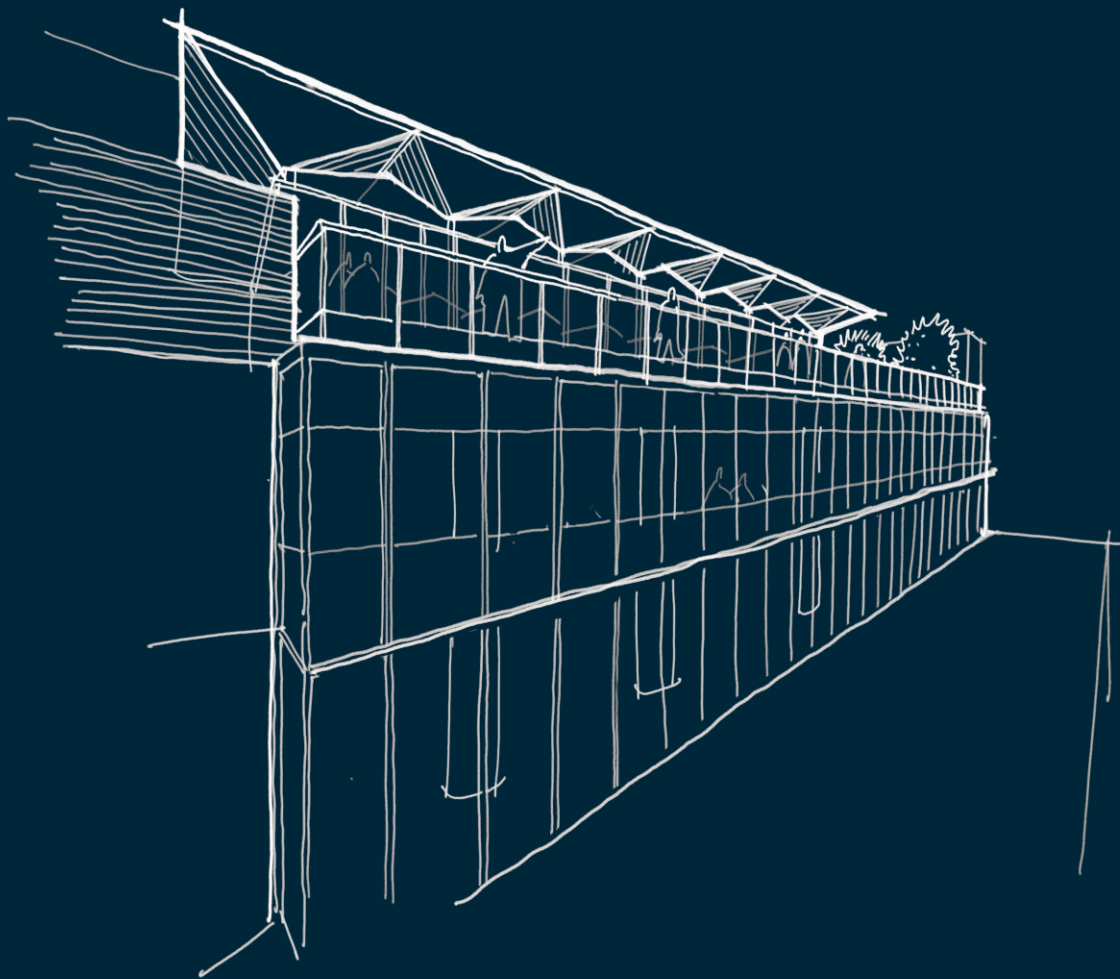


# 200 Gray's Inn Road

Planning Statement

DP9 Ltd

February 2023



**GPE.**



200 GRAY'S INN ROAD

# PLANNING STATEMENT

FEBRUARY 2023

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## 1. INTRODUCTION

1.1 This Planning Statement has been prepared by DP9 Ltd on behalf of Great Ropermaker (GP) Ltd ('the Applicant') in support of an application for full planning permission ('the Application') for the proposed erection of a roof extension at 200 Gray's Inn Road, London, WC1X 8XZ ('the Site').

1.2 The proposed description of development ('the Proposed Development') is as follows:

*"Erection of a single storey roof extension with associated landscaping."*

1.3 The Proposed Development will improve the existing office facilities through the provision of a high-quality, multifunctional space at roof level with an associated outdoor space for employees which will, in turn, enhance the appearance of the existing building.

1.4 This Planning Statement provides the planning case in support of the proposed development. It assesses the Proposed Development in the context of relevant adopted and emerging planning policy and guidance at national, regional and local levels, together with other material considerations.

### **Submission Documents**

1.5 This Planning Statement should be read in conjunction with the documents, plans and technical studies submitted to accompany the Application, as set out below.

- Cover Letter, prepared by DP9;
- Planning Application Form and Ownership Certificate, prepared by DP9;
- CIL Additional Information Form, prepared by DP9;
- Site Location Plan, prepared by Bennetts Associates;

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- Existing and Proposed Drawing Pack (see Drawing Register), prepared by Bennetts Associates;
  - Design and Access Statement, prepared by Bennetts Associates;
  - Energy and Sustainability Statement, prepared by Sweco;
  - Heritage, Townscape and Visual Impact Assessment, prepared by The Townscape Consultancy; and
  - Fire Strategy, prepared by Jensen Hughes.

## **2. SITE AND SURROUNDING CONTEXT**

- 2.1. Located within the London Borough of Camden ('LBC'), the Site comprises a 10-storey building with a basement level. The building is currently in use as an office (Class E) and has a number of commercial tenants. The building was designed by Fosters and Partners and was completed in June 1990. The Site is bound by Coley Street to the north, Gray's Inn Road to the west, Gough Street to the east and the Elm Yard to the south.

### **Surrounding Area**

- 2.2. Owing to its Central London location, the surrounding context includes a mix of uses and a range of building heights, extending from 4 to 15 storeys, with a mix of Victorian and Georgian terraces alongside contemporary commercial and residential developments.
- 2.3. The Site has a PTAL score of 6b, indicating the highest level of public transport accessibility, with access to a number of underground stations such as Chancery Lane and Russell Square. National Rail and Underground services are also provided from the nearby Farringdon Station.
- 2.4. The Site is not situated within a conservation area however, it partially abuts the Hatton Garden Conservation Area to the south and the Bloomsbury Conservation Area to the west. There are also several listed buildings situated on Gray's Inn Road, including Grade II Listed buildings at nos. 63 - 69 and 75 - 81a Gray's Inn Road.

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### **Planning History**

- 2.5. A full planning history search for the Site has been undertaken using LBC's online search facility. The Site has an extensive planning history since the construction of the existing building in 1990.
- 2.6. There have been a series of applications on the Site which include an extension at sixth-floor level and creation of a terrace at seventh-floor level (LPA ref. 2012/6889/P) which was approved in 2013. There has also been a series of further minor applications for alterations to the existing building, including the installation of access doors, satellite dishes and condensers. The Site has not been subject to any recent planning application of relevance.

### 3. PRE-APPLICATION CONSULTATION

3.1. A formal pre-application request was submitted to LBC in November 2022 and a pre-application meeting was held with officers on the 2 February 2023. The pre-application advice received has been summarised below.

- Further details requested in relation to the height of the proposed rooftop extension;
- Further information requested in relation to the proposed relocation of existing plant and equipment to facilitate the construction of The Pavilion;
- Review design of the proposed soffit, and reduce extent of overhang unless clear justification is provided in relation to reduction of overheating;
- Proposed rooftop terrace should maximise greening value, in line with London Plan policy;
- Queries regarding the proposed opening hours of the pavilion extension.

3.2. In response to the pre-application feedback, the design team has undertaken a comprehensive review of the Proposed Development and has sought to robustly address the comments received.

3.3. Most notably, the extent of protrusion of the proposed soffit has been reduced in response to LBC feedback, which has minimised visibility of the proposed pavilion from street level.

3.4. The extent of planting on the proposed rooftop terrace has also been increased through the provision of additional high- and low-level planting, to maximise the extent of greening.



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- 3.5. Regarding the relocation of the plant equipment, the Proposed Development will result in a net reduction in rooftop plant equipment, with any relocation of existing plant equipment to be located towards the centre of the existing roof in the existing plant area to minimise visual impact. It is suggested that a planning condition is introduced to finalise the exact position of any plant equipment.
- 3.6. In addition, the Application is supported with the additional information requested by LBC, including an Energy and Sustainability Statement, prepared by Sweco.

## 4. PROPOSED DEVELOPMENT

4.1 The proposed description of development is as follows:

*“Erection of a single storey roof extension with associated landscaping.”*

4.2 The Design and Access Statement submitted alongside this application fully illustrates and describes the proposed development and is summarised below.

### Summary of Proposed Development

4.3 In summary, the Proposed Development relates to the roof level only, and seeks to provide a pavilion which will serve as a multifunctional space for employees. The proposals will also enable access to an outdoor space at roof level, which will benefit from landscaping and planting.

4.4 In addition, the Proposed Development provides an opportunity to rationalise and relocate the existing rooftop plant and equipment.

4.5 The proposed roof extension will be a well designed and discreet addition to the existing building, located on a lower section of the roof to ensure the height of the existing building is not increased. The proposed areas are set out in the table below.

Measurement	Existing (sqm)	Proposed (sqm)	Change (sqm)
GIA	0	340	+ 340
GEA	0	360	+ 360
NIA	0	131	131

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- 4.6 The structural form of the development will benefit from pre-fabricated geometric timber sections which will create a gentle undulating soffit, complementing the existing aesthetic of the building whilst delivering an extension which is highly sustainable.

## 5. PLANNING POLICY FRAMEWORK

- 5.1 This section provides a brief summary of the key planning policies relevant to the Site and the Proposed Development.

### **Development Plan**

- 5.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that when making any determination under the Planning Acts, it should be in accordance with the development Plan unless material considerations indicate otherwise. The adopted Development Plan for LBC comprises the following:

- London Plan (2021)
- Camden Local Plan (2017)

### **National Policy and Guidance**

- 5.3 The following national planning policy and guidance documents are material considerations in the determination of the Application:

- National Planning Policy Framework (NPPF); and
- Planning Practice Guidance (PPG).

- 5.4 The National Planning Policy Framework was updated on 20 July 2021 and sets out the government's planning policies for England and how these are expected to be applied.

- 5.5 This revised Framework replaces the previous National Planning Policy Framework published in March 2012 and revised subsequently in July 2018, June 2019, and July 2021.

- 5.6 At the heart of the NPPF is the presumption on favour of sustainable development, which considers three dimensions: social, economic and environmental sustainability.

#### **Supplementary Planning Guidance**

- 5.7 The Proposed Development has been informed by supplementary planning guidance prepared by the Mayor and LBC, namely:

- LBC Employment Sites and Business Premises CPG (January 2021);
- LBC Energy Efficiency and Adaptation CPG (January 2021);
- LBC Design CPG (January 2021); and
- Mayor's Draft Fire Safety LPG (February 2022).

#### **Site Designations**

- 5.8 The Site is subject to the following designations, as defined by the adopted LBC Proposals Map:

- Central London Area ('Central Activities Zone' or 'CAZ');
- Partially within the LVMF viewing corridor of Blackheath Point to St Paul's Cathedral.

## **6. PLANNING POLICY ASSESSMENT**

- 6.1 This section of the Planning Statement assesses the Proposed Development against planning policy at national, regional and local level and sets out any other material considerations which are relevant to the determination of the Application.

### **Principle of Employment Floorspace**

- 6.2 At the heart of the NPPF is the presumption in favour of sustainable development, achieved through meeting the three 'overarching aims': building a strong, responsive and competitive economy; supporting strong, vibrant and healthy communities; and contributing to, protecting and enhancing the natural, built and historic environment.
- 6.3 Paragraph 81 of the NPPF states that planning decisions should support the growth of businesses through the opportunity to expand, as well as increasing productivity taking into account both local businesses needs and wider opportunities for development.
- 6.4 This is consistent with Policy E1 of the London Plan, which sets out that improvements of the quality of office space should be supported through new office provision and refurbishment.
- 6.5 At local level, Policy E1 of the Local Plan outlines that LBC will look to support a successful and inclusive economy in Camden by safeguarding existing employment sites and premises in the borough. LBC supports the intensification of employment sites and premises where the provision of additional employment and other benefits are in line with Local Plan Policy E2.

- 6.6 Policy E2 of the Local Plan states that LBC will encourage the provision of employment sites in the borough. As well as protecting premises or sites that are suitable for continued business uses including those which are located within the CAZ.
- 6.7 The Proposed Development provides an opportunity to optimise and enhance the current employment offer through a well-designed and discreetly located addition at roof level, providing an uplift in office floorspace and expansion of employee facilities which will assist in attracting new, potentially high-profile, tenants to the borough. The principle of development is therefore consistent with economic policy objectives at national, regional and local level, and the proposals should therefore be strongly supported by LBC.

### **Mixed Use Policy**

- 6.8 LBC Local Plan Policy H2 seeks to secure the inclusion of self-contained homes as part of a mix of uses in non-residential developments. The policy states that within the Central London Area, where development involves additional floorspace of more than 200 sqm (GIA), LBC will require 50% of all additional floorspace to be self-contained housing, subject to the following considerations:
- the character of the development, the site and the area;
  - site size, and any constraints on developing the site for a mix of uses;
  - the priority the Local Plan gives to the jewellery sector in the Hatton Garden area;
  - whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use and other nearby uses; and
  - whether the development is publicly funded or serves a public purpose.

- 6.9 The Proposed Development comprises the provision of a small rooftop pavilion which will serve as ancillary office floorspace for existing and future tenants. The proposal will comprise a modest, discreet addition to an existing 10-storey office building. Although the GIA of the Proposed Development would trigger the requirements of Policy H2, the majority of the proposed GIA will consist of internal storage space, circulation space and WC facilities, with the total NIA extending to just 131sqm, which is well below the threshold of Policy H2.
- 6.10 It is therefore considered that the requirements of Policy H2 should not be applicable in this case, given that the provision of residential floorspace is not a realistic proposition in this instance, and having regard to the modest uplift in ancillary floorspace which is proposed which falls below the 200sqm policy threshold in terms of NIA uplift.

### **Design**

- 6.11 Paragraph 126 of the NPPF states that the creation of high-quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve, and that 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.
- 6.12 Further to this, Paragraph 130 of the NPPF requires planning policies and decisions to ensure developments function well and add to the overall quality of the area, are visually attractive as a result of good architecture, are sympathetic to local character and ensure the creation of beautiful and distinctive places.
- 6.13 The London Plan supports this objective through Policy D3, which states that development must make the best use of land by following a design-led



approach. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context.

- 6.14 Local Plan Policy D1 seeks to secure high quality design in development. LBC will require development to meet the criteria as set out in the policy, which includes respecting local context and character.
- 6.15 In response, the Proposed Development has been informed by the architecture of the existing building and the surrounding local context, as detailed in the Design and Access Statement. The proposed extension would be a well-considered, high-quality addition to the existing building, designed by award winning architect practice Bennetts Associates, and constructed using contextual, sustainable materials which will complement the existing building.
- 6.16 Overall, it is considered that the proposed extension will serve to enhance the existing building and as such, the Proposed Development is acceptable in this regard.

### **Heritage and Conservation**

- 6.17 Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 place a statutory duty on local planning authorities to consider the impact of proposals upon listed buildings and conservation areas and to pay special regard to the desirability of preserving and enhancing the special architectural or historic interest of listed buildings or their setting and the character and appearance of conservation areas.
- 6.18 The NPPF establishes national level policy on the conservation and preservation of the historic environment. The National Planning Policy Framework states that any harm to, or loss of, the significance of a designated

heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.

- 6.19 Paragraph 206 of the NPPF sets out that developments that are within the setting of a conservation area should look to enhance their significance. Through the Proposed Development the roof terrace allows users of the roof to see the significance of the asset. For example, offering an elevated view of the Bloomsbury Conservation Area will enable users of the roof to see the original street layouts and formal landscaped squares which would not be obtainable from ground level. And a reason why the conservation area has been designated.
- 6.20 The London Plan seeks to protect heritage assets and Policy HC1 states that proposals should conserve the significance of heritage assets by being sympathetic and appreciating their surroundings. Proposals should avoid harm and identify enhancement opportunities by integrating heritage consideration early on in the design process.
- 6.21 In addition, Policy D2 of the Local Plan seeks to resist development outside the conservation area that causes harm to the character or appearance of the conservation area.
- 6.22 Whilst located within a conservation area or immediately adjacent to any listed buildings, the Proposed Development has been designed to preserve the setting of the nearby heritage assets. As set out in the Heritage, Townscape and Visual Impact Assessment, prepared by The Townscape Consultancy, the supporting verified views illustrate the very low visual impact of the Proposed Development on the surrounding area and the effect on the local townscape is considered to be neutral.

6.23 In addition, there would be a minimal change to the townscape within which any nearby heritage assets are located, and the Proposed Development would not harm any elements of setting that contribute to their heritage significance.

6.24 It is therefore considered that the Proposed Development is acceptable in this regard.

### **Energy and Sustainability**

6.25 The London Plan takes a hierarchical approach to sustainability to maximise the use of existing materials, from retention, through to reuse and recycling. The most preferable option is to retain and refurbish existing buildings, and this approach has been adopted in relation to the Proposed Development.

6.26 Local Plan Policy CC1 set out LBC's position on sustainable development. The policy states that LBC will seek to promote zero carbon development and require all development to reduce carbon dioxide emissions, ensuring that all developments optimise resource efficiency.

6.27 Creating a highly sustainable and energy efficient addition to the existing building has been a key objective of the Proposed Development. As set out in the supporting Energy Statement, prepared by Sweco, the Proposed Development incorporates extensive energy efficiency measures along with low and zero carbon strategies. As a result, the Proposed Development will achieve regulated CO2 savings of 15% relative to a New-Build Part L 2021 at Be Green stage. In addition, the heating and cooling of the Proposed Development will be provided by an all-electrical system – Air Source Heat Pump.

6.28 Although comprising a minor development, the proposals have sought to meet the policy requirements set out in the London Plan and LBC Local Plan in relation to carbon reduction and should therefore be supported by LBC.

## **7. CONCLUSIONS**

- 7.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires proposals to be determined in accordance with the Development Plan unless other material considerations indicate otherwise.
- 7.2 This Planning Statement assesses the Proposed Development against the Development Plan and other relevant national, regional and local planning policy and guidance. National policy, the London Plan and Camden Local Plan all seek to ensure that development makes the most effective and efficient use of land.
- 7.3 The existing building, although providing functional office space, does not effectively utilise the existing roof space. The Proposed Development therefore provides an excellent opportunity to optimise the development potential of the roof area through the creation of a high quality, multifunctional space which complements the existing building, whilst meeting the highest standards of sustainability. This will, in turn, positively contribute towards the borough's office stock in a location where new employment development is directed, enhancing the existing office facilities and helping to attract new, potentially high profile, tenants into the borough.
- 7.4 For the reasons outlined above, the principle of the development is consistent with the broad objectives of planning policy and in accordance with the Government's overarching objectives for sustainable growth. Therefore, the Proposed Development should be granted planning permission.