



Heritage Assets planning assessment

Introduction

1. This note has been prepared in response to comments received from Historic England ('HE') and the Greater London Authority ('GLA') in relation to heritage impacts of the pending planning application (ref. 2022/4259/P) at 88 and 100 Gray's Inn Road and 127 Clerkenwell Road.
2. Whilst the Townscape, Heritage and Visual Impact Assessment ('THVIA') dated October 2022, prepared by The Townscape Consultancy, concludes that in all cases the proposed development would cause no harm to the significance of the heritage assets surrounding the site, both HE and the GLA have identified that the proposals would cause some less than substantial heritage harm to nearby listed buildings and the Bloomsbury Conservation Area.
3. The Stage 1 report prepared by the GLA is specific with regard the level of harm caused on an asset-by-asset basis. It sets out that there is less than substantial harm (low to medium) caused to Gray's Inn Registered Park and Gardens (Grade II*), 1 & 6-8 Gray's Inn Square (Grades II*), 1-5 Verulam Buildings (Grade II), 1-6 Raymond Buildings (Grade II), and the Bloomsbury Conservation Area. It is explained that this is because the proposed new building would introduce a greater overall mass and height which would be visible from the southwest of the site. The HE letter dated 14 November 2022 states that for similar reasons 'further harm' would be caused to these assets.
4. The GLA report says that the quality of the proposed architecture would lead to improvements to the setting of the Bourne Estate (Grade II) and enhance the character of the Hatton Garden Conservation Area, which the site is within.
5. Whilst it remains the position of The Townscape Consultancy that the proposed development would cause no harm to any surrounding heritage assets, given the comments provided by HE and the GLA, we have provided this note which, as required by paragraph 202 of the NPPF, weighs the public benefits of the proposal against the less than substantial harm to the significance of designated heritage assets. This has been prepared to supplement the Planning Statement dated 30 September 2022, which did not provide an assessment against paragraph 202 of the NPPF.

National Planning Policy Framework ('NPPF') 2021

6. Paragraph 202 of 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, where appropriate, securing its optimum viable use”.

Perceived Heritage Harm

7. In its letter dated 14 November 2022, HE considers that the proposed development would cause harm to the significance and setting of Gray's Inn Gardens, Verulam Buildings and the Bloomsbury Conservation Area due to its height, bulk, scale and detailed design.
8. In the GLA Stage 1 Report, dated 5 December 2022, the GLA consider that the increased overall mass and height of the proposed development would cause less than substantial harm to the significance of Gray's Inn Gardens (Grade II*), 1 & 6-8 Gray's Inn Square (Grade II*), 1-5 Verulam Buildings (Grade II), 1-6 Raymond Buildings (Grade II), and the Bloomsbury Conservation Area. The GLA Report considers that this would be at a low to medium scale in terms of less than substantial harm.

Public Benefits

9. This section of the note outlines the numerous social, economic and environmental public benefits which this proposal would deliver.
 - Delivery of six affordable homes
10. The proposed development would provide six affordable residential flats at 88 Gray's Inn Road. This includes four low cost rented units and two intermediate units, which exceeds the 60:40 split target set out in Camden's Local Plan Policy and would help to deliver housing for identified needs in the borough, which is a significant public benefit.
11. One of the six affordable residential units has been specifically designed to be accessible for wheelchair users and all units have been designed to exceed national space standards and offer outdoor amenity space in the form of inset balconies and terraces. The high quality of the proposed residential units would be a significant social public benefit.
12. Paragraph 2.5 of the Camden Local Plan sets out that one of the key benefits of growth is securing self-contained housing, the priority land use within the Local Plan, including affordable housing that meet the needs of residents so Camden remains a place accessible for all. Accordingly, the delivery of affordable housing by a commercial scheme is considered to be a significant public benefit which in itself would outweigh less than substantial harm (low to medium) to some heritage assets.



- Supporting business and job provision

13. The proposed development would also 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. This is a substantial economic public benefit which would provide a larger capacity high quality employment space and more local jobs in the CAZ and Knowledge Quarter.
14. As well as quantitative benefits, the proposal would provide much needed Grade A quality office accommodation suited for world class office, academic, cultural, research, scientific and media businesses which continue to be attracted to the Knowledge Quarter.
15. Again at paragraph 2.5 of the Local Plan, supporting businesses and the provision of jobs is given as one of the key benefits of growth.
16. The 326 sqm GIA of affordable workspace would be offered at a 20% rental discount for a period of 10 years.
17. The applicant has also committed to a number of employment and training benefits which would be delivered as part of the proposed development. These benefits include:
 - a. Implementation of an Employment and Training Strategy.
 - b. Creation of 21 construction apprenticeship roles.
 - c. Jobs that will be advertised through the King's Cross Construction Skills Centre.
 - d. A minimum of seven two-week work experience placements to be provided during the construction period.
 - e. Commitments to the Camden Local Procurement Code & one supplier capacity building workshop / Meet the Buyer event.
 - f. Ensuring 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.
 - g. Commitment to join the Council's Inclusive Business Network and promote good employment practice to occupiers.



- h. Work with Camden Learning/STEAM on school engagement, specifically local schools such as St. Alban's C of E Primary School.

- Proposed architecture

- 18. The demolition of 100 Gray's Inn Road, identified as a negative contributor to the Hatton Garden Conservation Area, and replacing it with a high-quality and visually appealing building would result in an enhancement of the Hatton Garden Conservation Area, a designated heritage asset, and is also a public benefit.
- 19. The proposed development would also deliver public realm improvements, including increasing the amount of public realm on Clerkenwell Road by circa 30 sqm, and increasing the pavement pinch point from 3.1 metres to 6 metres.
- 20. Additionally, the façade of the proposed development would increase the active frontage of the site from 54.5 metres to 63 metres and incorporate seating into the façade design, increasing public inclusivity.
- 21. The GLA considered the architectural and materials quality of the proposals to be of a high standard and in providing an improvement compared to the current buildings would enhance the character and appearance of the conservation area which it is within.

- Landscaping and greening

- 22. The proposed development would also deliver public benefits to landscaping. This includes, 410 sqm of biodiverse roof planting, and 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.
- 23. Similarly, the scheme would deliver a number of public benefits to ecology and biodiversity. The current site is of poor ecological value and the proposed development would lead to a biodiversity net gain of 4326% and urban greening factor score of just over 0.3, a particularly high level.
- 24. The benefits would be delivered through the creation of new ecologically valuable habitats through the provision of green roofs, bird boxes and bat boxes.

- Sustainability

- 25. The proposed development would be a car-free development, removing the car parking area currently at the basement of the site, and would deliver a highly sustainable building which would deliver the following benefits:



- a. A structure which includes timber, a sustainable building material;
- b. BREEAM score of 75.11% is currently targeted – which is equivalent to an 'Excellent' rating.
- c. Be a London Energy Transformation Initiative (LETI) Pioneer Project, and achieve a Nabers UK score 5-5.5 (out of 6). Pursue Net Zero Carbon certification through the UKGBC framework.
- d. 99.7% of demolished building materials, by weight, being recycled.
- e. Achieve a 16% cumulative carbon emissions reduction against Part L of the Building Regulations 2021 (at the time of application submission).
- f. Provide rooftop PV panels.

- Financial benefits

26. In terms of financial contributions, the proposed development would deliver the following benefits:
- a. Community Infrastructure Levy payment of over £1,000,000;
 - b. £123,645 carbon offset payment;
 - c. Employment and Training contribution of £83,955;
 - d. A construction apprenticeship fee of £1,700 per apprenticeship, £35,700 in total;
 - e. Financial contribution for proposed highway and pedestrian improvement works around the building on Gray's Inn Road and Clerkenwell Road.

Conclusion

27. The proposed development seeks to provide an exemplar new building in terms of sustainability which would provide high quality office floorspace within the CAZ and Knowledge Quarter and use the growth that this would deliver to provide job opportunities and affordable housing for local residents, the latter would be within the refurbished 88 Gray's Inn Road.
28. Whilst the position of the applicant remains that the proposed development would cause no harm to nearby heritage assets, this note has identified that any perceived less than substantial harm to the significance and setting of Gray's Inn Gardens, Verulam Buildings, Raymond Buildings and the Bloomsbury Conservation Area, would be clearly outweighed by the significant public benefits which would be delivered through the proposed development.



29. The proposed development would make the best use of the land and deliver social, economic and environmental benefits which would outweigh any less than substantial harm to some local heritage assets. The proposal therefore fully meets the test required by paragraph 202 of the NPPF. It would also enhance the setting of some listed buildings and enhance the character and appearance of the conservation area that it is within.