



**GERALDEVE**

**Town Planning Statement**

88 & 100 Gray's Inn Road and 127 Clerkenwell Road, WC1X 8AL

On behalf of: Lawnmist Limited

Date: 30 September 2022

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## 1 Introduction

- 1.1 This Town Planning Statement has been prepared by Gerald Eve LLP on behalf of Lawnmist Limited ('the Applicant'). It supports an application for full planning permission to redevelop 100 Gray's Inn Road and 127 Clerkenwell Road as a timber framed building for office use (Class E), with retail uses (Class E) at the ground floor, and the refurbishment of 88 Gray's Inn Road to provide six affordable housing units and affordable workspace ('the Proposed Development').
- 1.2 The Site comprises three buildings; 100 Gray's Inn Road, 127 Clerkenwell Road and 88 Gray's Inn Road ('the Site'). No. 100 Gray's Inn Road is located on the junction of Gray's Inn Road and Clerkenwell Road and is the most prominent of the three buildings. It is a ground plus seven storey 1960's office building which has subsequently been re-clad with horizontal banding. The Site is within the Hatton Garden Conservation Area and Camden's Conservation Area Appraisal and Management Strategy defines this building as being a 'negative contributor'. No. 127 Clerkenwell Road is a ground plus six storey 1980's building. No. 88 Gray's Inn Road is not visible from the street, being to the rear of the 100 Gray's Inn Road servicing area and 80-86 Gray's Inn Road. It comprises ground plus three storeys and is built from white brick with crittall windows.
- 1.3 These buildings have been within the Applicant's long-term ownership. This proposal seeks to redevelop them to provide exemplar new architecture with high sustainability credentials meeting the requirements of modern occupiers within the Knowledge Quarter, so to ensure their ongoing viable and sustainable use long into the future.
- 1.4 The current building does not meet occupier requirements, it is poorly laid out, has low floor to ceiling heights, and is not attractive. The Applicant therefore appointed a full project team in 2020, led by Piercy & Company, to explore options for the redevelopment of the Site. Four development options were originally tested; 1) refitting the individual buildings, 2) refurbishing each of the existing buildings and upgrading mechanical and electrical equipment; 3) substantially refurbishing the buildings, including demolition of 100 Gray's Inn Road to the second floor and providing additional height; 4) new buildings at 100 Gray's Inn Road and 127 Clerkenwell Road and refurbishment of 88 Gray's Inn Road.

- 1.5 Following a detailed comparison assessment undertaken by the technical team, it was decided that the best approach would be to demolish 100 Gray's Inn Road and 127 Clerkenwell Road, where at least 95% of construction waste would be able to be recycled, to provide a new building constructed from a timber frame. This would be highly adaptable, have much better floor to ceiling heights and deliver significant well-being benefits to tenants, including external terraces for all building users. This would provide a long term, sustainable solution for the Site rather than a further iteration of *ad hoc* refurbishment works to the buildings which could never be refurbished to a high standard given the particularly poor floor to ceiling heights. No. 88 Gray's Inn Road would be refurbished to be used as affordable workspace and housing, the requirement for which is generated by the extra floor area which only a new building at 100 Gray's Inn Road and 127 Clerkenwell Road could provide.
- 1.6 Detailed whole life carbon work was undertaken during the pre-application period to compare the chosen development option against ones which sought to retain a greater extent of existing building fabric. Independent analysis of this work on behalf of LB Camden ('LBC') was undertaken by Enhabit, which within its report dated 17 May 2021 concluded that the options had been "examined adequately and the proposed option (New Build) is justified by the whole life cycle carbon comparison and viability".
- 1.7 Given the mixed-use character of the local area and the number of residential flats nearby, particularly at the Shene and Ledham buildings on the Bourne Estate to the rear, detailed consultation work has taken place in addition to the discussions with planning officers and two sessions which were held with the Camden Design Review Panel (DRP). A consultation website was provided online (100graysinnroad.community), door knocking sessions took place to raise awareness regarding the scheme, public exhibitions took place on 7 December 2021 and 25 May 2022, and meetings with the local community were held in May 2021 and July 2022.
- 1.8 Feedback from people who attended these sessions was generally positive with recognition that the buildings fronting Clerkenwell Road were unattractive, and that redevelopment could deliver public benefits. To respond to comments which were made during the consultation period, the following changes have been made to the Proposed Development from what was originally presented:

- The building height has been reduced by circa 2 metres and the extent of the new basement space adjacent the residential buildings has been significantly reduced;
- Massing at the south-eastern part of the building has been set-back to ensure that there is not an unacceptable level of light loss to nearby residential flats;
- The east facing terrace on the first floor has been removed due to proximity to residential windows;
- The southern elevation, which is closest to the current quiet garden, has been redesigned so that there is reduced visibility between the building and the outdoor seating area;
- Local residents raised crime and anti-social behaviour as important issues locally and asked that CCTV monitoring external areas is provided as part of the scheme, which it would be;
- In relation to the affordable housing which is proposed, the local community asked that allocation priority is given to local residents – something which the Applicant would be happy to commit to subject to comments from LB Camden;
- A priority would be given to providing job and education opportunities for residents on the Bourne Estate, both during the construction and occupational periods.

1.9 The Proposed Development has also benefitted from significant input from the LB Camden officer team and the DRP. Significant changes have included reducing the overall height, bulk and mass of the scheme, introducing wider variety to the design of the main façade, an arched main entrance on Clerkenwell Road, revised materiality with regard the roof extension, and a revised form to the roof extension to moderate views from Gray’s Inn Gardens

1.10 The proposed scheme has benefited and evolved because of this consultation and full planning permission is now sought for the following:

**“Demolition of 100 Gray’s Inn Road and 127 Clerkenwell Road and the erection of a mixed-use office led (Class E) development comprising a basement, ground plus eight storey building for flexible retail / restaurant / office uses at ground floor and basement (Class E), basement excavation, provision of roof terraces, external plant equipment and enclosures, servicing bay, waste storage, cycle parking, public realm works; partial demolition and extension of 88 Gray’s Inn Road for use of the upper floors for housing**

**(Class C3) and ground floor as offices (Class E) with associated external alterations and associated works.”**

1.11 This Town Planning Statement assesses the Proposed Development in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 and the statutory duties found in Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

1.12 The public benefits arising from the scheme are explained throughout this Statement and are summarised as follows:

- The delivery of six high quality affordable housing units (2 x 1 bed, 2 x 2 bed, 2 x 3 bed) within the Central Activities Zone, four of which would be low-cost rent and two intermediate rent – all of which would meet the relevant national size standards and have private outdoor amenity space;
- The provision of high-quality, office floorspace which could support Knowledge Quarter uses, would support job creation in the Central London Area, CAZ and Knowledge Quarter, and meet an identified local and London-wide need for such floorspace;
- Inclusion of affordable workspace at the ground floor of 88 Gray’s Inn Road;
- A commitment to providing job opportunities to residents on the Bourne Estate and, as a minimum, 21 construction apprenticeships and five end user apprenticeships;
- The delivery of a scheme providing a high-quality building which would have a positive impact upon the character and appearance of the Hatton Garden Conservation Area and other nearby heritage assets;
- Improved and increased public realm in front of the building on Clerkenwell Road;
- Refurbishing the existing building at 88 Gray’s Inn Road and delivering a new timber framed building to deliver an adaptable building at the Site for the long term;
- Recycling at least 95% of existing building fabric, which has been confirmed as achievable by a Pre-Demolition Audit which has already been undertaken;
- The provision of Community Infrastructure Levy contributions and financial contributions to be secured through a Section 106 agreement;

- Promoting sustainable modes of travel with a focus on cycling and high-quality end of trip facilities;
- Biodiversity net gain of 4326%, achieved through the provision of biodiverse green roofing and herb rich shrub planting;
- To minimise the impact of construction on local amenity, modular construction would reduce the build time on-site; and
- The buildings would be air quality neutral.

### Application Documentation

1.13 This Statement, which includes draft Section 106 Heads of Terms, should be read alongside the following supporting documentation:

- Planning Application Form, prepared by Gerald Eve LLP;
- CIL Form, prepared by Gerald Eve LLP;
- Site Location Plan, prepared by Piercy & Company;
- Existing, Demolition and Proposed Plans, Sections and Elevations, prepared by Piercy & Company;
- Design and Access Statement, prepared by Piercy & Company;
- Townscape, Heritage and Visual Impact Assessment, prepared by The Townscape Consultancy;
- Financial Viability Assessment (including Addendum), prepared by Gerald Eve;
- Whole Life Carbon Assessment and Circular Economy Statement, prepared by Max Fordham;
- Energy Statement, prepared by Max Fordham;
- Sustainability Statement, prepared by Max Fordham;
- Affordable Housing Statement, produced by Gerald Eve LLP;
- Air Quality Assessment, GEM Air Quality;
- Archaeological Statement, prepared by MOLA;
- Ground Investigation Study, prepared by GEA;
- Preliminary Ecological Appraisal, prepared by MKA Ecology;
- Biodiversity Net Gain Plan, prepared by MKA Ecology;
- Construction Management Plan, prepared by Blue Sky Building;
- Contamination Statement, prepared by HTS;

- Daylight & Sunlight assessment, prepared by Lumina;
- Employment and Training Statement, prepared by Lawnmist Limited;
- Fire Statement, prepared by Warringtonfire;
- Noise Assessment, prepared by Max Fordham;
- Statement of Community Involvement, prepared by Kanda;
- Structural Methodology Statement, prepared by HTS;
- Flood Risk Assessment, prepared by HTS;
- Drainage Statement and SUDs strategy, prepared by HTS;
- Transport Assessment, prepared by NRP;
- Travel Plan, prepared by NRP;
- Delivery and Servicing Plan, prepared by NRP;
- Tree Report, prepared by Arborclimb;
- Ventilation and Extraction Statement, prepared by Max Fordham; and
- Site Waste Management Plan, prepared by Paul Mews Associates.



## 2 Site and Surroundings

- 2.1 The Site comprises three buildings located at the southeast corner of the Gray's Inn Road and Clerkenwell Road junction.

### 100 Gray's Inn Road

- 2.2 No. 100 Gray's Inn Road is the corner property which has seven levels above the ground floor. It is slightly recessed from the building line on Clerkenwell Road as there are four prominent, albeit bowed, trees in front of the property. There are three ground floor retail (Class E) units (one of which is vacant) and entrances either side of these which provide access to the office (Class E) floors above.
- 2.3 This property is a post-war building of a utilitarian design featuring glass and panelling. The Hatton Garden Conservation Area appraisal and management strategy (August 2017) states that the building is a 'negative contributor' in terms of its appearance. Holborn Town Hall was the original building at this Site.
- 2.4 There are only 15 buildings within the Hatton Garden Conservation Area which are identified by LB Camden as having a negative impact upon the character and appearance of the area. Although no specific justification is provided in relation to this property (or indeed any building), it is set out that reasons for this designation include inappropriate bulk, scale, height or materials, poor quality design or construction, or because they fail to address the street.
- 2.5 Without referring to this building, the conservation area audit goes on to state that the architectural character of the locality has been weakened by large office buildings designed without an appreciation of the area's character. It states that there is an opportunity for large buildings to successfully maintain the traditional rhythm of the local townscape.
- 2.6 There is a range of mechanical and electrical equipment on the roof of 100 Gray's Inn Road and several telephone antennae which are prominent when viewed from street level.
- 2.7 There is a servicing yard to the rear of the building. This can be accessed through a narrow undercroft from Gray's Inn Road. Cycle and car parking, as well as back of house amenity space, is provided at basement level.

### 127 Clerkenwell Road

- 2.8 No. 127 Clerkenwell Road is a more modern red brick office building which has six upper levels. The building has a separate access from Clerkenwell Road, and the front facade includes several arched features and brick / stone detailing which form a pastiche traditional design, which in part reflects the style of the neighbouring property at no. 125.
- 2.9 There is a large zinc clad plant enclosure at roof level, as well as a prominent escape staircase to the rear of this building. Beyond this, the building steps down to two storeys so that it is subservient in scale to buildings which form part of the Bourne Estate.

### 88 Gray's Inn Road

- 2.10 No. 88 Gray's Inn Road is a mid-twentieth century four-storey building to the rear of the Site, accessed via an undercroft located underneath existing residential properties fronting Gray's Inn Road. The building is currently used as office accommodation (Use Class E).
- 2.11 Most of the architecture surrounding the Site is generally from Victorian or Edwardian eras and as a result is similar and generally of a finer urban grain. To the south-east of the Site is the Bourne Estate, the majority of which is Grade II listed. The Bourne Estate was built in the early-Edwardian era by the London County Council and consists, predominantly, of five storey blocks of flats with balcony access. To the south east of the site lies Grays Inn being one of the Inns of Court. Many of the buildings are Grade II\* listed along with the Gardens which are Registered Grade II\*.
- 2.12 To the south of the Site along Gray's Inn Road is a five-storey period terrace which is designated by LB Camden as making a 'positive contribution' to the conservation area. The building next to no. 127, The Griffin, is ground plus two storeys in height and is also considered to be a 'positive contributor.' There is an extant planning permission to extend the height of this building.
- 2.13 The Site is covered by the following planning designations:
- Hatton Garden Conservation Area (but outside the Hatton Garden Area);
  - Bourne Estate sub-area of the Hatton Garden Conservation Area;

- Central London Area;
- GLA Central Activities Zone;
- Conservation Area Retail frontage (though no retail designation as part of the Local Plan);
- Within the Background Setting Consultation Area behind St Paul's Cathedral from Blackheath Point (threshold at circa 52.9m AOD).

### 3 Planning History

- 3.1 An examination of the London Borough of Camden’s online planning history search has been undertaken and the Site’s relevant planning history is summarised in this Section.

#### 100 Gray’s Inn Road

- 3.2 An examination of LB Camden’s online planning records for 100 Gray’s Inn Road revealed extensive history for the site. The most relevant planning history is included below.

- 3.3 There have been several planning applications for rooftop antenna since 1995. Most recently, on 17 July 2019, prior approval was granted (ref. 2019/2556/P) for the **“Replacement of 3 no. existing antennas with 3 no. new antennas, the addition of 2no cabinets and ancillary works thereto, all on the roof”**.

- 3.4 On 22 March 2012, permission was granted (ref. 2011/4711/P) for **“Additions and alterations in association with change of use from car park (*sui generis*) to office use (Class B1) at part basement and rear part ground floor levels, including single storey extension at rear ground floor level over existing ramped area and alterations to ground floor frontages on both Clerkenwell Road and Gray’s Inn road elevations”**.

- 3.5 On 21 November 1989, permission was granted (ref. 8900300) for the **“Continued use of the 1st and 2nd floors of 100 Gray’s Inn Road as offices without compliance with condition 02 of planning permission granted by Secretary of State’s letter dated 10th October 1973”**.

- 3.6 On 12 September 1963, permission was granted (ref. 23597/5827) for the **“Redevelopment of the site of Holborn Hall, Nos. 129-137 Clerkenwell Road and No. 100 Gray’s Inn Road, Holborn, by the erection of an eight storey building plus basement for use as shops on the ground floor, showrooms on the first and second floors and offices on the third to seventh floors with car-parking accommodation, etc., in the basement, generally as shown on the drawings submitted”**. It is assumed that this planning permission is in relation to the building which is currently at the Site.

#### 88 Gray’s Inn Road

- 3.7 On 19 December 2016, permission was granted (ref. 2015/2580P) for the **“Demolition of the existing two-storey rear extension and replacement with a four-storey rear extension;**

**demolition of the existing single-storey roof extension and replacement with a new single-storey roof extension”.**

- 3.8 On 2 May 1968, permission was granted (ref. 4990) for the **“Addition of third floor for model making and incidental storage”.**
- 3.9 On 14 September 1966, permission was granted (ref. 2202) for the **“Erection of a third floor to the existing light industrial building.”**

127 Clerkenwell Road

- 3.10 Planning history for 127 Clerkenwell Road is also extensive. The most relevant applications are summarised below.
- 3.11 On 16 March 2019, a certificate of lawfulness was granted (ref. 2019/0247/P) for the **“Use of the basement and ground floor as offices (Class B1a)”** as the showroom condition had not been complied with for a period of 10 years.
- 3.12 On 4 October 1988, permission was refused (ref. 8800045) for the **“Redevelopment of the site by the erection of a building comprising of a basement ground and six floors over for office use as shown on drawings numbered 3106/TP/B/01 02 03 04 05 and 06.”**
- 3.13 On 24 May 1988, planning permission was granted (ref. 8888800046) for the **“Redevelopment of the site by the erection of a building comprising of a basement ground and six floors over to be used as showroom/plant room in the basement showroom with ancillary office at ground floor and offices on the floors above.”** It is assumed that this permission is in relation to the current building at the Site.
- 3.14 On 10 January 1964, permission was granted (ref. 13615) for the **“Erection of a building comprising basement, ground and six floors over to be used as storage in the basement, showroom on ground floor and offices on the floors above.”**
- 3.15 On 9 January 1963, permission was granted (ref. 19608/8191) for the **“Redevelopment of the site of 127 Clerkenwell Road, by the erection of a building comprising basement, ground and six floors over, to be used as storage in the basement, a showroom on the ground floor and offices on the floors above.”**

## 4 Consultation

- 4.1 This section of the Statement summarises the pre-application and consultation process and how the Proposed Development has responded to comments received. It should be read alongside the Statement of Community Involvement ('SCI') submitted with the application, prepared by Kanda, and the Design & Access Statement, prepared by Piercy & Company.
- 4.2 The Localism Act 2011 emphasises the need to involve and engage with the local community during the planning process.
- 4.3 Paragraph 39 of the National Planning Policy Framework (2021) emphasises that early engagement and good quality pre-application discussion enables better coordination between public and private resources and provides improved outcomes for the community.
- 4.4 Part A of Policy GG1 of the London Plan (2021) encourages early and inclusive engagement with stakeholders and local communities on the development of proposals.
- 4.5 At a local level, LBC adopted a Statement of Community Involvement ('SCI') in 2006 and this was last revised in 2016. The SCI sets out how LBC will involve local people, local businesses and other key organisations and stakeholders when they prepare planning policies and consider planning applications.
- 4.6 The SCI which forms part of this application demonstrates that a thorough and constructive consultation process has been undertaken in the preparation of the proposals which has culminated in the scheme submitted for planning. Feedback from the various consultees has been reviewed by the project team and fed into the design evolution of the Proposed Development ahead of the submission.

### Pre-application Engagement with LBC

- 4.7 The Proposed Development has been subject to extensive discussions over an extended period with LBC Officers. Pre-application meetings have been held with Officers in respect of

a range of matters including design, land use, whole life carbon, transport, overlooking, landscaping, air quality and SuDS.

- 4.8 Pre-application meetings to discuss the Proposed Development took place In-between October 2020 and July 2022.
- 4.9 The design of the buildings has progressed significantly following Officer comments. In particular, the scheme has responded to Officer and DRP comments by decreasing the height of the proposed building and reducing and simplifying the massing of the roof to minimise the visual impact from both distant and close-up views.

#### Pre-application Engagement with the Greater London Authority (GLA)

- 4.10 The Proposed Development has also been subject to extensive discussions with Officers from the Greater London Authority (GLA). Pre-application meetings held with GLA Officers covered matters including land use, affordable housing, design, heritage, strategic views, the agent of change principal, fire safety, transport, and sustainability.
- 4.11 Pre-application meetings to discuss the Proposed Development were held with GLA Officers on 28 April 2021 and 22 July 2022.
- 4.12 The pre-application meetings were positive, with officers being supportive of the scheme principles. The design team has also responded to Officer comments by providing a more detailed assessment in relation to London View Management Framework views, which is included within the Design & Access Statement.

#### Design Review Panel

- 4.13 The design team presented at two Design Review Panels, on 26 February 2021 and 6 May 2022.
- 4.14 At the first meeting, the Panel requested more variation in the elevations and the ground floor to be more clearly defined. The Panel also requested that the proposed building was reduced in height. The Panel sought further evidence and clarification as to why a full redevelopment was the most sustainable option, rather than retaining and refurbishing the existing buildings.

4.15 These comments were considered by the design team and a revised proposal was presented to the Panel on 6 May 2022. Written feedback set out that the Panel considered many aspects of the design had improved since the first review. Piercy & Company has provided a response to the DRP written comments following the second meeting at Appendix 1 of the Design & Access Statement.

#### Public Consultation

4.16 The proposal has been subject to comprehensive public engagement, managed by Kanda. The SCI which accompanies the application fully details the consultation exercise and a summary is provided below.

4.17 On 16 June 2021, a dedicated project consultation website was launched and has been visited by over 393 different people. The online feedback form on the project website was open until 6 June 2022 but did not receive any completed submissions.

4.18 A letter was sent out to nearby neighbours of the Site on the Bourne Estate, inviting them to a meeting and presentation about the Proposed Development on 9 September 2021. On 15 September 2021, a door knocking session took place on the Bourne Estate.

4.19 In September 2021, a newsletter was posted to circa 3,278 residents and businesses in the local area, inviting them to the public exhibition on 7 December 2021. The public exhibition took place, providing the opportunity for local residents to learn more about the proposals, speak to members of the project team and provide their feedback. This was attended by 13 local residents.

4.20 In May 2022, a newsletter was posted to circa 3,299 residents and businesses in the area, inviting people to a public exhibition on 25 May 2022. The public exhibition took place, which provided updated proposals for 100 Gray's Inn Road following the feedback from previous rounds of consultation. There was also a pre-meeting for close neighbours of the site between 6pm-7pm. The exhibition was attended by 18 local residents and three people attended the neighbour pre-meeting.

4.21 Meetings have also taken place to discuss the Proposed Development with:

- Ward Councillors;
- Bourne Estate Tenants Association;



- Grays Inn Building Tenants' Association;
  - The Honourable Society of Grays Inn;
  - Freeholder of The Griffin, 125 Clerkenwell Road;
  - Matrix Chambers, The Griffin Building;
  - 3VB, Verulam Buildings;
  - Head of Security, LB Camden.
- 4.22 Feedback from the public consultation was generally positive, with the majority of the local residents responding in support of the Proposed Development. Queries and concerns were provided in relation to disturbance during the construction phase and potential overlooking.
- 4.23 The Applicant is actively considering measures to limit disruption caused by construction, this includes undertaking part of the build via modular construction and establishing a Community Working Group. If possible, construction works would be programmed so they could take place at the same time as planned works on the Bourne Estate. The Applicant has responded to overlooking concerns by removing a terrace at first floor level, and narrowing and deepening the windows at the rear building.
- 4.24 The Applicant intends to continue to communicate regularly and openly with all stakeholders, including the Bourne Estate Tenants & Residents Association, throughout the planning process and, should planning permission be granted, subsequently during the construction and operational phases.

## 5 Proposed Development

5.1 The key details of the Proposed Development are summarised in this section of the Statement. This section should be read in conjunction with the Design and Access Statement, and application drawings prepared by Piercy & Company.

5.2 Full planning permission is sought for:

**“Demolition of 100 Gray’s Inn Road and 127 Clerkenwell Road and the erection of a mixed-use office led (Class E) development comprising a basement, ground plus eight storey building for flexible retail / restaurant / office uses at ground floor and basement (Class E), basement excavation, provision of roof terraces, external plant equipment and enclosures, servicing bay, waste storage, cycle parking, public realm works; partial demolition and extension of 88 Gray’s Inn Road for use of the upper floors for housing (Class C3) and ground floor as offices (Class E) with associated external alterations and associated works.”**

5.3 The Proposed Development encompasses the following:

### 100 Gray’s Inn Road and 127 Clerkenwell Road

- Demolition of 100 Gray’s Inn Road and 127 Clerkenwell Road;
- Construction of a basement, ground plus eight storey building at 100 Gray’s Inn Road and 127 Clerkenwell Road constructed from a glulam frame with CLT floor structures;
- Improved and increased public realm on Clerkenwell Road, including the use of timber cobbles;
- Provision of high-quality office accommodation measuring 11,895 sqm GIA across the Site;
- External terraces in connection with the office use at levels 2, 3, 4, 5, 8, and at roof level. The rear terraces would be available for use between 8am to 7pm Mondays to Fridays, and the roof terrace between 8am to 11pm Mondays to Fridays;
- At the ground floor of the new building, two units which could be used for either retail or as a restaurant (both Class E). A further unit, measuring 814 sqm GIA, which could be used as either retail, a restaurant or offices;

- At basement level, the provision of long stay and short stay cycle racks, electric bike charging station, and changing facilities;
- Reducing the level of the existing basement, to help ensure that a significant amount of plant equipment could be provided within the building. The maximum depth of the basement would be 16.72m AOD, 4.45m below street level;
- A dedicated servicing bay accessed off Gray's Inn Road, including a turntable and refuse stores;
- Changes to the pavement treatment at the current vehicular entrance to 127 Clerkenwell Road;
- Biodiverse roof and intensive planting at the rear and roof level of the new building, leading to an Urban Greening Factor Score of 0.3;
- Rooftop plant equipment and PV panel array measuring 23 sqm.

#### 88 Gray's Inn Road

- Partial demolition of newer elements of 88 Gray's Inn Road, including at the north and west sides of the building, as well as the third-floor roof extension;
- Replacement roof extension at third floor level;
- Partial excavation to ensure that services can be installed at basement level, including Air Source Heat Pumps;
- Provision of 326 sqm GIA of affordable workspace at the ground floor, at a 20% discount for a 10-year period;
- Provision of six affordable housing flats measuring 823 sqm GIA, four x Low Cost Rented flats and two x Intermediate Rented flats, equating to 67:33 split by tenure, 68:32 in terms of floorspace and 66:34 by habitable rooms;
- The unit mix would be 2 x one bedroom, 2 x two bedroom, and 2 x three bedroom flats, all of which would exceed the national space standards. The two-bed units would be Intermediate flats, with the one bed and three bed units being Low Cost Rented flats;
- All flats would have external amenity space, at the flats at the first and second floors this would be provided through the removal of existing windows and providing recesses within the building;
- Cycle parking in connection with the affordable workspace at basement level with residential cycle parking at ground floor level;

- PV panel array at roof level measuring 21 sqm and biodiverse roof at the western section.

5.4 The total uplift of the Proposed Development is 4,254 sqm GIA. The existing and proposed land uses are detailed in Table 1, below.

**Table 1 - Land Use Summary**

Land Use (Use Class)	Existing sqm GIA	Proposed sqm GIA	Change sqm GIA
<b>Retail (Class E) / Restaurant (Class E)</b>	468 sqm	364 sqm	-104 sqm
<b>Retail (Class E) / Restaurant (Class E) / Office (Class E)</b>	0 sqm	814 sqm	+814 sqm
<b>Office (Class E)</b>	9,174 sqm	11,895 sqm	+2,721 sqm
<b>Residential (Class C3)</b>	0 sqm	823 sqm	+823 sqm
<b>Total</b>	9,642 sqm	13,896 sqm	+4,254 sqm

## 6 Planning Policy Context

6.1 The statutory development plan for the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004 comprises:

- The London Plan (2021);
- The Camden Local Plan (2017); and
- The Camden Site Allocations Plan (2013).

6.2 The National Planning Policy Framework (NPPF) and National Planning Practice Guidance (“NPPG”) are both material considerations.

### Statutory Tests

6.3 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that Local Planning Authorities should pay special regard to the desirability of preserving a listed building or its setting or any features of historic or architectural interest which it possesses when considering applications.

6.4 Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of conservation areas.

### National Planning Policy and Guidance

6.5 The National Planning Policy Framework (‘NPPF’) sets out the Government’s economic, environment and social planning policies for England and supersedes the vast majority of Planning Policy Guidance Notes (PPGs) and Planning Policy Statements (PPSs). It summarises in a single document all previous national planning policy advice. Taken together, these policies articulate the Government’s vision of sustainable development, which should be interpreted and applied locally to meet local aspirations.

### National Guidance – Planning Practice Guidance (as updated to 2022)

6.6 In March 2014, the Government launched the web-based Planning Practice Guidance (‘PPG’). This aims to provide guidance which is useable in an up-to-date and accessible manner.

6.7 The PPG outlines how Government planning practice should be followed and interpreted in accordance with the principles of the NPPF. Regarding decision making, the guidelines set out in the PPG are a material consideration and accordingly should carry weight in the determination of planning applications.

Regional Planning Policy - London Plan (2021)

6.8 The London Plan 2021 is the overall strategic plan for Greater London, which includes the 32 Boroughs and the City of London. The aim of the London Plan is to set out an overarching framework to co-ordinate and integrate economic, environmental, transport and social considerations over the next 20 to 25 years. The London Plan forms the London-wide policy context within which the Boroughs set their local planning agendas, and forms part of the statutory development plan.

6.9 This high level, over-arching vision is supported by detailed objectives that will lead to the Mayor’s vision of ‘Good Growth’. These objectives include:

- Building strong and inclusive communities;
- Making the best use of land;
- Creating a healthy city;
- Delivering the homes Londoners need;
- Growing a good economy; and
- Increasing efficiency and resilience.

Local Planning Policy – The Camden Local Plan (2017)

6.10 The Camden Local Plan adopted in July 2017 sets out how development will be managed within the Borough. The Plan seeks to address several challenges; adapting to Camden’s growing population and to social change, the supply and cost of housing in the Borough, maintaining a successful economy and improving opportunities, inequalities, health and wellbeing, improving transport, quality of the environment and crime and safety.

6.11 To address these challenges, the Plan sets three key objectives:

- (1) Developing new solutions with partners to reduce inequality and improve health and wellbeing;

(2) Creating conditions for and harnessing the benefits of economic growth;

(3) Investing in our communities to ensure sustainable neighbourhoods.

6.12 The Council's objective is to create the conditions for growth to provide the homes, jobs and other facilities needed to support it, while ensuring that growth delivers opportunities and benefits for our residents and businesses. The Plan aims to deliver sustainable growth while continuing to preserve and enhance the features that make Camden such an attractive place to live, work and visit.

#### Emerging Local Planning Policy Context

6.13 LBC is in the process of preparing a new Site Allocations document. An initial formal consultation on the 'Site Allocations Local Plan' was carried out between 13 February and 27 March 2020. For a variety of reasons including the impacts of the Covid-19 pandemic, an additional round of consultation took place in the early part of 2022 which focused upon policies for growth areas and sites; and climate action in Camden.

6.14 The draft plan identifies several key development sites and areas across the Borough, including the Knowledge Quarter (draft Policy KQ1), which this Site sits within.

6.15 A Publication Draft of the Site Allocations Local Plan is programmed to be published for consultation later in 2022. Once updated and adopted this Development Plan Document will supersede the 2013 Site Allocations Plan.

#### Other Material Considerations

6.16 Supplementary Planning Guidance and Documents which are a material consideration in the determination of this application include the following:

- Mayor of London's 'Be Seen' Energy Monitoring Guidance (2021);
- Mayor of London's Energy Planning Guidance (2022);
- Mayor of London's Whole Life-Cycle Carbon Assessments Guidance (2022);
- Mayor of London's Circular Economy Guidance (2022);
- Mayor of London's Accessible London SPG (2014);
- Mayor of London's Character and Context SPG (2014);
- Mayor of London's Housing and Viability SPG (2017);

- Mayor of London’s Housing SPG (2016);
- Mayor of London’s London View Management Framework SPG (2012);
- Mayor of London’s Control of Dust and Emissions SPG (2014);
- Hatton Garden Conservation Area Appraisal and Management Strategy (2017);
- Camden Planning Guidance – Design (2021);
- Camden Planning Guidance – Access for All (2019);
- Camden Planning Guidance – Employment Sites & Business Premises (2021);
- Camden Planning Guidance – Energy Efficiency and Adaptation (2021);
- Camden Planning Guidance – Town Centres and Retail (2021);
- Camden Planning Guidance – Amenity (2021);
- Camden Planning Guidance – Public Open Space (2021);
- Camden Planning Guidance – Air Quality (2021);
- Camden Planning Guidance – Housing (2021);
- Camden Planning Guidance – Transport (2021);
- Camden Planning Guidance – Trees (2019);
- Camden Planning Guidance – Developer Contributions (2019); and
- Camden Planning Guidance – Water and Flooding (2019).

6.17 In addition to the guidance set out above, several draft guidance documents to support the London Plan (2021) have been reviewed and taken into consideration:

- Air Quality Neutral;
- Fire Safety;
- Sustainable Transport, Walking and Cycling; and
- Urban Greening Factor.

#### Key Planning Considerations

6.18 The key planning considerations affecting the Proposed Development are considered to include the following:

1. Land Use;
2. Design;
3. Townscape and Heritage;
4. Energy and Sustainability;



5. Transport and Servicing;
6. Amenity, Including Daylight / Sunlight, Noise and Air Quality;
7. Ecology and Biodiversity; and
8. Other Technical Considerations, Including Fire Safety and Flood Risk.

6.19 In the following sections of the Planning Statement, we address each of the key planning considerations noted above having regard to the Development Plan as a whole, and any wider material considerations.

## 7 Land Use

- 7.1 This section of the Statement assesses the proposed land uses and their acceptability, in principle, in planning policy terms.

### Commercial Office (Class E) Policy Context

- 7.2 The NPPF sets out the Government’s commitment to securing economic growth and advises that planning policies and decisions should help create the conditions in which businesses can invest, expand, and adapt. Paragraph 81 specifies that significant weight should be placed on supporting economic growth and productivity, taking into account both local business needs and wider opportunities for development.
- 7.3 Policy SD5 of the London Plan states that offices and other CAZ strategic functions are to be given greater weight relative to new residential development at this location in the CAZ.
- 7.4 At the local level, LBC Local Plan Policy E1 explains that the Council will secure a successful and inclusive economy by creating the conditions for economic growth and harnessing the benefits for local residents and businesses. To do so, the policy says the Council will, among other things, support and promote the development of the Knowledge Quarter and direct office development to the Central London Area.
- 7.5 Policy E2 of the Local Plan sets the policy context for the provision of new employment premises in the Borough. More specifically, the wording of the policy states that LBC will consider a higher intensity redevelopment of sites that are considered suitable for continued business on the following conditions, among others:
- i. the level of employment floorspace is increased or at least maintained;
  - ii. the proposed premises include floorspace suitable for start-ups, small and medium-sized enterprises, such as managed affordable workspace where viable;
  - iii. the scheme would increase employment opportunities for local residents, including training and apprenticeships;

iv. the scheme includes other priority uses, such as housing, affordable housing and open space, where relevant, and where this would not prejudice the continued operation of businesses on the Site.

#### Commercial Office (Class E) Assessment

- 7.6 The proposed development would deliver an uplift of 2,721 sqm GIA of office floorspace (including 326 sqm GIA of affordable workspace), as well as a further 814 sqm GIA of flexible Class E floorspace at ground level which could be used as office accommodation.
- 7.7 The Site is located within the CAZ, Central London Area, and the Knowledge Quarter. As such the delivery of high-quality employment space is supported at all policy levels.
- 7.8 To support Local Plan Policy E1 and E2, Camden’s Draft Site Allocations Local Plan Policy KQ1(f) seeks to ensure that at least 20% of additional floorspace in the Knowledge Quarter is affordable workspace.
- 7.9 The provision of 326 sqm GIA of affordable workspace represents 9% of the maximum total 3,535 sqm GIA uplift of proposed employment floorspace, or 12% of floorspace when excluding the flexible ground floor unit.
- 7.10 The affordable workspace located at the ground floor of 88 Gray’s Inn Road would offer a 20% discount for a 10-year period. The Financial Viability Statement, produced by Gerald Eve LLP, demonstrates why this offer is suitable in the context of the overall scheme viability.
- 7.11 The Proposed Development would also increase employment opportunities for local residents, not only by virtue of being a larger office building that can accommodate more staff, but also through the Applicant’s commitment to delivering employment and training initiatives.
- 7.12 These employment and training initiatives would provide apprenticeship and work placement opportunities during both the construction of the Proposed Development and during the operational stage. The employment and training opportunities that will be delivered by the Proposed Development, and which can be secured through Section 106 obligations, can be found within the Employment and Training Plan, produced by Lawnmist Limited, which has been submitted in support of this application.

Retail (Class E) and Restaurant (Class E) Policy Context

- 7.13 Paragraph 86 of the NPPF seeks to promote a positive approach to town centre environments and to direct retail development to town centres in the first instance, recognising town centres as the heart of their communities.
- 7.14 London Plan policy E9 states that a successful, competitive and diverse retail sector, which promotes sustainable access to goods and services for all Londoners, should be supported in line with the wider objectives of this Plan, particularly for town centres.
- 7.15 Policy E1 of the Local Plan indicates that the Council will secure a successful and inclusive economy in Camden and will recognise the importance of other employment generating uses including retail, education, health, markets leisure and tourism.
- 7.16 Policy TC1 of the Local Plan sets out that the Council will promote retail and other town centre uses across the borough. Retail floorspace is expected to be supported by a range of other town centre uses including food, drink and entertainment uses.

Retail (Class E) and Restaurant (Class E) Assessment

- 7.17 The Proposed Development would deliver 364 sqm GIA of Class E retail / restaurant floorspace and a further 814 sqm GIA of flexible Class E floorspace, which could be used as retail / restaurant use (or office). There would be one retail / restaurant unit which would wrap around the corner of Clerkenwell Road and Gray's Inn Road, and there would be a smaller unit next to the main office entrance, on Clerkenwell Road. These would both provide active frontages and uses which would be accessible to members of the public. These units have been sized and configured following input from retail agents to help ensure that they would generate interest from a range of prospective tenants. In between these units, a flexible retail, restaurant or office use is proposed. Although a deep unit, this wouldn't have a significant frontage on to Clerkenwell Road, and the Applicant would accept a condition, should planning permission be granted, that this would need to have an active frontage. Overall, the Proposed Development seeks to increase the length of active frontages at the Site from 54.5m, at present, to 63m.
- 7.18 The Site is designated as being within the Central London Area, is located within a popular area for retail, restaurant and café operators, and is also fully accessible by public transport,

walking and cycling. The provision of Class E commercial uses at the ground floor of the building would complement the surrounding retail uses by providing further amenities and would allow for improved activation. It would also allow public access into the building.

- 7.19 The provision of main town centre uses in this location complies with the aspirations for sites within the CAZ and Central London Area as set out within regional and local planning policy.

#### Mixed Used Policy and Residential (Class C3) Context

- 7.20 Chapter 5 of the NPPF provides a framework for delivering a sufficient supply of homes by setting out how Local Authorities should assess, and plan for housing need to be met through sufficient land being available to meet housing need.
- 7.21 Policy SD5 of the London Plan states that offices and other CAZ strategic functions are to be given greater weight relative to new residential in all other areas of the CAZ.
- 7.22 Policy H1 of the Camden Local Plan sets out that self-contained housing is the priority land use across the Borough.
- 7.23 Policy H2 of the Local Plan aims to maximise housing supply and seeks to achieve commensurate levels of self-contained housing whenever non-residential development is proposed to ensure a balance of uses across the Borough. The policy requires that where more than 200sqm GIA of non-residential development is proposed in the Central London Area, 50% of the additional floorspace will be required to be delivered as self-contained housing with an appropriate mix, including affordable housing where relevant. The requirement to deliver affordable housing on Site is subject to a set of criteria which is set out at Policy H4 of the Local Plan and the Housing CPG.
- 7.24 Policy H4 sets out the Council's approach to affordable housing provision which is based on a site's capacity to provide housing, with affordable housing being required on a sliding scale between 2% and 50%.
- 7.25 Policy H6 of the Local Plan requires a mixture of housing choice and mix, including 10% of new building housing to be accessible or adaptable for wheelchair users. Policy H7 of the Local Plan seeks to secure a mix of large and small homes with dwelling size priorities.

- 7.26 Policy A2(p) of the Local Plan seeks to secure new and enhanced open space and give priority to play facilities and the provision of amenity space which meet residents' needs where a development creates a need for different types of open space.
- 7.27 The Housing CPG provides detailed guidance on calculating a site's capacity to provide housing, along with a split between market and affordable.

Mixed Use Policy and Residential (Class C3) Assessment

- 7.28 The Proposed Development seeks to provide an uplift of 4,254 sqm GIA, thus generating a residential floorspace requirement of 2,127 sqm GIA under Local Plan Policy H2.
- 7.29 Based on the proposed areas, the mixed-use policy, and sliding affordable housing scale set out at Policy H4, the affordable housing target is 42.54% of the total residential requirement – so 905 sqm GIA of floorspace.
- 7.30 The Applicant acquired 88 Gray's Inn Road with the specific purpose that this would be able to accommodate affordable housing and as part of this application six flats are proposed within this building. These measure 823 sqm GIA, which is very close to the affordable housing policy requirement. The shortfall is 82 sqm GIA, less than the size of a typical unit, which the Housing CPG sets out to be 100 sqm.
- 7.31 The proposed split of the six residential units is four low cost rented units and two intermediate units. Low cost rented homes are for households on low incomes where the rent levels are based on the formulas in the Social Housing Regulator's Guidance. The rent levels for these homes use a capped formula. Intermediate rental units represent a discount of up to 80% of market levels.
- 7.32 In terms of the percentage split, 66.6.% of units would be social affordable and 33.33% would be intermediate rent, which exceeds the 60:40 split target set out in Local Plan Policy H4 and would help to deliver housing for identified needs in the borough.
- 7.33 One of the six units has been specifically designed to be accessible for wheelchair users, representing 16.66%, which complies with Local Plan Policy H6. There would be two x 1 bed units, two x 2 bed units and two x 3 bed units.

- 7.34 The proposed residential units would all be of high quality, as can be seen in the Design and Access Statement, produced by Piercy & Company. The residential units exceed national space standards and offer outdoor amenity space in the form of inset balconies and terraces. There is no open space at the Site to provide playspace, though there is a playpark nearby, off Portpool Lane.
- 7.35 The Proposed Development is unable to provide market housing on-site. This is due to the challenges of providing the additional housing within the main building, which would compromise the commercial floorspace, and the impact it would have on the viability of the scheme.
- 7.36 Several design options including market housing were considered by Piercy & Company, which can be viewed in the Housing Options section of the Design & Access Statement. This included an option to refurbish 127 Clerkenwell Road to provide a mixture of affordable and market residential units, however, this was discounted due to layout inefficiencies, loss of retail frontage on Clerkenwell Road, noise and pollution impacts, and compromises to the residential and office accommodation.
- 7.37 A second option that included market residential was a new build commercial scheme replacing 100 Gray's Inn Road and 127 Clerkenwell Road with the market housing at the south west corner of the Site. This was discounted due to irregular and inefficient office floorplates, noise and pollution impacts on the residential units, and the loss of retail frontage on Clerkenwell Road.
- 7.38 The third option considered was a new build commercial scheme replacing 100 Gray's Inn Road and 127 Clerkenwell Road with both market and affordable residential units located in a block on the north east corner of the Site. However, this was discounted due to the different uses being stacked on top of each other causing inefficiencies, the core size being insufficient, noise and pollution impacts, residential units being predominantly single aspect and north facing, and the loss of retail frontage to Clerkenwell Road.
- 7.39 A fourth option included a new build commercial scheme on the site of 100 Gray's Inn Road and 127 Clerkenwell Road, with market housing on the top floor. However, this was discounted as it would create major inefficiencies associated with risers and the additional core needed that would travel all the way up the building but only serve four residential units.

- 7.40 The Applicant has no nearby land holdings, and it is therefore not feasible for it to provide the market housing required by Local Plan Policy H2 off-site.
- 7.41 Furthermore, the Financial Viability Report, produced by Gerald Eve LLP, also illustrates why it would not be possible for the Applicant to make a payment in lieu of market housing, or in relation to the modest shortfall in affordable housing.
- 7.42 Overall, it is considered that the proposed land uses provide a suitable mix within this part of the CAZ. Retail / restaurant uses would be provided at the ground floor to ensure visual interest and local amenities, improved commercial space would be provided within the Knowledge Quarter, and a good mix of affordable housing units, the Council's priority land use, would be provided in a central location, where housing is typically particularly unaffordable.



## 8 Design

- 8.1 This section of the Statement assesses the proposal against relevant design planning policies contained in national and local planning policy documents. Further details on the design can be found in the submitted Design and Access Statement, prepared by Piercy & Company.

### Design

- 8.2 The Government attaches great importance to the design of the built environment in the NPPF. Paragraph 126 states 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. Paragraph 130 of the NPPF states that planning policies and decisions should ensure that developments will function well and add to the overall quality of the area, be visually attractive as a result of good architecture and effective landscaping, be sympathetic to local character and history, establish or maintain a strong sense of place, optimise the potential of the site and create safe places.
- 8.3 London Plan Policies D1 to D3 apply to the design and layout of the development and set out a range of urban design principles relating to the quality of the public realm, the provision of convenient, legible movement routes and the importance of designing out crime by maximising the provision of active frontages.
- 8.4 Policy D5 of the London Plan states that development proposals should achieve the highest standards of accessible and inclusive design and that proposals should deliver high quality people focused spaces, which are convenient and welcoming with no disabled barriers.
- 8.5 At a local level, Policy D1 of the Camden Local Plan seeks to secure high quality design in development and to ensure that new developments are attractive, safe and easy to use. The policy lists what characteristics LB Camden will expect to achieve this policy objective including requiring development to respect local context and character, preserves or enhances the historic environment and is of sustainable and durable construction.
- 8.6 LBC has also published a Planning Guidance CPG (January 2021) which establishes design principles to be used in the assessment of development proposals. The document reinforces

or where necessary amplifies existing guidance and defines the Council's expectations for new buildings, as positive and enduring additions to this unique urban landscape.

- 8.7 This application proposes a new basement, ground plus eight storey commercial building at 100 Gray's Inn Road and the refurbishment of 88 Gray's Inn Road, to provide six affordable housing units and affordable workspace.
- 8.8 At the start of the design process, Piercy & Company undertook a detailed analysis of the current buildings at 100 Gray's Inn Road and 127 Clerkenwell Road which found that there would be significant challenges to refurbish either building. In terms of 100 Gray's Inn Road, it has low floor to ceiling heights at floors three to seven (2.2m to 2.4m), poor quality cladding, and outdated services. No. 127 Clerkenwell has small windows and a deep plan, meaning that it is very dark internally. The low floor to ceiling heights at the basement of both buildings would make it difficult to house modern day plant equipment required to ensure best in class services.
- 8.9 At the beginning of the project, three design options were considered in detail: 1) refurbishment of the current buildings and an upwards extension to 100 Gray's Inn Road and 127 Clerkenwell Road, 2) refurbishment of 127 Clerkenwell Road, demolition of 100 Gray's Inn Road to second floor level and upwards extension, 3) new build.
- 8.10 It was considered that the new build scheme would perform significantly better in terms of floor to ceiling heights, future adaptability, and well-being offer, and following a review of Whole Life Carbon analysis comparisons, it was decided to progress this scheme.
- 8.11 The design of the building seeks to respond to the rich architectural language within the local built environment. Design clues which have been taken from nearby buildings include the deep red palette, brickwork and stucco detailing, corncicing, and banding.
- 8.12 The proposed building form of 100 Gray's Inn Road is expressed as two building volumes, a corner block on the junction of Gray's Inn Road and Clerkenwell Road, with a mansard element above. At ground floor there would be generously proportioned shop frontages and an arched entrance to the offices. So that the building can be expressed differently along the lengthy Clerkenwell Road frontage, a solid recessed semi-circular bay separates the western element where fenestration is spaced at two metres and at the eastern element where it is spaced at three metres. The façade would be constructed from rose dyed pigmented

concrete. The building would have a ‘crown’ which would be expressed as a pitched roof form. The materiality of this would be a curtain walling system with a layer of mandarin coloured metal mesh.

- 8.13 At the rear of the Site, the building would be stepped back to respect the narrower grain architecture and to ensure that nearby residential properties retain good light levels. On the lower portion of the rear façade, there would be a solid red brick elevation with punched narrow windows. There would be deep reveals to limit solar gain and to help prevent overlooking between properties. The upper portion of the southern façade would be made up of a horizontal grid of glazing and light red concrete spandrel panels.
- 8.14 The new building has been designed to be a ‘kit of parts’ which would enable off-site manufacturing to take place, which reduce the on-site construction programme. The building would also be quicker to assemble given the proposed timber structure.
- 8.15 The maximum height of the building would be at the lift overrun, at 58.44 AOD. The Site is within the Background Setting Consultation Area behind St Paul’s Cathedral as described within the London View Management Framework (View 6A.1). Although the proposed building at 100 Gray’s Inn Road would breach this threshold, it would not harm the view of St Paul’s Cathedral from Blackheath Point, given that from this viewpoint it is set away from the tower and domes of the cathedral, and as there are already building visible to the rear of this Site.
- 8.16 The proposed design also seeks to make improvements to the public realm, particularly on Clerkenwell Road, where the building lines of 100 Gray’s Inn Road and 127 Clerkenwell Road currently differ. The amount of public realm on Clerkenwell Road would increase by circa 30 sqm and the pinch-point on Clerkenwell Road would increase from 3.1 metres to 6 metres. As part of the façade design, seating would be incorporated.
- 8.17 With regard 88 Gray’s Inn Road, given the generous floor to ceiling heights and the solid structure of the building, no other option than retention was considered, though more modern, lightweight elements would be removed, including the third-floor extension, which will be replaced. Given that the building typology matches that of the Bourne Estate and given LB Camden’s mixed-use policy, it was considered that this building would be best used for affordable housing, with affordable workspace at the ground floor. This building would be accessed from a new arched opening from Gray’s Inn Road. This arched passage would

create an attractive and distinctive entrance and was complemented by the Design Review Panel.

- 8.18 The top floor of 88 Gray's Inn Road would be rebuilt and clad in toned concrete or ceramic tiles.

#### Landscaping

- 8.19 The landscaping aspects of the proposals have been progressed by FFLO Landscape Architects. The landscaping features that would be delivered as part of the Proposed Development include the following:

- Improvements to the streetscape of Clerkenwell Road, specifically measures to improve the health of the existing trees and six more bicycle stands;
- 410 sqm of biodiverse roof planting;
- Climbing plants to the rear of 100 Gray's Inn Road to create shade for the users of the building and privacy for its neighbours;
- A robust drought tolerant planting pallet irrigated from a 27m<sup>3</sup> water storage tank set within the building;
- A simple landscape design using timber to carbon bank, in a form intended to reduce material waste and contribute to a future circular economy of materials; and;
- Retention of existing trees.

- 8.20 These landscaping features lead to an Urban Greening Factor calculated as just over 0.3.

#### Ventilation and Extraction

- 8.21 A Ventilation and Extraction Statement, prepared by Max Fordham, is submitted in support of this application. The Statement describes the methods by which the requirements for ventilation will be met in the proposed scheme.

- 8.22 The six proposed residential units at 88 Gray's Inn Road have been designed to use mechanical ventilation with heat recovery (MVHR). This would be provided to each dwelling to offer efficient whole dwelling fresh air ventilation whilst reducing heat loss especially in

winter. Air shall be extracted from toilets, bathroom, utility rooms and kitchens, with fresh air provided to bedrooms.

- 8.23 The residential units would also make use of natural ventilation, using openable windows and doors to allow air flow, particular to mitigate summertime overheating. Most residential units are provided as dual aspect to promote cross flow ventilation.
- 8.24 The affordable workspace at the ground floor of 88 Gray's Inn Road has been designed to make use of natural ventilation, using openable window elements in the facade to allow air flow, particularly to mitigate summertime overheating.
- 8.25 Regarding the office floors at the new building at 100 Gray's Inn Road, the ventilation from ground level up to level 8 has been designed to provide an individual fresh air AHU with heat recovery on each floor. It would be a mixed mode building as opening windows would be provided, which would more likely be used in future years when noise and air quality levels may improve.
- 8.26 The ground floor retail units would be provided with a high-level ventilation louvre band above the street facing glazing to provide fresh air and exhaust air ventilation.

#### Overlooking

- 8.27 Throughout the design process, the team has been aware of the need to ensure that there would not be an unacceptable level of overlooking from the office building to the nearby residential flats. This has sought to be mitigated using translucent window materials where required, deep window reveals and extensive planting along the rear terraces. During the pre-application process, windows at the lower portion of the south elevation have been reduced in width and at ground floor positioned above eye level to ensure that there would not be an unacceptable level of overlooking to the quiet garden, which is already overlooked by buildings to the east and west.

#### Archaeology Assessment

- 8.28 In respect of archaeology, Policy D2 of the Local Plan states that the Council will protect remains of archaeological importance by ensuring acceptable measures are taken

proportionate to the significance of the heritage asset to preserve them and their setting, including physical preservation, where appropriate.

- 8.29 The Site lies within the London Suburbs Archaeological Priority Area (APA), a Tier 2 APA. The Proposed Development includes basement excavation so that plant equipment could be contained within the building, and the digging of foundations. The Proposed Development would however not include a further basement level.
- 8.30 Accordingly, an Archaeological Desk-Based Assessment ('DBA') has been prepared by Museum of London Archaeology (MOLA) to assess any potential impact on below ground heritage assets and any mitigation measures.
- 8.31 The DBA states that there are no designated assets within the Site, however, there is limited potential for post-medieval building remains relating to buildings which are known to have occupied the Site from the 17<sup>th</sup> century onwards, including the Holborn Town Hall constructed in 1880. The DBA also indicates that there is low to moderate potential for encountering Roman remains as the Site is adjacent to the possible course of a Roman road. However, the DBA states that the modern buildings on Site are likely to have truncated or removed much of the archaeological material, particularly through foundations, basements and service trenches.
- 8.32 It is considered that impacts upon the potential archaeological remains could be mitigated through a proportionate programme of archaeological fieldwork which could be controlled via planning condition in consultation with the Greater London Archaeological Advisory Service (GLAAS). The Proposed Development therefore complies with the NPPF, London Plan Policy 7.8 and Policy D2 of the Local Plan.

### Heritage

- 8.33 A full analysis of the impact of the Proposed Development on designated heritage assets is included within the Townscape, Heritage and Visual Impact Assessment ('THVIA'), prepared by The Townscape Consultancy and submitted as part of the application. The Townscape Consultancy has been engaged from early inception of the scheme to guide and advise on heritage and townscape matters.

- 8.34 Section 66 of the 1990 Planning (Listed Buildings and Conservation Areas) Act 1990 provides that decision makers are required to have “special regard” to the desirability of preserving listed buildings and their settings.
- 8.35 Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of conservation areas.
- 8.36 The Government has attached great importance to conserving and enhancing the historic environment in the NPPF. The NPPF advises that decisions on applications with implications on designated heritage assets should be made based on the significance of the asset, and the harm (substantial or less than substantial) that the proposals would cause to the significance of the heritage asset.
- 8.37 Paragraph 194 of the NPPF states that that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance.
- 8.38 Paragraph 197 of the NPPF states that in determining planning applications, local planning authorities should take account of:
- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
  - the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
  - the desirability of new development making a positive contribution to local character and distinctiveness.
- 8.39 Paragraph 199 of the NPPF states that in assessing impact, the more important the asset, the greater the weight should be given to its conservation. It notes that significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting.

- 8.40 Paragraph 200 states that any harm, of loss of, the significance of a designated heritage asset should require clear and convincing justification and that substantial harm to, or loss of grade II listed buildings should be exceptional.
- 8.41 Paragraph 201 notes that where a Proposed Development will lead to substantial harm, local planning authorities should refuse consent unless it can be demonstrated that the substantial harm is necessary to achieve substantial public benefits.
- 8.42 In Paragraph 202, the NPPF states that where a development proposal will lead to ‘less than substantial harm’ to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, securing its optimum viable use.
- 8.43 London Plan Policy HC1 states 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.
- 8.44 Camden Local Plan Policy D2 states that the Council will preserve and where appropriate enhance Camden's heritage assets and their settings. In relation to conservation areas, the policy says that the Council will take into account of Conservation Area Statements, Appraisals and Management Strategies.
- 8.45 Regarding heritage, the Design CPG sets out that, *inter alia*, the Council will take account of the desirability of sustaining and enhancing heritage assets and putting them to viable uses consistent with their conservation.
- 8.46 In terms of heritage assets, the Site is within the Hatton Garden Conservation Area and close to the Bloomsbury Conservation Area, which is to the west. There are several listed buildings nearby which include at the Bourne Estate (group listing), Verulam Buildings, properties on Gray’s Inn Square and properties on Theobalds Road.
- 8.47 No. 100 Gray’s Inn Road is a negative contributor to the Hatton Garden Conservation Area.
- 8.48 In terms of townscape, The Townscape Consultancy consider that the proposed massing and form of the new building would sit comfortably within the surrounding context and mark an improvement to this Site at the corner of Gray’s Inn Road and Clerkenwell Road. It goes on to state that the visually rich elevations would be sympathetic in tone and character to the



buildings within the Site's context. On this basis it is considered that the Proposed Development would improve the streetscape experience along Gray's Inn Road and Clerkenwell Road.

8.49 In terms of heritage, The Townscape Consultancy considers that in all cases the Proposed Development would cause no harm to the architectural or heritage significance of the heritage assets surrounding the Site.

8.50 Overall, the Proposed Development is considered to comply with policy and guidance in relation to heritage, townscape, and visual impacts. In addition to its architectural quality, also recognised by LB Camden, DRP and the GLA, the Proposed Development would better contribute to the character and appearance of the Hatton Garden Conservation Area and would be in compliance with the three objectives of sustainable development contained within the NPPF.

## 9 Energy and Sustainability

- 9.1 This section of the Statement assesses the proposed energy and sustainability strategy, and its acceptability in planning policy terms.

### Energy and Sustainability Policy Context

- 9.2 Section 14 and Paragraph 152 of the NPPF identify the role that planning plays in helping shape places to secure radical reductions in greenhouse emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure.
- 9.3 London Plan Policy SI 2 states that major developments should be net carbon zero with a minimum on-site reduction of at least 35 percent beyond Building Regulations. This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy:
- Be lean: use less energy and manage demand during operation.
  - Be clean: exploit local energy resources and supply energy efficiently and cleanly.
  - Be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site.
  - Be seen: monitor, verify and report on energy performance.
- 9.4 Policy SI 2 explains that major development proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy.
- 9.5 Policy SI 2 also states that development proposals that are referable to the Mayor should calculate whole life cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions.

- 9.6 Additionally, Policy SI 2 of the London Plan explains that major development proposals should calculate and minimise carbon emissions from any other part of the development that is not covered by Building Regulations.
- 9.7 Policy SI 3 encourages developers to engage at an early stage with relevant energy companies and bodies to establish the future energy and infrastructure requirements arising from large-scale development proposals.
- 9.8 Policy SI 4 states that major development proposals should demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the cooling hierarchy set out in the Policy SI 4 (B).
- 9.9 Policy SI 7 of the London Plan supports the promotion of a more circular economy that improves resource efficiency and innovation to keep products and materials at their highest use for as long as possible and sets a target of 95% of construction and demolition waste and material to be re-used, recycled or recovered. Policy SI 7 also requires referable applications to submit a Circular Economy Statement, with Policy SI 7 (B) listing a number of matters that the statement should demonstrate.
- 9.10 At a local level, through Local Plan Policy CC1, LBC require all development to minimise the effects of climate change and encourages developments to meet the highest feasible environmental standards that are financially viable during construction and occupation. Moreover, all development is required to reduce carbon dioxide emissions in line with the targets set out within the London Plan.
- 9.11 In support of these objectives, LBC requires the location of development and mix of land uses to minimise the need for car travel, support energy efficiency improvements to existing buildings and the optimisation of energy efficiency.
- 9.12 Policy CC1 of the Local Plan also requires all proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building.
- 9.13 Policy CC2 of LBC's Local Plan provides an overview of the requirements of all new developments to adopt appropriate climate change adaptation measures. The Policy also requires any development involving 5 or more residential units or 500 sqm or more of any additional floorspace to demonstrate the adaptation measures in a Sustainability Statement.

9.14 Additionally, Policy CC2 indicates ways in which LBC will promote and measure sustainable design and construction. This includes encouraging new build residential development to use the Home Quality Mark and Passivhaus design standards and expecting non-domestic developments of 500 sqm of floorspace or above to achieve “excellent” in BREEAM.

9.15 In January 2021, LBC updated the CPG on Energy Efficiency and Adaptation to help ensure that the Council’s commitment to reducing carbon emissions is achieved.

#### Energy and Sustainability Assessment

9.16 This application seeks to bring forward an exemplar new building at 100 Gray’s Inn Road in terms of energy use and sustainability, whilst refurbishing the existing building at 88 Gray’s Inn Road.

9.17 The proposal is seeking to achieve the following standards:

- BREEAM Excellent;
- London Energy Transformation Initiative (LETI) Pioneer Project;
- Nabers Score 5-5.5 (out of 6);
- To be net zero carbon on construction and in operation (in accordance with UK Green Building Council’s “Net Zero Carbon Buildings: A Framework Definition”).

9.18 A fundamental aspect of the new building is the use of an engineered timber solution which would consist of a glulam frame with cross-laminated timber (CLT) floors. The use of timber is a highly sustainable solution, which is lightweight, adaptable, and can allow quicker construction.

9.19 The application is supported by a Sustainability Statement, prepared by Max Fordham, which details the sustainable design measures which the Proposed Development incorporates, and provides a summary of the BREEAM Pre-Assessment and credits which are being targeted. Overall, a BREEAM score of 75.11% is currently targeted – which is equivalent to an ‘Excellent’ rating.

9.20 The Sustainability Statement confirms that the Proposed Development aims to become a LETI Pioneer Project, and achieve a Nabers UK score 5-5.5 (out of 6). The Statement also states that the Proposed Development is pursuing Net Zero Carbon certification through the UKGBC framework. This would be delivered through optimising design to minimise embodied

carbon, reducing operational carbon through efficient design, focusing on performance in use, and providing robust after care service.

- 9.21 Additionally, a Whole Life Cycle Carbon Assessment ('WLCA') of the Proposed Development has been prepared by Max Fordham and accompanies the planning submission. The assessment was carried out to evaluate the environmental impact of the proposed development during its life cycle and was undertaken in line with Policy SI 2 of the London Plan.
- 9.22 The assessment compares the Proposed Development against alternative designs that were considered. The assessment estimates that the WLC of the Proposed Development would be 1,082 kgCO<sub>2</sub>/m<sup>2</sup>GIA.
- 9.23 As part of this assessment, three options were tested: 1) refurbishment of the current buildings and an upwards extension to 100 Gray's Inn Road and 127 Clerkenwell Road, 2) refurbishment of 127 Clerkenwell Road, demolition of 100 Gray's Inn Road to second floor level and upwards extension, 3) new build. The modelling undertaken by Max Fordham demonstrates that the Proposed Development would perform better in terms of carbon usage than any of the other options tested.
- 9.24 Independent analysis of this work on behalf of LB Camden ('LBC') was undertaken by Enhabit, which within its report dated 17 May 2021 concluded that the options had been "examined adequately and the proposed option (New Build) is justified by the whole life cycle carbon comparison and viability".
- 9.25 Furthermore, in line with Policy SI 7 of the London Plan, a detailed Circular Economy Statement has been prepared by Max Fordham and submitted as part of this application. The Statement outlines how the Proposed Development would incorporate Circular Economy measures, such as recycling demolition and construction materials. The Statement aims to meet all policy requirements and, where possible, exceed the targets.
- 9.26 A Pre-Demolition Audit has been undertaken which sets out that 99.7% of demolished building materials, by weight, could be recycled.
- 9.27 The application is supported by an Energy Statement prepared by Max Fordham which provides an assessment against the energy hierarchy set out in London Plan Policy SI 2.

- 9.28 In terms of 'Be Lean', the design of the new building has sought to reduce energy demand by incorporating measures including high performing building materials and windows, high efficiency lighting, and a wastewater heat recovery system. With regard the refurbishment of 88 Gray's Inn Road, the building would be improved thermally to ensure a better performance in terms of air tightness. These measures would reduce carbon usage by 6% beyond the 2021 baseline at the new building and by 13% with regard 88 Gray's Inn Road.
- 9.29 With regard 'Be Clean', the London Heat Map has been assessed which confirms that no existing district heating or cooling networks are near the Site. However, a heating connection between the two buildings would be provided, this would be beneficial in terms of using waste heat from the office cooling system.
- 9.30 In terms of 'Be Green', Air Source Heat Pumps (ASHPs) are proposed as part of the all-electric development to provide heating and cooling. Solar PV arrays are also proposed at the roof levels of both 100 and 88 Gray's Inn Road.
- 9.31 With regard. 'Be Seen', the post-construction energy performance of the development would be monitored and reported to ensure the actual carbon performance is aligned with the net zero carbon target.
- 9.32 The Proposed Development, at this stage of the design process, would achieve a 16% cumulative carbon emissions reduction against Part L of the Building Regulations 2021. Although this is below the GLA's 35% target, based on the recent changes to the baseline, this is considered to demonstrate the energy efficiency of the Proposed Development. As a result of the 43.4 tonne annual shortfall against net zero carbon at this stage of the design process, a carbon offset contribution of £123,645 is included as part of the draft Section 106 Heads of Terms.
- 9.33 In terms of cooling, a range of measures would be put in place across the Proposed Development to prevent overheating. In particular, the depth of the external façade at 100 Gray's Inn Road would provide shading. Other measures include the use of high performance solar controlled glass, provision of inset balconies at 88 Gray's Inn Road, and green roofing at both buildings to limit heat gains through the building fabric.

9.34 It is concluded in terms of energy and sustainability that the Proposed Development is in accordance with London Plan Policies and Camden Local Plan, as well as the aspirations of the Energy Efficiency and Adaptation CPG.

## 10 Transport and Servicing

- 10.1 This section of the Statement assesses the acceptability of the Proposed Development in planning policy terms with regard highways and servicing.

### Transport and Highways Policy Context

- 10.2 Chapter 9 of the NPPF outlines aims for a transport system balanced in favour of sustainable transport modes, to give people a real choice about how they travel and encourages solutions which support reductions in greenhouse gas emissions and reduce congestion.
- 10.3 Paragraph 111 of the NPPF is clear that development should only be refused on highways grounds if there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe.
- 10.4 Paragraph 112 of the NPPF requires development to give priority to pedestrians and cycle movements, address the needs of people with disabilities, create places that are safe, secure and attractive and allow for the efficient delivery of goods and access by service and emergency vehicles.
- 10.5 London Plan Policy T1 states all development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes. The policy further states that development should ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.
- 10.6 Local Plan Policy T1 prioritises walking, cycling and public transport in the borough. In pursuance of this LB Camden will seek to ensure developments improve the pedestrian environments by supporting improvements to the pedestrian environment. The delivery of improved walkways, wide pavements and safe and permeable developments is supported.
- 10.7 Policy T1 (h) states that LB Camden will seek to ensure that development provides for accessible, secure cycle parking facilities exceeding minimum standards outlined within the London Plan (Table 6.3) and design requirements outlined within LB Camden's Transport CPG (2021).



10.8 LB Camden Local Plan Policy T2 states that the Council will limit the availability of parking and require new development in the borough to be car free.

10.9 In January 2021, LB Camden adopted its Transport CPG which provides information on all types of detailed transport issues within the borough.

#### Transport Assessment

10.10 The Site has excellent public transport links, with a Public Transport Accessibility Level of 6B, the highest score that can be achieved.

10.11 A Transport Assessment, prepared by NRP, has been submitted as part of the application. The Transport Assessment assesses the likely transport implications arising from the Proposed Development and sets out the proposed parking, access and servicing arrangements.

10.12 Regarding highways impact, a multi-modal trip generation assessment has been undertaken. The assessment indicates that the Proposed Development is unlikely to generate significant parking pressures due to the location of the Site. Furthermore, it is anticipated that most trips will be made by sustainable modes and the overall number of two-way trips will decrease, this is primarily due to the decrease in retail floorspace which forms part of the proposal. The Proposed Development is therefore not anticipated to have a detrimental impact on the local highway network in terms of congestion or road safety.

10.13 A Workplace Travel Plan has also been prepared by NRP and is submitted as part of the application. The Plan outlines how the Proposed Development would encourage building users to use sustainable modes of transport, in line with Local Plan Policy T1.

#### Car and Cycle Parking Policy Context

10.14 Policy T6 of the London Plan details the Mayor's approach to the provision of car parking. Part B states that car-free development should be the starting point for all development proposals in places that are (or planned to be) well-connected by public transport.

10.15 Policy T5 of the London Plan requires development proposals to provide appropriate levels of cycle parking, which is fit for purpose, secure and well-located. Table 10.2 of the London

Plan details minimum cycle parking standards. The minimum requirement for office, restaurant, retail and residential use is detailed below.

**Table 2 – London Plan 2021 cycle standards**

Use	Long-stay requirement	Short-stay requirement
Restaurants	1 space per 175sqm (GEA)	1 space per 20 sqm (GEA)
Offices	1 space per 75sqm (GEA)	First 5,000 sqm: 1 space per 500 sqm Thereafter: 1 space per 5,000 sqm (GEA)
Retail	First 1000 sqm: 1 space per 250 sqm Thereafter: 1 space per 1000 sqm (GEA)	First 1000 sqm: 1 space per 60 sqm Thereafter: 1 space per 500 sqm (GEA)
Residential	1 space per studio or 1 person 1 bedroom dwelling  1.5 spaces per 2 person 1 bedroom dwelling  2 spaces per all other dwellings	5 to 40 dwellings – 2 spaces

10.16 Camden Local Plan Policy T1 sets out that the Council expect developments to provide, as a minimum, the number of cycle parking spaces as set out in the London Plan. The Camden Transport CPG sets out that the Council will also seek an additional 20% of spaces over and above the London Plan standard to support the expected future growth of cycling.

10.17 Regarding car parking, Camden Local Plan Policy T2 sets out that all new non-residential developments (including the re-development and/or conversion of existing sites with new occupiers) are expected to be car-free. This is re-iterated in the Transport CPG.

#### Car and Cycle Parking Assessment

- 10.18 In accordance with London Plan Policy T6 and the Camden Local Plan, the Proposed Development would be car free as all car parking spaces which are currently at the Site would be removed. Due to the car-free nature of the Proposed Development, visitors are therefore likely to travel sustainably using the wide range of public transport services available near to the Site as well as walking or cycling, in accordance with the London Plan, Mayor's Transport Strategy (2018) and the Mayor's Healthy Streets Agenda.
- 10.19 In accordance with London Plan Policy T6, Camden Local Plan Policy T1 and the Camden Transport CPG, the Proposed Development would provide 235 long stay cycle parking spaces and 44 short stay cycle parking spaces.
- 10.20 The office and flexible Class E cycle parking spaces would be located within the basement of 100 Gray's Inn Road. The affordable workspace cycle parking would be located within the basement of 88 Gray's Inn Road and the residential cycle parking located at ground floor of 88 Gray's Inn Road. Additional Sheffield stands are also proposed on Clerkenwell Road.

#### Delivery, Servicing, Waste and Refuse Policy Context

- 10.21 Part G of London Plan Policy T7 states that development proposals should facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible.
- 10.22 Local Plan Policy T4 states that the council will promote the sustainable movement of goods and materials and requires developments of over 2,500sqm to minimise the impact of freight movement via road by prioritising the use of the TfL road network or other major roads, accommodation goods vehicles on-site and providing Construction Management Plans, Delivery and Servicing Management Plans and Transport Assessments where appropriate.
- 10.23 Local Plan Policy CC5 outlines that the Council requires developments to include facilities for the storage and collection of waste and materials.

#### Delivery, Servicing, Waste and Refuse Assessment

- 10.24 The application is supported by a Delivery and Servicing Plan, prepared by NRP, and a Waste Management Plan, prepared by Paul Mew Consultants.

- 10.25 The Delivery and Servicing Plan details how the Proposed Development would incorporate a servicing bay within the development site which would be accessed from Gray's Inn Road. This would include a vehicle turntable at ground floor level to ensure that any servicing and delivery vehicles could enter and leave the Site in forward gear, which overcomes the issue of requiring vehicles to reverse into or out of the Site.
- 10.26 To ensure that the proposed vehicle turntable is always usable, it is fitted with two motors so that if one should fail, the other could be used. Furthermore, ongoing maintenance of the turntable would be undertaken and, in the unlikely event that both motors fail, the turntable could be manually rotated.
- 10.27 The Delivery and Servicing Plan also provides a framework to ensure that servicing and freight activity is effective. It includes a range of tools and techniques aimed at reducing and retiming deliveries by refining building operations and ensuring that procurement activities account for vehicle movements and emissions.
- 10.28 The Waste Management Plan provides information on how the Proposed Development would implement safe and effective site waste management and how it seeks to minimise refuse service trips. The Plan outlines the methods of waste collection and confirms that the Proposed Development would adhere to the requirements of the LB Camden guidance.
- 10.29 The Waste Management Plan also confirms that a swept path analysis has been conducted and demonstrates collection vehicles could access and egress the service yard. It also confirms that the design of the bin stores conforms with local design guidelines and industry standards. There would be two stores which would both be directly accessible from the servicing yard.
- 10.30 The Proposed Development would allow safe and efficient delivery and servicing, and has been designed to provide a policy compliant level of waste storage. The Proposed Development is therefore in accordance with London Plan Policy T7 and Camden Local Plan Policy CC5.

## 11 Amenity

11.1 This section of the Statement assesses the Proposed Development against amenity considerations comprising daylight and sunlight, noise and air quality. There are residential buildings close to the Site, including the Shene Building to the south and Ledam Building to the south-east of the Site.

### Daylight and Sunlight Policy Context

11.2 At the national level, the Building Research Establishment ('BRE') Report 'Site Layout Planning for Daylight and Sunlight 2022' comprises tests to assess the impact that a new development will have on the light to neighbouring properties. The tests within the document are given as advice and are not mandatory. As such they are not planning policy.

11.3 The examples given with the BRE guide can generally be applied to any part of the UK, from urban to rural locations. The BRE Guidelines specify that the daylight and sunlight results be considered flexibly and in the context of the Site. Clearly there would be a higher expectation for daylight and sunlight in a rural or suburban environment than in a dense city centre location such as this in Bloomsbury. Therefore, the guide needs to be applied sensibly when assessing daylight and sunlight to allow for a more practical approach to central London urban design.

11.4 The BRE Report advises that daylight and sunlight levels should be assessed for the main habitable rooms of neighbouring residential properties. Habitable rooms in residential properties are defined as kitchens, living rooms and dining rooms.

11.5 Vertical Sky Component ('VSC') analyses the daylight provided at the centre of a window and is the most commonly used daylight testing method. The BRE guidance considers that if a development would lead to a neighbouring window having less than 80% of its former value then the occupants of the existing building will notice the difference.

11.6 The daylight distribution method assesses the change in position of the No Sky Line ('NSL') between the existing and proposed situations.

11.7 The Annual Probable Sunlight Hours ('APSH') method is used to test the impact that a development would have on sunlight levels at existing southern facing residential windows.

The BRE guidance recommends that the APSH received at a given window should be at least 25% of the total available, including 5% in winter.

- 11.8 London Plan Policy D6 states the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing, and maximising the usability of outside amenity space.
- 11.9 Policy A1 of the Local Plan sets out how the Council will manage the impact of development to protect the quality of life of occupiers and neighbours. The policy states that planning permission will be granted unless it causes unacceptable harm to residential amenity. To protect residential amenity, the Council will consider a variety of factors including sunlight, daylight and overshadowing.

Daylight and Sunlight Assessment

- 11.10 A Daylight and Sunlight Report has been prepared by Lumina and has been submitted as part of this planning application. The daylight and sunlight analysis has been considered by reference to the criteria and methodology within the Building Research Establishment Guidelines (2022), which when published, recognised that it should not form a mandatory set of criteria, rather it should be used to help and inform design.
- 11.11 The assessment confirms that the properties within The Griffin Building adhere to all the numerical daylight values set out within the BRE Guidelines.
- 11.12 The assessment assumes that there is a Landlord/Manager's flat on the second floor above the Griffin Public House. The second-floor window of this property would be fully compliant with the numerical daylight values set out within the BRE Guidelines.
- 11.13 The daylight and sunlight assessment also confirms that the properties within the Gray's Inn Buildings would be fully compliant with the BRE VSC standards and BRE Annual Sunlight standards, whilst being almost fully compliant with the BRE No Skyline Distribution.
- 11.15 With regard to the Ledham Building, in line with BRE guidance, the west facing windows have been assessed with and without the projecting balconies, most of which are believed to serve non-habitable rooms, with the exception being a flat at each end of the block and at the

northern end of the block which lies adjacent to the Proposed Development, which has a living room at each level that is not affected by a projecting balcony.

- 11.16 The assessment states that although some of the percentage reductions of VSC exceed the 20% margin in the BRE Guidelines at the Ledham Building, they are not substantially above that target, being in the mid-20s ranging from 25.28% and 28.86%.
- 11.17 Furthermore, the assessment states that the existing VSC values are already relatively low and so the absolute change in VSC is relatively low in real terms, and the resultant residual absolute VSC values would also be correspondingly relatively low ranging from 7.47% VSC at ground floor level and 13.36% VSC at third floor level.
- 11.18 Overall, the assessment shows relatively good sunlight results for each of the principal windows at the Ledham Building with the only material loss of sunlight arising to the very small recessed secondary windows where the BRE sunlight criteria does not apply in any event. This therefore shows that were it not for the “canopy-effect” of the balconies any impact to the windows below those balconies would be very small.
- 11.19 Regarding the Shene Building, the assessment concludes that there would be almost full compliance with the BRE VSC standards with only five windows (three at ground floor level and two at first floor level) where the reduction in VSC would marginally exceed the 20% threshold.
- 11.20 The results of the No Skyline Daylight Distribution analysis at the Shene Building show similar results with four rooms experiencing a reduction in internal Daylight Distribution marginally above the 20% target.
- 11.21 The assessment within the Daylight and Sunlight Report also concludes that all the windows at the Shene Building would comfortably satisfy the BRE target for Annual Sunlight.
- 11.22 The Daylight and Sunlight Report assessment draws the following conclusions:
- The Proposed Development of the main redevelopment part of the Application Site would lead to a handful of impacts that exceed the recommendations in the BRE Guidelines. However, the number of shortfalls and the quantum by which the results do not fully satisfy the recommendations in the BRE Guidelines, are few and relatively minor;

- The impact on residential premises at the Griffin Building, Grays Inn Buildings, the Griffin Public House and the Shene Building in the Bourne Estate, would all be very minor and have no material negative impact on existing levels of amenity;
- The most sensitive neighbouring residential property is the Ledham Building in the Bourne Estate, and in particular, a single living room at each level at the northern end of that block of flats. The massing and profile of the south east corner of the Proposed Development adjacent to that part of the Ledham Building has been cut back and designed to maintain the light passing around the rear of the proposed building to safeguard the daylight amenity of that particular set of living rooms;
- The potential impact on 90-98 Gray's Inn Road has already been established through the extant planning consent granted in December 2016 (LPA Ref. 2015/2580/P) at 88 Gray's Inn Road.

11.23 The Proposed Development is therefore considered to be in compliance with London Plan Policy D6 and Camden Local Plan Policy A1 by virtue of not causing unacceptable harm to residential amenity.

#### Noise Policy Context

11.24 Paragraph 174 of the NPPF requires planning decisions to prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of, among other things, noise.

11.25 London Plan Policy D14 details the ways in which development proposals should manage noise. The list includes avoiding significant adverse noise impacts, mitigating and minimising the existing and potential adverse impacts of noise without placing unreasonable restrictions on existing noise-generating uses, improving and enhancing the acoustic environment and separating new noise-sensitive development from major noise sources using distance, screening, layout, orientation, uses and materials.

11.26 Where it is not possible to achieve separation of noise-sensitive development and noise sources, Policy D14 allows for any potential adverse effects to be controlled and mitigated through applying good acoustic design principles.



11.27 At a local level, Camden Local Plan Policy A1 seeks to manage the impact of adverse effects from noise and vibration.

11.28 Policy A4 of the Local Plan sets out that noise and vibration in developments will be managed, and planning permission will only be granted for noise generating equipment (including plant and machinery) if it can be operated without causing harm to amenity. Detailed standards are set out in Appendix 3 of the Local Plan.

#### Noise Assessment

11.29 The Application is supported by a Noise Impact Assessment prepared by Max Fordham. Regarding noise from plant equipment, an assessment has been undertaken to establish the maximum external noise levels from the proposed building services plant. The assessment compares the predicted worst-case breakout noise levels from potential plant with the representative background noise at the closest existing residential receptors. The assessment also establishes the predicted noise generated from the external terraces.

11.30 In accordance with LB Camden guidance, maximum noise level limits have been set for building services plant which are predicted to result in a noise rating level which is at least 10db below the existing background noise level during the worst-case night-time period at the closest sensitive receptor locations. The survey undertaken shows that the background noise level at the nearest residential receptor is 43.5 decibels and that the plant equipment would be able to be mitigated so that noise levels do not exceed 28.7 decibels. Accordingly, building services plant is expected to have no adverse impact at the closest noise sensitive receptors.

11.31 The Noise Impact Assessment also concludes that noise generated from the terraces located to the rear and at roof level of the proposed building at 100 Gray's Inn Road is expected to have no adverse impact on amenity.

11.32 To ensure that this is the case, the proposed terraces would have limited hours of use and would only be able to be used by office tenants. The terraces at the rear of the building, which are closer to residential properties, would only be able to be accessed from 8am to 7pm, Mondays to Fridays. The roof terrace would be able to be accessed from 9am to 11pm, Mondays to Fridays. No music would be able to be played on the terraces.

11.33 In noise terms, it is concluded that the Proposed Development would protect neighbouring amenity and is therefore in compliance with Policies D13 and D14 of the London Plan and Policies A1 and A4 of the Camden Local Plan.

Air Quality Policy Context

11.34 Paragraph 174 of the NPPF states that development should not contribute to or be put at unacceptable risk of, or be adversely affected by unacceptable levels of pollution, including air pollution.

11.35 London Plan Policy SI 1 requires that development proposals to not lead to further deterioration of existing poor air quality, create any new areas that exceed air quality limits and create unacceptable risk of high levels of exposure to poor air quality. To meet these requirements, development proposals must be at least Air Quality Neutral and design solutions should be used to prevent or minimise increased exposure to existing air pollution.

11.36 Camden Local Plan Policy CC4 seeks to ensure that the impact of development on air quality is mitigated and that exposure to poor air quality is reduced in the borough.

Air Quality Assessment

11.37 The application is supported by an Air Quality Assessment prepared by Gem Air Quality. The Assessment has been undertaken to quantify the potential impacts on local air quality associated with both the construction and operation of the Proposed Development. The Assessment concludes the following:

- The impact of dust soiling and particulate matter can be reduced to a negligible level through appropriate mitigation measures, which are listed within the report and are applicable to a medium risk site. Implementation of the Best Practice Measures would help reduce the impact of the construction activities;
- The predicted concentrations of nitrogen dioxide and particulate matter in all modelled years are below the relevant objectives applicable to the type of use;
- The Proposed Development would be air quality neutral in relation to the transport and building emissions.

11.38 The Assessment ultimately concludes that air quality would not pose a constraint to the redevelopment of the Site. The Proposed Development is therefore considered to be

acceptable in terms of effects upon air quality in accordance with Policy SI 1 of the London Plan and Camden Local Plan Policy CC4.

## 12 Ecology and Biodiversity

- 12.1 This section of the Statement assesses the biodiversity credentials of the Proposed Development.
- 12.2 The NPPF at Paragraph 180 is clear that proposals should support conservation and enhancement of biodiversity, whilst encouraging opportunities to incorporate biodiversity improvements in and around developments, where this can secure measurable net gains for biodiversity.
- 12.3 London Plan Policy G5 states major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping, green roofs, green walls and nature-based sustainable drainage (though green walls are no longer supported by the GLA).
- 12.4 Part B of Policy G5 sets out that boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The Mayor recommends a target score of 0.3 for predominately commercial development.
- 12.5 Policy A3 of the Camden Local Plan sets out that the Council will, *inter alia*, safeguard protected and priority habitats and species, assess developments against their ability to realise benefits from biodiversity proportionate to the scale of development proposed and expect developments to incorporate additional trees and vegetation wherever possible.

### Ecology Assessment

- 12.6 The application is supported by a Preliminary Ecology Assessment and Biodiversity Net Gain Plan prepared by MKA Ecology.
- 12.7 The Ecology Assessment sets out that the Site is within close proximity to the Spa Fields Gardens, St Andrew's Gardens, and Coram's Fields Site of Importance for Nature Conservation, so accordingly mitigation measures should be put in place during the construction period to ensure no impact on this SINC. A Construction Management Plan, which would be able to address how construction would be managed with regard the SINC, is included within the draft Section 106 Heads of Terms.

- 12.8 There is a butterfly-bush to the rear of 100 Gray's Inn Road and 127 Clerkenwell Road. As this is listed as invasive as part of the London Invasive Species Initiative, MKA Ecology has recommended that this is removed as part of the Proposed Development.
- 12.9 Given the extent of built form at the Site, it is currently of very little ecological value. It is proposed to create new ecologically valuable habitats through the provision of green roofs, bird boxes and bat boxes. MKA Ecology set out that the Proposed Development would lead to a biodiversity net gain of 4326%.

#### Arboricultural Assessment

- 12.10 The application is supported by an Arboricultural Impact Assessment and Method Statement, produced by Arborclimb Consultants. The assessment concludes that all existing trees, other than a Cherry, Laurel and shrub mix to the rear of 100 Gray's Inn Road and 127 Clerkenwell Road, are to be retained as part of the Proposed Development. Its removal is not considered to be of notable arboricultural significance, especially given the replacement planting strategy which is proposed.
- 12.11 The assessment also concludes that the False acacia, off site to the southeast, is in very poor physiological and structure condition and should be removed irrespective of any development works either on or off-site.
- 12.12 The Arboricultural Method Statement and Tree Protection Plan indicates how all retained trees, including those to the front of the Site on Gray's Inn Road and Clerkenwell Road, can be adequately managed and protected throughout the construction phase. Based on these, the retained trees would be suitably protected throughout the development to form a key part of the post development landscape.
- 12.13 The application is supported by an Urban Greening Factor Assessment prepared by FFLO. As a result of the green roofs and planting, the assessment sets out that the Proposed Development would result in an Urban Greening Factor score of just over 0.3.
- 12.14 This Urban Greening Factor score achieves the 0.3 target set for commercial developments in the London Plan and represents a significant improvement over the existing quantum of greening on-site.

12.15 To conclude, the Proposed Development has maximised the opportunity for urban greening and biodiversity enhancements on-site and represents a significant improvement over the existing situation in accordance with London Plan Policy G5 and Policy A3 of the Camden Local Plan.

## 13 Other Technical Considerations

- 13.1 This section of the Statement assesses the Proposed Development against other technical considerations comprising fire safety, flood risk and drainage.

### Fire Safety

- 13.2 London Plan Policy D5 states development proposal should achieve the highest standards of accessible and inclusive design. They should 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.
- 13.3 London Plan Policy D12 promotes the highest standards of fire safety for all developments. The policy requires development to, *inter alia*, be designed to incorporate appropriate features which reduce risks from fire, constructed in a way to minimise the spread of fire and provide suitable means for escape. Supporting text at Paragraph 3.12.9 requires all major development to submit a Fire Statement.
- 13.4 The application is supported by a Fire Statement as prepared by Warringtonfire which defines the fire safety objectives and performance requirements of the development, and the methods by which these objectives will be achieved. The document has been prepared in the context of London Plan Policies D5 and D12, and relevant Building Regulations.

### Flood Risk and Drainage Policy Position

- 13.5 Paragraph 167 of the NPPF states that when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment.
- 13.6 Paragraph 169 of the NPPF states that major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate.
- 13.7 Policy SI 12 of the London Plan requires developments to ensure that flood risk is minimised and mitigated, and that residual risk is addressed. Policy SI 13 of the London Plan details that

development proposals should aim to achieve greenfield run-off rates and that there should be a preference for green over grey features in line with the drainage hierarchy.

- 13.8 At a local level, Policy CC3 of the Local Plan seeks to reduce flood risk and maximise water efficiency through the use of Sustainable urban Drainage Systems (SuDS) to achieve greenfield runoff rates where feasible. Additionally, LB Camden Planning Guidance 'Water and Flooding' (March 2019) gives further guidance in respect of the water environment in LB Camden, water efficiency and flooding.

#### Flood Risk and Drainage Assessment

- 13.9 The application is supported by a Flood Risk Assessment, and SuDs Strategy, both prepared by HTS. The assessment notes that the Site is within Flood Zone 1 and is at a low risk of flooding from all sources including fluvial and tidal sources and surface water.
- 13.10 Regarding drainage, the assessment details how the surface water drainage strategy has been prepared with regard to the drainage hierarchy detailed in London Plan Policy SI 13 including the incorporation of SuDS.
- 13.11 In summary, the Proposed Development would utilise blue and blue / green roofs and an attenuation tank, so to attenuate as close to greenfield rates as possible. Surface water from all new development will be restricted to 9.38l/s for the 1 in 100 year + 40% Climate Change storm event for 100 Grays Inn Road, and 7.61 l/s for 88 Grays Inn Road.
- 13.12 The Proposed Development is therefore considered to accord with Paragraphs 167 and 169 of the NPPF, London Plan Policies SI 12 and SI 13 of the London Plan, Camden Local Plan Policy CC3 and the aspirations of the Water and Flooding CPG.



## 14 S106, CIL and Planning Conditions

14.1 Under Section 106 of the Town and Country Planning Act 1990 (as amended), local planning authorities have the power to enter into planning obligations with the Applicant and any persons with an interest in the land to be developed as a means of mitigating any impacts of a development proposal.

14.2 In accordance with Regulation 122(2) of the CIL Regulations (as amended), and paragraph 57 of the NPPF, planning obligations should only be sought where they meet all the following tests:

- Necessary to make the development acceptable in planning terms;
- Directly related to the development; and
- Fairly and reasonably related in scale and kind to the development.

14.3 Paragraph 55 of the NPPF supports that planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.

14.4 In terms of the Proposed Development, the potential Section 106 heads of terms are listed below to form the basis for discussions with Officers during the determination period:

### Affordable housing

- Six affordable housing flats at 88 Gray's Inn Road (four x low cost rented and two x intermediate units).

### Employment & Training

- Affordable workspace at 88 Gray's Inn Road at a 20% rental discount for a period of 10 years;
- Employment and Training Strategy;
- Employment and Training contribution of £83,955;
- 21 construction apprenticeship roles;
- A construction apprenticeship fee of £1,700 per apprenticeship, £35,700 in total;
- Jobs to be advertised through the King's Cross Construction Skills Centre;

- A minimum of seven two-week work experience placements to be provided during the construction period.
- Camden Local Procurement Code & one supplier capacity building workshop / Meet the Buyer event;
- Ensure that tenants within the building seek to provide a minimum of five apprenticeship and five work placement positions per year. Apprenticeship positions to be paid at a minimum of the London Living Wage;
- Join the Council's Inclusive Business Network and promote this and good employment practice to occupiers;
- Work with Camden Learning/STEAM on school engagement, specifically local schools such as St. Alban's C of E Primary School.

#### Energy & Sustainability

- Carbon offset contribution of £123,645;
- Energy Efficiency & Renewable Energy Plan;
- Sustainability Plan - BREEAM 'Excellent' rating and minimum credit requirements under Energy (60%), Materials (40%) and Water (60%);
- Landscape and Ecology Management Plan (LEMP).

#### Transport

- Car-free development;
- Construction Management Plan, including construction logistics plan and associated requirement for a Construction Working Group to be formed prior to commencement;
- Financial contribution for proposed highway and pedestrian improvement works around the building on Gray's Inn Road and Clerkenwell Road, which would be in lieu of a Pedestrian, Cycling and Environmental contribution;
- Delivery, Servicing and Operational Waste Management Plan.

#### Community Infrastructure Levy

- 14.5 On 6 April 2010, the Community Infrastructure Levy Regulations 2010 came into force to fund the provision, improvement, replacement or maintenance of infrastructure required to

support development, as set out within each Local Authority's Regulation 123 list (a 'living' document which provides a summary of the infrastructure which CIL receipts should fund).

14.6 In London, CIL is charged at both a regional level, by the Mayor, as well as at a local level, by LBC. In terms of Mayoral CIL, the revised Charging Schedule referred to as MCIL2 is now used and given that this Site is within the Band 1 and Central London charging zones, it is payable at the following rates:

- Offices - £185 per sqm GIA (plus indexation);
- Residential - £80 per sqm GIA (plus indexation);
- Retail - £165 per sqm GIA (plus indexation).

14.7 Camden adopted its revised CIL charging schedule on 30 October 2020. This Site is within Zone A (Central), where development is charged at the following rates:

- Office, Research and Development – £110 per sqm GIA (plus indexation);
- Residential – £644 per sqm GIA (plus indexation);
- Retail / Restaurant - £32 per sqm GIA (plus indexation).

14.8 Developments involving affordable housing can apply for relief from CIL for that aspect of the proposal. This is set out in Regulation 49 of the CIL Regulations 2010 (as amended).

14.9 A CIL form has been submitted with this application.

#### Planning Conditions

14.10 Paragraph 56 of the NPPF states that 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. It goes on to set out the pre-commencement conditions should be avoided unless there is clear justification. We will look to agree potential planning conditions with Officers during the determination period.

## 15 Summary and Conclusions

- 15.1 Section 38(6) of the Town and Country Planning Act 1990 requires applications for planning permission to be determined in accordance with the statutory development plan unless material considerations indicate otherwise.
- 15.2 Section 66 of the Planning (Listed Buildings and Conservation Area) Act 1990 requires local planning authorities to have special regard to the desirability of preserving the setting of listed buildings in the exercise of all planning functions.
- 15.3 Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that local planning authorities should pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas when considering applications.
- 15.4 This Statement has assessed the proposals within the legislative framework, having regard to the development plan and relevant guidance at national, regional and local level.
- 15.5 The Proposed Development would deliver the following public benefits:
- The delivery of six high quality affordable housing units (2 x 1 bed, 2 x 2 bed, 2 x 3 bed) within the Central Activities Zone, four of which would be low-cost rent and two intermediate rent – all of which would meet the relevant national size standards and have private outdoor amenity space;
  - The provision of high-quality, office floorspace which could support Knowledge Quarter uses, would support job creation in the Central London Area, CAZ and Knowledge Quarter and meet an identified local and London-wide need for such floorspace;
  - Inclusion of affordable workspace at the ground floor of 88 Gray's Inn Road;
  - A commitment to providing job opportunities to residents on the Bourne Estate and, as a minimum, 21 construction apprenticeships and five end user apprenticeships;
  - The delivery of a scheme providing a high-quality building which would have a positive impact upon the character and appearance of the Hatton Garden Conservation Area and other nearby heritage assets;
  - Improved and increased public realm in front of the building on Clerkenwell Road;
  - Refurbishing the existing building at 88 Gray's Inn Road and delivering a new timber framed building to deliver an adaptable building at the Site for the long term;

- Recycling at least 95% of existing building fabric, which has been confirmed as achievable by a Pre-Demolition Audit which has already been undertaken;
- The provision of Community Infrastructure Levy contributions and financial contributions to be secured through a Section 106 agreement;
- Promoting sustainable modes of travel with a focus on cycling and high-quality end of trip facilities; and
- Significant improvements in terms of urban greening and reduction of water runoff;
- Biodiversity net gain of 4326%, achieved through the provision of biodiverse green roofing and herb rich shrub planting;
- The buildings would be air quality neutral.

15.6 The Proposed Development accords with the provisions of the National Planning Policy Framework, the London Plan, and the Camden Local Plan, relevant emerging planning policy and the principles of the presumption in favour of sustainable development. From this Statement, it is concluded that there are no material considerations of sufficient weight to determine that this application is anything other than in accordance with the Development Plan, on this basis, planning permission should be granted accordingly.