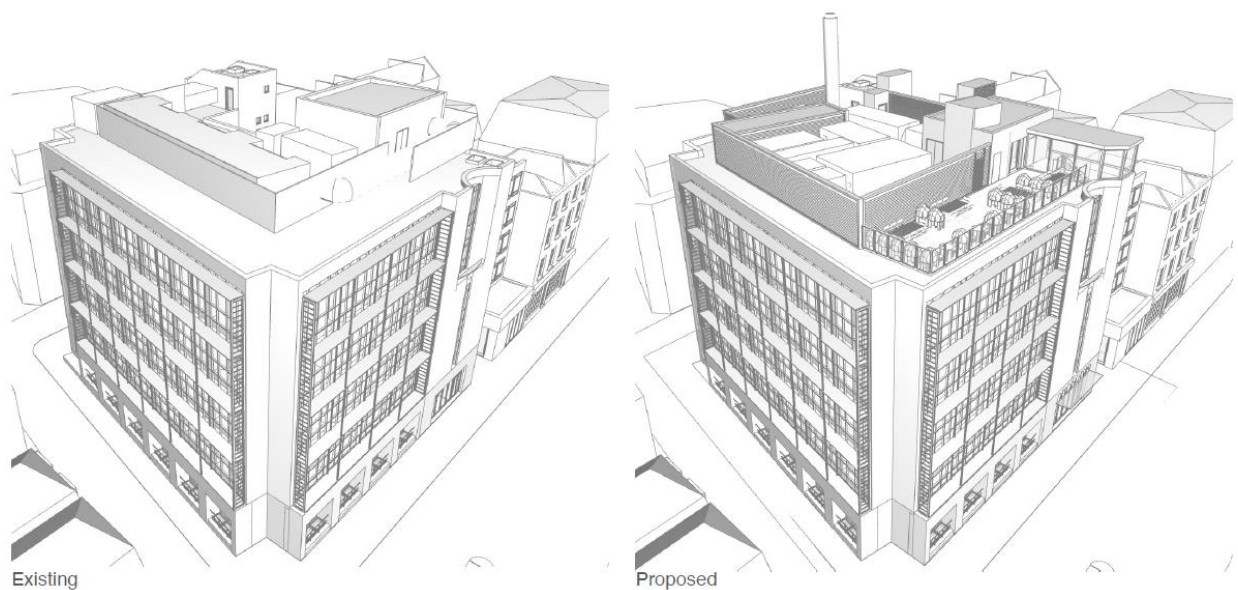


Figure 8: 3D views of existing and proposed scheme (source: BMJ Architects, 2021)

6.3. Courtyard Infill

The rear courtyard is accessed from an undercroft from Brownlow Mews. Currently, the courtyard houses disparate plant items and cycle parking provision. The façade is of limited merit, and is in effect regarded as a 'back of house' area. Due to the need for additional plant equipment the scheme proposals comprise a courtyard infill to the rear of the building. The infill will be from 1st to 4th floor level and will accommodate a significant proportion of MEP plant required to service a laboratory building (see Figure 9 below).

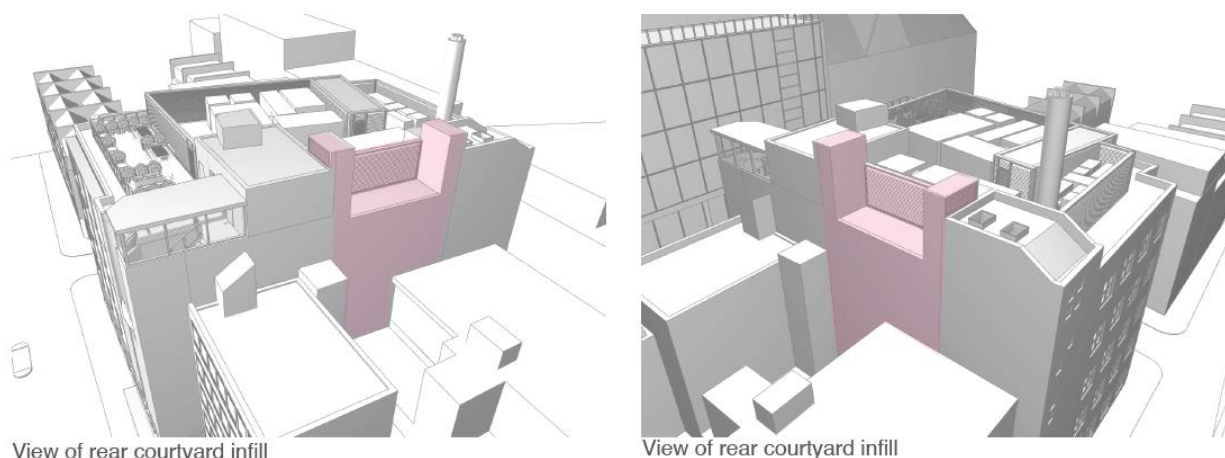


Figure 9: 3D views of rear courtyard infill (source: BMJ Architects, 2021)

The project team has looked at various options to locate plant and this is considered to be the most appropriate solution. To have sufficient capacity for tenant plant on each floor will increase the sites flexibility and attractiveness to occupiers, as the basement floor area and the rest of the floors are to be used for specialist lab facilities, and locating plant onto these areas would reduce the amount of space required for technical lab facilities. This in turn also enables the scheme to provide rooftop amenity space for future occupiers of the building to improve health and wellbeing and general wellness.

6.4. Noise

Hann Tucker Associates undertook an Environmental Noise Survey and Plant Noise Assessment in support of the scheme proposals.

Based on the results of the survey, plant noise emission criteria have been presented with reference to Local Authority requirements. We have also reviewed the manufacturer's plant noise data to determine the likely plant noise emissions at the nearest residential noise sensitive windows. The preliminary assessment indicates that various items of plant would not achieve the requirements of the Local Authority without suitable acoustic mitigation measures.

In the report, Hann Tucker have therefore proposed various acoustic mitigation measures, including acoustic louvered perimeter screening, solid barriers, infill walls and induct attenuators, which are to be included in the design. In our opinion with the proposed mitigation measures the plant noise would be compliant with Camden Council requirements. It should be noted that BREEAM plant noise emission criteria are less stringent than that of Camden Council. Therefore, by achieving the Council criteria the associated BREEAM credits should also be achieved.

6.5. Heritage Matters

Given the site's location in the Bloomsbury Conservation Area, a Heritage Statement has been prepared by Savills Heritage and Townscape in support of the scheme proposals. The report provides a brief overview of the historic background of the site, assesses the significance relevant heritage assets and potential impacts of the proposals upon these assets.

The design of the new plant enclosure seeks to reduce any adverse effect upon the historic environment surrounding the building, by both recessing and concealing the new plant through the design of the rooftop and louvres. This equally applies to the new roof terrace in relation to the Grade II listed buildings to the south, as it will occupy a position setback from the street on the eastern façade of the building, utilising the existing roof space and will not be visually intrusive. Furthermore the proposed plant enclosure, with the exception of the raised flue, is of a similar scale to the existing rooftop arrangement and therefore any change to the wider setting will be reduced. At street level any changes to the building are minimal and chiefly relate to the addition of a new canopy, signage and minor amendments to the main entrance, all of which would have no detrimental effect upon the conservation area or listed terraces to the south.

In terms of the extension of the east stair core, this is a contextually appropriate approach in relation to the identified heritage assets. Any change to the setting is mitigated by this extension occupying a setback position, located to the east of the building and of a similar height to the existing roof features. In relation to the proposed infill above ground floor level, this will be of equal proportion to the existing roof height and, owing to its containment within the site boundaries, will have no material impact upon the historic built environment of the surrounding area. Furthermore, the orientation of the infilled section of the building means that it will be largely concealed at street level and therefore any impact upon the identified heritage assets is mitigated.

The Heritage Statement concludes that the proposals will cause no harm to the significance of either the Bloomsbury Conservation Area or the Grade II listed Nos. 75-81 Grays Inn Road by way of a change in their setting, and will preserve the character and appearance of both designated heritage assets.

6.6. Sustainable Design

The scheme proposals have been designed to be as sustainable as possible given the end use of the building. The scheme is targeting BREEAM Very Good and a significant EPC improvement to B. It is noted that achieving higher targets for the refurbishment of a building of this era for laboratory purposes is challenging. KJ Tait Engineers have prepared a Sustainability Statement in support of the scheme proposals which sets out the sustainable design and construction measures implement in summary these are, as follows:

- i. Passive design measures have been considered throughout the design of the scheme to reduce energy demand.
- ii. The development will incorporate air source heat pump technology.
- iii. Water use will be reduced to a target maximum of 105 l/person/day through the use of low flow equipment such as dual flush WCs and low flow taps and showers.
- iv. Water meters are to be installed in each tenant demise to manage their usage and limit their consumption.
- v. A rainwater harvesting system located at roof level of the building will provide irrigation to planters on the terrace area.

- vi. All the new building elements will achieve the highest feasible rating on the BRE Green Guide to Specification. Materials will be specified to have a low embodied energy, taking into account whole life cycle analysis. All materials will be sourced from manufacturers who employ environmental management systems such as ISO 14001 or BES 6001. All timber used in construction will be FSC or PEFC certified.
- vii. The construction site will be managed in such a way that the environmental impact is minimised. This includes following best practice policies for dust pollution by using dust sheets, covering skips and damping down where appropriate and following best practice policies to minimise noise pollution, including the use of quieter machinery where possible. Site working hours will be managed to mitigate the possibility that they will cause a nuisance to the surrounding properties.
- viii. All plant and equipment installed will be appropriately sized and selected for efficiency in order to reduce greenhouse gas emissions.
- ix. Limiting noise levels will be specified for items of plant serving the development, in line with the local authority's requirements. These limits will ensure any a negligible impact on nearby receptors.
- x. Construction site waste will be monitored through a Site Waste Management Plan.

6.7. Roof Terrace and East Stair Core Extension

To enhance the amenity and overall well-being for the future building occupiers, the application scheme includes a communal roof terrace, overlooking Grays Inn Road. The terrace is located on the east façade to minimise overlooking of residential properties and is also set back from the Roger Street Façade for this reason. The terrace will enhance comprise external seating, planting and a 1500mm glazed balustrade.

To access the roof terrace the east stair core has been extended to roof level to provide inclusive access. This stair extension has been sensitively designed by the architects and will comprise a glazed curtain walling and a zinc roof, the materials proposed are light weight and contemporary. The extension to the stair core is necessary and would not be over bearing in terms of bulk and massing. The design of the roof terrace and the proposed materials is set out in section 4.5 of the Design and Access Statement.

6.8. Daylight and Sunlight

Gordon Ingram Associates (GIA) have prepared a daylight and sunlight impact assessment on neighbouring properties, looking at the effects of the application scheme proposals. The consultant's technical daylight, sunlight and overshadowing assessment of the scheme accompanies the planning application and takes account of the residential properties located at 91 and 93 Grays Inn Road and 4-6 Brownlow Mews.

Upon successful completion of the proposed scheme, one of the two properties that the consultant assesses will meet the national numerical values identified in paragraphs 2.2.21 and 3.2.11 of the BRE handbook for daylight and sunlight. When considering daylight (VSC and NSL) to the remaining property, it will experience an isolated imperceptible breach of VSC to one window, whilst the NSL test is met for daylight. Breaches in sunlight (APSH) occur to two of the five rooms assessed within this property. The primary window serving these two rooms is opaque and limits the level of sunlight entering the room in the existing scenario. In our opinion it is unlikely the change in sunlight will alter how these spaces are currently used and enjoyed.

The report concludes that the technical analysis shows that following the implementation of the proposed development 4-6 Brownlow Mews will adhere to the BRE recommendations for daylight and sunlight. 91-93 Grays Inn Road has two rooms that will fall short of the recommended criteria for sunlight, an isolated breach in daylight (VSC) although is considered compliant against the NSL criteria. GIA's transient overshadowing assessment indicates that little to no change occurs to the amenity spaces at the times they are most likely used and enjoyed.

When constructing buildings, alterations in daylight and sunlight to adjoining properties are often unavoidable. The numerical guidance given in the BRE document should be treated flexibly. The compliance rates are 90% in relation to daylight and 60% in relation to sunlight.

6.9. Front Entrance Canopy

An important part of the scheme design will be improving the front entrance area to the building. This will comprise a new canopy, signage and minor improvements to the main entrance to enhance the building's presence and signifying way finding. The front entrance of the site is immediately adjacent to the public highway. It is acknowledged that a further 'over sailing licence' will be required under section 176 and 177 of the Highways Act 1980 for building over the highway.

6.10. Cycle Provision

Secure and covered cycle storage forms part of the scheme proposals, located at ground level in the courtyard. This will be accessed via a secure gate from Brownlow Mews and will be predominantly for building users. 38Nr double tier cycle stands are proposed with adequate space for safe access and 2Nr non-standard cycle hoops are also proposed. This is in accordance with Local Plan Policy T1.

These numbers exceed the BREEAM requirement, which is based on the occupancy number of 260 persons. BREEAM requires 10% provision equating to 26Nr cycle parking. The number of cycle parking also exceeds the London Plan (2021) requirements for Research & Development use however, it is below the number required for Office use. This is considered to be a reasonable number for a mix of office and research and development space.

Provision has also been made for high quality facilities that promote cycle usage, this includes 7Nr showers across the floors as a core facility, a wheelchair accessible shower in the basement and suitably sized lockers in close proximity. This is covered in more detail in section 5.3 of the Design and Access Statement prepared by BMJ Architects.

6.11. Services, Deliveries and Waste

Larger deliveries of consumables and equipment will require to be managed with access gained through the Brownlow Mews, the rear courtyard and access door. General Waste and Recycling will be managed by the Building Manager FM team with storage of designated Eurobins in the courtyard. These will then be managed to meet the refuse collection vehicles on Brownlow Mews. The Clinical Waste stream and any other specialist waste streams such as sharps will be managed by the tenants and an area for locked storage of this has been designated in the courtyard. The tenants will manage arrangements with their collection companies.

Gas deliveries will be managed by the tenants. Any external refilling of gas storage vessels will need to take place at a time outside parking restriction times. This is covered in more detail in section 5.4 of the Design and Access Statement. In our opinion the servicing, delivery and waste has been appropriately managed for the scheme and is in accordance with Policy A1.

6.12. Fire Safety Strategy

A Fire Statement has been prepared by The Fire Surgery who are competent fire engineers Chartered with The Institution of Fire Engineers. The statement defines the fire safety objectives, performance requirements of the development and the methods by which these objectives will be provided/ satisfied. In summary, the report describes the following matters:

- Automatic fire detection and alarm system to a minimum Category L2 level of coverage to BS5839: pt. 1 2017 will be provided.
- A refuge has been provided in Stair 1 lobby at each level. The refuge is 900 x 1400mm and clear of the escape from other people. Emergency Voice Communication (EVC) systems to BS5839-9 (2011) are provided at each refuge.
- Emergency lighting to be provided to BS5266-1.
- Adequate fire hydrant coverage to be provided to the building.
- Evacuation lift to BS9999: 2017 to be provided.
- Escape stair with unvented lobby with dry riser as per BS 9999 since the building height is 15.3m and under 18m to be provided.
- Fire service vehicle access to the site is facilitated by Grays Inn Road.

Overall, the Fire Statement prepared complies with Policy D12 of the London Plan (2021).

In the next section we address planning conditions, obligations and CIL.

7. Planning Conditions, Obligations and CIL

7.1. Planning Conditions

Planning conditions should only be imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects (NPPF Paragraph 55-56).

PPG notes (paragraph 007, ID 21a-007-20140306) that it is important the local planning authority limits the use of conditions that require their approval of further matters after the permission has been granted unless they are specifically justified. Such conditions should be discussed with the applicant before permission is granted to ensure that unreasonable burdens are not being imposed and that these conditions ensure that the timing of submission meets the planned sequence of developing the site.

We have not identified a need for any pre-commencement conditions with our application – and we would respectfully request that in the event the Council considers any such conditions to be necessary, that these be identified early on in the evaluation of the development scheme. As mentioned earlier in this Statement, the Applicant needs to deliver this project to the property market by Q3 2022. Consequently, any planning conditions should meet the government test identified at paragraph 57 of the NPPF.

7.2. Obligations

No matters are identified that would require a S106 legal agreement.

7.3. Community Infrastructure Levy (CIL)

The application scheme seeks to create an additional 385sqm of new floor space – and it would therefore be CIL liable. CIL applies to all proposals that add 100m² or more of new floorspace (GIA) or an extra dwelling to a development. Camden adopted the CIL charge on 25 September 2020 which took effect on 30 October 2020.

We understand there to be two different CIL payments that will apply to 85 Grays Inn Road, set out in the table below.

CIL	Date of Adoption	Category	CIL Tariff (£ per sqm excluding indexation)
Camden CIL	30 October 2020	Office (B1a), Research & Development (B1b)	£110
Mayoral CIL 2 (MCIL 2)	1 April 2019	Offices in Central London	£185

In the next section we set out the conclusion.

8. Summary and Conclusion

The proposed scheme for 85 Grays Inn Road by Grays Property Holdings Limited will bring new life and investment to a vacant office building – repurposing the building to deliver a high-quality scheme to meet the requirements of London’s burgeoning life sciences sector. This well-devised scheme incorporates sustainable design measures, e.g. targeting BREEAM Very Good, providing a new roof space for future occupiers, and introducing improved facilities alongside the provision of level access across all levels of the upgraded building.

Overall, the scheme complies with the national, regional and local plan policies. In addition, the development meets the aims of the emerging policy aspirations and the vision for the Knowledge Quarter, as supported by Camden Council and the Mayor of London. The scheme accords with NPPF paragraphs 11, 81 and 130.

Therefore, for the reasons set out in this Statement, we respectfully ask Camden Council to consider the application favourably and grant planning permission for the scheme.



Figure 10: 3D view of proposed scheme (source: BMJ Architects, 2021)

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