
From: Richard Young [REDACTED]
Sent: 21 March 2022 20:21
To: North 1
Subject: RE: Planning Inspectorate APP/X5210/W/21/3286015: 14 Gray's Inn Square, WC1R 5JP
Attachments: 22 03 21 Response to Camden Statement of Case.pdf

Dear Roxanne

Please find attached our Response to the LPA Statement

Kind regards

Richard

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Subject: Planning Inspectorate APP/X5210/W/21/3286015: 14 Gray's Inn Square, WC1R 5JP

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PINS Refs: APP/X5210/W/21/3286015
APP/X5210/Y/21/3286011

Camden Refs: 2021/1310/P & 2021/0516/L

21st March 2022

**Planning (Listed Buildings and Conservation Areas) Act 1990, Town and Country
Planning Act 1990**

Appeal by The Honourable Society of Gray's Inn

Site Address: 14 Gray's Inn Square, London WC1R 5JP (Vehicular Exit Arch)

RESPONSE TO LPA STATEMENT OF CASE & THIRD-PARTY COMMENTS

1.0 The LPA letter to PINS dated 23/02/2022 refers at paragraph 1.2 to:

- *A draft decision notice as attached in appendix 1*
- *A delegated officer report at appendix 2*

Neither appear to be attached to the letter forwarded. However, we have viewed the Officer Report on the LPA website.

2.0 Paragraph 2.5 of the officer report repeats a false assertion, first promulgated by the Bloomsbury Association, that the existing traffic barrier was erected in 2017 as a temporary measure.

Whilst the traffic lights (now removed) were installed in 2017 as a temporary measure to permit two-way traffic during the closure of the High Holborn entrance due to building works, a rising barrier has controlled this exit for well over 25 years as set out in our response dated 29th July 2021 to Bloomsbury Society comments of 16 May 2021, Bloomsbury CAAC comments of 24 May 2021 and Camden Design Comments of 2 June 2021 – Response document included at Appendix 1 for ease of reference.

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- 3.0 During the LPA initial consideration of the application, further email correspondence took place between GHK and Camden included at Appendix 2 for ease of reference.
- 4.0 Other than a further email dated 5th August 2021 from the Conservation Officer requesting details of any accidents involving night-time two-way use of the Holborn entrance to justify the proposals, no further correspondence with the LPA took place specifically concerning the merits of this application albeit that we were continually chasing the LPA generally to progress a number of outstanding applications which they had failed to determine within appropriate timescales
- 5.0 No further response is made as the planning case is made in the original Heritage Design & Access Statement and the Appendix 1 and 2 documents submitted as part of the application and subsequent appeal and no additional matters have been raised by the LPA in their Appeal response.

Summary

- The LPA should have determined the application by the 11th June 2021.
- Having regard to the operational requirements, we believe that the proposed gates are an appropriate replacement for the existing barrier arm and will enhance both the setting of the listed building and the conservation area generally.
- The proposed gates will improve road safety by allowing the one-way traffic system to operate 24 hours, 7 days a week. They will also enhance pedestrian safety by deterring those who choose to ignore the long-standing restriction on pedestrian use and climb over or under the existing barrier arm.
- For the reasons outlined above and in the previously submitted documents forming part of the original application, we respectfully request that this appeal against non-determination should be allowed and both Listed Building and Planning Consent granted.

Response prepared by:
Richard Young Architect RIBA

APPENDIX 1 – Response issued to LPA 29th July 2021

The Town and Country Planning Act 1990, (as amended)

Application: 21/1310/P and 2021/0516/L

Proposal: Replacement of traffic barrier to Gray's Inn Square vehicular exit with gates.

Site: 14 Gray's Inn Square, London WC1R 5JP

Response to Bloomsbury Association comments dated 16 May 2021 (numbers as their letter)

1. The assertion that a traffic-light controlled barrier was erected in 2017 is completely incorrect.

The current Deputy Head Porter has advised that *'there has been a barrier in use for well over 25 years as an exit for vehicles only and only used for entry when necessary. Pedestrians have always been discouraged from using it and the Inn has implemented various strategies to discourage them'*. This relates to his tenure at the Inn. We have members and residents of long standing that recall the barrier (not necessarily the current barrier as it has been damaged and replaced many times) being in place since at least the early 1980s and we have maintenance contracts for the current equipment going back 10 years with the existing supplier. Prior to the redevelopment of 19/21 High Holborn, that required the temporary closure of that entrance, we sought advice from a Highways Consultant as to measures necessary to safely operate the Gray's Inn Square gate for two way traffic during the course of the development. Temporary traffic lights were considered necessary to avoid conflict causing vehicles to reverse out over the pavement onto the highway. The measures designed to deter pedestrian use, that had been damaged and broken down by those that persisted in trying to use the route, were reinstated and the key clamp barrier replaced with new fittings. On the completion of the work at 19/21 High Holborn the temporary traffic lights were removed. The other comments made by Mr Heath are untrue. It is also interesting to note that he refers to an enforcement case reference and yet this is not a matter that was ever raised with the Society by the Council's Planning Department.

2. Clearly this is matter of opinion but we do not consider the proposal to be damaging to the setting of any Listed Buildings (See also our detailed response to design comments overleaf).
3. There is not any intention to permit pedestrian access through this gateway whether or not permission is granted. It is a vehicular exit without any designated pavement for pedestrians and is not safe to be used as such. The Society does permit permissive use through certain parts of the estate and pedestrian access is available from the Eastern boundary via Verulam Buildings, but a minute's walk away, where there is a pavement and safe route to follow.
4. Policy T1 is not relevant. This vehicular egress has not been an accepted route for pedestrians and pedestrian access or egress will not be provided. The proposed gates will permit a 24/7 means of egress for vehicles and will avoid the conflict that currently arises out of hours when the necessary closure of the outer gates results in all vehicles exiting onto High Holborn.

The plan submitted as page 3 of the Bloomsbury Association's comments appears to have been lifted from the Inn's website and doctored without their permission. Images on the Inn's website are subject to copyright and the Inn require that the plan be removed from any public record concerning the application and should not be stored by any means, electronic or otherwise.



Response to Design Comments

Camden Planning email dated 02 June 2021, Bloomsbury CAAC comments dated 24 May 2021 and Bloomsbury Association comments dated 16 May 2021.

- The existing opening is too narrow to accommodate gates set within the archway (the original timber gates open into a recess to maintain the full carriageway width). The new gates are therefore set in front of it to read with the railings. The piers are not attached to the building. We have not aligned the gates with the railings because these terminate in a radius back to the building face and to do so would look odd. In addition, from a practical perspective, even though the gates fold back on themselves as they open, that positioning restricts the necessary turning circle. (Larger vehicles 'cut' the curve of the granite kerbs which are almost flush with the paving)
- We have moved the gateposts closer to the edge of the kerb which we now illustrate on the revised drawings.
- We can confirm that the gates will match the adjacent railings in terms of weight and design. We have prepared revised / enhanced drawings to confirm this which include 1:5 dimensioned details. See Drawing HK 2271 / 00.002 / Rev A
- We have refined the opening mechanism such that this is now largely underground to avoid the need for a prominent arm

Conclusion

We believe that the proposed gates are an appropriate replacement for the existing barrier arm and will enhance both the setting of the listed building and the conservation area generally.

The revised and additional detail drawings demonstrate that the design of the proposed new gates matches the detailing and weight of the adjacent existing railings.

The proposed gates will improve road safety by allowing the one-way traffic system to operate 24 hours, 7 days a week. They will also enhance pedestrian safety by deterring those who choose to ignore the long-standing restriction on pedestrian use and climb over or under the existing barrier arm.

It should be noted that the fallback position is the retention of the existing barrier arm.

29th July 2021



APPENDIX 2 – email correspondence GHK Architects / Camden

Richard Young

From: Richard Young
Sent: 03 August 2021 11:03
To: 'Nick Baxter'
Cc: Sofie Fieldsend
Subject: RE: 14 Gray's Inn Square - 2021/1310/P and 2021/0516/L
Attachments: 21 02 02 Heritage Design and Access Statement.pdf

Dear Nick

Thanks for your comments.

The driver for replacement of the existing lifting barrier with gates is explained in the Heritage Design and Access Statement which I attach for ease of reference. Essentially the Inn want to maintain the one way traffic system 24 hours, 365 days a year but without compromising out of hours security which is currently achieved by closing the outer timber gates. This cannot be achieved with a barrier arm as even 'law abiding' citizens persistently attempt to vault or dodge under the arm in broad daylight in full view of security staff! You will appreciate that at night the sparsely populated Squares and Gardens provide scope for a range of nefarious activity.

Re views in, as noted the arch does still retain the original full height solid gates on the street side which are currently closed at night and all day too at weekends and holidays so no views in at all are possible when they are closed. Given that views in from the street cannot be an at oblique angle because of the 'tunnel', I really do not feel that the proposed gates will have any impact on the openness of the view in from the street and will be barely perceptible against the brightness beyond (The fact that the gate piers are not visible from the street helps). The addition of the proposed inner gate will also allow views in 'out of hours' whereas currently the 'out of hours' appearance is very much 'locked and bolted'.

Viewed from Gray's Inn Square, I accept that the gate in this position is not 'historically correct'. However I consider that it is more sympathetic to both the Building and the Square than the existing barrier arm and furthermore, do not believe that the proposed gates cause harm to the setting of either.

Kind regards

Richard

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From: Nick Baxter <Nick.Baxter@camden.gov.uk>
Sent: 02 August 2021 15:30
To: Richard Young <richard.young@ghkarchitects.co.uk>
Cc: Sofie Fieldsend <Sofie.Fieldsend@camden.gov.uk>
Subject: 14 Gray's Inn Square - 2021/1310/P and 2021/0516/L

Dear Richard,

I hope you are well.

Thank you for this revision.

The existing position is that there is a rising pole with a metal skirt blocking the exit. This retains the essential openness of the original opening and allows views in to be appreciated by passers-by. It also stands off from the walls, adding differentiation and further openness. There are thus conservation area issues here, as well as listed building ones.

My concern is that the tall, heavy gates proposed will obstruct views in (by 25% viewed at right angles, more so at oblique angles), and have an atypical relationship with the arch, than which they will be wider. I don't believe gates are a traditional part of a chambers building like this, which would normally only be guarded by a porter's lodge. As well as their incorrect relationship with the arch, the gates themselves will open in a strange bifold fashion, rather than a traditional one.

I am wondering what has prompted this application. I understand that you want to keep pedestrians out, but have you considered a more dignified, discreet version of the rising barrier you have, perhaps with a timber pole, in the current offset position? This would clearly read as a later addition and would allow appreciation of (what I understand to be) the original free-flowing relationship between the street and the square.

Kind regards,

Nick Baxter MSc, BA hons
Senior Conservation Officer
Regeneration and Planning
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The majority of Council staff are continuing to work at home through remote, secure access to our systems. Where possible please communicate with us by telephone or email.