

Address:	Battle Bridge House, Offices And Premises At Basement-6th Floors 300-306 Gray's Inn Road London WC1X 8DU		1
Application Number(s):	2023/2199/P	Officer: Sofie Fieldsend	
Ward:	Kings Cross		
Date Received:	30/05/2023		

Proposal: Refurbishment and extension of the building to provide residential flats (Class C3) and commercial, business and service use (Class E) including external alterations for new facades to all elevations, the introduction of terraces, reconfiguration of entrances and servicing arrangements, new hard and soft landscaping, provision of cycle parking and other ancillary works.

Background Papers, Supporting Documents and Drawing Numbers:

Existing Plans:
 GIR-HAP-ZZZ-XX-DR-A-PL-0001 Location Plan Rev PL01; GIR-HAP-ZZZ-XX-DR-A-PL-0002 Site Plan PL01; GIR-HAP-ZZZ-B1-DR-A-PL-1099 Existing Lower Ground Floor Plan Rev PL01; GIR-HAP-ZZZ-00-DR-A-PL-1100 Existing Ground Floor Plan Rev PL01; GIR-HAP-ZZZ-01-DR-A-PL-1101 Existing 1st Floor Plan Rev PL01; GIR-HAP-ZZZ-02-DR-A-PL-1102 Existing 2nd Floor Plan Rev PL01; GIR-HAP-ZZZ-03-DR-A-PL-1103 Existing 3rd Floor Plan Rev PL01; GIR-HAP-ZZZ-04-DR-A-PL-1104 Existing 4th Floor Plan Rev PL01; GIR-HAP-ZZZ-05-DR-A-PL-1105 Existing 5th Floor Plan Rev PL01; GIR-HAP-ZZZ-06-DR-A-PL-1106 Existing 6th Floor Plan Rev PL01; GIR-HAP-ZZZ-07-DR-A-PL-1107 Existing 7th Floor Plan Rev PL01; GIR-HAP-ZZZ-RF-DR-A-PL-1110 Existing Roof Plan Rev PL01; GIR-HAP-ZZZ-XX-DR-A-PL-1200 Existing Elevation – North Rev PL01; GIR-HAP-ZZZ-XX-DR-A-PL-1201 Existing Elevation – East Rev PL01; GIR-HAP-ZZZ-XX-DR-A-PL-1202 Existing Elevation – South Rev PL01; GIR-HAP-ZZZ-XX-DR-A-PL-1203 Existing Elevation – West Rev PL01; GIR-HAP-ZZZ-XX-DR-A-PL-1300 Existing Section – AA Rev PL01; GIR-HAP-ZZZ-XX-DR-A-PL-1301 Existing Section – BB Rev PL01; GIR-HAP-ZZZ-XX-DR-A-PL-1302 Existing Section – CC Rev PL01

Demolition:
 GIR-HAP-ZZZ-B1-DR-A-PL-2099 Strip Out Lower Ground Floor Plan Rev PL01; GIR-HAP-ZZZ-00-DR-A-PL-2100 Strip Out Ground Floor Plan Rev PL01; GIR-HAP-ZZZ-01-DR-A-PL-2101 Strip Out 1st Floor Plan Rev PL01; GIR-HAP-ZZZ-02-DR-A-PL-2102 Strip Out 2nd Floor Plan Rev PL01; GIR-HAP-ZZZ-03-DR-A-PL-2103 Strip Out 3rd Floor Plan Rev PL01; GIR-HAP-ZZZ-04-DR-A-PL-2104 Strip Out 4th Floor Plan Rev PL01; GIR-HAP-ZZZ-05-DR-A-PL-2105 Strip Out 5th Floor Plan Rev PL01; GIR-HAP-ZZZ-06-DR-A-PL-2106 Strip Out 6th Floor Plan Rev PL01; GIR-HAP-ZZZ-07-DR-A-PL-2107 Strip Out 7th Floor Plan Rev PL01; GIR-HAP-ZZZ-RF-DR-A-PL-2110 Strip Out Roof Plan Rev PL01; GIR-HAP-ZZZ-XX-DR-A-PL-2200 Strip Out Elevation – North Rev PL01; GIR-HAP-ZZZ-XX-DR-A-PL-2201 Strip Out Elevation – East Rev PL01; GIR-HAP-ZZZ-XX-DR-A-PL-2202 Strip Out Elevation – South Rev PL01; GIR-HAP-ZZZ-XX-DR-A-PL-2203 Strip Out Elevation – West Rev PL01; GIR-HAP-ZZZ-XX-DR-A-PL-2300

Strip Out Section – AA Rev PL01; GIR-HAP-ZZZ-XX-DR-A-PL-2301 Strip Out Section – BB Rev PL01; GIR-HAP-ZZZ-XX-DR-A-PL-2302 Strip Out Section – CC Rev PL01.

Proposed Plans:

GIR-HAP-ZZZ-B1-DR-A-PL-3099 Proposed Lower Ground Floor Plan Rev PL01; GIR-HAP-ZZZ-00-DR-A-PL-3100 Proposed Ground Floor Plan Rev PL02; GIR-HAP-ZZZ-01-DR-A-PL-3101 Proposed 1st Floor Plan Rev PL02; GIR-HAP-ZZZ-02-DR-A-2PL3102 Proposed 2nd Floor Plan Rev PL02; GIR-HAP-ZZZ-03-DR-A-PL-3103 Proposed 3rd Floor Plan Rev PL02; GIR-HAP-ZZZ-04-DR-A-PL-3104 Proposed 4th Floor Plan Rev PL02; GIR-HAP-ZZZ-05-DR-A-PL-3105 Proposed 5th Floor Plan Rev PL02; GIR-HAP-ZZZ-06-DR-A-PL-3106 Proposed 6th Floor Plan Rev PL02; GIR-HAP-ZZZ-07-DR-A-PL-3107 Proposed 7th Floor Plan Rev PL02; GIR-HAP-ZZZ-08-DR-A-PL-3108 Proposed 8th Floor Plan Rev PL02; GIR-HAP-ZZZ-09-DR-A-PL-3109 Proposed 9th Floor Plan Rev PL02; GIR-HAP-ZZZ-RF-DR-A-PL-3110 Proposed Roof Plan Rev PL02; GIR-HAP-ZZZ-XX-DR-A-PL-3200 Proposed Elevation – North Rev PL02; GIR-HAP-ZZZ-XX-DR-A-PL-3201 Proposed Elevation – East Rev PL02; GIR-HAP-ZZZ-XX-DR-A-PL-3202 Proposed Elevation – South Rev PL02; GIR-HAP-ZZZ-XX-DR-A-PL-3203 Proposed Elevation – West Rev PL01; GIR-HAP-ZZZ-XX-DR-A-PL-3300 Proposed Section – AA Rev PL01; GIR-HAP-ZZZ-XX-DR-A-PL-3301 Proposed Section – BB Rev PL01; GIR-HAP-ZZZ-XX-DR-A-PL-3302 Proposed Section – CC Rev PL02

Supporting documents:

Covering Letter (dated 26 May 2023); CIL Additional Information Form; Town Planning Statement (dated 26 May 2023); Design and Access Statement (dated May 2023); Planning Design Addendum (dated September 2023); Residential Amenity Management Plan (dated May 2023); Energy and Sustainability Statement (dated 28 July 2023); Energy & Sustainability Comments – GDM Responses (dated 11 August 2023); Camden Sustainability and Energy Pro Forma; Noise Assessment Report (dated 18 May 2023); Daylight, Sunlight & Overshadowing Report (dated May 2023); Preliminary Ecological Assessment and BREEAM (dated May 2023); Phase 2 Bat Survey (September 2023); Heritage, Townscape and Visual Impact Assessment (dated May 2023); Planning Fire Statement (dated 23 May 2023); Sustainable Drainage Strategy (dated 5 May 2023); Flood Risk Assessment (dated 19 May 2023); Transport Statement (May 2023); BREEAM Travel Plan (dated May 2023); Draft Delivery & Servicing Management Plan (dated May 2023); Draft Construction/Demolition Management Plan Pro Forma; Active Travel Audit (dated 12 September 2023); Air Quality Assessment (dated May 2023); Camden Air Quality Pro Forma; Statement of Community Involvement (dated May 2023)

Recommendation Summary: Grant conditional planning permission subject to a Section 106 legal agreement.

Applicant:

Platignum Properties Limited

Agent:

Gerald Eve LLP
One Fitzroy
6 Mortimer Street
London
W1T 3JJ

Analysis Information

Land use details				
Use Class	Description	Existing GIA (sqm)	Proposed GIA (sqm)	Difference GIA (sqm)
E	Offices	3,785	4,342	+ 557
C3	Dwellings (flats)	0	714	+ 714
	Total	3,785	5,056	+ 1,271

Residential Use Details (Proposed):						
	Residential Type	No. of Bedrooms per Unit				
		1	2	3	4	Total
Private market housing	Flat	3	3	1	0	7
	House	0	0	0	0	0
	TOTAL	3	3	1	0	7

Parking details			
Car Type (ground floor car park)	Existing spaces	Proposed spaces	Difference
Car - General	1	0	- 1
Car - Disabled accessible	0	0	0
Cycle Type	Existing spaces	Proposed spaces	Difference
Cycle – residential long stay	0	12	+12
Cycle – commercial long stay	0	76	+76
Cycle – short stay (total on street)	0	14	+14

Officers' Report

Reason for Referral to Committee: Major development involving the construction of more than 10 new dwellings or more than 1000 sq. metres of non-residential floorspace [clause 3(i)].

Executive Summary

- i. The site comprises 300-306 Gray's Inn Road which fronts Gray's Inn Road and Acton Street. The application site is not listed, but is within the Bloomsbury Conservation Area (CA). The nearest Listed Buildings are the Grade II terraces on Acton Street which adjoin the site and are adjacent. In addition there are rows of Grade II listed terraces to the South on Fredrick Street and Ampton Street.
- ii. The proposals would result in the partial loss of Battle Bridge House. This building is outlined as a building that detracts from the character and appearance of the Bloomsbury Conservation Area and is considered to contribute little to the street scene or townscape. The proposed replacement building will reuse the existing superstructure, which presents a sustainable reuse of a significant element of the existing building thereby preserving embodied carbon in compliance with policy. The detailed design of the replacement facades will respond to the language of the surrounding area and provide a high standard of design and finish, enhancing the setting and character of several heritage assets. Less than substantial harm has been identified to surrounding heritage assets through the scale of the extensions increasing the prominence of this commercial buildings on the residential streets.
- iii. The comprehensive redevelopment has provided an opportunity to design a building that has a better relationship to Gray's Inn Road and Acton Street and enhance the character and appearance of the Bloomsbury Conservation Area as the current building is currently recognised as detracting from the conservation area.
- iv. The proposed development would provide increased commercial and employment floorspace. The scheme would also provide seven new homes, which would provide a good standard of living accommodation, all units are private sale housing.
- v. In conclusion, the proposal would cause less than substantial harm to surrounding heritage assets and the Bloomsbury Conservation Area through the proposed extensions. There would also be limited impacts on neighbouring amenity, however, the public benefits of the scheme would be significant enough to outweigh these matters. There are several public benefits of the scheme that could outweigh any identified harm:
 - Additional employment floorspace.
 - Creation of 7 new residential units at the site.

- A contribution of £114,450 to contribute towards affordable housing.
- Removal of car parking.
- High quality architecture with excellent sustainability benefits.
- Significant contributions towards the provision of local infrastructure and facilities are proposed through CIL and financial contributions in the S106.

1 Site

- 1.1 The application site covers an area of approximately 0.19 hectares (1900 sqm). The site fronts both Gray's Inn Road and Acton Street. Gray's Inn Road primarily has a commercial character and Acton Street has a residential character.
- 1.2 To the rear and East of the site are Grade II listed Georgian residential terraces on Acton and Fredrick Street.
- 1.3 Battle Bridge House is a 7-storey building with a connected lower 'annex' building fronting Acton Street which is 3 storeys high. There is an existing vehicle entrance via an undercroft off Acton Street that accesses the servicing yard. This development proposes to move their servicing to on-street, but to retain access to the rear courtyard via an internal lobby for cycle parking.



Image 1 – Existing aerial view looking East

- 1.4 The site is located within the Bloomsbury Conservation Area and the building is defined as making a negative contribution in the Bloomsbury Conservation Area Appraisal and Management Strategy 2011. It is also within a Central London Area.
- 1.5 Acton Street and Gray's Inn Road form part of the Strategic Road Network (SRN). Transport for London (TfL) is the highway authority for Acton Street and Camden is the highway authority for this section of Gray's Inn Road.

- 1.6 The site has a PTAL rating of 6b, which is considered to be the best level of public transport accessibility. Various transport interchanges are located within a 6-minute walk of the site, including Kings Cross station (Circle, Piccadilly, Hammersmith & City, Northern, Metropolitan and Victoria tube lines and national rail) and St Pancras station (national rail and Eurostar). Other London Underground stations are also located nearby, including Russell Square which is 900 metres to the southwest and Chancery Lane, which is approximately 1.2 kilometres to the southeast. In addition, bus stops serving bus routes 17 and 46 are located nearby on Gray's Inn Road. Bus routes 63 and 259 can also be accessed from bus stops nearby on Acton Street, Gray's Inn Road (northern section) and King's Cross Road.
- 1.7 The site is located in close proximity to cycle route C6, which follows Sidmouth Street, Ampton Street, Cubitt Street, Pakenham Street and Phoenix Place. The route provides a connection with high quality cycle facilities between Kentish Town and Elephant and Castle. The site would be easily accessible to cyclists using C6. Gray's Inn Road forms part of the primary cycle route network in the borough
- 1.8 The building is currently occupied by BUPA for use as an office at the upper floors and private medical clinic at ground and basement level (Class E).

2 The Proposal

- 2.1 The proposal is for the partial demolition, and re-use and redevelopment of Battle Bridge House with upward extensions to provide additional office space (Class E) and seven new residential units within the annex building fronting Acton Street (Class C3). The seven residential units would comprise of a 1x 3bed, 3x 2Beds and 3x1Beds. The ground level servicing yard accessed off Acton Street will be infilled, with an internal lobby providing access to the courtyard and cycle and refuse storage for the offices. Servicing is proposed on Acton Street with alterations to the existing TFL bus stop to facilitate a new loading bay.
- 2.2 The proposals also include commercial roof terraces at levels eight and nine; installation of plant rooms at each floor; and provision of cycle parking for all uses and associated end of trip facilities.



Image 2 – The proposed building

Revisions

2.3 In response to comments received from officers and TFL, revised drawings were submitted incorporating the following amendments:

- Updated highways arrangement for servicing off Acton Street;
- Reduction in the scale of the rear residential balconies to provide more breathing room to the adjoining listed terrace;
- Reduction in the recessed entrances off Acton Street; and
- Revision of the front ground floor façade of the residential block including detailed design of substation.

3 Relevant history

The site

- 3.1 L15/22/A/15721**- “The redevelopment of the site by the erection of a basement, part 7 storey and part 3 storey building comprising basement and storage, ground floor showrooms, first floor showrooms and offices, second floor offices and residential and third to sixth floors as offices.” – **Granted 02/10/1973**
- 3.2 L15/22/A/18511** - The redevelopment of the site by the erection of a basement, part 7 storey and part 3 storey building comprising basement plant and storage,

ground floor showrooms, first floor showrooms and offices, second floor offices and residential and third to sixth floors as offices.- **Granted 30/08/1974**

- 3.3 **TP16989/25706** - The erection of an extension to Nos. 300-304, Gray's Inn Road, St. Pancras, on the site of No. 306, Gray's Inn Road, St. Pancras, for use as warehouse in the basement, offices on the first, second and third floors with a residential flat on the fourth floor. **Granted 27/05/1955**
- 3.4 **TP16989/16850** - Alterations to the access to the highway and access ramp at 300/306, Gray's Inn Road and 57/63, Acton Street, St. Pancras.- **granted 16/01/1956**
- 3.5 **TP16989/203** - The erection of and extension at ground floor level at the rear of Nos. 300-306 Gray's Inn Road and Nos. 57-63 Acton Street, St. Pancras. – **Refused 02/07/1959**
- 3.6 **TP16989/12836** - Construction of additional storey to rear building at 300-306 Grays Inn Road, St. Pancras. **Granted 13/10/1959**
- 3.7 **L15/22/A/27087** - Erection of a linking passageway at ground level, use of part of the basement for 'X' ray screening, darkroom and inspection purposes and use of part of the first floor as an exhibition and showroom area and seminar room in connection with B.U.P.A services. **Granted 31/10/1978**
- 3.8 **L15/22/A/27076** - Erection of a louvred screen at roof level around existing cooling units. **Granted 31/10/1978**
- 3.9 **L15/22/A/25366** - Use of the ground floor as a womens health screening clinic with ancillary storage in the basement area. **Granted 16/01/1978**
- 3.10 **2004/1709/P** - Enclosure of existing ground floor entrance to upgrade disabled access. **Granted 09/07/2004**
- 3.11 **2008/5860/P** - Change of use of basement, ground and part first floor from Health Screening Unit (D1) to B1 (office) use. **Withdrawn**
- 3.12 **2012/2165/P** - Change of use of 5th floor from office (Class B1a) to flexible use comprising office (Class B1a) and Health Clinic (Class D1). - **Granted 15/06/2012**

Relevant neighbouring sites:

- 3.13 **Acorn House, 314-320 Gray's Inn Road: 2020/3880/P** - Redevelopment of Acorn House as a part 6, part 10 storey mixed-use building with 33 affordable homes (with external playspace at level 6, a community room and terrace at level 9), affordable office space and retail unit at ground and basement level; together with cycle parking facilities and associated ancillary uses. – **Granted 01/11/2021**

4 Consultation Summary

Statutory

4.1 Transport for London (TfL) – Spatial Planning

- TfL remains concerned on the proposed relocation of Acton Street Bus Stop, please see below comments from our bus teams. TfL is willing to discuss further to identify an acceptable solution.
- The existing bus stop includes a length for the entry taper in front of the parking bays with the exit taper covered by the double red lines, in front of the bus cage. It is not just a case of moving bays/cages around as to do so will mean that the bus cage is sandwiched between the parking bays at the rear of the cage and loading/disabled bay at the front. Therefore, in the new location there does not appear to be an exit taper to allow the bus to pull out safely and easily. The implications of not providing this would mean that buses would a) have to queue to enter the bus cage or b) would not be able to align correctly to the kerb to enable ramp deployment for those with wheelchairs or pushchairs.
- A solution could be to increase the existing length of the cage by 12 metres (i.e. over the current on-site length) to provide a total length of 87 m. This will allow the same number of buses to stop for what is a busy facility, allow easy entry and exit and allow buses to align correctly for ramp deployment. Colleagues in the Public Transport Planning Team have suggested that this additional length could be achieved by relocating the cage up to 15 metres further east, should the parking/disabled bays still remain in the layout shown in the transport statement. The bus stop flag also needs to be relocated accordingly, noting that the bus is required to stop with the rear of its front doors in line with the flag position (see TfL's Accessible Bus Stop Design Guidance 2017).
- Alternatively, the disabled/loading bay could be maintained in its current location, which allows for an exit taper from the cage in the form of double red lines.
- Furthermore, we require tracking by a 12-metre electric bus to ensure that a bus can achieve entry and exit to the cage, past the bays at both ends if occupied and subsequent buses may also be able to access the front or rear of the cage if another bus is still loading.

TfL Updated response to revisions: - I confirm that I am happy with this now as this clearly shows the electric bus tracking labelled on the drawing and able to manoeuvre successfully. I also note that the van is shown in the tracking to reverse back towards the bus cage.

The proposal results in the need to relocate bus stops/ parking bay etc, therefore an obligation should be secured that the applicant, prior to first occupation, shall enter into s278 agreement under Highways Act 1980 with TfL to deliver highway work on Acton Street, this includes but not limited to the

relocation of parking bays, bus stop, removal of redundant vehicular crossover, improve/ make good of footway on Acton Street in the vicinity of the site's frontage.

Officer response: Following revisions TfL are now satisfied with the application and support the scheme as the previous comments have been addressed.

A S106 obligation is secured requiring the applicant to enter into s278 agreement under Highways Act 1980 with TfL to deliver highway work on Acton Street, this includes but is not limited to the relocation of parking bays, bus stop, removal of redundant vehicular crossover, and to improve/ make good the footway on Acton Street in the vicinity of the site's frontage.

Local groups/stakeholders

4.2 Bloomsbury CAAC

Bloomsbury CAAC were consulted, and no comments were received.

4.3 Thames Water

Waste Comments:

With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Management of surface water from new developments should follow guidance under sections 167 & 168 in the National Planning Policy Framework. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes>

We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

Thames Water would advise that with regard to WASTE WATER NETWORK and SEWAGE TREATMENT WORKS infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

Water Comments:

If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online at thameswater.co.uk/buildingwater.

On the basis of information provided, Thames Water would advise that with regard to water network and water treatment infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommends the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

4.4 Camden Cycling Campaign

We represent the interests of cyclists living or working in or passing through Camden.

Design: though the amount of cycle storage seems adequate, the route from the street to the various storage areas is long and involves several doorways. This is especially true for the storage at lower ground level (5 doors between the exterior and the lifts plus 2 between the lifts and the store). This will make it very difficult for users, especially those with restricted mobility. The developer is urged to simplify these routes.

CMP: the proposed exit route for eastbound traffic uses Caledonia Street. This is a narrow street and is signed as "Unsuitable for HGVs". Traffic should use Wharfedale Road (incidentally the routes to and from site in Figure 3 of the draft CMP seem to be reversed).

Officer response:

- *Design* – See section 17.11
- *CMP* – See section 17.39

Adjoining Occupiers

- 4.5 Multiple site notices were displayed on Gray's Inn Road, Acton Street, Fredrick Street and Ampton Street from the 9th June until the 3rd July 2023. A press advert was placed on 15th June 2023 in the Camden New Journal.

4.6 3 objections were received during the public consultation to the original plans from the residents of Frederick Street including One Housing Group. Their objections can be summarised below:

4.7 Privacy and noise (Balconies and courtyard): from rear balconies to their windows and rear gardens of the residents of Frederick Street.

- Noise report doesn't cover balcony noise
- Their homes are single glazed
- Suggest that layouts should be flipped so only bedrooms face towards the rear and there should be no rear balconies.
- Balconies are less than 18m to their homes
- Rear courtyard should be limited to use between 9am-5pm, concerns about noise from residents of Fredrick Street.

4.8 Noise (Plant and Construction): Concern about noise from plant as their properties have single glazing. Concern about noise and disruption during construction – noise monitoring should be conducted on Fredrick and Acton Street.

4.9 Light: Loss of light to No.72 Fredrick Street and its adjoining terrace.

4.10 Design: concerned no clear visual graphics of how the rear elevation of the residential block facing Fredrick Street properties will appear.

4.11 Bats: Bats present in the rear gardens of Fredrick and Acton Street will be impacted by PIR lighting. Concern no environmental assessment of their habitats.

4.12 Community engagement: Concern comments submitted by the residents of Frederick Street on the balconies were ignored. Resident of Fredrick Street concerned they did not see any of the site notices or the newsletters sent out by the applicant. Concern no local community public benefits to scheme.

4.13 Revisions: Following the latest set of minor revisions outlined in section 2.3 one follow up objection was received from the resident of 72a Fredrick Street which considered the revised plans not to be an improvement in relation to their property. Their revised objection can be summarised as follows:

- The 'plant part' has been increased in height which will increase its impact on light to the basement room and require artificial lights.
- No amendment to removing rear balconies or additional screening or their noise concerns.
- Suggest that evergreen trees could be planted in rear courtyard for privacy.

4.14 Officer response:

- *Privacy and noise (Balconies)* – See sections 13.43 and 13.44-13.46
- *Noise (Plant and construction)* - See sections 13.40-13.41 and 17.37-17.41
- *Light* - See sections 13.1-13.37

- *Design- Officers are satisfied that the proposed elevational drawings and CGI images within the design and access statement and the design addendum are sufficient for assessment.*
- *Bats - See section 12.9-12.11*
- *Community engagement - See sections 4.5 and 7 (Consultation and procedure)*
- *Revisions – For clarity the revisions to the scheme are only as outlined in section 2.3 and no revision was made to increase the height of the plant. See sections 13.43 and 13.44-13.46 regarding privacy and noise.*

5 Policies & Guidance

5.1 National Planning Policy Framework 2023

5.2 NPPG

5.3 The London Plan 2021

5.4 Mayor's Supplementary Planning Guidance

5.5 Camden Local Plan (2017)

- G1 Delivery and location of growth
- H1 Maximising housing supply
- H2 Maximising the supply of self-contained housing from mixed-use schemes
- H3 Protecting existing homes
- H4 Maximising the supply of affordable housing
- H6 Housing choice and mix
- H7 Large and small homes
- C1 Health and wellbeing
- C5 Safety and security
- C6 Access for all
- E1 Economic development
- E2 Employment premises and sites
- A1 Managing the impact of development
- A2 Open space
- A3 Biodiversity
- A4 Noise and vibration
- D1 Design
- D2 Heritage
- CC1 Climate change mitigation
- CC2 Adapting to climate change
- CC3 Water and flooding
- CC4 Air quality
- CC5 Waste
- TC1 Quantity and location of retail development
- TC2 Camden's centres and other shopping areas
- T1 Prioritising walking, cycling and car-free development
- T2 Parking and car-free development

- T3 Transport infrastructure
- T4 Sustainable movement of goods and materials
- DM1 Delivery and monitoring

5.6 Supplementary Planning Guidance

Camden Planning Guidance (2018/2019/2021)

Access for All CPG

Air Quality CPG

Amenity CPG

Biodiversity CPG

Community uses, leisure and pubs CPG

Design CPG

Developer Contribution CPG

Employment sites and business premises CPG

Energy efficiency and adaptation CPG

Housing CPG

Planning for health and wellbeing CPG

Public open space CPG

Town centres and retail CPG

Transport CPG

Trees CPG

Water and flooding CPG

Bloomsbury Conservation Area appraisal and management strategy 2011

Planning Statement - Intermediate Housing Strategy and First Homes 2022

Draft Site Allocations Local Plan (2020)

Policy KQ1 – Supporting growth in the knowledge quarter innovation district

The draft allocations set out the Council's aspirations, but given the current status of the document and that it will be revisited as part of wider work on the Local Plan Review, it only has limited weight in decision-making.

6 Assessment

The principal considerations material to the determination of this application are considered in the following sections of this report:

7	Consultation and procedure
8	Land use principles
9	Housing mix, unit size, quality of accommodation and affordable housing
10	Demolition
11	Design and Conservation
12	Landscaping and trees, Open space, Nature conservation and biodiversity
13	Impact on neighbouring amenity
14	Air quality
15	Sustainability and energy
16	Flood risk and drainage
17	Transport
18	Safety and security
19	Refuse and recycling
20	Employment and training opportunities
21	Fire Safety
22	Financial obligations
23	Community Infrastructure Levy (CIL)
24	Planning Balance and public benefits
25	Conclusion
26	Recommendations
27	Legal comments
28	Conditions
29	Informatives

7 Consultation and procedure

Consultation

- 7.1 A Statement of Community Involvement (SCI) has been submitted as part of the application which details the consultation that the applicant undertook prior to submitting their application.
- 7.2 London Communications Agency was appointed by the Applicant to deliver a consultation programme in support of the development proposals for the site.
- 7.3 Consultation activities included:
- A consultation website (www.300graysinnroad.co.uk) with comprehensive information on the proposals was launched on 14th April. The website was viewed 1,473 times.
 - A flyer/newsletter was sent to 3,767 local residents and businesses on 21st April surrounding the site.
 - Letters to political and community stakeholders to introduce the consultation, which led to two one-to-one meetings being held with the project team
 - Newspaper adverts in the Camden New Journal on 20th April, both in print and online.
 - Social media adverts, leading to 444 click through to their website.
 - A public exhibition on 28th April attended by three people.
 - A Webinar on Zoom on 16th May attended by three people.
- 7.4 Officers consider the applicant has sought to engage with the community whilst preparing their proposals which is welcomed.

8 Land use principles

Principle of development

- 8.1 Policy G1 of the Local Plan sets out how the Council will create conditions for growth to deliver homes, jobs and infrastructure by supporting development that makes the best use of the site, providing a mix of uses in accessible parts of the borough (including self-contained housing) to deliver 16,800 new homes, 695,000sqm of new office floorspace and 30,000sqm of new retail floorspace by 2031. The Council anticipate the most significant growth to be delivered across the Borough, with Town Centres and the Central London Area playing a key role in facilitating that growth. The Council will generally expect larger developments in the highly accessible areas to include a mix of uses. It is considered for the reasons outlined below that the development meets this expectation by significantly increasing the amount of office floorspace and providing 7 new homes.
- 8.2 The application site is also located within the Central London Area, which is a highly accessible area (PTAL level 6b - the best), which is well served by public transport.

- 8.3 The existing site comprises 4,342 sqm in class E office floorspace. The proposed development would introduce 714sqm of residential floorspace and increase the existing office space (Class E) to 5,056sqm. Overall, the total floorspace will increase by 1,271sqm.
- 8.4 The proposed development would maintain and increase the existing key use on site and would be in accordance with the character and established mix of uses in the existing buildings and the surrounding area. The proposed development and intensification of business, and residential uses would help meet the aspirations of both local and regional policy for this important Town Centre Location, and as such, the principle of development in this location is considered acceptable and in accordance with London Plan Policy and Local Plan Policy G1.

Mixed use policy and residential accommodation

- 8.5 Policy H2 requires a mix of uses in new developments, including a contribution to the supply of housing. In the Central London Area, where development involves additional floorspace or more than 200sqm (GIA), the Council requires 50% of all additional floorspace to be self-contained housing. We will require self-contained housing to be provided on site, particularly where 1,000sqm (GIA) of additional floorspace or more is proposed.
- 8.6 The proposed development would deliver a mix of uses including employment (Class E), and residential accommodation (Class C3). The proposals would maintain the overall character of the site as a commercial development while increasing the quantum of residential to conform to the Council's aim of securing mixed-use development. The overall increase in floorspace (GIA) would be 1,271sqm, split between non-residential and residential uses as follows:
- Non-residential floorspace uplift = 557sqm (43.8%)
 - Residential floorspace uplift = 714sqm (56.2%)
- 8.7 Policy H2, expects a requirement for 635.5sqm of the overall uplift (50% of 1,271sqm) to be provided as self-contained residential housing. The proposals would comply with and exceed the policy requirement by providing 714sqm residential floorspace.
- 8.8 The development would provide 3x 1Beds, 3x 2Beds and a 1x3bed units; providing private market housing. This housing provision is very much welcomed by the Council given the current challenge of meeting housing targets. The proposal complies with policies on affordable housing, housing mix, unit size, quality of accommodation are covered in later sections of this report.
- 8.9 In summary, the economic planning objectives would be achieved and there would be a significant uplift in residential accommodation. Overall, the proposed amount and balance of uses is appropriate for this site. As such, the proposed development and the provision of residential floorspace is considered to be in

compliance with the aspirations of the development plan as a whole, particularly with reference to Local Plan Policy H2, and London Plan policy SD6.

Proposed office use

- 8.10 Policy E1 of the Local Plan supports the provision of a range of business and employment floorspace including the intensification of existing employment sites and seeks to direct new office development to the growth areas, Central London and the town centres to meet expected demand. Policy E2 of the Local Plan reiterates that the sites which are suitable for business use will be protected and the intensification of employment uses will be supported provided they are maintained or increased. Policy E2 goes on to say that where premises or sites are suitable for continued business use, the Council will consider higher intensity redevelopment schemes which improve functional efficiency, maintain or, preferably, increase the amount of employment floorspace and number of jobs. Redevelopment should retain as far as possible existing businesses that desire to remain on the site and the re-provided employment floorspace on the proposal site should be designed flexibly to be able to accommodate a range of business types and sizes, in particular small and medium-sized enterprises (SMEs) and businesses in growth sectors such as the creative industries.
- 8.11 The proposed development would deliver an increase in office floorspace of 557sqm. The site is located within the Central London Area where office uses are supported. It is also located within the Knowledge Quarter, a world-class cluster of scientific and knowledge-based institutions and companies that specialise in areas like life sciences, data and technology and the creative industries, the policies of the SALP seek to promote and grow the Knowledge Quarter. Whilst these are only draft policies which carry limited weight, they are helpful as they show the Council's aspirations for the area and the direction of travel in terms of policy. The proposed development accords with the Council's aspirations and policies for the Central London Area and Knowledge Quarter.
- 8.12 As offices now fall within Class E of the Use Classes Order 2020 which has a very wide remit it is considered necessary and desirable taking account of development plan policies to impose controls which prohibit the space being used for alternative Class E uses. Condition 30 restricts the class E office floorspace as proposed to solely be used as class E (g) to safeguard its future as an employment site that will continue to meet the needs of the knowledge quarter.
- 8.13 **E(g) is defined as:**
- Uses which can be carried out in a residential area without detriment to its amenity:
- E(g)(i)** Offices to carry out any operational or administrative functions,
 - E(g)(ii)** Research and development of products or processes
 - E(g)(iii)** Industrial processes
- 8.14 The existing building is expected to become vacant in November 2023 as BUPA are consolidating their office accommodation elsewhere within London. As such,

the proposed development would not displace existing tenants or cause harm to Camden's local economy.

- 8.15 The development would have an uplift of 557sqm in office floorspace which is less than the 1,000sqm of office floorspace threshold which triggers a requirement for the provision of affordable workspace in line with the Employment Sites and Business Premises CPG.
- 8.16 The floorplates have been designed to be flexible with future SMEs in mind and the building could be easily divided up to accommodate multiple businesses.
- 8.17 At ground floor the frontage on Gray's Inn Road will be occupied as office space as per the existing arrangement, and on Acton Street there will be additional access to the office and its back of house facilities, as well as a new UKPN substation.
- 8.18 Given the location of the site within the Central London Area and the SALP Knowledge Quarter and the existing office use of the site, the increase in office floorspace is considered appropriate in this location, and in accordance with policies E1 and E2 of the Local Plan, and London Plan policies SD6 and E1.

Conclusion; land use principles

- 8.19 Overall, the proposed development is considered to have an appropriate mix of uses for the site that would enhance the existing spaces while benefitting a number of the Council's policy objectives by contributing towards a successful economy and making an appropriate contribution towards the Borough's supply of housing. As such, the development on balance is considered to be in accordance with the Camden Local Plan and London Plan and is acceptable in this regard.

9 Housing mix, unit size, quality of accommodation and affordable housing

Policy review

- 9.1 Local Plan Policies A1, H1, H2, H4, H6, H7 and the Housing CPG, and London Plan policy H1 are relevant with regards to new housing, including to tenure and unit size. Local Plan policy H6 is relevant with regards to the amenity of proposed housing. These policies are outlined in more detail below.
- 9.2 Policy H1 sets out that the Council will aim to secure a sufficient supply of homes to meet the needs of existing and future households by maximising the supply of housing and exceeding a target of 16,800 additional homes from 2016/17 - 2030/31, including 11,130 additional self-contained homes. Policy H2 supports the aims of Policy H1, where non-residential development is proposed the Council will promote the inclusion of self-contained homes as part of a mix of uses.
- 9.3 In relation to Policy H1, there is also the Housing Delivery Test (HDT). The HDT is an annual measurement of housing introduced by the government. It measures

whether planned requirements (or, in some cases, local housing need) have been met over the last 3 years. The government's most recently published figure is for 2021, when the measurement for Camden was 76% - which means that Camden has to produce an action plan and apply a 20% buffer to our 5-year housing land supply. The borough falls substantially short of what is needed for a 5-year supply at the moment. Consequently, the presumption in favour of sustainable development in paragraph 11(d) of the NPPF is engaged, and there is a need to place great weight on the provision of housing in decision making. The NPPF indicates that applications should be granted unless their adverse impacts would significantly and demonstrably outweigh their benefits when assessed against NPPF policies as a whole.

- 9.4 Policy H4 expects a contribution to affordable housing from all developments that provide one or more additional homes and involve a total addition to residential floorspace of 100sqm GIA or more.
- 9.5 Policy H6 is about housing choice and mix, and it aims to minimise social polarisation and create mixed, inclusive, and sustainable communities, by seeking high quality accessible homes and a variety of housing suitable for Camden's existing and future households. Policy H7 aims to secure a range of homes of different sizes that will contribute to creation of mixed, inclusive and sustainable communities and reduce mismatches between housing needs and existing supply.
- 9.6 Policy A1 seeks to protect the quality of life of occupiers and neighbours. We will grant permission for development unless this causes unacceptable harm to amenity. This includes light, outlook and privacy of new residential units.

Mix of unit sizes

- 9.7 The existing site contains no residential units. The proposal includes seven residential units made up of 3x 1Beds, 3x 2Beds and a 1x3bed.
- 9.8 Policy H7 seeks to provide a range of unit sizes to meet demand across the Borough. This policy considers 1 bedroom/studios as lower priority and 2 and 3 bedroom units to be of higher priority. The proposal would provide an acceptable mix of unit sizes so that more than half (50%) would be high priority units. On this basis, the unit mix is considered to be acceptable and in accordance with policy H7.

Design and layout

- 9.9 The Ministry of Housing, Communities and Local Government (MHCLG) (now the Department for Levelling up, Housing and Communities) released nationally described space standards in March 2015, which are incorporated in the Local Plan under Policy H6. The minimum gross internal floor areas are set by the number of bedrooms and bed spaces/occupiers in each dwelling. The development would provide one 3 bedroom/5 person flat, three 2 bedroom/4 person flats and three 1bedroom/2person flats, which require a minimum of

50m², 70m² and 86m² respectively. All of the units comply with the national standards and comfortably exceed them. The 3 bedroom flat would measure 90.8sqm, the 2 bedroom flats would measure 72.2sqm, and the 1 bedroom flats would measure 52.5sqm. All bedrooms in all the proposed units meet the size guidance.

- 9.10 The flats would be located in a separate adjoining block to the north/east end of the site from the first floor upwards, fronting and with access from Acton Street. All units would be dual aspect with private balconies to the rear. All units would have private amenity space which meet London Plan standards for units of their size.
- 9.11 The proposed development is therefore considered to provide an acceptable standard of residential accommodation.

Access and inclusive design

- 9.12 New build residential developments must comply with the access standards in Part M of the Building Regulations. This includes parts 1 (Visitable dwellings), 2 (Accessible and adaptable dwellings) and M4 (3) wheelchair user dwellings. The Council expects all new build housing development to go above the minimum mandatory Building Regulations with a requirement to meet Building Regulations part M4 (2); and for 10% of the units to meet part M4 (3) (wheelchair housing) in line with Policy H6. Although there are only 7 new units proposed, one unit (three bed at 4th floor) will be fully wheelchair accessible and would be secured by condition (19). Condition 19 will also secure the remaining 6 units to be designed and constructed in accordance with Building Regulations Part M4 (2).

Daylight and sunlight (DLSL)

- 9.13 No internal DLSL assessment of the proposed residential units has been submitted. However, the new residential building will have generous windows on the rear elevation with access to private balconies to provide good daylighting to all the living/kitchen areas and the bedrooms will be on the Acton Street frontage. All units are dual aspect facing north and south. The main living space has large windows facing over rear gardens with a southern aspect which will provide good light. It is therefore considered that the new units would have acceptable levels of light.

Affordable Housing

- 9.14 Policy H4 of the Local Plan seeks to maximise the supply of affordable housing, in line with aiming to exceed the Borough wide strategic target of 5,300 affordable homes from 2016/17-2030/2031. The Camden Strategic Housing Market Assessment estimates a need for around 10,000 additional affordable homes from 2016-2031. Policy H4 has a sliding scale target that requires an additional 2% affordable housing per capacity for each additional home. Capacity for one additional home is defined within the Local Plan as the creation of 100m² of additional residential floorspace (GIA). In assessing capacity, additional residential floorspace is rounded to the nearest 100m² (GIA). The affordable

housing target of 50% applies to developments with capacity for 25 or more additional dwellings. Schemes providing between 1-9 units will be expected to make a payment in lieu (PiL) of affordable housing.

9.15 Based on the uplift in floorspace of 1,271 sqm and in accordance with policy H2, the development would be expected to provide 635.5 sqm of housing with a split between affordable and market as determined by policy H4 (see below paragraph for calculation). The policy requires that 12% of housing floorspace would be expected to be the target for affordable, but as the scheme is for less than 10 units on-site provision is not expected and a payment in lieu is sought.

9.16 The amount of residential floorspace provided would exceed the policy requirement and given that less than 10 units are proposed a payment in lieu in this instance would be acceptable for the affordable housing. The payment in lieu is calculated by multiplying the target affordable floorspace by the cost per square metre of £1,500. This equates to a further financial contribution of £114,450 in line with policies H2 and H4 of the Camden Local Plan. This will be secured by a S106 legal agreement.

9.17 The payment in lieu calculation is shown below.

Total addition to floorspace proposed	1,271 sq m GIA
Self-contained housing floorspace target	$1,271 \times 50\% = 635.5$ sq m GIA
Capacity	$635.5 / 100 = 6$ additional homes
On-site addition to self-contained housing floorspace provision - market	714 sq m GIA
On-site addition to self-contained housing floorspace provision - affordable	0 sq m GIA
Affordable housing percentage target (capacity x 2%)	$6 \times 2\% = 12\%$
Affordable housing floorspace target (= shortfall in this scenario)	76.3 sq m GIA
Payment-in-lieu of affordable housing (shortfall GIA x £1,500 psm)	$76.3 \times £1,500 = £114,450$
Total payment (affordable housing shortfall only)	£114,450

10 Demolition

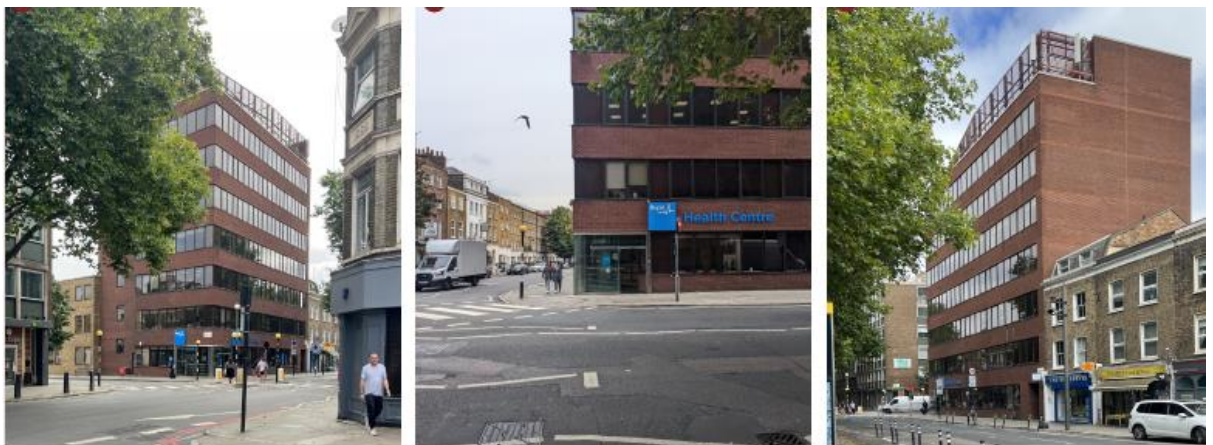
10.1 The proposal involves the partial demolition of Battle Bridge House. In terms of the level of demolition, the majority of the superstructure will be retained, and the

core, facades and roofs will be removed. This is shown in the demolition drawing below.



Image 3: Rear elevation (Section AA) showing the scope of demolition.

10.2 Policy D2 (Heritage) resists the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area. It is acknowledged that this building is recognised as detracting from the Bloomsbury Conservation Area and is not a positive contributor.



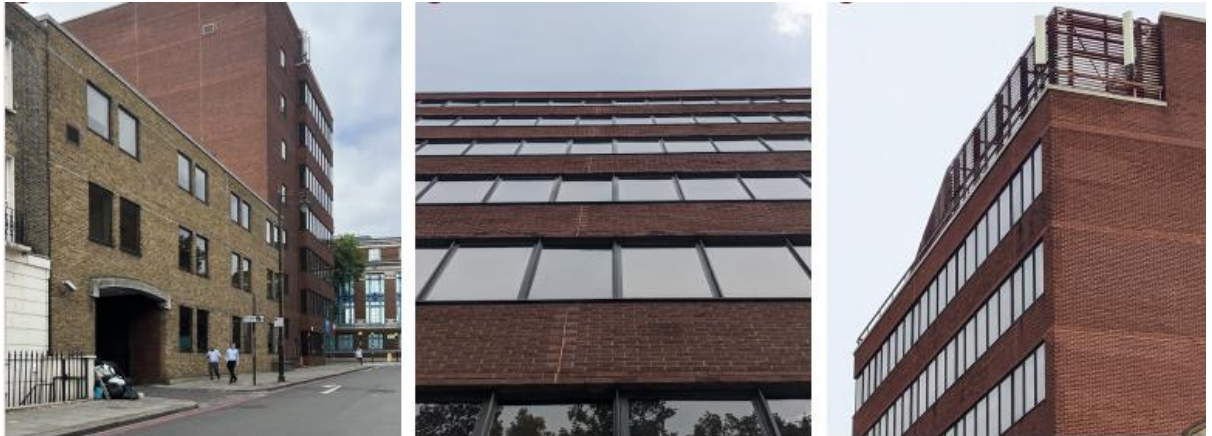


Image 4: Images of the existing elevations fronting Gray's Inn Road and Acton Street.

- 10.3 There is limited architectural merit to the existing facades and the development will replace these and enhance the site. The retention of the superstructure allows reuse of materials and significant structural elements which reduces waste and release of embodied carbon which is welcomed. The demolition will allow for an enhanced office layout and flow with additional floorspace to help cater for the future tenants.
- 10.4 Given the above there is no objection to the partial loss of this building on design and heritage grounds. The development will create a better relationship in terms of its facades with the neighbouring listed buildings, the streetscape, and the conservation areas, than the existing which has a more limited contribution.
- 10.5 Policy CC1 (Climate change mitigation) requires all proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building. All proposals for substantial demolition and reconstruction should be fully justified in terms of the optimisation of resources and energy use in comparison with the existing building.
- 10.6 A detailed Whole Life Carbon Assessment is not required in this instance, as the scheme falls somewhere in between substantial refurbishment and substantial demolition. Nonetheless in line with policy CC1, the applicant has provided details within the energy and sustainability statements regarding embodied carbon.
- 10.7 The sustainability statement outlines that a pre-demolition audit will be carried out prior to works commencing on site. This audit will highlight the potential for maximum material recovery through demolition and provide a bill of quantities of tonnages that will arise. A report will be produced detailing materials arising as well as a list of suggested actions to be undertaken so that maximum material recovery is achieved. This will be secured by condition 13 through a 'resource management plan'. The foundations and superstructure are to be retained and reused. Although this imposes some limitations in terms of proportions and building line, it allows for resource efficiency and quicker construction. Condition 13 will also ensure that at least 95% of the demolition waste is diverted from the landfill as well.

- 10.8 Furthermore, the flexible floorplates ensure that the building is adaptable for alternative uses in the future. This would enable the use of the building to change in the future with minimal interventions to the building, which meets the aspirations of policy D2 which states that design should be durable in construction and where appropriate should be flexible and adaptable for a range of uses over time.
- 10.9 Overall, the proposed partial demolition of the existing building is considered acceptable in this instance given the low architectural and sustainability quality of the majority of the existing buildings on site, the reuse, recycling and adaption of existing structures and materials, and the sustainability improvements provided (Energy and Sustainability is discussed in more detail in section 17), in accordance with policies D1, D2, and CC1 of the Camden Local Plan 2017.

11 Design and Conservation

Legislative background

- 11.1 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 ("the Listed Buildings Act") states that in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
- 11.2 Section 72 of the Listed Buildings Act also requires local planning authorities to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.
- 11.3 The effect of these sections of the Listed Buildings Act is that there is a statutory presumption in favour of the preservation of Listed Buildings and their settings, and conservation areas. Considerable importance and weight should be attached to their preservation. A proposal which would cause harm to their significance should only be permitted where there are strong countervailing planning considerations which are sufficiently powerful to outweigh the presumption.
- 11.4 The duties imposed by the Listed Buildings Act are in addition to the duty imposed by section 38(6) of the Planning and Compulsory Purchase Act 2004, to determine the application in accordance with the development plan unless material considerations indicate otherwise.
- 11.5 Paragraph 195 of the NPPF states:

"Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage

asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal."

- 11.6 Reflecting the statutory requirement for special regard and attention to be given to preservation of designated heritage assets, paragraph 199 confirms that great weight should be given to the asset's conservation. Paragraph 202 states:

"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."

- 11.7 The following section appraises the impact on nearby heritage assets as far as is relevant to the context of the application, before considering how the significance of these assets would be impacted by the proposals. It also outlines the overall design impact. Image 7 shows a map of the nearby designated heritage assets surrounding the site.

Site description

- 11.8 The site is located on the corner of Gray's Inn Road and Acton Street. The existing building fronting Gray's Inn Rd comprises 7 storeys with an additional roof storey to accommodate plant. A 3 storey building occupies the Acton Street frontage to the rear. Both were built in the 1970s.



Image 5: Existing view to corner Gray's Inn Road and Acton Street.

- 11.9 The site falls within the Bloomsbury Conservation Area. Bloomsbury is widely considered to be an internationally significant example of town planning. The original street layouts, which employed the concept of formal landscaped squares and an interrelated grid of streets to create an attractive residential environment, remain a dominant characteristic of the area.

- 11.10 The site is located in Sub Area 14 (Calthorpe Street/Frederick Street) as outlined in the Bloomsbury CA Assessment. It is located on the eastern side of Gray's Inn Road. It comprises an area of mainly nineteenth century terraced housing.
- 11.11 Those buildings facing onto Gray's Inn Road are generally taller and more ornate which reflect the historic status of this street as a busy route linking High Holborn to King's Cross. Building uses are generally commercial, communal or medical which gives the street its distinct character. Gray's Inn Road is also of mixed character with buildings of different scales and ages, from 3 storey Georgian terraces to larger twentieth century commercial and residential buildings up to 7 storeys and more recently 10 storeys. However, to the east and south the scale and use of buildings changes to smaller terraced house which gives this part of the conservation area a quieter, residential character.
- 11.12 The built environment is characterised by a fine urban grain, of a repetitive nature. The nineteenth century town houses are in long terraces with consistent plot widths, heights with horizontal parapets providing a terminating feature to the skyline.



Image 6: Aerial view of Existing building fronting Gray's Inn Road and Acton Street

- 11.13 There are a number of Grade II listed terraces in close proximity on Acton Street, Fredrick Street, Ampton Street and Ampton Place. Although given the location of the terraces on Ampton Street, no impact or harm has been identified to this street.

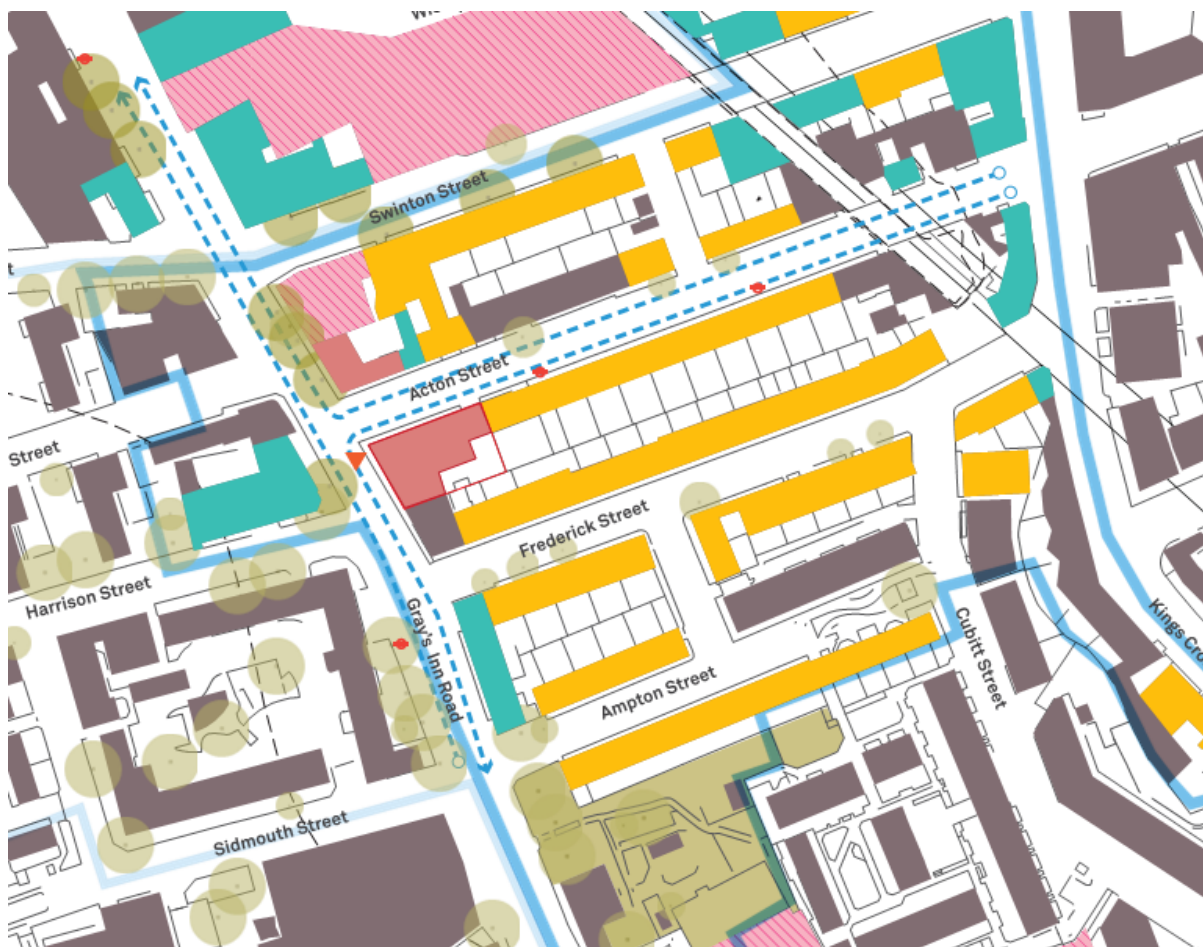


Image 7: Location of heritage assets surrounding the site (Grade II listed buildings shown in yellow and the application site in red)

- 11.14 These uniform Georgian terraces derive their special architectural and historic interest from them being examples of nineteenth century domestic houses, which have a collective townscape value due to the general consistency of materials, height, layout, façade hierarchy and appearance.

Site Appraisal

- 11.15 In views from both Acton Street and Frederick Street the existing building is visible, but due to the rear of the building being largely un-fenestrated it has a recessive appearance which visually detaches it from being a part of the residential streets.
- 11.16 The existing building is eight storeys in height (including the plant level), with a lower three storey block located on Acton Street, and dates from the latter part of the twentieth century. The corner building is clad in brick which horizontal strips of glazing facing onto Gray's Inn Road. The lower second is architecturally different, using a lighter brick and different fenestration pattern, to more closely reference the different character and appearance of Acton Street.

- 11.17 The Gray's Inn Road building is considered to lack a positive engagement with the street, due to its horizontal bands of dark and opaque windows at street level and above.
- 11.18 Due to its overall size and poor quality appearance it makes a negative contribution to the character and appearance of the streetscene and the Bloomsbury Conservation Area and a replacement building could, potentially, offer significant enhancements.

Design Review Panel (DRP)

- 11.19 The proposals were considered by Camden's Design Review Panel at pre-application stage on 24 February 2023. The formal written report was issued March 2023 (attached at Appendix 1).
- 11.20 The report's summary section is provided below:

The panel finds much to admire in the proposals, including the retention of the existing structure and the overall sustainability ambition. It considers the proposed heights generally acceptable but considers the massing requires further refinement to reduce its impact on the conservation area, and that the detail of the architectural approach should also be developed. The impact of the building in views from the conservation area should be examined in more detail, and both massing and design detail simplified to improve its presence in relation to listed buildings. A clearer design distinction should be developed between elevations to reflect their different roles in primary and secondary views. The Gray's Inn Road façade should be refined with more verticality and a finer grain, and the architecture could use more colour to create a gateway building to the Knowledge Quarter. The cross-laminated timber roof extension could potentially be expressed differently to the building below.

Glazing ratios should be reviewed and potentially reduced, especially in the southern elevation and roof extension. The north-western corner rooftop set-back could be aligned with the recessed entrance. This double-height entrance should be scaled back, and option for pedestrian crossings to be relocated for the entrance location to work. A different architectural language should be developed for the Acton Street residential block to distinguish it from the commercial building, and full height windows reduced. Rear terraces should be refined to avoid overlooking. The courtyard and Acton Street entrance could be retained to create more space and provide easier access to cycle storage. The carbon impact of raised access floors should be reduced. Window designs need careful design to avoid thermal bridging. Further thinking is needed on the mechanical ventilation heat recovery system used, and the location of extracts.

- 11.21 The proposals presented to the Design Review Panel are largely the same, however, a number of recommendations were made, in terms of refining the proposals. A summary of the changes to the scheme made following the DRP's recommendations is outlined below:

- Further simplification of the eastern façade of the Gray's Inn Rd building was made to reduce the building's visual impact on views along Acton Street.
- Adjustments were made to the 8th floor terrace at the rear to reduce the massing and its impact on views from Frederick Street.
- A sub-station on the Gray's Inn Road frontage was moved to the Acton Street frontage of the residential building to increase the activation of the Gray's Inn Road frontage.
- Adjustments were made to the design of the residential building façade to provide a stronger differentiation with the Gray's Inn Road building façade.
- The entrance on the corner of Gray's Inn Road and Acton Street was moved to the main Gray's Inn Road frontage to improve the conditions of the public realm.
- Refinements were made to the upper storeys of the western façade on Gray's Inn Rd to improve solar shading.

11.22 Officers are satisfied that the DRP's recommendations have been sufficiently addressed.

Assessment

11.23 Policy D1 of the Camden Local Plan seeks to secure high quality design in all development by requiring development to respond to local character and context, be highly sustainable in design and construction, integrate well to the surrounding streets and townscape, comprise high quality architecture, and be accessible for all. Policy D2 states that the Council will only permit development within conservation areas that preserves or enhances the character and appearance of the area. London Plan policies D4, D5 and D6 and CPG (Design) also seek to secure high quality design.

11.24 While it is one office site, the smaller element on Acton Street has been referred to as the annex building and larger block on the corner of Acton Street and Grays Inn Road is referred to as the office block. In the proposal the annex building is converted to be primarily residential and the office is retained towards the corner. The proposals involve retaining much of the existing structure of both buildings; therefore the proposed footprint of the buildings largely follows the footprint of the existing. As mentioned the Acton Street building is redesigned for residential use. It is proposed to move the existing entrance on the Gray's Inn building on the corner with Acton Street to a central position on the Gray's Inn Road frontage which would reduce congestion on this corner and better activate the Gray's Inn Road frontage.

11.25 The applicants have submitted a Townscape, Visual Impact and Heritage Assessment that contains 14 verified views from the most sensitive locations surrounding the site that were agreed with officers prior to submission. These are shown in images 8, 11, 12 and 13.

Scale and massing

- 11.26 The proposals will increase the existing 7 storey building (excluding the plant level) to 10 storeys with the 10th storey pulled back from Gray's Inn Road to reduce the impact of the additional height and to align with the shoulder height of the recently approved Acorn House, 314-320 Gray's Inn Road.
- 11.27 Both blocks in the proposed building are significantly bigger than the existing building. The corner office building will be two storeys taller than the existing (including the existing plant level). The proposed residential building is two storeys taller than the existing although the fourth floor would be set back.



Image 8: View 1a - Gray's Inn Road, junction with Cromer Street

- 11.28 The north western corner of the 9th storey of this corner office building is cut out to form a terrace which also reduces the mass and impact of the additional height. To the rear the mass is reduced by recessing the core element from Acton Street and setting back the south of the top floor to reduce the impact of views from Fredrick Street. Overall, it is considered that the increase in height is acceptable in the context of the character of Gray's Inn Road and its surroundings.
- 11.29 At the western end of Acton Street many of the buildings are four storeys in height so an increase in height over the existing building is acceptable. It is acknowledged that the proposed annex building includes a fifth floor which is not a common feature of the street. It has been set back which softens its impact but it would be visible in views along Acton Street, however, it is seen in the context of the significantly larger office building adjacent and as a gentle and subtle transition to the larger scale development on Gray's Inn Road rather than the office development on this street wrapping onto Acton Street. The heritage impacts of the scale are addressed in the listed building section below, but officers consider that this increase is acceptable as it still maintains a bookend to the terrace and a transition in scale to the Gray's Inn Road corner building.

Detailed design and Materials

- 11.30 Each block has been designed differently to reflect the different uses proposed and the differing street contexts they have to address. On the office block, the new façade which addresses Gray's Inn Road offers a much more interesting and better detailed elevation which is appropriate to the grander status of this street. Its design takes its cues from the rhythms and proportions of other

buildings along Gray's Inn Road. Whilst modern in appearance, the character and appearance of Gray's Inn Road is mixed in terms of building ages, styles and materials and this design is considered to positively contribute to its context.

- 11.31 For example, whilst the pattern of window openings has a horizontal emphasis, this is balanced by strong vertical rhythm echoing the adjacent building on the other side of Acton Street.

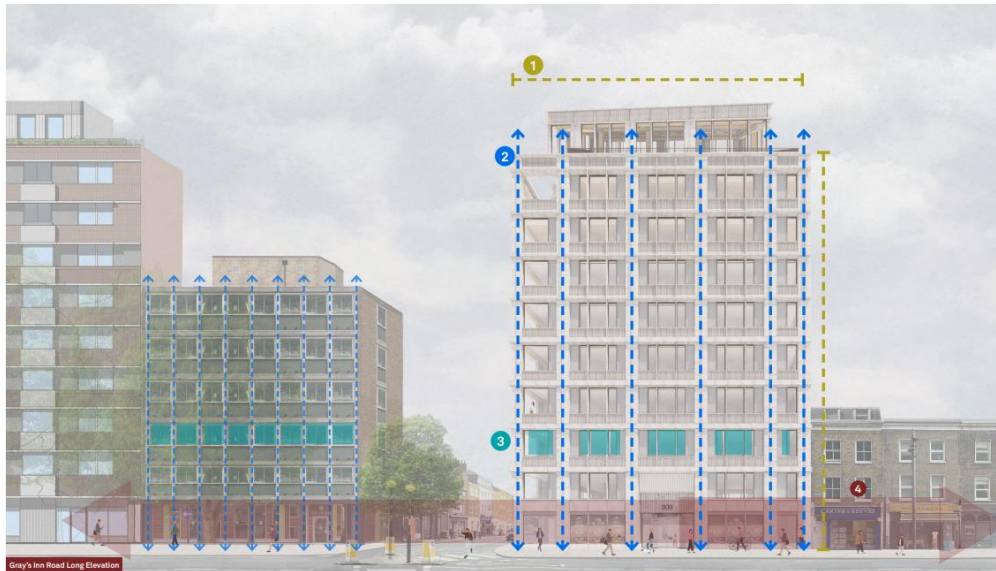


Image 9: Excerpt from Design and Access Statement showing the proposal in the street context of Gray's Inn Road

- 11.32 The proportions of the window openings themselves are informed by the proportions of the Telephone Exchange opposite in terms of their pattern and subdivision. A textured ribbed panel at the base of the windows and a light blue metal ventilation panel provide additional decoration and visual interest. The light blue tone references glazed ceramic features found locally and also the blue decoration on the Telephone Exchange. At the ground floor the building responds more positively with the public realm in terms of its increased openness, relocation of the entrance and relationship to the character of the ground floor of other buildings along Gray's Inn Road.

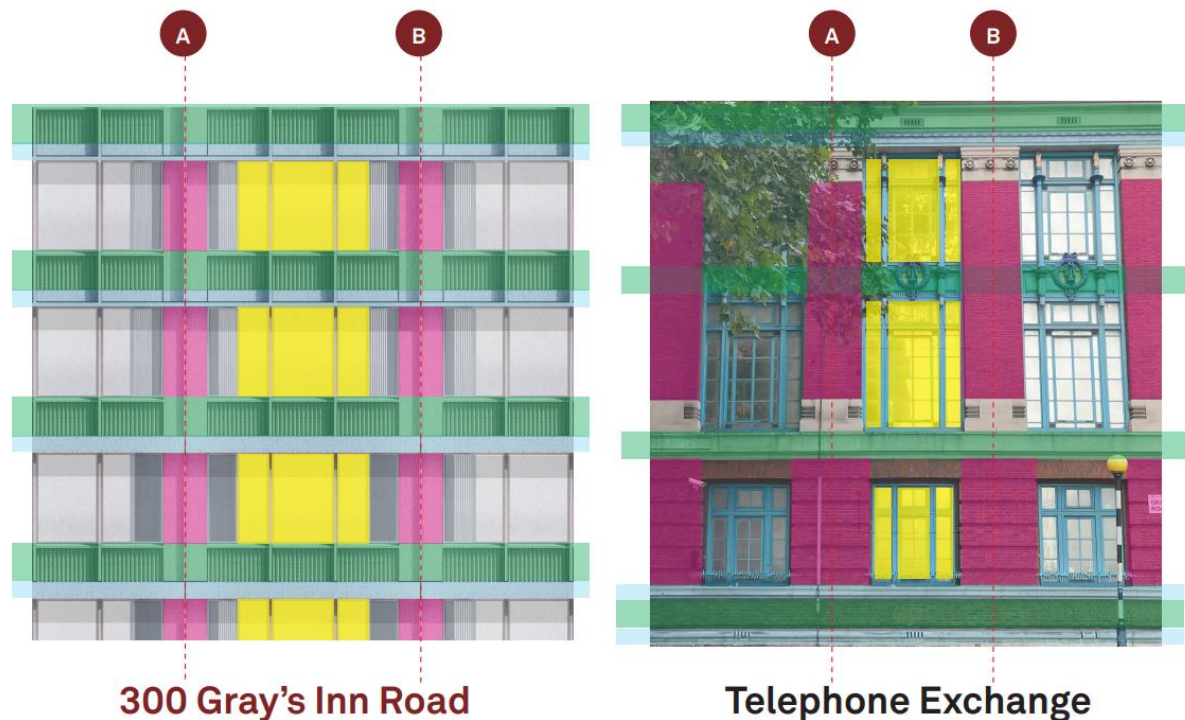


Image 10: Excerpt from the Design and Access Statement showing the relationship of the development with the adjacent Telephone Exchange

- 11.33 The predominant material proposed on the corner Gray's Inn Road building is concrete in response to the use of stone prevalent in civic architecture in the Bloomsbury Conservation Area. The concrete is given a textured appearance using a finer grain aggregate on the upper storeys and a larger grained aggregate on the ground floor which is considered to be acceptable. It is intended to utilise advances in concrete technology to reduce the embodied carbon of this material.
- 11.34 The detailed design of the residential building also takes its cues from its local context, in particular the adjoining listed Georgian terrace on Acton Street. With a ground floor in differing materials and brickwork and vertically proportioned windows above.
- 11.35 A precast concrete ground floor detail creates a solid and grounded base in response to the white stucco base of the Georgian terrace. The upper storeys comprise a yellow stock brick, the original brick tone of the Georgian terrace before its discolouration and ageing over time. The brick surface is given interest and depth through the brick framing, deep window reveals and stepped profile of the surface. Window frames and railings use a colour palette similar to that of the metal work of the adjacent terrace. As the existing structure is retained it means that the hierarchy of floor levels found in Victorian town houses cannot be replicated. However, the general appearance of the facade sits comfortably with the rest of Acton Street, especially as there is more variety in the buildings at its western end. The general façade appearance offers an enhancement over the existing.

- 11.36 Condition 3 is attached securing details and samples of the proposed materials to ensure that they are high quality and contextual.

Impact on the identified heritage assets: Bloomsbury Conservation Area

- 11.37 As was outlined in earlier sections of this report, whilst the existing building has a negative impact on the conservation area, at the rear its plain appearance and simple flat back reduce its impact on the residential streets to the east and create a clear break between the commercial character of Gray's Inn Road and the residential character the neighbouring streets.
- 11.38 Because this proposal adds additional scale to an existing building that detracts from the character and appearance of the Conservation Area, the cumulative impact of the height, bulk, form and increased activation of the rear of the building does make it feel more prominent in views. However, this is balanced against the high quality detailed design as proposed and described above which offers enhancement to the existing situation. When viewed from Acton Street, Frederick Street and Ampton Place the building's commercial character is now more imposing on the more domestic character of the residential streets behind. This change is considered to cause some harm to the character and appearance of the conservation area. Taking the impact on the conservation area as a whole, the level of harm is at the lower end of **less than substantial harm**. This harm is has to be balanced against the wider heritage, design and public benefits of the scheme in accordance with the relevant test in the NPPF (see para 11.6, above). The planning balance is addressed in the planning balance (Section 24, below).

Impact on the identified heritage assets: Listed buildings

- 11.39 Acton Street, Frederick Street, Ampton Street and Ampton Place contain grade II listed townhouses which can be seen against the backdrop of the proposed development. The special interest of these buildings lies largely with their group and townscape value, as a cohesive and planned residential area which is similar to the contribution they make to the conservation area.
- 11.40 The setting of the listed buildings on Ampton Street is not considered to be harmed through the development given its location (Image xx shows the impact on this street). This section therefore focuses on the impact on Acton Street, Frederick Street and Ampton Place.



Image 11 View 6a - Ampton Street, by Gray's Inn Road

11.41 As is outlined above the impact of the proposed development will have a visual impact on views of the listed buildings on Acton Street, Frederick Street and Ampton Place as shown in the mocked up images below.



Image 12: View 2- Acton Street, junction with Swinton Place



Image 13: View 5 - Frederick Street, junction with Ampton Place

- 11.42 Officers consider that this increased bulk which is visible in views of the listed buildings on these residential streets does result in a degree of harm to their setting as it introduces a greater commercial character into their residential setting.
- 11.43 For the reasons outlined above harm will be caused to the setting of the listed buildings identified above on Acton Street, Frederick Street and Ampton Place. Taking the impact on the listed buildings as a whole, including that some of their special architectural and historic interest will come from the interior of the building which are not affected by the proposals, the level of harm is at the lower end of less than substantial harm. This impact is also weighed against a number of public benefits in the planning balance (Section 23, below) in accordance with the NPPF.

Conclusion

- 11.44 The application site is located in the Bloomsbury conservation area and while the site does not contain any listed buildings; it does adjoin and is located close to a number of listed buildings as detailed above. The proposals would result in the partial loss of the existing building on site; however, these are considered to contribute little to the street scene or townscape. The retrofitted proposed replacement building responds to the scale and language of the surrounding area, and is considered to provide a high standard of design and finish.
- 11.45 It is acknowledged that that the proposal's scale would result in a minor visual impact on the heritage assets mentioned above comprising both the setting of the listed buildings and the character and appearance of the Bloomsbury Conservation Area. However, for the reasons discussed below, officers do not consider this impact to result in harm to the significance of the heritage assets to an extent that would warrant a reason for refusal (see planning balance in section 23, below).
- 11.46 Overall, the proposals are considered to be in accordance with policies D1 and D2 of the Camden Local Plan.

12 Landscaping and trees, Open space

Open space contribution

- 12.1 The Local Plan requires an appropriate contribution to open space, with priority given to publicly accessible open space. Policy A2 gives priority to securing new public open space on-site, with provision of space off-site near to the development except where on-site provision is not achievable. If there is no realistic means of direct provision, the Council may accept a financial contribution in lieu of provision.
- 12.2 CPG Public Open Space states that developments exceeding 1,000sqm in floorspace will be expected to contribute towards open space and play facilities,

as will schemes of 11 or more additional dwellings, so only the commercial element triggers a requirement.

- 12.3 The CPG describes public open space as 'open space that can be used and enjoyed by all the community. It is distinct from privately accessible open space such as private or communal gardens or balconies that do not ordinarily provide access for everyone'.
- 12.4 Policy A2 (part m) applies a standard of 0.74m² per occupant for commercial developments and 9m² per occupant for residential in terms of on-site provision. However as fewer than 11 residential units are proposed the residential contribution of the calculation is not triggered.
- 12.5 The net commercial uplift in the scheme is 1,271sqm. Based on an employment density of 1 worker per 13sqm, there would be around 97.8 additional occupiers. This would equate to a requirement of 72.4sqm overall (0.74sqm *open space requirement* x 97.8 *additional occupiers*).
- 12.6 No new public open space is provided that meets the requirements set out in CPG Public Open Spaces because of the constraints of the site. Policy A2 acknowledges that achieving the full amount can be challenging, particularly on sites within densely built up parts of the borough such as this, where the majority of the site is already built over. There is also no existing public open space on site at present, and the building occupies almost the full footprint and this structure is being reused. It would not be feasible onsite and there are limited options for offsite provision in a reasonable distance. Therefore, a financial contribution is required towards the provision, maintenance and improvement of open space. A financial contribution of £19,548 would be secured by S106 legal agreement towards public open space which includes capital costs and maintenance costs for 10 years.

Landscaping and trees

- 12.7 There is a lack of public open space and soft landscaping features within the site boundary or surrounding it. As such, the proposed development would not necessitate the removal of existing trees or landscaping and it is not necessary to secure details of tree protection measures.
- 12.8 The proposal includes the introduction of new soft landscaping through green roofs is welcomed. Full details of the green roofs would be secured by condition 9.

Nature conservation and biodiversity

- 12.9 An objection was received from a resident of Fredrick Street, concerned about the impact of the lighting from the development on bats in the local area. A Preliminary Ecological Assessment and BREEAM Ecology Report was submitted which carried out a Preliminary Ecological Appraisal (PEA) on the existing building and outdoor space within the site which concluded that there were no vegetative habitats on site.

- 12.10 A Preliminary Roost Assessment and Phase II bat survey were submitted which concluded that there was only low bat activity and no emergences recorded, no further surveys were deemed necessary, it is considered that bats will not be impacted as a result of the proposed development. The Preliminary Roost Assessment outlines in the mitigation section that to minimise light spill that mitigation will be applied by only lighting specific areas such as entrance ways, using a minimal level of lighting and lowering the height of lights.
- 12.11 The site is not within a Site of Importance for Nature Conservation (SINC). The Council's Nature Conservation Officer has reviewed the development and does not raise objection subject to conditions relating to external lighting, green roofs and planting. The only habitat currently found on site is building and hardstanding, which has very little ecological importance. The proposed loss of this "habitat", therefore, presents no constraint.
- 12.12 The proposals present the opportunity to incorporate ecological enhancements and improve the biodiversity at an otherwise innocuous urban site. Creating new habitat and improving opportunities for fauna which may be at the site, such as roof planting, will be in line with the London Plan and the London Borough of Camden Local Plan. Detail of the green roofs is secured by condition 9. New flora planted should preferably be native and of local stock where possible.
- 12.13 The site has potential to incorporate further enhancements by incorporating bird and bat boxes. Condition 16 has been attached securing details of bird and bat box locations and types and indication of species to be accommodated.

13 Impact on neighbouring amenity

Policy review

- 13.1 Camden Local Plan policies A1 and A4 and the Amenity CPG are relevant with regards to the impact on the amenity of residential properties in the area. Any impact from construction works is dealt with in the transport section.

Daylight and sunlight

- 13.2 A Daylight, Sunlight and Overshadowing Report has been submitted as part of this application prepared by Point 2 Surveyors Limited which details any impact upon neighbouring properties.
- 13.3 The leading industry guidelines on daylight and sunlight are published by the Building Research Establishment in BR209 'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice' (third edition, 2022) (BRE). The development plan supports the use of the BRE guidance for assessment purposes, however, it should not be applied rigidly and should be used to quantify and understand impact when making a balanced judgement.
- 13.4 Paragraph 125 of the NPPF supports making efficient use of land and says that authorities should take a flexible approach in applying policies or guidance

relating to daylight/sunlight where they would otherwise inhibit making efficient use of a site, as long as the resulting scheme would provide acceptable living standards.

Methodology

13.5 The methodology and criteria used for the assessment is based on the approach set out by BRE guidance. The report makes use of several standards in its assessment of surrounding buildings which are described in the BRE guidance:

- Vertical Sky Component (VSC) – This relates to daylight on the surface of a window. A measure of the amount of sky visible at the centre of a window.
- The BRE considers that daylight may be adversely affected if, after development, the VSC is both less than 27% and less than 0.8 times (a reduction of more than 20%) its former value.
- No Sky Line (NSL), also known as Daylight Distribution (DD) – This relates to daylight penetration into a room. The area at desk level (“a working plane”) inside a room that will have a direct view of the sky.
- The NSL figure can be reduced to 0.8 times its existing value (a reduction of more than 20%) before the daylight loss is noticeable.
- Annual Probable Sunlight Hours (APSH) - A measure of the amount of sunlight that windows of main living spaces within 90 degrees of due south receive and a measure of the number of hours that direct sunlight reaches unobstructed ground across the whole year and also as a measure over the winter period. The main focus is on living rooms.
- The BRE considers 25% to be acceptable APSH, including at least 5% during the winter months. Impacts are noticeable if less than these targets, and sunlight hours are reduced by more than 4 percentage points, to less than 0.8 times their former value. It recommends testing living rooms and conservatories.
- The overshadowing of open spaces is assessed by considering any changes to surrounding outdoor amenity spaces. A Sun Hours on Ground assessment has been undertaken which uses the BRE methodology.
- The BRE recommends at least half (50%) of the area should receive at least two hours (120 mins) of sunlight on the 21st March, and the area which can receive some sun on the 21st March is less than 0.8 times its former value.

Alternative targets

13.6 The BRE guidance targets are based on a model which is meant to apply broadly across the whole country, so it does not tend to account for much denser urban settings like London or Growth Areas. As a result, it recommends setting alternative targets which take account of relevant local context.

13.7 Table F1 of the BRE guidance indicates suggested alternative VSC targets based on street width to building height ratios. For example, the ratio for the junction of Acton Street and Gray’s Inn Road is just over 1.0, which would equate to a retained VSC target of 16-17%.

13.8 The approach is supported by the London Plan. The LP Housing SPG states:

The degree of harm on adjacent properties and the daylight targets within a proposed scheme should be assessed drawing on broadly comparable residential typologies within the area and of a similar nature across London. Decision makers should recognise that fully optimising housing potential on large sites may necessitate standards which depart from those presently experienced but which still achieve satisfactory levels of residential amenity and avoid unacceptable harm.

- 13.9 The daylight/sunlight report used a contextual site analysis to consider other points of local context including Swinton Street, Cubit Street and Frederick Street. The analysis concluded a retained VSC value of 17% VSC can be considered an acceptable level of retained daylight for the surrounding properties, which is in line with the BRE guidelines as described above.
- 13.10 The alternative targets considered were therefore 17% for VSC. Officers have also applied a retained target 50% for NSL which represents a reasonable light penetration into the rooms for urban contexts. The targets are also consistent with those that have been applied to other schemes in Camden.

Assessment

- 13.11 The daylight sunlight report identifies several residential properties that are affected by the proposal. This section of the report discusses the impacts on the following properties:
- 1. Tangmere, 225 Grays Inn Road
 - 2. 243 Grays Inn Road
 - 3. 70 Acton Street
 - 4. 68 Acton Street
 - 5. 66 Acton Street
 - 6. 64 Acton Street
 - 7. 62 Acton Street
 - 8. 55-53 Acton Street
 - 9. 298 Grays Inn Road
 - 10. 296 Grays Inn Road
 - 11. 294 Grays Inn Road
 - 12. 292 Grays Inn Road
 - 13. 72 Frederick Street
 - 14. 70 Frederick Street
 - 15. 68 Frederick Street
 - 16. 66 Frederick Street
 - 17. 64 Frederick Street
 - 18. 62 Frederick Street
 - 19. 49 Frederick Street
 - 20. 47 Frederick Street
 - 21. 45 Frederick Street

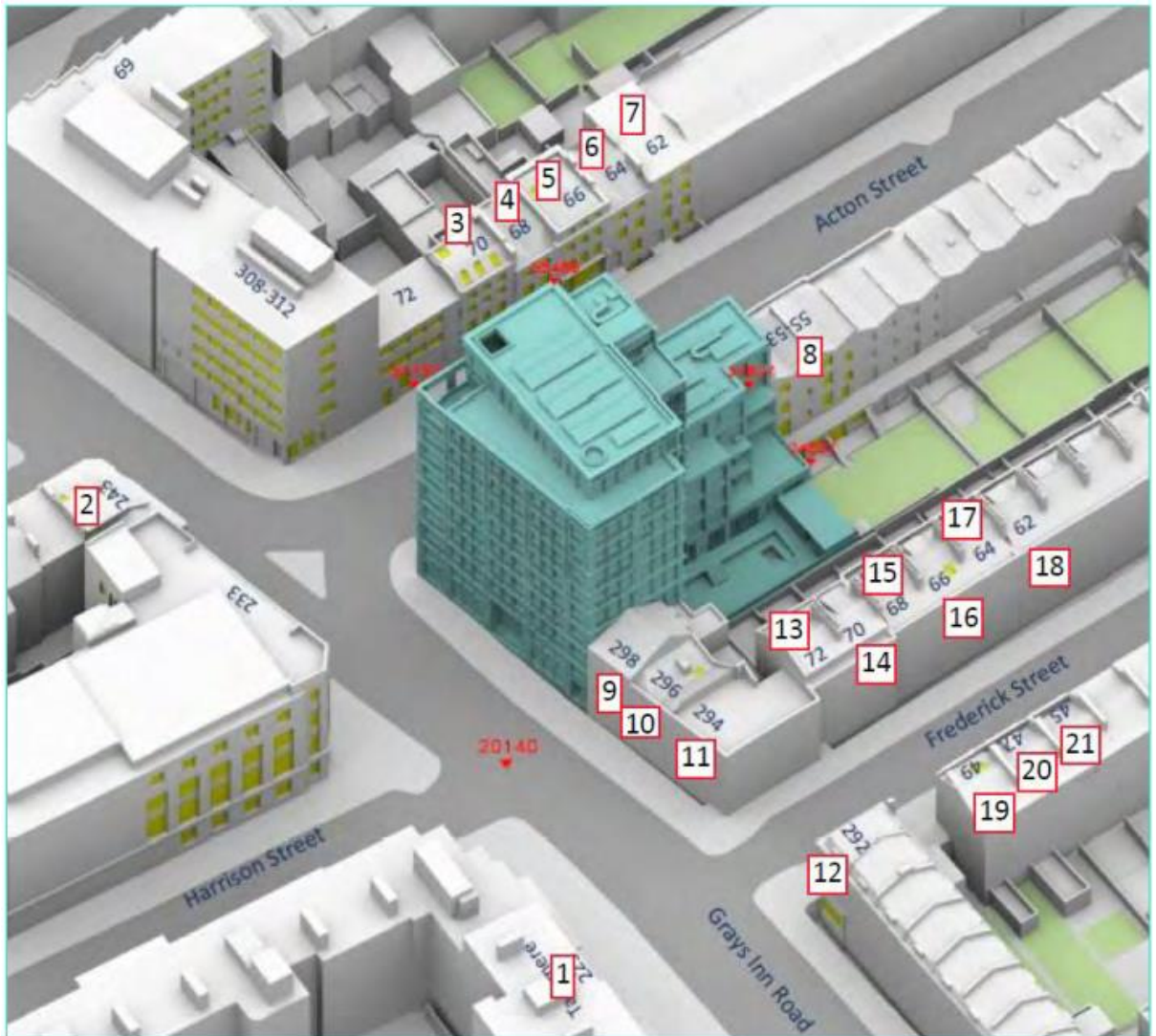


Image 14: Nearest relevant properties to the application site

13.12 The report outlines out of the 21 buildings identified that only 8 do not fully adhere to the BRE Guidelines for daylight (VSC and NSL) and sunlight (APSH). These properties include:

- 70 Acton Street
- 68 Acton Street
- 66 Acton Street
- 64 Acton Street
- 298 Gray's Inn Road
- 72 Frederick Street
- 70 Frederick Street
- 68 Frederick Street

13.13 It should be noted that APSH is not relevant to the properties on Fredrick Street and Gray's Inn Road as all of the windows that face the site are oriented due north. Windows are only assessed if they are 90° of due south for this test.

13.14 The analysis of these 8 properties is outlined below.

70 Acton Street (Building no. 3 in Image 14, above)

- 13.15 This property is located north of the site on the opposite side of Acton Street with residential uses at 1st-3rd floor. 9 of the total windows will experience relative alterations in VSC that range from 26% to 28%. Which is below the standard VSC recommendation however, it is worth noting that all of the windows retain a VSC of 17% or above which is in line with the alternative target VSC value outlined in the above methodology. Therefore, whilst there would be some reductions in VSC, the retained levels are generally commensurate with the wider local context.
- 13.16 In terms of NSL, three of the four rooms assessed will meet the BRE guidance. The remaining bedroom (R2/241), located on the 1st floor, experiences an alteration in NSL of 58%. It is worth noting that bedrooms are considered to be 'less important' by the BRE for NSL (para 2.2.10). This property would adhere to the BRE Guidelines for APSH, thus there will be a negligible change in sunlight.

68 Acton Street (Building no. 4 in Image 14, above)

- 13.17 This property is located north of the site on the opposite side of Acton Street and is entirely in residential use. 5 of the total windows will experience relative alterations in VSC of between 23% to 25% which is just beyond guidance and arguably considered minor adverse in the context of a central London location. It is also worth noting that four of the five windows retain a VSC of between 19% to 23% which exceeds the alternative target VSC value of 17%. The remaining ground floor window will retain a VSC of 16% which is fractionally below this level, but nonetheless generally commensurate with the wider local context.
- 13.18 In terms of NSL, one of the six rooms meets the guidance while the other five rooms experience alterations between 36% and 45%. This would however, meet the alternative target of retaining 50%. It is also worth noting that all of the rooms will retain a view of the sky dome to at least 50% of the working plane within the rooms, which in our experience, is a reasonable level of daylight distribution for an urban area such as this.
- 13.19 In regard to APSH, four of the six rooms relevant for analysis will adhere to the BRE Guidelines. The remaining rooms are located on the ground (R1/300) and 2nd floor (R2/302) and will experience some alterations in winter APSH that are beyond guidance. Both rooms will, however, retain an annual APSH of 32% and 48% which is far in excess of the 25% suggested and an excellent level of annual sunlight availability for an urban location.
- 13.20 In terms of winter APSH, the 2nd floor room will retain 4%, which is fractionally below the 5% suggested, while the ground floor room will retain 2%. Overall, the rooms within this property will continue to retain a good level of sunlight throughout the year.

66 Acton Street (Building no. 5 in Image 14, above)

- 13.21 This property is located north of the site on the opposite side of Acton Street with residential uses at 1st-3rd floor. Eight of the 10 windows assessed will meet the BRE criteria for VSC. The remaining two windows will experience an alteration in VSC of 21%, which is fractionally beyond guidance and arguably considered a minor adverse effect in the context of an urban location. Furthermore, all of these windows retain a VSC of 21% or above which exceeds the alternative target VSC value of 17%.
- 13.22 In terms of NSL, four of the seven rooms adhere to the BRE guidance. The remaining three rooms experience alterations of between 23%-25%, which is just beyond the 20% recommendation but within the 50% alternative target. All of these rooms will, also, retain a view of the sky dome to at least 74% of the working plane within the room which, in our experience, is a good level of daylight distribution for an urban area such as this.
- 13.23 This property would adhere to the BRE Guidelines for APSH, thus there will be a negligible change in sunlight.
- 13.24 Overall, there is considered to be a minor adverse effect on the daylight to this property and a negligible effect upon the sunlight availability.

64 Acton Street (Building no. 4 in Image 14, above)

- 13.25 This property is located north of the site on the opposite side of Acton Street and is entirely in residential use. All six of the windows assessed will meet the BRE test for VSC and will adhere to guidance for NSL meaning that there will be a negligible change in daylight to this property.
- 13.26 In terms of APSH, five of the six rooms assessed will meet guidance. The remaining room (R2/320) will experience an alteration in winter APSH that is beyond guidance however, the room will retain an annual APSH of 55%, which is far in excess of the 25% suggested within the BRE and an excellent level of sunlight availability for an urban location. The room will also retain a winter APSH of 4% which is just below the 5% suggested.
- 13.27 Overall, there is considered to be a negligible effect upon the daylight and sunlight amenity to this property.

298 Gray's Road (Building no. 9 in Image 14, above)

- 13.28 This property is located south of the site with residential uses at 1st-3rd floor. Four of the six windows assessed will meet the BRE criteria for VSC. The remaining two windows serve bedrooms located on the 1st and 2nd floor (W2/51 & W2/52). Both windows experience alterations in VSC of 42% and 49%, although the BRE does acknowledge that daylight to bedrooms is less important. Nonetheless, it is worth noting that both of these windows face directly onto the existing building, as illustrated in the image below (the bedroom windows are outlined in blue in the image below). It should also be noted that side windows so close to a boundary are unneighbourly and can take more than their fair share of light and outlook. Such windows can severely limit development potential if they are given an unduly high expectation of protection.

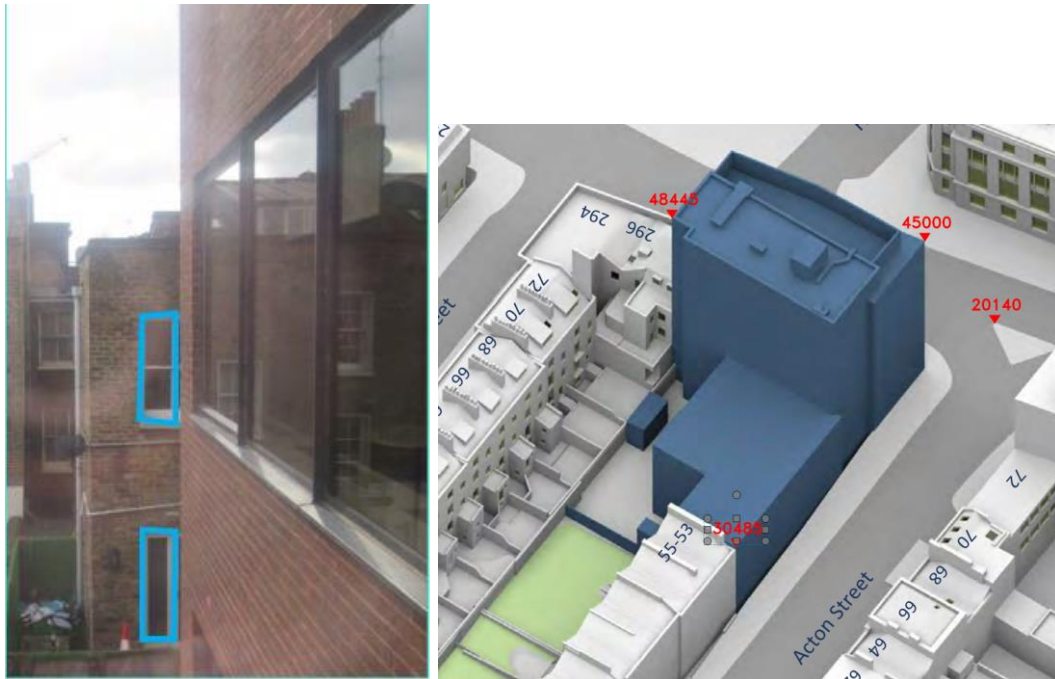


Image 15: location of W2/51 & W2/52 in relation to the site in photograph and context

- 13.29 As a result, both windows experience low levels of VSC in the existing condition (11% and 14%). In situations such as this, where windows have low levels of VSC in the existing condition, even relatively modest absolute changes can be disproportionately presented as larger percentage alterations.
- 13.30 In terms of NSL, three of the five rooms will meet BRE guidance. The remaining two bedrooms (the two bedrooms highlighted in the image above) experience alterations of 37% and 26% and would still meet the alternative target of 50% retention. It is worth noting that bedrooms are considered by the BRE to be 'less important' for NSL, and are more susceptible to alterations in daylight distribution given the location of their windows directly on the site boundary.

72 Fredrick Street (Building no. 13 in Image 14, above)

- 13.31 This residential property is located directly to the south of the site on Frederick Street. Five windows will experience relative alterations in VSC of between 25% to 30%. The windows on the 2nd and 3rd floors retain a VSC of 18% and 20% which exceeds the alternative target VSC value of 17%. The windows on the lower ground to 1st floor retain a VSC of between 8% and 15%. It is worth noting that the lower ground and ground floor windows achieve VSC values below the alternative target value in the existing condition (11% & 16%). In situations where windows have low existing levels of VSC, even modest absolute changes (3-4% VSC) can be disproportionately presented as larger percentage alterations. Nonetheless, the scale of these effects would ordinarily be considered to be no greater than minor adverse in nature, particularly in the context of a Central London location.

- 13.32 In terms of NSL, the five rooms experience alterations in NSL of between 22%-48% which would comply with the alternative target of 50% retention. It is also worth noting that three of these rooms retain a view of the sky dome to at least 58% of the working plane, which is a reasonable level of daylight distribution for an urban area such as this. Furthermore, three of these five rooms are bedrooms which are considered by the BRE to be 'less important' for NSL.

70 Fredrick Street (Building no. 14 in Image 14, above)

- 13.33 This residential property is located directly to the south of the site on Frederick Street. Four windows will experience relative alterations in VSC of between 21% to 34%. It is worth noting however that the 1st and 3rd floor windows will retain a VSC of 17% and 23% respectively, which is in line with or above the alternative target VSC value of 17% and is therefore commensurate with the local wider context.
- 13.34 The lower ground and ground floor windows retain lower levels of VSC albeit, it is worth noting that the lower ground floor window achieved a VSC of 11% in the existing condition meaning that even a relatively modest absolute change (7% VSC) can be disproportionately presented as a larger percentage alteration (34%). Nonetheless, the scale of these effects would ordinarily be considered to generally be minor adverse in nature, particularly in the context of a Central London location.
- 13.35 In terms of NSL, the four rooms experience alterations between 25% and 39% which would comply with the alternative target of 50% retention. It is also worth noting, that the ground, 1st and 3rd floor rooms will retain a view of the sky dome to at least 59% of the working plane, which is a reasonable level of daylight distribution for an urban environment such as this. Additionally, the 3rd floor room is a bedroom which is considered by the BRE to be less important for NSL.

68 Fredrick Street (Building no. 15 in Image 14, above)

- 13.36 This residential property is located directly to the south of the site on Frederick Street. The technical analysis shows that one window located on the lower ground (W1/29) will meet the BRE test for VSC. The remaining three windows will experience alterations in VSC of between 21% to 24%, which is just beyond the 20% recommendations within the BRE Guidelines. It is worth noting, however, that the 1st floor window (W1/31) will retain a VSC of 21%, which is above the alternative target VSC value of 17%. Nonetheless, the scale of these effects would ordinarily be considered to be no greater than minor adverse in nature, particularly in the context of a Central London location.
- 13.37 In terms of NSL, two of the four rooms assessed will meet the BRE test. The remaining two rooms will experience a percentage alteration in NSL of 24%, which is fractionally beyond guidance and does comply with the alternative target of 50% retention. Both rooms will also retain a view of the sky dome to 54% and 74% of the working plane, which is still considered to be a reasonable level of daylight distribution for an urban environment such as this.

Conclusion – Daylight and sunlight

- 13.38 The proposed scheme would have some localised impacts in terms of light to surrounding properties. Overall, most impacts are consistent with the existing urban context and built forms and whilst rooms would experience reductions, they would retain appropriate levels of daylight and sunlight. The affected properties are in general compliant with BRE or alternative targets with the more notable impacts being on some of the closer properties on Fredrick Street. However, these are not considered to be so severe as to warrant refusal of the application.

Outlook

- 13.39 The residential properties closest to the application site are 55 Acton Street located to the east of the site and to the south are 298 Gray's Inn road and 66-72 Fredrick Street. These properties face onto the proposed office space and residential units. In regard to No.55 Acton Street closest to the boundary the development will match their rear building line and the scheme was revised to pull the rear residential balconies off this boundary, so it would not impact on this property's outlook. While the block on Gray's Inn Road is increasing in height, the additional height would not have an impact on No.298 Gray's Inn Road given the siting of this building.
- 13.40 The rear windows of 66-72 Fredrick Street would face directly onto rear of the development would experience a change in their outlook due to the additional two storeys inserted on the Acton Street block and the introduction of residential rear balconies. The rear building line is not coming closer to these properties, it remains at a separate distance of 13.2m and their main living spaces are to the front of the properties with bedrooms and kitchens to the rear. While the additional height might marginally increase a sense of enclosure with a marginal impact on the outlook for these properties, it is acknowledged that this is central London location with a tight urban grain and the primary outlook for the residents is out of their main living spaces, rather than the rooms to the rear. On balance, the impact on outlook, whilst it is reduced, is acceptable in the context.

Noise and disturbance

- 13.41 The proposals include the addition of plant at basement level, ground floor and within the rear staircase of the commercial building and individual ASHP located on the rear balconies of the residential element. A Noise Assessment has been submitted in support of the proposals prepared by Auricl Acoustic Consulting.
- 13.42 The report has been reviewed by the Council's Environmental Health Officer (EHO) who has confirmed this report is acceptable and appropriate noise guidelines have been followed. Overall, the application is considered appropriate in environmental health terms subject to conditions to ensure the development protects residents within the building and neighbouring buildings from noise and vibration within the development; and a condition to secure details of the external noise level emitted from plant and any necessary mitigation measures to ensure it complies with Camden's noise standards, and ongoing compliance with Camden's noise standards. Conditions 20-22 secure these.

- 13.43 New roof terraces will be created within both the commercial and residential elements. Within the residential block, rear terraces will be present at 1-4th floor and a front terrace at 4th floor. In the commercial element, an 8th floor corner roof terrace is proposed fronting Acton street and Gray's Inn Road and at 9th floor a front terrace facing Gray's Inn Road and a smaller rear terrace is proposed.
- 13.44 Within the office element, the new roof terraces at 8th floor would be closest to the surrounding residential properties. Due to its larger scale, conditions have been attached restricting the use to 8am-9pm Monday-Friday and not on Saturdays and Sundays and to prevent music from being played (Conditions 24 and 25). The roof terrace at ninth floor is small scale and staggered away from neighbouring residential properties, it is unlikely that a significant number of people would be able to use the terraces at any one time and their hours of use have not been restricted. However, a condition will ensure loud music is not played on them. The suggested conditions are considered sufficient to prevent unacceptable noise disturbance.

Privacy and Overlooking

- 13.45 The residential development is limited to the eastern end of the site and fronts Acton Street. While the residential flats rear windows and modest balconies would face towards 66-72 Fredrick Street. The distance between their rear windows and the new balconies would be between 17.6m and 20.4m and the closest windows on the new residential block would be 16.4m away. Given the urban grain this would not be considered a close relationship, with the properties on Fredrick Street primarily having their primary living accommodation to the front. In addition due to modest depth and location of the rear balconies they would not offer overlooking to properties on Acton Street or Gray's Inn Road. As such, the relationship would reflect the tight urban grain of the area, and there would not be a harmful level of overlooking.
- 13.46 There would be no windows on the rear of the office element and the side windows facing over the gardens would be in similar location to the existing which would not result in increased overlooking.
- 13.47 The office development would also have rear and side terraces at 9th floor, but given their siting at a higher level, shape and use of planters (details of these planters are secured under condition 4) it is unlikely to result in harmful overlooking to the properties to the south (rear) of the site.

Amenity Conclusion

- 13.48 As set out above there will some impacts to light to residential properties, with the most notable impacts being on the closest properties along Fredrick Street. However, on balance these are not considered to be so severe as to warrant refusal of the application on this basis. The proposed building would alter the outlook from nearby residential properties to the South of the site, but this impact is not harmful, and the proposals would not cause unacceptable harm by way of

loss of privacy or noise disturbance subject to conditions. As such, the proposals are considered to accord with policies A1 and A4 of the Local Plan.

14 Air quality

14.1 Camden Local Plan policy CC1 is relevant with regards to air quality.

14.2 An Air Quality Assessment (AQA) has been submitted as part of this application. The Council's Air Quality Officer has been consulted on this application and has no objections subject to conditions on air quality monitoring and mechanical ventilation.

14.3 With regards to the impact of local air quality on building occupants, the most sensitive residential receptors face onto Acton street although these achieve the UK Air Quality Objectives for NO₂ there is still elevated levels of NO₂. Mechanical ventilation will therefore be required (and would be secured by condition 7) to ensure air inlets are away from busy roads.

Impacts on local air quality

14.4 The air quality assessment considers the operational phase of the proposed development and impacts on local air quality due to emissions from road traffic associated with the proposed development. No on-site or on-street parking is provided as part of the proposed development, with existing parking spaces to be removed. The proposed development is car-free. There is no onsite combustion and therefore no operational impact on air quality.

14.5 The proposals are air quality neutral which meets the policy requirement.

Construction Impacts

14.6 The site is a medium risk for construction dust and appropriate measures to reduce the risk are proposed including real time dust monitoring. These would be secured in the Construction Management Plan as part of the s106 legal agreement, and a condition is recommended for the dust monitoring (condition 8). Condition 27 is also attached ensure no non-road mobile machinery will be used on site unless it is compliant with the NRMM Low Emission Zone requirements.

15 Sustainability and Energy

15.1 In November 2019, Camden Council formally declared a Climate and Ecological Emergency. The council adopted the Camden Climate Action Plan 2020-2025 which aims to achieve a net zero carbon Camden by 2030.

15.2 In line with London Plan (LP) policies, SI1, SI2, SI3, SI4, SI5 and SI7 and Camden Local Plan (CLP) policies CC1, CC2, CC3, and CC4, development should follow the core principles of sustainable development and circular economy, make the fullest contribution to the mitigation of and adaptation to

climate change, to minimise carbon dioxide emissions and contribute to water conservation and sustainable urban drainage.

Redevelopment strategy

- 15.3 The development plan promotes circular economy principles and local plan policy CC1 and London Plan policy SI7 require proposals involving substantial demolition to demonstrate that it is not possible to retain and improve the existing building and to optimise resource efficiency.
- 15.4 In this case, it is a retrofit and refurbish scheme as it retains the existing superstructure.
- 15.5 To ensure greater resource efficiency through recycling and reuse of materials, a condition is attached requiring 95% of construction and demolition waste to be reused, recycled, or recovered, and 95% of excavation waste to be put to beneficial use (condition 13). Condition 13 also requires a resource management plan and pre-demolition audit.

Energy and carbon reductions

- 15.6 To minimise operational carbon, development should follow the energy hierarchy set out in the London Plan (2021) Chapter 9 (particularly Policy SI2 and Figure 9.2) and major developments such as this scheme should meet the target for net zero carbon. The first stage of the energy hierarchy is to reduce demand (be lean), the second stage is to supply energy locally and efficiently (be clean), and the third step is to use renewable energy (be green). The final step is to monitor, verify and report on energy performance (be seen).
- 15.7 After carbon has been reduced as much as possible on-site, an offset fund payment can be made to achieve net zero carbon.

Energy and carbon summary

- 15.8 The following summary table shows how the proposal performs against the policy targets for carbon reductions in major schemes, set out in the London Plan and Camden Local Plan.

Policy requirement (on site)	Min policy target	Proposal reductions
Total carbon reduction: LP policy SI2 and LP CC1	35%	39 %
Be lean stage [non-residential] (low demand): LP policy SI2	15%	7 %
Be green stage (renewables): CLP policy CC1	20%	32 %

Table 1 - Carbon saving targets (non-residential) and the scheme results

Policy requirement (on site)	Min policy target	Proposal reductions
Total carbon reduction: LP policy SI2 and LP CC1	35%	76 %
Be lean stage [residential] (low demand): LP policy SI2	10%	14 %

Be green stage (renewables): CLP policy CC1	20%	62 %
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Table 2 - Carbon saving targets (residential) and the scheme results

Total carbon reductions

- 15.9 Reductions are measured against a baseline which are the requirements set out in the Building Regulations. Major development should aim to achieve an on-site reduction of at least 35% in regulated carbon emissions below the minimums set out in the building regulations (Part L of the Building Regulations 2021). The remainder of the carbon savings to 100% reduction (zero carbon) should then be secured through a carbon off-set payment. This is charged at £95/tonne CO₂/yr (over a 30 year period) which is spent on delivery of carbon reduction measures in the borough.
- 15.10 Residential development should be exceeding the target now, so GLA guidance has introduced a more challenging aspirational target of 50% on-site total savings that residential development should aim to achieve.
- 15.11 In this case, the development exceeds the policy target of 35% reductions, achieving an overall on-site reduction of 39% (non-residential) and 76% (residential) below Part L requirements as shown in Tables 1 and 2 above. The residential exceeds the aspirational **50%** target. **A carbon offset of £45,150 will be secured by Section 106 legal agreement** to bring it to zero carbon, in compliance with the development plan.

Be lean stage (reduce energy demand)

- 15.12 London Plan policy SI 2 sets a policy target of at least a 10% (residential) and 15% (non-residential) reduction through reduced energy demand at the first stage of the energy hierarchy.
- 15.13 In this case, the development exceeds the policy target of 10% for residential, reducing emissions by 14% at this stage through energy efficient design, in compliance with the development plan.
- 15.14 However, it is acknowledged that it does fall short of the 15% target for the non-residential element with a reduction of 7%. The Council's sustainability team have accepted this given it is a retrofit scheme achieves a site-wide 56% improvement under Be Lean, with the refurbishment achieving 61% and the new extension (floors 7, 8 and 9) 7% improvement from Be Lean under the Part L 2021 of the Building Regulations. It is acknowledged by the GLA that it can be challenging to achieve the 15% target for the new extension under the new 2021 Building Regulations since the 'actual' building is compared against the 'notional' building that uses highly efficient fabric and system specifications. The proposed values are performing much better than the Part L 2021 limiting values and 'notional' building values, and demonstrate a U-value improvement of 22% and in this instance it would be acceptable.
- 15.15 The proposals involve high performance insulation, low air permeability, efficient glazing, and addresses the requirements of the cooling hierarchy and overheating which can avoid the use of active cooling in the development. The

proposal includes energy efficient measures like MVHR, efficient water saving fixtures, fittings and appliances and low energy light fittings.

Be clean stage (decentralised energy supply)

- 15.16 London Plan Policy SI3 requires developers to prioritise connection to existing or planned decentralised energy networks, where feasible, for the second stage of the energy hierarchy. Camden Local Plan policy CC1 requires all major developments to assess the feasibility of connecting to an existing decentralised energy network, or where this is not possible establishing a new network.
- 15.17 The proposals do not include connection to a District Energy Network (DEN) but there are currently no existing networks near the development. It is acknowledged that in 15-20 years the heating system may be due for replacement, this would be the time to re-evaluate and install an alternative system that would be able to connect to this network if it has expanded close enough to the site which will futureproof connections.

Be green stage (renewables)

- 15.18 Camden Local Plan policy CC1 requires all developments to achieve a 20% reduction in CO2 emissions through renewable technologies (after savings at Be Lean and Be Clean), where feasible, for the third stage in the energy hierarchy.
- 15.19 In this case, the development significantly exceeds the policy target of 20%, reducing emissions by 32% (non-residential) and 62% (residential) at this stage through renewables, in compliance with the development plan. The proposal includes PV panels on the roof and ASHP with full details secured by conditions 10 and 11. The applicant explored the cooling hierarchy and it was demonstrated that some active cooling may be required as the building could be at risk of overheating after introducing preferred passive design measures. The proposal includes low carbon heating like Air Source Heat Pumps (ASHPs) which are proposed on the rear balconies of the residential units and within the commercial designated plant areas.

Be seen (energy monitoring)

- 15.20 The London Plan policy SI 2 requires the monitoring of energy demand and carbon emissions to ensure that planning commitments are being delivered. In this case, the development has committed to reporting a building management system. Condition 12 will be added to secure reporting to the GLA and in the event of performance not being met an action plan to be submitted to and approved by the GLA.

Climate change adaption and sustainable design

- 15.21 Local Plan policy CC2 expects non-residential development, and encourages residential development arising from conversion, extension or change of use, to meet BREEAM Excellent. The office areas would exceed policy requirements and achieve BREEAM excellent with a score of 84.9%, with the following policy-compliant minimum credits:
- **Energy 91.7%**

- *Water* **85.7%**
- *Materials* **92.9%**

15.22 These Sustainability measures will be secured through a section 106 sustainability plan, including BREEAM 'Excellent', individual BREEAM scores listed above and water efficiency targets for residential parts.

15.23 The development plan (CLP policy CC3 and LP policy SI12 and SI13) also seeks to ensure development does not increase flood risk, reducing the risk of flooding where possible. Development should incorporate sustainable drainage systems (SUDS) and water efficiency measures.

15.24 In this case, the development incorporates SUDS and blue roofs. Furthermore, the proposal also includes the provision of a green / blue roof integrated with the solar panels, which would enhance the biodiversity of the site and reduce water runoff. Condition 5 secures the construction of the SuDs including installation of blue/green roof. Details of this system will be secured by condition 5. Condition 28 will secure water efficiency measures, ensuring a maximum internal water use of 105 litres per day (plus an additional 5 litres for external water use) for each home. Flood risk is covered in the 'Flood risk and drainage' section of this report.

16 **Flood risk and drainage**

16.1 Camden Local Plan policy CC3 states major development schemes are expected to:

- Achieve greenfield run-off rates wherever feasible and as a minimum, 50% reduction in run off rates.
- To include Sustainable Urban Drainage Systems (SuDS), unless demonstrated to be inappropriate.
- To follow the drainage hierarchy in policy SI 13 of the London Plan.
- To constrain run-off volumes to greenfield run-of volumes for the 1 in 100 year 6 hour event plus climate change.

16.2 A flood risk assessment and sustainable drainage strategy were submitted in support of the application. The site is shown in the EA Flood Maps as being located within Flood Zone 1, which based on the NPPF, is classified as having a 'low' probability of tidal and fluvial flooding. Following initial concerns raised by the Council's Lead Local Flood Authority (LLFA) Officer as to the level of detail provided, the applicant provided additional information to address these comments.

16.3 As the proposed development will comprise of a largely refurbished building (they are retaining the superstructure) that covers the majority of the site area with a small rear courtyard retained, the scope for additional soft landscaping is limited. However, the scheme will meet the policy targets above and achieve greenfield run off rates. The table below shows that the development will be providing a greater than >91.4% betterment in run-off rates in the 1 in 100yrs +40% rainfall event.

Return Period	Existing Runoff Rate (l/s)	Proposed Runoff Rate (l/s)	Percentage Betterment
1 in 1 year	7.2	1.4	81.5%
1 in 30 years	18.2	1.8	91.1%
1 in 100 years	23.2	2.0	91.4%
1 in 100 years + 40% Climate Change	N/A	2.2	>91.4%

Table 3: Post development runoff rate comparison

- 16.4 Planting will be installed within the courtyard and the commercial terraces and green/blue roofs will be incorporated which is welcomed. As a consequence the development will have a notable reduction in terms of flood risk and water runoff.
- 16.5 The Council's Lead Local Flood Authority (LLFA) Officer has confirmed that the proposed SuDS are acceptable, subject to them being constructed in line with the submitted details evidence of their installation (conditions 5 and 6). Condition 9 secures details of the green roof.

17 Transport

Policy review

- 17.1 Camden Local Plan policies T1, T2, T3 and T4 and the Transport CPG are relevant with regards to transport issues.

Introduction

- 17.2 The site has a PTAL rating of 6b which is considered to be an excellent level of public transport accessibility. The site is located on Acton Street and Grays Inn Road (A5200) in the Central London Area. Acton Street and Grays Inn Road form part of the Strategic Road Network (SRN). Transport for London (TfL) is the highway authority for Acton Street and Camden is the highway authority for this section of Gray's Inn Road.
- 17.3 Various transport interchanges are located within a 5-10 minute walk of the site, including Kings Cross and St Pancras International stations. In addition, bus stops serving bus routes 17 and 46 are located nearby on Gray's Inn Road. Bus routes 63 and 259 can also be accessed from bus stops nearby on Acton Street, Gray's Inn Road (northern section) and King's Cross Road.
- 17.4 The site is located in close proximity to cycle route C6, which follows Sidmouth Street, Ampton Street, Cubitt Street, Pakenham Street and Phoenix Place. The route provides a connection with high quality cycle facilities between Kentish Town and Elephant and Castle. The site would be easily accessible to cyclists using C6.

- 17.5 Gray's Inn Road forms part of the primary cycle route network in the borough (see Camden's Cycling Action Plan – April 2019). Cyclists and pedestrians make up a considerable proportion of the traffic in the vicinity of the site, particularly during peak periods.
- 17.6 The site is conveniently located near various Santander cycle hire docking stations including one on Ampton Street at the junction with Gray's Inn Road, one on Cromer Street at the junction with Gray's Inn Road, and another on Gray's Inn Road at the junction with Guilford Street.
- 17.7 The site is also conveniently located near various parking bays for dockless rental e-bikes and rental e-scooters, including one on Ampton Street, and one on Cromer Street.
- 17.8 Documents submitted in support of the application include a Transport Assessment and an active travel audit.

Cycle parking

- 17.9 Local Plan Policy T1 requires developments to sufficiently provide for the needs of cyclists which also helps to promote health, improved air quality and sustainable transport. The table below shows the number of long stay spaces to be provided at ground and basement floor levels.

Table 5.2: Summary of Long-Stay Cycle Parking Provision						
Land Use	Two-Tier Stand Spaces	Sheffield Stand Spaces	Accessible Sheffield Stand Spaces	Vertical Stand Spaces	Foldable Bike Locker Spaces	Total Provision
Residential	10	0	2	0	0	12
Office	36	6	4	22	8	76
Total	46	6	6	22	8	88

Image 16: Table showing the summary of long stay cycle parking provision

- 17.10 The number of cycle parking spaces to be provided exceeds the minimum requirements of the London Plan, which is welcomed. The proposals also include the provision of lockers, changing facilities and showers which will help to encourage staff to commute by bike.
- 17.11 Camden Cycling Campaign raised comments about the ground and lower ground layouts and routes to the cycle stores being too long and having several doorways which could make it difficult for users to access. Officers also raised this concern with the developer and discussed whether the layout could be amended and simplified to address this issue. Having considered the options, officers acknowledge that retention of the existing superstructure does constrain the layout, the ground floor has to work very hard to accommodate all the needs of both uses and there is a need to take account of fire safety and security considerations raised through the shared use of the corridor entrance off Acton Street. It is considered that the layout is the optimum which can be achieved and that management/operational arrangements can make it easy for cyclists to

manage. The corridors will have a minimum width of 1.5m which is considered suitable for cyclists, doors will have a 1000mm minimum clear width and will be operated by push buttons which is considered acceptable in this instance. Condition 18 secures details and the installation of the cycle parking and access arrangements.

- 17.12 The type of facilities to be provided are in accordance with CPG Transport and London Cycling Design Standards (LCDS) guidance. Condition 18 also secures their installation.
- 17.13 Cycle parking facilities for visitors cannot be provided within the site boundary due to lack of space. Instead, 'Sheffield' stands (or similar) will be provided on-street by the Council or TfL. The London Plan cycle parking requirements for visitors equates to 10 spaces for the office space and 2 spaces for the residential dwellings. The applicant has proposed locating 5 'Sheffield' stands (or similar) on Grays Inn Road for the office space and 1 'Sheffield' stand (or similar) on Acton Street for the residential dwellings. The cycle parking stands would be installed on the footway in the vicinity of the site by the Council or TfL. An off-site cycle parking contribution of £2,000 for this purpose would be secured through a section 106 planning obligation.

Car parking

- 17.14 Policy T2 states that the Council will limit the availability of parking and require all new developments in the borough to be car-free. The application site is located within a town centre, falls within a controlled parking zone and has a PTAL of 6b. Therefore, the proposed development would need to be car-free. The applicant is willing to restrict the ability of residents to apply for an on-street parking permit via legal obligation. Car free development will be secured by a S106 legal agreement.
- 17.15 No new car parking spaces will be created and all existing spaces within the servicing yard will be removed.
- 17.16 There is no disabled parking provided on site. However, the London Plan has a requirement for at least 1 disabled parking space to be provided for the office space. A potential location on the opposite side of Acton Street from the site has been identified.

Deliveries and servicing

- 17.17 The site is located on the strategic road network and strategic cycle route network. Traffic congestion is a significant problem in this part of the borough, particularly during peak periods but often throughout the day on Monday to Friday.
- 17.18 The site currently benefits from an on-site servicing yard with vehicular access from Acton Street. However, the access is narrow, and vehicles are unable to enter and exit the site in a forward gear. This type of arrangement is less than ideal and can lead to dangerous situations on the adjacent public highway.

- 17.19 The proposed development includes the removal of the on-site servicing yard and vehicular access from Acton Street. Instead, servicing activities would take place from the kerbside in the vicinity of the site. A proposal to provide a loading bay has been considered by Officers and TfL and is deemed to be acceptable, subject to an obligation to enter into a S278 legal agreement with TfL to carry out these works who are the highways authority.
- 17.20 A draft Delivery and Servicing Plan (DSP) has been submitted in support of the planning application. This is welcomed as it demonstrates that issues related to delivery and servicing movements have been considered at an early stage.
- 17.21 A more detailed DSP would be secured as a Section 106 planning obligation. This would help to ensure that any operational impacts associated with delivery and servicing movements could be mitigated. This would allow site occupiers to demonstrate compliance with the DSP while managing a regime of continual improvement.

Trip generation/ Travel Planning

- 17.22 The proposals would create an additional 557 square metres of office floorspace and 7 new residential dwellings. A Transport Assessment (TA) has been prepared and submitted in accordance with TfL Healthy Streets guidance which seeks to promote healthy and active lifestyles. The TA includes details of trip generation analysis for the proposed development.
- 17.23 The table shown below has been taken from the applicant's transport assessment which summarises the predicted additional trips by mode for the proposed development, including servicing trips.

Table 7.7: Net Change in Trip Generation									
Travel Mode	AM Peak Hour			PM Peak Hour			Daily		
	In	Out	Total	In	Out	Total	In	Out	Total
Underground	+6	+1	+8	+1	+7	+8	+39	+38	+77
Rail	+4	+1	+5	0	+4	+5	+24	+23	+47
Bus	+3	+1	+4	+1	+3	+4	+19	+19	+38
Taxi	0	0	0	0	0	0	0	0	0
Motorcycle	-2	0	-2	0	-2	-2	-9	-9	-18
Car Driver	-1	0	-1	0	-1	-1	-4	-4	-8
Car Passenger	+1	0	+1	0	+1	+1	+3	+3	+6
LGV	0	0	0	0	0	0	+2	+2	+4
OGV	0	0	0	0	0	0	0	0	0
Cycle	+1	0	+1	0	+	+1	+7	+7	+15
Walk	+1	+1	+3	+1	+2	+3	+14	+14	+27
Total	+14	+5	+19	+3	+15	+18	+94	+92	+185

Image 17: Net change in trip generation

- 17.24 The proposed development is expected to generate an additional 185 trips across the day. The vast majority of the additional trips will be by public transport, with a considerable percentage (22.7%) to be made using active travel modes.

Officers consider this to represent a modest increase. These additional trips would mainly be made by sustainable modes of transport.

- 17.25 The applicant has also undertaken a Healthy Streets Check of the key walking routes to the site, including Acton Street and Gray's Inn Road, in accordance with TfL guidance. This considers any problems along the routes (e.g., high traffic speed and volume), while making recommendations for how to address such problems (e.g., traffic calming and improved pedestrian crossings). The Council would like to implement any recommendations in order to improve the walking experience to and from the site, subject to feasibility, consultation where necessary, and funding. This may require joint working with TfL.
- 17.26 A draft travel plan has been submitted in support of the planning application. This is welcomed as it demonstrates a commitment to encouraging and promoting trips by sustainable modes of transport. However, the projected modal share for cycling is lower than expected. Modal share projections for walking and cycling will need to be in accordance with Camden's Transport Strategy and the Mayor's Transport Strategy.
- 17.27 A travel plan and associated monitoring and measures contribution of £11,221 would be secured as a Section 106 planning obligation. The Travel Plan would be targeted towards staff and visitors. The location of the site with excellent connections to the public transport network would help to reduce the need to travel by single occupancy private car and would encourage staff and visitors to make walking, cycling and travel by public transport the natural choice for day-to-day trips to and from the site.

Highway impacts in the Vicinity of the Site

- 17.28 The public highway adjacent to the site on Acton Street and Gray's Inn Road could potentially sustain considerable damage as a direct result of construction traffic travelling to and from the site during the demolition and construction phases of the proposed works.
- 17.29 Various amendments to existing traffic management orders have been proposed. This includes the provision of a disabled parking bay and a loading bay on Acton Street. In addition to this, TfL have indicated that the existing bus stop on the south side of Acton Street would need to be lengthened to allow buses to be able to pull in and out of the bus stop unhindered when the proposed loading bay is being utilised.
- 17.30 The Council and/or TfL would also need to install 'Sheffield' stands (or similar) on the footways adjacent or near to the site to provide for visitor cycle parking requirements.
- 17.31 The Council would need to repair any damage to the public highway on completion of the proposed development. A highways contribution of £50,000 would be secured as a Section 106 planning. The highway works would be implemented by the Council's or TfL's highways contractor on completion of the development. The highway works would include where necessary:

- Removal of a redundant vehicular crossover on Acton Street.
- Repaving the footways directly adjacent to the site on Acton Street and Gray's Inn Road (including where the redundant vehicular crossover is to be removed).
- Amendments to existing traffic management orders on Acton Street to include (1) provision of a disabled parking bay, (2) provision of a loading bay (or appropriate loading restrictions), and (3) lengthening the existing bus stop as requested by TfL.
- Any other works the Council acting reasonably requires as a direct result of the Development.

Pedestrian, cycling and environmental improvements

- 17.32 The proposed development will generate a modest increase in multi-modal trips to and from the site on a daily basis. The Council's transport policies are geared towards encouraging and promoting active travel (i.e., walking and cycling). The Council would therefore seek to secure a Pedestrian, Cycling and Environmental (PC&E) improvements contribution as a section 106 planning. This would be used by the Council alongside similar contributions secured from other major developments to transform the public realm in the local area for the benefit of cyclists and pedestrians, and to improve road safety for all road users in and around the site. The focus would be on improving conditions for walking and cycling on cycle routes near the site (Gray's Inn Road) and on routes between the site and nearby transport interchanges, namely Kings Cross St Pancras.
- 17.33 As mentioned previously, the Council has developed proposals to improve conditions for cyclists, and wider Healthy Streets improvements, along the Gray's Inn Road Corridor. A sizeable portion of the PC&E improvements contribution would be used to upgrade existing cycle, pedestrian, and urban greening facilities along the corridor. For example, at-grade cycle lanes would be upgraded to fully segregated stepped cycle tracks, which afford cyclists a greater degree of comfort, priority, and safety.
- 17.34 The Gray's Inn Road scheme has a TfL Prioritisation Rating of 'Very High'. The scheme also features as 'High Priority' on our hexcell mapping of priority locations in the Borough for transport projects, based on a combination of indicators including air quality, road safety, walking and cycling potential, and the Gray's Inn Road corridor itself is one of the busiest in London in terms of cycle journeys, requiring high quality, safe, protected cycle lanes alongside wider Healthy Streets improvements. The approved improvements, once implemented, will make it easier and safer for cyclists and pedestrians to travel to and from the property.
- 17.35 A pedestrian, cycling, and environmental improvements contribution of £75,000 would be secured as a Section 106 planning obligation.

Cycle hire improvements

- 17.36 A parking bay for dockless rental e-bikes and rental e-scooters is conveniently located on Cromer Street at the junction with Gray's Inn Road. However, this merely provides capacity for existing usage by residents and people who work in or visit the area. Officers anticipate significant demand for more parking bays to be provided in the area should planning permission be granted. A cycle/e-scooter hire improvements contribution of £2,000 would therefore be secured as a Section 106 planning obligation. This would allow the Council to provide additional capacity for the parking of dockless rental e-bikes and rental e-scooters in the local area (e.g., by expanding existing bays and providing additional bays). Officers anticipate staff and visitors using these modes of transport as an alternative to public transport, especially when their primary mode of transport is rail with a secondary trip by bus.

Construction Management Plan (CMP)

- 17.37 The proposal would require a significant amount of demolition and construction works. A large number of construction vehicle movements would be generated during the demolition and construction period. The Council's primary concern is public safety in addition to ensuring that construction traffic does not create (or add to existing) traffic congestion. There is also the need to ensure that there is no cumulative impact with other developments in the area. The proposal is likely to lead to a variety of amenity issues for local people, such as noise, vibration, dust and air quality.
- 17.38 The Council needs to ensure that the development can be implemented without being detrimental to amenity or the safe and efficient operation of the highway network in the local area. The site is located on the strategic road network and strategic cycle route network. Traffic congestion is a significant problem in this part of the borough, particularly during peak periods but often throughout the day on Monday to Friday.
- 17.39 The Camden Cycling Campaign raised concerns about the draft CMP using Caledonia Street for eastbound traffic. A draft CMP using the Council's CMP pro-forma has been submitted in support of the planning application. However, the document lacks detail as a principal contractor has yet to be appointed. However, a more detailed CMP would be secured by a S106 Legal Agreement which would also ensure liaison with local residents and businesses. The CMP would be submitted and agreed prior to any works commencing on site. The final CMP would require significant input from Council officers, residents, and other stakeholders before being approved.
- 17.40 The Council would expect construction vehicle movements to and from the site to be scheduled to avoid peak periods to minimise the impacts of construction on the transport network. This is particularly important due to the location of cycle and pedestrian routes adjacent to the site. The contractor would need to register the works with the Considerate Constructors' Scheme. The contractor would also need to adhere to the CLOCS standard.

- 17.41 In addition, a CMP implementation support contribution of £10,116, and a Construction Impact Bond of £16,000 would be secured as s106 planning obligations in accordance with Policy A1. A further requirement to form a construction working group consisting of representatives from the local community prior to commencement of demolition or construction would also be secured via a Section 106 planning obligation.

18 Safety and security

- 18.1 Camden Local Plan Policy C5 (safety and security) and the Design CPG are relevant with regards to secure by design.
- 18.2 Following feedback from Officers about the recessed entrances on Acton Street providing opportunity for ASB, this element was revised to reduce their depth which is welcomed.
- 18.3 The Designing Out Crime Officer was consulted prior to the application being submitted and was involved in the design process. With regards to the residential units, it was advised that these achieve 'Secured by Design' accreditation, which can be easily achieved. An informative will be added to the decision notice to remind the applicant that it is recommended the scheme is designed to Secured by Design Silver credentials.

19 Refuse and recycling

- 19.1 Camden Local Plan policy CC5 (Waste) and Camden Planning Guidance (Design) are relevant with regards to waste and recycling storage and seek to ensure that appropriate storage for waste and recyclables is provided in all developments.
- 19.2 Separate dedicated waste stores are provided for the commercial uses and for the residential units. The residential waste store is located at ground floor with direct access onto Acton Street. The Office waste store is located to the rear of the building at ground floor with access leading onto Acton Street. Accessed internally from the main core, refuse bins are taken across the external deck and through the corridor, exiting on to Acton Street for collection.
- 19.3 The individual commercial occupiers' waste stores should have sufficient capacity to allow refuse and recycling to be segregated. The size/ capacity of the waste stores should be sufficient to accommodate the volumes of waste generated by the occupiers' business activities and the frequency that waste will be collected.
- 19.4 A condition is recommended prior to the occupation of the development for full details of the location, design and method of waste storage and removal including recycled materials for both the commercial and residential uses. The final details would need to be agreed the Council's Environmental Services Officer (condition 17). An additional condition will also ensure that refuse and recycling bins are not left on the public highway (condition 23).

20 Employment and training opportunities

- 20.1 The proposed development would be likely to generate increased employment opportunities during the construction phase, and as such, the Council would aim to ensure that local people benefit from these opportunities by securing a package of employment and training obligations through a Section 106 legal agreement.
- 20.2 The employment and training package in line with the Employment, Sites and Business Premises CPG will cover the following:

Apprenticeships - as the build cost for this scheme will exceed £3 million the applicant must recruit 1 construction apprentice paid at least London Living Wage per £3million of build costs and pay the council a support fee of £1,700 per apprentice as per section 63 of the Employment sites and business premises CPG. Recruitment of construction apprentices should be conducted through the Council's King's Cross Construction Skills Centre. The applicants planning statement indicates that a minimum of 4 apprentices will be recruited with an associated support fee of £6,800.

Construction Work Experience Placements - The applicant should provide 8 construction work placement opportunities of not less than 2 weeks each, to be undertaken over the course of the development, to be recruited through the Council's King's Cross Construction Skills Centre, as per section 69 of the Employment sites and business premises CPG.

Local Recruitment – our standard local recruitment target is 20%.The applicant should work with the Kings Cross Construction Skills Centre to recruit to vacancies, advertising with us for no less than a week before the roles are advertised more widely.

Local Procurement – The applicant must also sign up to the Camden Local Procurement Code, as per section 61 of the Employment sites and business premises CPG. Our local procurement code sets a target of 10% of the total value of the construction contract.

- 20.3 Officers welcome the applicant's offer in line with the CPG.
- 20.4 The scheme results in a net increase of employment floorspace of 557 sqm and therefore doesn't trigger the requirement set out in the CPG for affordable workspace (trigger is 1,00sqm) or occupation phase employment and skills obligations. The development would also provide a flexible layout which would attract a number of different sized businesses and occupiers including SMEs in the future.
- 20.5 Overall, the proposals meet the aims and objectives of policies E1 and E2 of the Camden Local Plan.

21 Fire Safety

- 21.1 Policy D12 (Fire safety) of the London Plan requires all major development proposals to be submitted with a Fire Statement. The application has been supported by a Fire Strategy Report which includes details of the fire strategy. The report has been prepared by authors with the relevant qualifications and experience.
- 21.2 The fire strategy for the residential is based on guidance in BS9991: 2015 Fire safety in the design, management and use of residential buildings – Code of practice. The fire strategy for the non-residential areas is based on guidance in BS9999: 2017 Fire safety in the design, management and use of buildings – Code of practice.
- 21.3 The residential building will be designed with a single core in accordance with BS 9251. The residential flats will be designed in accordance with the recommendations of BS 9991.
- 21.4 The office will be served by two stairs across all floors. Sprinklers are proposed, all office areas are proposed to be covered by a BS8489-1: 2016 industrial and commercial watermist system or BS EN 12845 automatic sprinkler system. All residential areas are to be covered by a BS 9251:2021 residential sprinkler system designed to category 2, with enhancements where coverage is provided to ancillary areas.
- 21.5 Further checks to do with fire safety are dealt with under the building control regulations. Condition 29 requires a fire statement to be submitted.

22 Financial obligations

- 22.1 The following financial contributions are required to mitigate the impact of the development upon the local area, including on local services. These form part of the heads of terms discussed previously in the report.

22.2

Contribution	Amount (£)
Public open space contribution	£19,548
Highways contribution	£50,000
Pedestrian, Cycling and Environmental Improvements contribution	£75,000
Travel plan and associated monitoring and measures contribution	£11,221
Off-site cycle parking contribution	£2,000
Cycle/e-scooter hire contribution	£2,000
CMP implementation support contribution	£10,116
Construction Impact Bond	£16,000
Carbon offset contribution	£45,150
Apprentice support fee	£6,800
Affordable housing contribution	£114,450
Total	£352,285

23 Community Infrastructure Levy (CIL)

23.1 The proposal would be liable for both the Mayor of London's CIL2 (MCIL2) and Camden's CIL due to the net increase in floorspace and creation of residential units. Based on the MCIL2 and Camden's CIL charging schedules and the information given on the plans, the charges are likely to be £681,251. This estimate is based on the uplift of the development and the existing/demolished uses being lawful. The CIL estimate is based on the following calculations:

- E office use MCIL2 – 557sqm x £185 = £103,045
- C3 residential floorspace - MCIL2 - 714sqm x £80 = £57,120
- E office use Camden CIL – 557sqm x £110 = £61,270
- C3 residential floorspace Camden CIL – 714sqm x £644 = £459,816

23.2 This would be collected by Camden after the scheme is implemented and could be subject to surcharges for failure to assume liability, submit a commencement notice and late payment, and subject to indexation in line with the construction costs index. An informative would be attached on any decision notice advising the applicant of these charges. The final charges would be decided by Camden's CIL team.

24 Planning Balance and Public benefits

24.1 As discussed above, the existing building is outlined in the Bloomsbury Conservation Area statement as a detractor/opportunity site. The proposals are considered to enhance the existing building in terms of its detailed design responding to its context whilst providing a contemporary addition, sustainability credentials including retrofitting the existing building instead of demolishing it and removal of car parking. However, it is acknowledged within the design and heritage section that the scale of the extensions which would increase the prominence of this commercial building on the residential streets and would cause less than substantial harm to setting of nearby listed buildings and the Bloomsbury Conservation Area.

24.2 The planning balance and public benefits brought forward through the development are outlined below.

24.3 The National Planning Policy Framework (NPPF) (paragraph 202) states:

“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.”

24.4 Public benefits which are taken into account can be anything that delivers economic, social, or environmental objectives, as described in the National Planning Policy Framework, but they must flow from the proposed development. In this case, the proposals provide a significant a number of public benefits, including environmental, social and economic benefits which are considerable and are considered to outweigh the identified harm. The most significant of these

are listed below, but it is worth highlighting the provision of housing must be given significant weight because of the Council's performance in terms of the Housing Delivery Test.

Environmental benefits:

- Providing a highly sustainable retrofitted building which uses low carbon materials and recycle existing material identified in a pre-demolition audit;
- Overall improvement to the townscape and street scene;
- Delivering a building which achieves a BREEAM score of "Excellent" for the office element which goes a long way to meeting zero carbon;
- Creating car free development and removing the existing office car parking on site;
- Promoting sustainable modes of travel with a focus on cycling and exemplary end of trip facilities;
- Providing urban greening at roof level and along the new terraces to provide biodiversity and ecology benefits; and
- Contributing to new public realm and open space with a contribution of £19,548

Economic benefits:

- Providing new high-quality flexible office accommodation in an identified area of economic growth to provide significant numbers of jobs, apprenticeships, and work experience for workers across the construction and end user phases; and
- Investment in the Camden economy through local procurement during construction.

Social Benefits:

- Opportunities for local people to undertake apprenticeships and work placements;
- Seven new high quality homes and PIL towards the provision of affordable homes
- Enhancements to several designated heritage assets; and
- Significant contributions towards the provision of local infrastructure and facilities through CIL, financial contributions in the S106.

24.5 Paragraphs 10 and 11 of the NPPF state there is a presumption in favour of sustainable development, which should be a golden thread running through decision making. The dimensions of sustainable development are economic, social and environmental which should be sought jointly. The proposed development would result in significant benefits through all 3 strands of sustainable development without any adverse impacts that significantly or demonstrably outweighing them. The proposal is in accordance with relevant National and Regional Policy, the Camden Local Plan, Camden Planning Guidance and other supporting policy guidance.

25 **Conclusion**

- 25.1 The proposed development is a well-considered scheme which presents the opportunity to make significant improvements to the local area, deliver notable environmental improvements, and provide a range of significant public benefits.
- 25.2 The proposed development has an appropriate mix of uses for the site that would increase and enhance the existing uses around the site while benefitting a number of the Council's policy objectives by contributing towards a successful economy and making an appropriate contribution towards the Borough's supply of housing.
- 25.3 Although the development results in some impacts to light of surrounding properties, these impacts are not disproportionate to the dense urban context or tight urban grain. The most significant impacts are not so detrimental as to undermine the quality of accommodation and on balance, the impact is considered acceptable.
- 25.4 The proposals would result in the partial loss of Battle Bridge House; however, it contributes little to the streetscene or townscape and it is recognised in the conservation statement as being a negative contributor. The proposals preserve and, in some cases, enhance the setting of the nearby designated heritage assets. Less than substantial harm has been identified by officers to the setting of nearby listed buildings and the character and appearance of the conservation area; however, this is balanced against the public benefits.
- 25.5 Overall, the benefits of the proposal deliver a sustainable scheme retaining the superstructure while architecturally enhancing and extending the existing building to provide much needed homes and improving the employment offer.

26 Recommendation

- 26.1 Planning Permission is recommended subject to conditions and a Section 106 Legal Agreement covering the following Heads of Terms:

Affordable housing

- An affordable housing contribution of £114,450

Employment and training

- The applicant should work to CITB benchmarks for local employment when recruiting for construction-related jobs.
- The applicant should advertise all construction vacancies and work placement opportunities exclusively with the King's Cross Construction Skills Centre for a period of 1 week before marketing more widely.
- The applicant should provide at least 8 construction work placement opportunities of not less than 2 weeks each, to be undertaken over the course of the development, to be recruited through the Council's King's Cross Construction Skills Centre.
- Provision of 4 apprentice placements and a support fee of £6,800. Recruitment of construction apprentices should be conducted through the Council's King's Cross Construction Skills Centre. Recruitment of non-

construction apprentices should be conducted through the Council's Inclusive Economy team.

- The applicant must also sign up to the Camden Local Procurement Code.
- The applicant should provide the final updated local employment, skills and local supply plan setting out their plan for delivering the above requirements in advance of commencing on site.

Energy and sustainability

- BREAAAM Excellent compliance and post construction review, targets as stated in the energy and sustainability statements for Energy, Materials and Water
- Energy measures including on-site renewables
- Energy provisions to be secured through Energy Efficiency & Renewable Energy Plan to include:
 - *Non-Residential parts –*
 - *New parts*
 - overall minimum 39% CO2 reductions beyond Part L 2021 as amended;
 - minimum 7% Be Lean stage reduction through building efficiency;
 - minimum 32% Be Green stage reduction through renewables
 - *Refurbished parts:*
 - overall minimum 62% CO2 reductions beyond Part L 2021 as amended;
 - minimum 60.5% Be Lean stage reduction through building efficiency;
 - minimum 1.5% Be Green stage reduction through renewables
 - *Residential parts –*
 - overall minimum 76% CO2 reductions beyond Part L 2021 as amended;
 - minimum 14% Be Lean stage reduction through building efficiency;
 - minimum 62% Be Green stage reduction through renewables
- Sustainability measures for the whole development in accordance with approved statements
- Carbon offset contribution of £45,150

Landscaping, trees and open space

- A contribution of £19,548 towards public open space

Transport

- Car free development
- Construction Management Plan (CMP) and associated requirement for a Construction Working Group to be formed prior to commencement.
- CMP implementation support contribution of £10,116 and a Construction Impact Bond of £16,000.
- Financial contribution of £50,000 for highway works directly adjacent to the site. Works to include amongst other things:
 - Removal of a redundant vehicular crossover on Acton Street.
 - Repaving the footways directly adjacent to the site on Acton Street and Grays Inn Road (including where the redundant vehicular crossover is to be removed).

- Amendments to existing traffic management orders on Acton Street to include (1) provision of a disabled parking bay, (2) provision of a loading bay (or appropriate loading restrictions), and (3) lengthening the existing bus stop as requested by TfL.
 - Any other works the Council acting reasonably requires as a direct result of the Development.
- Delivery and servicing management plan
 - Level Plans are required to be submitted at the appropriate stage showing the interaction between development thresholds and the Public Highway to be submitted to and approved by the Highway Authority prior to any works starting on-site. The Highway Authority reserves the right to construct the adjoining Public Highway (carriageway, footway and/or verge) to levels it considers appropriate.
 - Strategic workplace travel plan (for the office) and associated monitoring and measures contribution of £11,221.
 - Off-site cycle parking contribution of £2,000
 - Pedestrian, Cycling and Environmental Improvements contribution £75,000.
 - Cycle/e-scooter hire contribution of £2,000
 - Agreement to enter into a S278 legal agreement with TFL regarding Acton Street highway works

27 Legal Comments

27.1 Members are referred to the note from the Legal Division at the start of the Agenda.

28 Conditions

1	<p>Implementation</p> <p>The development hereby permitted must be begun not later than the end of three years from the date of this permission.</p> <p>Reason: In order to comply with the provisions of Section 91 of the Town and Country Planning Act 1990 (as amended).</p>
2	<p>Approved drawings</p> <p>The development hereby permitted shall be carried out in accordance with the following approved plans:</p> <p>Existing Plans: GIR-HAP-ZZZ-XX-DR-A-PL-0001 Location Plan Rev PL01; GIR-HAP-ZZZ-XX-DR-A-PL-0002 Site Plan PL01; GIR-HAP-ZZZ-B1-DR-A-PL-1099 Existing Lower Ground Floor Plan Rev PL01; GIR-HAP-ZZZ-00-</p>

DR-A-PL-1100 Existing Ground Floor Plan Rev PL01; GIR-HAP-ZZZ-01-DR-A-PL-1101 Existing 1st Floor Plan Rev PL01; GIR-HAP-ZZZ-02-DR-A-PL-1102 Existing 2nd Floor Plan Rev PL01; GIR-HAP-ZZZ-03-DR-A-PL-1103 Existing 3rd Floor Plan Rev PL01; GIR-HAP-ZZZ-04-DR-A-PL-1104 Existing 4th Floor Plan Rev PL01; GIR-HAP-ZZZ-05-DR-A-PL-1105 Existing 5th Floor Plan Rev PL01; GIR-HAP-ZZZ-06-DR-A-PL-1106 Existing 6th Floor Plan Rev PL01; GIR-HAP-ZZZ-07-DR-A-PL-1107 Existing 7th Floor Plan Rev PL01; GIR-HAP-ZZZ-RF-DR-A-PL-1110 Existing Roof Plan Rev PL01; GIR-HAP-ZZZ-XX-DR-A-PL-1200 Existing Elevation – North Rev PL01; GIR-HAP-ZZZ-XX-DR-A-PL-1201 Existing Elevation – East Rev PL01; GIR-HAP-ZZZ-XX-DR-A-PL-1202 Existing Elevation – South Rev PL01; GIR-HAP-ZZZ-XX-DR-A-PL-1203 Existing Elevation – West Rev PL01; GIR-HAP-ZZZ-XX-DR-A-PL-1300 Existing Section – AA Rev PL01; GIR-HAP-ZZZ-XX-DR-A-PL-1301 Existing Section – BB Rev PL01; GIR-HAP-ZZZ-XX-DR-A-PL-1302 Existing Section – CC Rev PL01

Demolition:

GIR-HAP-ZZZ-B1-DR-A-PL-2099 Strip Out Lower Ground Floor Plan Rev PL01; GIR-HAP-ZZZ-00-DR-A-PL-2100 Strip Out Ground Floor Plan Rev PL01; GIR-HAP-ZZZ-01-DR-A-PL-2101 Strip Out 1st Floor Plan Rev PL01; GIR-HAP-ZZZ-02-DR-A-PL-2102 Strip Out 2nd Floor Plan Rev PL01; GIR-HAP-ZZZ-03-DR-A-PL-2103 Strip Out 3rd Floor Plan Rev PL01; GIR-HAP-ZZZ-04-DR-A-PL-2104 Strip Out 4th Floor Plan Rev PL01; GIR-HAP-ZZZ-05-DR-A-PL-2105 Strip Out 5th Floor Plan Rev PL01; GIR-HAP-ZZZ-06-DR-A-PL-2106 Strip Out 6th Floor Plan Rev PL01; GIR-HAP-ZZZ-07-DR-A-PL-2107 Strip Out 7th Floor Plan Rev PL01; GIR-HAP-ZZZ-RF-DR-A-PL-2110 Strip Out Roof Plan Rev PL01; GIR-HAP-ZZZ-XX-DR-A-PL-2200 Strip Out Elevation – North Rev PL01; GIR-HAP-ZZZ-XX-DR-A-PL-2201 Strip Out Elevation – East Rev PL01; GIR-HAP-ZZZ-XX-DR-A-PL-2202 Strip Out Elevation – South Rev PL01; GIR-HAP-ZZZ-XX-DR-A-PL-2203 Strip Out Elevation – West Rev PL01; GIR-HAP-ZZZ-XX-DR-A-PL-2300 Strip Out Section – AA Rev PL01; GIR-HAP-ZZZ-XX-DR-A-PL-2301 Strip Out Section – BB Rev PL01; GIR-HAP-ZZZ-XX-DR-A-PL-2302 Strip Out Section – CC Rev PL01.

Proposed Plans:

GIR-HAP-ZZZ-B1-DR-A-PL-3099 Proposed Lower Ground Floor Plan Rev PL01; GIR-HAP-ZZZ-00-DR-A-PL-3100 Proposed Ground Floor Plan Rev PL02; GIR-HAP-ZZZ-01-DR-A-PL-3101 Proposed 1st Floor Plan Rev PL02; GIR-HAP-ZZZ-02-DR-A-PL-3102 Proposed 2nd Floor Plan Rev PL02; GIR-HAP-ZZZ-03-DR-A-PL-3103 Proposed 3rd Floor Plan Rev PL02; GIR-HAP-ZZZ-04-DR-A-PL-3104 Proposed 4th Floor Plan Rev PL02; GIR-HAP-ZZZ-05-DR-A-PL-3105 Proposed 5th Floor Plan Rev PL02; GIR-HAP-ZZZ-06-DR-A-PL-3106 Proposed 6th Floor Plan Rev PL02; GIR-HAP-ZZZ-07-DR-A-PL-3107 Proposed 7th Floor Plan Rev PL02; GIR-HAP-ZZZ-08-DR-A-PL-3108 Proposed 8th Floor Plan Rev PL02; GIR-HAP-ZZZ-09-DR-A-PL-3109 Proposed 9th Floor Plan Rev PL02; GIR-HAP-ZZZ-RF-DR-A-PL-3110 Proposed Roof Plan

	<p>Rev PL02; GIR-HAP-ZZZ-XX-DR-A-PL-3200 Proposed Elevation – North Rev PL02; GIR-HAP-ZZZ-XX-DR-A-PL-3201 Proposed Elevation – East Rev PL02; GIR-HAP-ZZZ-XX-DR-A-PL-3202 Proposed Elevation – South Rev PL02; GIR-HAP-ZZZ-XX-DR-A-PL-3203 Proposed Elevation – West Rev PL01; GIR-HAP-ZZZ-XX-DR-A-PL-3300 Proposed Section – AA Rev PL01; GIR-HAP-ZZZ-XX-DR-A-PL-3301 Proposed Section – BB Rev PL01; GIR-HAP-ZZZ-XX-DR-A-PL-3302 Proposed Section – CC Rev PL02</p> <p>Supporting documents: Covering Letter (dated 26 May 2023); CIL Additional Information Form; Town Planning Statement (dated 26 May 2023); Design and Access Statement (dated May 2023); Planning Design Addendum (dated September 2023); Residential Amenity Management Plan (dated May 2023); Energy and Sustainability Statement (dated 28 July 2023); Energy & Sustainability Comments – GDM Responses (dated 11 August 2023); Camden Sustainability and Energy Pro Forma; Noise Assessment Report (dated 18 May 2023); Daylight, Sunlight & Overshadowing Report (dated May 2023); Preliminary Ecological Assessment and BREEAM (dated May 2023); Phase 2 Bat Survey (September 2023); Heritage, Townscape and Visual Impact Assessment (dated May 2023); Planning Fire Statement (dated 23 May 2023); Sustainable Drainage Strategy (dated 5 May 2023); Flood Risk Assessment (dated 19 May 2023); Transport Statement (May 2023); BREEAM Travel Plan (dated May 2023); Draft Delivery & Servicing Management Plan (dated May 2023); Draft Construction/Demolition Management Plan Pro Forma; Active Travel Audit (dated 12 September 2023); Air Quality Assessment (dated May 2023); Camden Air Quality Pro Forma; Statement of Community Involvement (dated May 2023).</p> <p>Reason: For the avoidance of doubt and in the interest of proper planning.</p>
3	<p>Detailed drawings / samples</p> <p>Detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the local planning authority before the relevant part of the work is begun:</p> <p>a) Details including plans, coloured elevations and sections at 1:20 of all new windows (including jambs, head and cill), ventilation grills, external doors, screening, balustrades, parapets, planters and associated elements;</p> <p>b) Manufacturer's specification details of all facing materials (to be submitted to the Local Planning Authority) and samples of those materials (to be provided on site). Samples of materials to be provided at a suitable size (eg. 1x1m);</p>

	<p>c) Detailed drawings of rain water collection including gutters and downpipes</p> <p>The relevant part of the works shall be carried out in accordance with the details thus approved and all approved samples shall be retained on site during the course of the works.</p> <p>Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policies D1 and D2 of the Camden Local Plan 2017.</p>
4	<p>Privacy measures</p> <p>Prior to the use of the rear office terraces at 9th Floor, details of the privacy measures including planters shall be submitted to and approved in writing by the local planning authority.</p> <p>The approved mitigation measures shall be provided in their entirety prior to the first use of the office terraces and permanently retained thereafter.</p> <p>Reason: In order to mitigate unnecessary overlooking in accordance with policies DM1 and A1 of the London Borough of Camden Local Plan 2017.</p>
5	<p>SuDS: Construction in accordance with details</p> <p><i>The sustainable drainage system as approved in Sustainable Drainage Strategy by Elliot Wood, Revision P2 Dated: 05/05/2023, Drawing Ref:BRST02 of the Blue/green roof shall be installed as part of the development to accommodate all storms up to and including a 1:100 year storm with a 40% provision for climate change, such that flooding does not occur in any part of a building or in any utility plant susceptible to water and to achieve a run-off rate of 2.2l/s as approved by the Local Planning Authority. The system shall include 28m³ of blue/green roof, 5m³ of permeable paving & an 18m³ Attenuation tank, as stated in the approved drawings and shall thereafter retained and maintained in accordance with the approved maintenance plan (SuDS Maintenance Schedule by Elliot Wood, Revision P1, Dated 30/06/2023).</i></p> <p><i>Reason: To reduce the rate of surface water run-off from the buildings and limit the impact on the storm-water drainage system in accordance with policies CC2 and CC3 of the London Borough of Camden Local Plan Policies and Policy SI 13 of the London Plan 2021.</i></p>
6	<p>SuDS: Evidence of installation</p> <p>Prior to occupation, evidence that the system has been implemented in accordance with the approved details as part of the development shall</p>

	<p>be submitted to the Local Planning Authority and approved in writing. The systems shall thereafter be retained and maintained in accordance with the approved maintenance plan.</p> <p>Reason: To reduce the rate of surface water run-off from the buildings and limit the impact on the storm-water drainage system in accordance with policies CC2 and CC3 of the London Borough of Camden Local Plan Policies and Policy SI 13 of the London Plan 2021.</p>
7	<p>Mechanical Ventilation</p> <p>Prior to commencement of the development excluding demolition and site preparation works, full details of the mechanical ventilation system including air inlet locations shall be submitted to and approved by the local planning authority in writing. Air inlet locations should be located away from busy roads or any other emission sources and as close to roof level as possible, to protect internal air quality. The development shall thereafter be constructed and maintained in accordance with the approved details.</p> <p>Reason: To protect the amenity of residents in accordance with London Borough of Camden Local Plan Policy CC4 and London Plan policy SI 1.</p>
8	<p>Construction related impacts – Monitoring</p> <p>Air quality monitoring shall be implemented on site. No development shall take place until:</p> <p>a) prior to installing monitors, full details of the air quality monitors have been submitted to and approved by the local planning authority in writing. Such details shall include the location, number and specification of the monitors, including evidence of the fact that they have been installed in line with guidance outlined in the GLA's Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance;</p> <p>b) <i>a confirmation email should be sent to airquality@camden.gov.uk no later than one day after the monitors have been installed with photographic evidence in line with the approved details.</i></p> <p>c) <i>prior to commencement, a baseline monitoring report including evidence that the monitors have been in place and recording valid air quality data for at least 3 months prior to the proposed implementation date shall be submitted to the Local Planning Authority and approved in writing.</i></p> <p><i>The monitors shall be retained and maintained on site in the locations agreed with the local planning authority for the duration of the development works, monthly summary reports and automatic</i></p>

	<p><i>notification of any exceedances provided in accordance with the details thus approved. Any changes to the monitoring arrangements must be submitted to the Local Planning Authority and approved in writing.</i></p> <p>Reason: To safeguard the amenity of adjoining premises and the area generally in accordance with the requirements of policies A1 (Managing the impact of development) and CC4 (Air quality) of the London Borough of Camden Local Plan 2017.</p>
9	<p>Green Roof details</p> <p>Prior to commencement of above-ground development full details of all biodiverse, substrate-based living roofs to be incorporated into the development shall be submitted to and approved in writing by the local planning authority. The design and planting scheme should reflect the local conditions and species of interest. The details shall include the following:</p> <ul style="list-style-type: none"> A. detailed maintenance plan; B. details of its construction and the materials used; C. a section at a scale of 1:20 showing substrate depth averaging 130mm with added peaks and troughs to provide variations between 80mm and 150mm; and D. full planting details including species showing planting of at least 16 plugs per m2. <p>The development shall not be carried out otherwise than in accordance with the details thus approved and shall be fully implemented before the premises are first occupied. Guidance on living roofs is available in the Camden Biodiversity Action Plan: Advice Note on Living Roofs and Walls.</p> <p>Reason: In order to ensure the development undertakes reasonable measures to take account of biodiversity and the water environment in accordance with policies A3, CC2 and CC3 of the London Borough of Camden Local Plan policies</p>
10	<p>Details of PV panels</p> <p>Prior to commencement of above ground works (excluding demolition and any site preparation works), drawings and data sheets showing the location, extent and predicted energy generation of photovoltaic cells and associated equipment to be installed on the building shall have been submitted to and approved by the Local Planning Authority in writing. The measures shall include the installation of a meter to monitor the energy output from the approved renewable energy systems. A site-specific lifetime maintenance schedule for each system, including safe roof access arrangements, shall be provided. The cells shall be installed in full accordance with the details approved by the Local Planning Authority and permanently retained and maintained thereafter.</p>

	<p>Reason: To ensure the development provides adequate on-site renewable energy facilities in accordance with the requirements of policies CC1 and CC2 of the Camden Local Plan 2017.</p>
11	<p>Air source heat pumps</p> <p>Prior to commencement of development, details, drawings and data sheets showing the location, Seasonal Performance Factor of at least 2.5 (or COP of 4 or more or SCOP of 3.4 or more) and Be Green stage carbon saving of the air source heat pumps and associated equipment to be installed on the building, shall have been submitted to and approved by the Local Planning Authority in writing. The measures shall include the installation of a meter to monitor the energy output from the approved renewable energy systems. A site-specific lifetime maintenance schedule for each system, including safe access arrangements, shall be provided. The equipment shall be installed in full accordance with the details approved by the Local Planning Authority and permanently retained and maintained thereafter.</p> <p>Reason: To ensure the development provides adequate on-site renewable energy facilities in accordance with the requirements of policy CC1 of the London Borough of Camden Local plan Policies.</p>
12	<p>Energy monitoring</p> <p>In order to demonstrate compliance with the 'be seen' post-construction monitoring requirement of Policy SI 2 of the London Plan, the legal Owner shall at all times and all in all respects comply with the energy monitoring requirements set out in points a, b and c below. In the case of non-compliance the legal Owner shall upon written notice from the Local Planning Authority immediately take all steps reasonably required to remedy non-compliance.</p> <p>a. Within four weeks of planning permission being issued by the Local Planning Authority, the Owner is required to submit to the GLA accurate and verified estimates of the 'be seen' energy performance indicators, as outlined in Chapter 3 'Planning stage' of the GLA 'Be seen' energy monitoring guidance document, for the consented development. This should be submitted to the GLA's monitoring portal in accordance with the 'Be seen' energy monitoring guidance.</p> <p>b. Once the as-built design has been completed (upon commencement of RIBA Stage 6) and prior to the building(s) being occupied (or handed over to a new legal owner, if applicable), the legal Owner is required to provide updated accurate and verified estimates of the 'be seen' energy performance indicators for each reportable unit of the development, as per the methodology outlined in Chapter 4 'As-built stage' of the GLA 'Be seen' energy monitoring guidance. All data and supporting evidence should be uploaded to the GLA's monitoring</p>

	<p>portal. The owner should also confirm that suitable monitoring devices have been installed and maintained for the monitoring of the in-use energy performance indicators, as outlined in Chapter 5 'In-use stage' of the GLA 'Be seen' energy monitoring guidance document.</p> <p>c. Upon completion of the first year of occupation following the end of the defects liability period (DLP) and for the following four years, the legal Owner is required to provide accurate and verified annual in-use energy performance data for all relevant indicators under each reportable unit of the development as per the methodology outlined in Chapter 5 'In-use stage' of the GLA 'Be seen' energy monitoring guidance document. All data and supporting evidence should be uploaded to the GLA's monitoring portal. This condition will be satisfied after the legal Owner has reported on all relevant indicators included in Chapter 5 'In-use stage' of the GLA 'Be Seen' energy monitoring guidance document for at least five years.</p> <p>Reason: In order to ensure that actual operational energy performance is minimised and demonstrate compliance with the 'be seen' post-construction monitoring requirement of Policy SI 2 of the London Plan 2021.</p>
13	<p>Reuse and recycling of demolition waste</p> <p>Prior to commencement of development, a resource management plan shall be submitted to and approved in writing by the Local Planning Authority. This shall include a pre-demolition audit and demonstrate how 95% of construction and demolition waste will be reused/recycled/recovered. The plan shall be thereafter be delivered in accordance with the approved details.</p> <p>Reason: To ensure the development contributes to reducing waste and supporting the circular economy in accordance with the requirements of Policy CC1 of the London Borough of Camden Local Plan 2017, Camden Planning Guidance, and Policy SI 7 of the London Plan 2021.</p>
14	<p>Landscaping details</p> <p>Prior to commencement of development (excluding demolition and any site preparation works), full details in respect of all hard and soft landscaping including to ground floor and the terraces at eighth floor, and ninth floor, shall be submitted to and approved in writing by the local planning authority. Details shall include species, indicative images and details of the maintenance programme. The building shall not be occupied until the approved details have been implemented and these works shall be permanently retained and maintained thereafter.</p> <p>Reason: In order to ensure the development undertakes reasonable measures to take account of biodiversity and the water environment in</p>

	accordance with policies A3, CC2 and CC3 of the London Borough of Camden Local Plan policies.
15	<p>Lighting Strategy</p> <p>Prior to installation of any external lighting, details shall be submitted to and approved in writing by the Local Planning Authority. Details shall include details of light fittings, their location, luminance levels, light spill, and temperature (colour).</p> <p>The external lighting shall be carried out in accordance with the approved details.</p> <p>Reason: In order to maintain a high quality of amenity and prevent harm to adjacent occupiers and wildlife (including bats) in accordance with policies A1, A3, D1 and D2 of the Camden Local Plan 2017.</p>
16	<p>Bird and bat boxes</p> <p>Prior to first occupation of the development a plan showing details of bird and bat box locations and types and indication of species to be accommodated shall be submitted to and approved in writing by the local planning authority. The boxes shall be installed in accordance with the approved plans prior to the occupation of the development and thereafter retained.</p> <p>Reason: In order to secure appropriate features to conserve and enhance wildlife habitats and biodiversity measures within the development, in accordance with the requirements of policy A3 of the Camden Local Plan 2017.</p>
17	<p>Waste storage / removal</p> <p>At least six months prior to completion, details of the location, design and method of waste storage and removal including recycled materials, shall be submitted to and approved by the local planning authority in writing. The facility as approved shall be provided prior to the first occupation of any of the new units and permanently retained thereafter.</p> <p>Reason: To ensure that sufficient provision for the storage and collection of waste has been made in accordance with the requirements of policies A1 and CC5 of the Camden Local Plan 2017.</p>
18	<p>Cycle parking</p> <p>Prior to first occupation of the development, full details of the following shall be submitted to and approved by the local planning authority:</p>

	<ul style="list-style-type: none"> • at least 76 long stay cycle spaces for the office and 12 for the residential element • staff lockers, showering facilities for the office • accessible door widths of 1.2m for all doors on route to the cycle parking; • electrically assisted doors with push buttons or security ID swipe access; <p>The approved cycle parking shall thereafter be provided in its entirety prior to the first occupation of any part of development, and permanently retained thereafter.</p> <p>Reason: To ensure the development provides adequate cycle parking facilities in accordance with the requirements of policies T1 and T2 of the Camden Local Plan 2017.</p>
19	<p>Accessible and adaptable dwellings</p> <p>All units hereby approved shall be designed and constructed in accordance with Building Regulations Part M4 (2) with one unit (the three-bed unit on the fourth floor) designed and constructed in accordance with Building Regulations Part M4 (3) adaptable, as shown on the approved plans.</p> <p>Reason: To ensure that the internal layout of the building provides flexibility for the accessibility of future occupiers and their changing needs over time, in accordance with the requirements of policy H6 of the Camden Local Plan 2017.</p>
20	<p>Noise standards</p> <p>All habitable rooms exposed to external road traffic noise in excess of 55 dBA Leq 16 hour [free field] during the day [07.00 to 23.00 hours] or 45 dBA Leq 8 hour [free field] at night [23.00 to 07.00 hours] shall be subject to sound insulation measures to ensure that all such rooms achieve an internal noise level of 35 dBA Leq 16 hour during the day and 30 dBA Leq 8 hour at night. The submitted scheme shall ensure that habitable rooms subject to sound insulation measures shall be able to be effectively ventilated without opening windows.</p> <p>No dwelling shall be occupied until the approved sound insulation and ventilation measures have been installed to that property in accordance with the approved details. The approved measures shall be retained thereafter in perpetuity.</p> <p>Reason: To ensure that the amenities of future occupiers are protected in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017</p>

21	<p>Noise standards</p> <p>Prior to commencement of the development (excluding demolition and any site preparation works), details shall be submitted to and approved in writing by the Council, of an enhanced sound insulation value $D_{nT,w}$ and $L'_{nT,w}$ of at least 5dB above the Building Regulations value, for the floor/ceiling/wall structures in the residential units, separating different types of rooms/ uses in adjoining dwellings, . Approved details shall be implemented prior to occupation of the development and thereafter be permanently retained.</p> <p>Reason: To ensure that the amenity of occupiers of the development site is not adversely affected by noise in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.</p>
22	<p>Noise standards</p> <p>Prior to use, machinery, plant or equipment and ducting at the development shall be mounted with proprietary anti-vibration isolators and fan motors shall be vibration isolated from the casing and adequately silenced and maintained as such.</p> <p>Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.</p>
23	<p>Delivery and refuse items</p> <p>All refuse and recycling bins, delivery cages, trolleys and any other items linked to deliveries and collection in association with the development hereby permitted are to be stored within the buildings and only brought out onto the public highway when deliveries are being made or refuse collected and returned to within the building immediately thereafter.</p> <p>Reason: In the interests of visual amenity and to prevent obstruction and inconvenience to users of the public highways, in accordance with policies A1, CC5 and T1 of the Camden Local Plan 2017.</p>
24	<p>Office terraces hours of use</p> <p>The use of the rear roof terraces at 9th floor and ground floor rear courtyard associated with the office use shall not be carried out outside the following times 8am-9pm Mondays to Fridays and not on Saturdays, Sundays and Bank Holidays.</p> <p>Reason: To safeguard the amenities of the nearest residential properties and the area generally in accordance with the requirements</p>

	of policies G1, A1 and A4 of the London Borough of Camden Local Plan 2017.
25	<p>No audible music played on office terraces</p> <p>No music shall be played on the office premises (including on the roof terraces) in such a way as to be audible within any adjoining premises or on the adjoining highway.</p> <p>Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies G1, D1, A1, and A4 of the London Borough of Camden Local Plan 2017.</p>
26	<p>External fixtures</p> <p>No lights, meter boxes, flues, vents or pipes, and no telecommunications equipment, alarm boxes, television aerials, satellite dishes or rooftop 'mansafe' rails shall be fixed or installed on the external face of the buildings, without the prior approval in writing of the local planning authority.</p> <p>Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policies D1 and D2 of the Camden Local Plan 2017.</p>
27	<p>Non-road mobile machinery</p> <p>All non-road mobile machinery (any mobile machine, item of transportable industrial equipment, or vehicle - with or without bodywork) of net power between 37kW and 560kW used on the site for the entirety of the demolition and phases of the development hereby approved shall be required to meet Stage IIIA of EU Directive 97/68/EC. The site shall be registered on the NRMM register for the demolition and construction phases of the development.</p> <p>Reason: To safeguard the amenities of the adjoining occupiers, the area generally and contribution of developments to the air quality of the borough in accordance with the requirements of policies CC1, CC2 and CC4 of the Camden Local Plan 2017.</p>
28	<p>Water use</p> <p>The residential development element hereby approved shall achieve a maximum internal water use of 105litres/person/day. The dwellings shall not be occupied until the Building Regulation optional requirement has been complied with.</p> <p>Reason: To ensure the development contributes to minimising the need for further water infrastructure in an area of water stress in</p>

	accordance with policies CC1, CC2 and CC3 of the Camden Local Plan 2017.
29	<p>Fire strategy</p> <p>Prior to commencement, a Fire Statement shall be submitted to and approved in writing by the Local Planning Authority. The Fire Statement shall be produced by an independent third party suitably qualified assessor which shall detail the building's construction, methods, products and materials used; the means of escape for all building users including those who are disabled or require level access together with the associated management plan; access for fire service personnel and equipment; ongoing maintenance and monitoring and how provision will be made within the site to enable fire appliances to gain access to the building. The development shall be carried out in accordance with the approved details.</p> <p>Reason: In order to provide a safe and secure development in accordance with policy D12 of the London Plan 2021.</p>
30	<p>Class E (g) use</p> <p>Notwithstanding the provisions of the Town and Country Planning (Use Classes) Order 1987 or the Town and Country Planning (General Permitted Development) Order 2015 (or any orders revoking and re-enacting those orders with or without modification), the areas shown on the approved plans as 'office' shall only be used for purposes within Use Classes E(g) (offices, research and development, or light industry), or a mix of those uses, and for no other purposes whatsoever.</p> <p>Reason: To safeguard future employment sites and premises in the borough that meet the needs of industry and knowledge quarter and other employers and to safeguard the amenity of the future and existing occupiers of the development site in accordance with policies G1, A1, E1 and E2 of the Camden Local Plan 2017.</p>

29 Informatives

1	<p>This proposal may be liable for the Mayor of London's Community Infrastructure Levy (CIL) and the Camden CIL. Both CILs are collected by Camden Council after a liable scheme has started, and could be subject to surcharges for failure to assume liability or submit a commencement notice PRIOR to commencement. We issue formal CIL liability notices setting out how much you may have to pay once a liable party has been established. CIL payments will be subject to indexation in line with construction costs index. You can visit our planning website at www.camden.gov.uk/cil for more information, including guidance on your liability, charges, how to pay and who to contact for more advice.</p>
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2	<p>Your proposals may be subject to control under the Building Regulations and/or the London Buildings Acts that cover aspects including fire and emergency escape, access and facilities for people with disabilities and sound insulation between dwellings. You are advised to consult the Council's Building Control Service, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (tel: 020-7974 6941).</p>
3	<p>Your proposals may be subject to control under the Party Wall etc Act 1996 which covers party wall matters, boundary walls and excavations near neighbouring buildings. You are advised to consult a suitably qualified and experienced Building Engineer.</p>
4	<p>All works should be conducted in accordance with the Camden Minimum Requirements - a copy is available on the Council's website at https://beta.camden.gov.uk/documents/20142/1269042/Camden+Minimum+Requirements+%281%29.pdf/bb2cd0a2-88b1-aa6d-61f9-525ca0f71319 or contact the Council's Noise and Licensing Enforcement Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No. 020 7974 4444)</p> <p>Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You must secure the approval of the Council's Noise and Licensing Enforcement Team prior to undertaking such activities outside these hours.</p>
5	<p>This approval does not authorise the use of the public highway. Any requirement to use the public highway, such as for hoardings, temporary road closures and suspension of parking bays, will be subject to approval of relevant licence from the Council's Streetworks Authorisations & Compliance Team London Borough of Camden 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No 020 7974 4444) . Licences and authorisations need to be sought in advance of proposed works. Where development is subject to a Construction Management Plan (through a requirement in a S106 agreement), no licence or authorisation will be granted until the Construction Management Plan is approved by the Council.</p>
6	<p>Your attention is drawn to the fact that there is a separate legal agreement with the Council which relates to the development for which this permission is granted. Information/drawings relating to the discharge of matters covered by the Heads of Terms of the legal agreement should be marked for the attention of the Planning Obligations Officer, Sites Team, Camden Town Hall, Argyle Street, WC1H 8EQ.</p>
7	<p>Mitigation measures to control construction-related air quality impacts should be secured within the Construction Management Plan as per the</p>

	standard CMP Pro-Forma. The applicant will be required to complete the checklist and demonstrate that all mitigation measures relevant to the level of identified risk are being included.
8	It is recommended that the residential units achieve 'Secured by Design – Silver' accreditation. You can find further information about 'Secured by Design' by reading the following guide: https://www.securedbydesign.com/images/downloads/HOMES_BROCHURE_2019.pdf
9	The correct street number or number and name must be displayed permanently on the premises in accordance with regulations made under Section 12 of the London Building (Amendments) Act 1939.
10	Under Section 25 of the GLC (General Powers) Act 1983, the residential accommodation approved is not permitted for use as holiday lettings or any other form of temporary sleeping accommodation defined as being occupied by the same person(s) for a consecutive period of 90 nights or less. If any such use is intended, then a new planning application will be required which may not be approved
11	A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via www.thameswater.co.uk . Please refer to the Wholesale; Business customers; Groundwater discharges section.
12	Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

Appendix 1: DRP report



London Borough of Camden Design Review Panel

Report of Formal Review Meeting: Battle Bridge House, 300 Gray's Inn Road

Friday 24 February 2023

Camden Council, 5 Pancras Square, London N1C 4AC

Panel

Catherine Burd (chair)

Kiru Balson

Mary Duggan

Shaun Ihejetoh

Chloë Phelps

Attendees

Sofie Fieldsend	London Borough of Camden
Kevin Fisher	London Borough of Camden
Edward Jarvis	London Borough of Camden
Jess MacDonnell	London Borough of Camden
Elaine Quigley	London Borough of Camden
Jane Wylie	London Borough of Camden
Tom Bolton	Frame Projects
Reema Kaur	Frame Projects
Drew Jones	Southend-on-Sea City Council (observer)

Apologies / report copied to

Neil McDonald	London Borough of Camden
Bethany Cullen	London Borough of Camden
George McKenzie	London Borough of Camden
Daniel Pope	London Borough of Camden
Richard Wilson	London Borough of Camden

Confidentiality

This is a pre-application review, and therefore confidential. As a public organisation Camden Council is subject to the Freedom of Information Act (FOI), and in the case of an FOI request may be obliged to release project information submitted for review.

Declaration of interest

Catherine Burd's architectural practice, Burd Haward, is currently working with Gerald Eve LLP on scheme unrelated to 300 Gray's Inn Road.

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1. Project name and site address

300 Gray's Inn Road, London WC1X 8DU

2. Presenting team

Duncan Roe	Beltane Asset Management
Emma Galvin	Haptic Architects
Scott Grady	Haptic Architects
Harry Sumner	Haptic Architects
Kate Parker	The Townscape Consultancy
Liam Dawson-Jones	Gerald Eve LLP
Kathryn Tyne	Gerald Eve LLP
Lisa Webb	Gerald Eve LLP

3. Planning authority briefing

The site, on the corner of Acton Street and Gray's Inn Road, is six storeys in height (plus basement). The building was constructed in 1974 and is currently occupied as Class E offices. Although it is a single, interconnected building, the main element facing Gray's Inn Road and the lower three storey annex element on Acton Street have two different styles. The existing building is deteriorating and out of date. Due to its poor façade, the Energy Performance Certificate (EPC) rating is 'G' which means that it cannot be let.

The site sits within the Bloomsbury Conservation Area but is not identified as a positive contributor. It adjoins a row of Grade II listed terraces on Acton Street, to the east. The terraces behind it to the south-east on Frederick Street are also Grade II listed. The site falls within the Knowledge Quarter.

The brief for 300 Gray's Inn Road is to substantially refurbish and extend the existing building, placing high quality design and sustainability at the project's core. The design will improve the office space and add new homes to the site. The proposal retains the superstructure of the building. The façade will be removed while the core layout is altered. Three additional storeys will be added facing Gray's Inn Road (rear part-infill) and two additional storeys facing Acton Street. The development will comprise 4,314 sqm of commercial floorspace and seven residential units.

Officers asked the panel for its views on the proposed height, massing and bulk, especially to the rear of the site and in views from Acton Street and Frederick Street; heritage impact on the Bloomsbury Conservation Area and listed terraces, including the animation of façades at the rear of the building; material palette; whether the residential block should have a different design approach to the main frontage block; and whether the architecture should be influenced more by nearby Georgian terraces.



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4. Design Review Panel's views

Summary

The panel finds much to admire in the proposals, including the retention of the existing structure and the overall sustainability ambition. It considers the proposed heights generally acceptable but considers the massing requires further refinement to reduce its impact on the conservation area, and that the detail of the architectural approach should also be developed. The impact of the building in views from the conservation area should be examined in more detail, and both massing and design detail simplified to improve its presence in relation to listed buildings. A clearer design distinction should be developed between elevations to reflect their different roles in primary and secondary views. The Gray's Inn Road façade should be refined with more verticality and a finer grain, and the architecture could use more colour to create a gateway building to the Knowledge Quarter. The cross-laminated timber roof extension could potentially be expressed differently to the building below.

Glazing ratios should be reviewed and potentially reduced, especially in the southern elevation and roof extension. The north-western corner rooftop set-back could be aligned with the recessed entrance. This double-height entrance should be scaled back, and option for pedestrian crossings to be relocated for the entrance location to work. A different architectural language should be developed for the Acton Street residential block to distinguish it from the commercial building, and full height windows reduced. Rear terraces should be refined to avoid overlooking. The courtyard and Acton Street entrance could be retained to create more space and provide easier access to cycle storage. The carbon impact of raised access floors should be reduced. Window designs need careful design to avoid thermal bridging. Further thinking is needed on the mechanical ventilation heat recovery system used, and the location of extracts.

These comments are expanded below.

Height and massing

- The panel considers that the introduction of a taller building of greater massing and scale is potentially justifiable. The massing of the scheme on Gray's Inn Road is successful and acceptable.
- However, the eastern façade of this taller element is a particularly significant part of the scheme's relationship with the Bloomsbury Conservation Area. The panel considers that this side/rear elevation currently appears too complicated, and that too much detail is visible at upper levels in relation to the surrounding terraced streets. The massing should be simplified to avoid overwhelming the context.
- More evidence is needed to demonstrate the building's impact in views from Frederick Street. This should include dynamic views, to test where the building appears and disappears above the Frederick Street terraces. The relationship



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between the roof lines of the terraces to south and that of the extended building should be examined carefully, to ensure it is sympathetic.

- It will also be important to assess the visibility and impact of the building in longer views, including from the higher ground at Percy Circus, to the east.
- The panel feels that the height proposed for the residential element facing Acton Street, where it steps up from the adjacent terraced houses, is acceptable.

Architecture

- The panel thinks that the scheme has the potential to be an architecturally exciting, high quality building. The scheme will be prominent, so design detail will be essential to delivering the quality required in a sensitive location.
- However, the panel suggests that the designs would benefit from greater clarity about whether the building is intended as a landmark, or whether it will blend into the background. This will help to determine the level of detailing on subsidiary facades, especially overlooking streets and listed buildings to the east. However, more could also be done to express the building as a gateway to the Knowledge Quarter.
- A stronger vision is encouraged for the different identities of each façade, to respond to differences in orientation and heat loss/gain, as well as to primary views from the north and the west, potentially using different grains to distinguish the role of each elevation.
- The panel supports the use of cross-laminated timber for the roof extension, but suggests that the change in material for these storeys could be emphasised in the architecture. At the moment, the additional floors do not read as a different type of structure, but there is opportunity for these to be expressed differently to demonstrate the character of the project more clearly.

Gray's Inn Road

- The panel also suggests that more work is needed to refine the design of the Gray's Inn Road façade. It enjoys references to the telephone exchange building opposite the site, but thinks that more clarity is needed on how these are expressed, and how the order of its elevation is reflected in the designs – especially as the two buildings will no longer share a brick colour. More verticality and a smaller façade grain should be considered.
- There is potential for the Gray's Inn Road façade to be more joyful, potentially including more colour. The façade rhythm could also relate more directly to the rhythm of the smaller scale retail frontage to the south.
- The panel is not convinced that the double-height entrance and the stepped down upper storeys on the corner of Gray's Inn Road and Acton Street



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represent the right approach. This corner is difficult to resolve, partly because of the clash with the positioning of the zebra crossing which is likely to cause congestion. If this can be altered, a corner entrance can work but, if not, an entrance could be better repositioned in the centre of the Gray's Inn Road frontage.

- The panel feels that the height of the corner entrance is more suited to the buildings at King's Cross Central than the character of Gray's Inn Road. It could be reduced to one and a half storeys, to better reflect local scale.
- The set back two top storeys do not align with the chamfered entrance. The panel feels that the two should be more clearly related, or that the set-back may not be required.
- The panel asks for consideration of how the scheme can improve the public realm on Gray's Inn Road, not only by improving the pedestrian crossing layout but also by adding greening to its surroundings, which is currently lacking.
- The panel also encourages the design team to relocate the electricity substation, if at all possible, to open up more active Gray's Inn Road frontage.

Acton Street

- The panel is pleased that residential accommodation is being provided on site, and consider the scale and massing of the residential element are appropriate. The current designs make the residential building seem an extension of adjacent office floorplates, and it feels that a clearer distinction could be made in the façade treatment between the two adjacent uses.
- The panel feels the residential element would benefit from a slightly less open, calmer façade that responds to the interior residential uses and layouts.
- The elevation and materiality of the residential block should be examined to explore how the transition can be made from the listed Acton Street terraces to the commercial corner block. The use of different materials, colours and windows should be explored as part of this.
- The panel suggests that the layout of the three-bed flat should be re-examined, as it seems separated into two disconnected sections by the lobby.
- The panel asks whether the existing courtyard and entrance from Acton Street could be retained. This could add extra external space at ground floor level, and potentially allow a shared entrance to bicycle storage from Acton Street for both residents and office workers.
- The panel suggests that the terraces at the rear of the residential building will overlook the gardens of houses on Acton Street. This could be addressed by simplifying the building line to bring the terrace closest to neighbours forward.



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- The depth of the wall at the rear of the Acton Street building should be aligned with the party wall at the rear of the Acton Street terraces.

Sustainability

- The panel considers the work carried out on the sustainability of the proposals to be very encouraging. In particular, it is pleased that the scheme is based around the retention of a significant proportion of the existing structure, and that u-value targets are stated.
- The panel asks for further information to demonstrate why architectural aspirations and u-value targets cannot be achieved without the high proportion of façade removal proposed.
- The introduction of raised access floors is likely to account for a significant proportion of the carbon impact of the scheme's architecture. The way these are designed should therefore be carefully assessed, with consideration of how material choices and application of circular economy principles can help to reduce their impact.
- The panel asks that materials with lower embodied carbon than concrete and steel are considered for use in the new façade.

Overheating and daylight

- The panel notes that the decision to rotate the core from current position means that most of the façade is now facing north. Careful thinking is therefore needed to ensure sufficient access to daylight for office floors.
- The panel has some concerns about the overall u-value of the proposed windows. There is a risk of thermal bridging with the use of glassfibre reinforced concrete. Window frames will have to be carefully detailed to achieve the performance targets identified, so the panel asks for reassurance that this can be achieved.
- The panel also asks that the proportion of glazing is measured for each façade. The proportion of glazing in the residential section of the building is potentially too high. It is difficult to justify the inclusion of floor-to-ceiling windows on sustainability grounds, and the proportions of these windows should be re-examined.
- The panel also notes that the rooftop extension includes floor-to-ceiling windows and a high proportion of glazing, and suggests that this approach should also be re-examined.
- The panels questions whether the southern façade of the office building is achievable as proposed. The south-facing glazing poses a risk of overheating,



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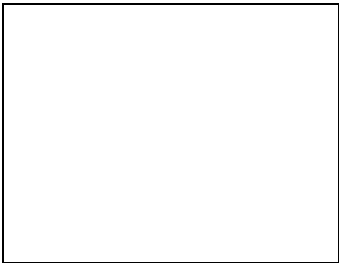
but the designs may also contravene building regulations on the spread of fire. This façade could be less perforated to address these risks.

- The panel also questions the inclusion of a skylight in the office section of the building, on the Acton Street frontage. This should be assessed to understand whether it will contribute to overheating.
- The location of the mechanical ventilation with heat recovery (MHVR) extracts requires careful thought. The shorter the duct, the more efficient the system, reducing the amount of insulation needed. The panel suggests that the current arrangements for the office building create unnecessarily long ducts, and that alternative arrangements should be explored.
- Water-based MHVR systems should also be investigated as an alternative to variable refrigerant flow. The use of refrigerant could significantly undermine the carbon benefits delivered elsewhere in the scheme.

Next steps

The panel is available to review the scheme again if required, once the applicant has had the opportunity to respond to its comments.





**Battle Bridge House,
Offices And Premises At Basement-6th Floors
300-306 Gray's Inn Road
London
WC1X 8DU**

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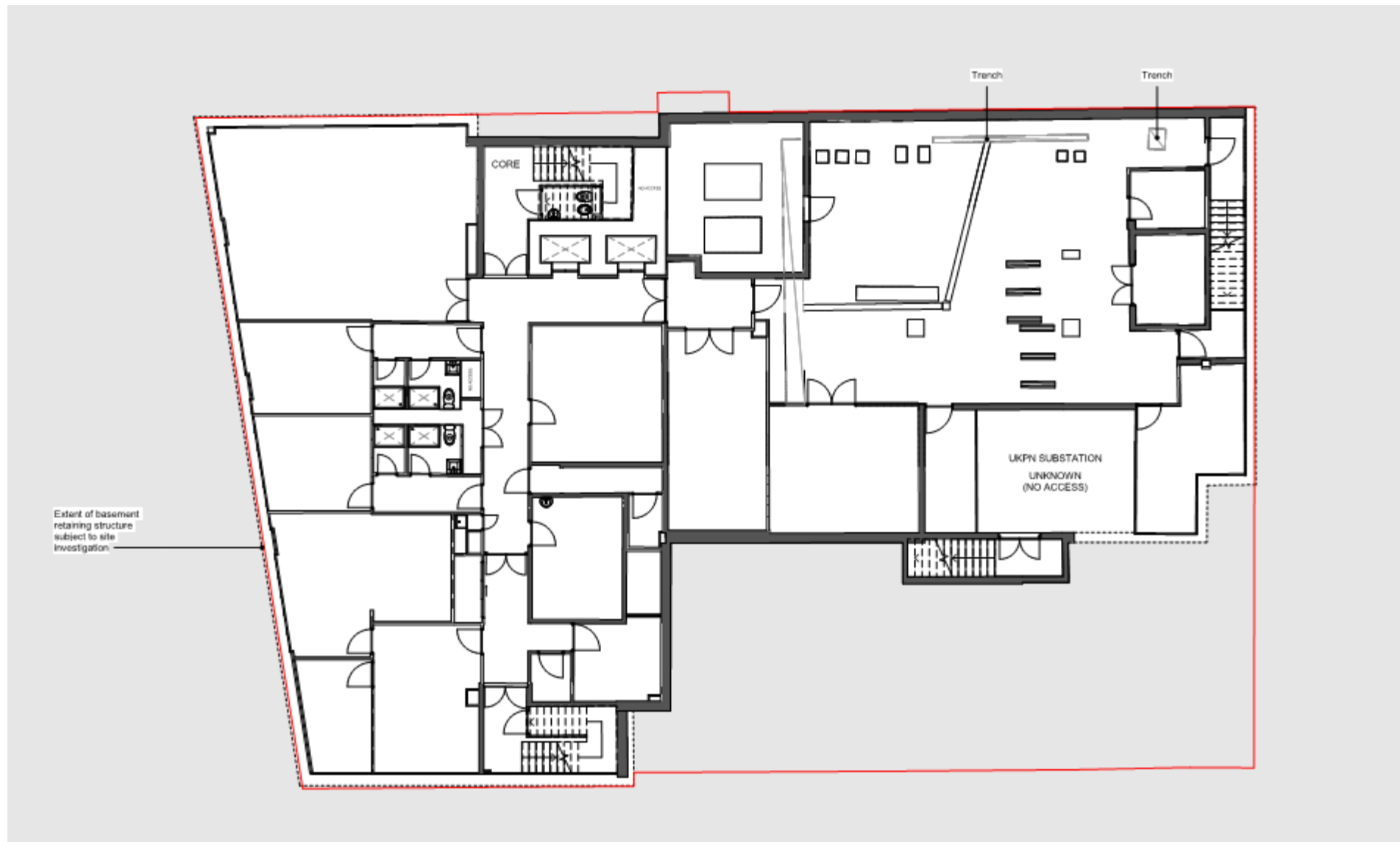
Fig.43 View from the corner of Comer Street

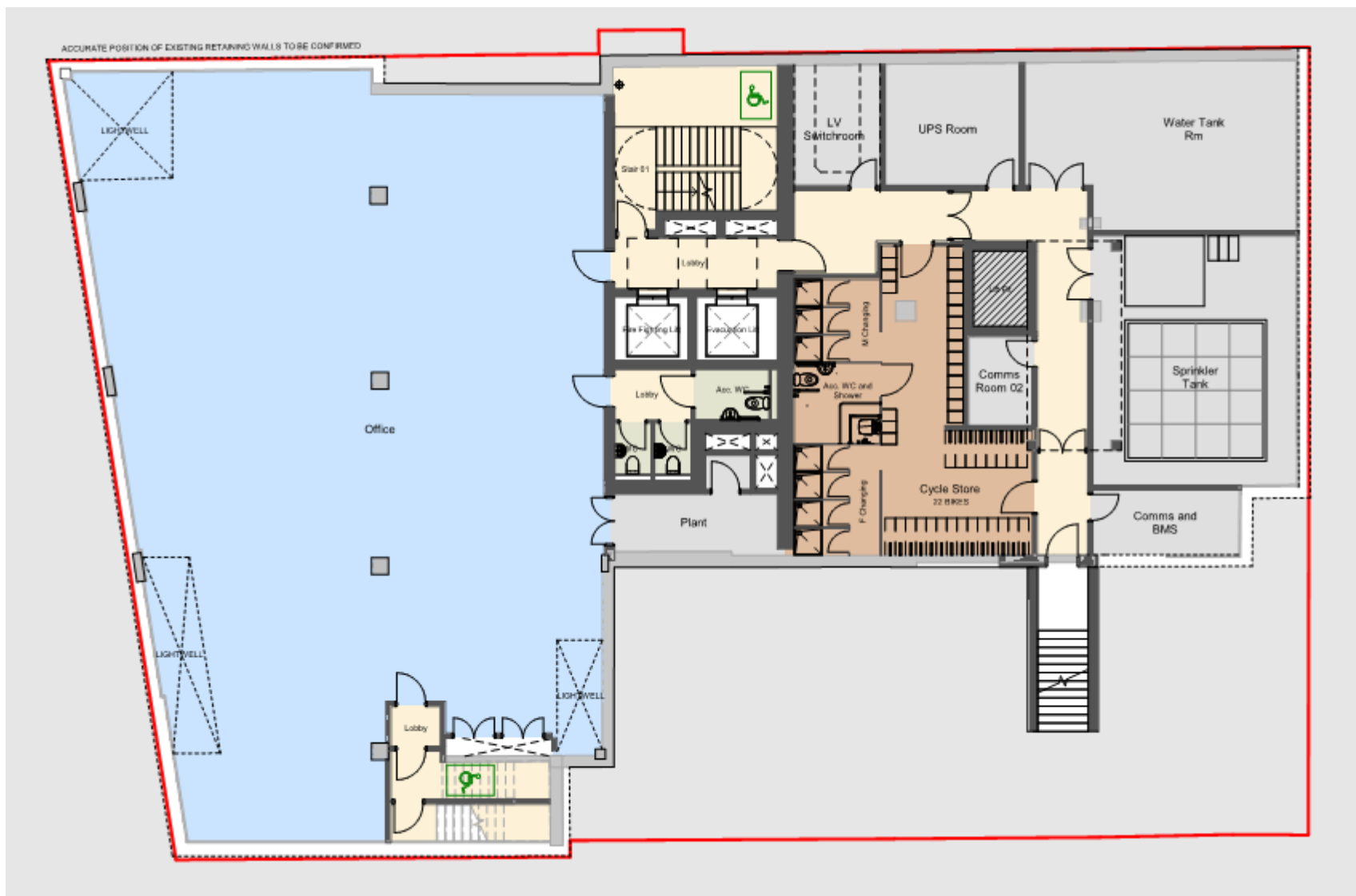


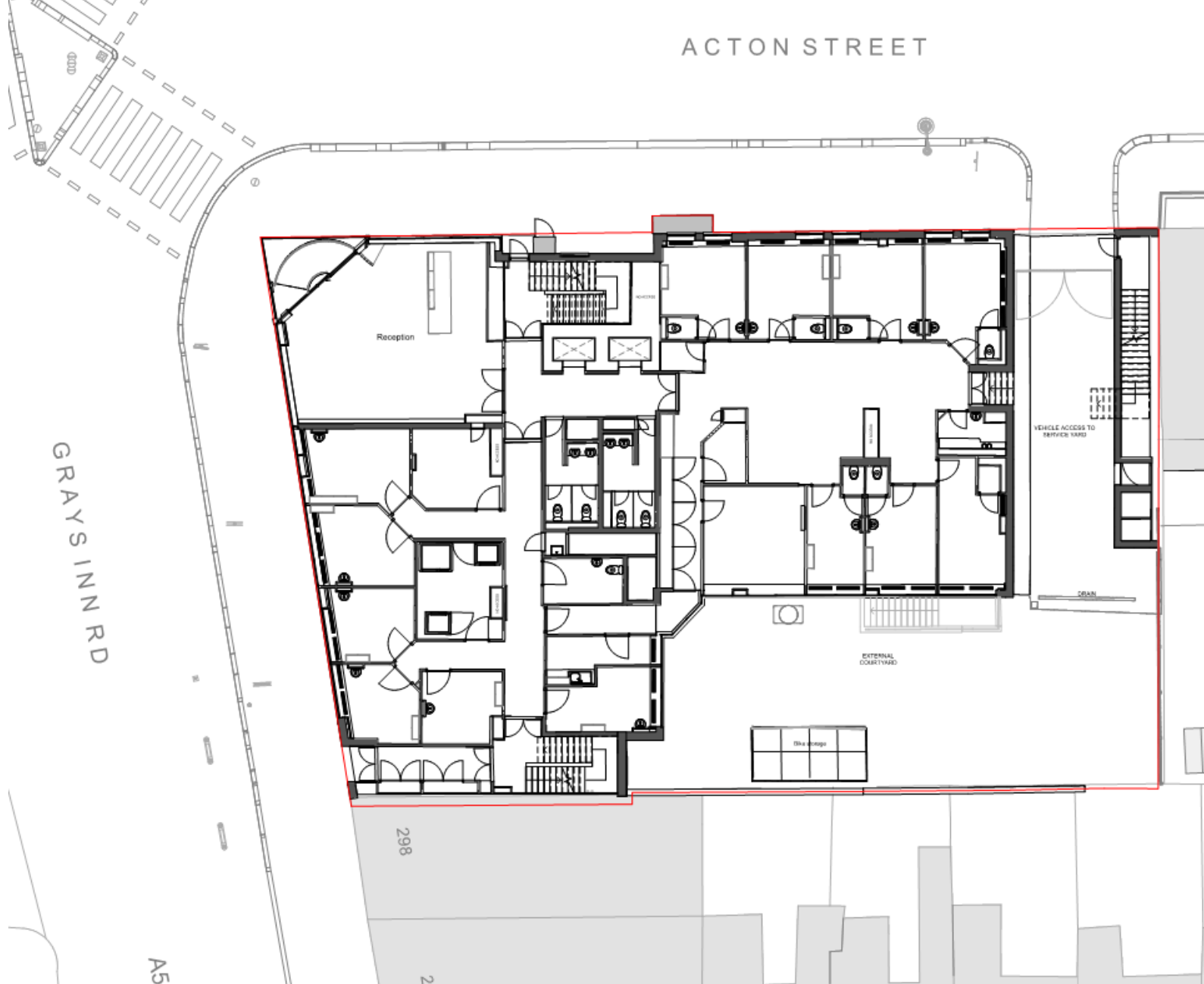
Fig.44 View from the corner of Harrison Street











ACTON STREET

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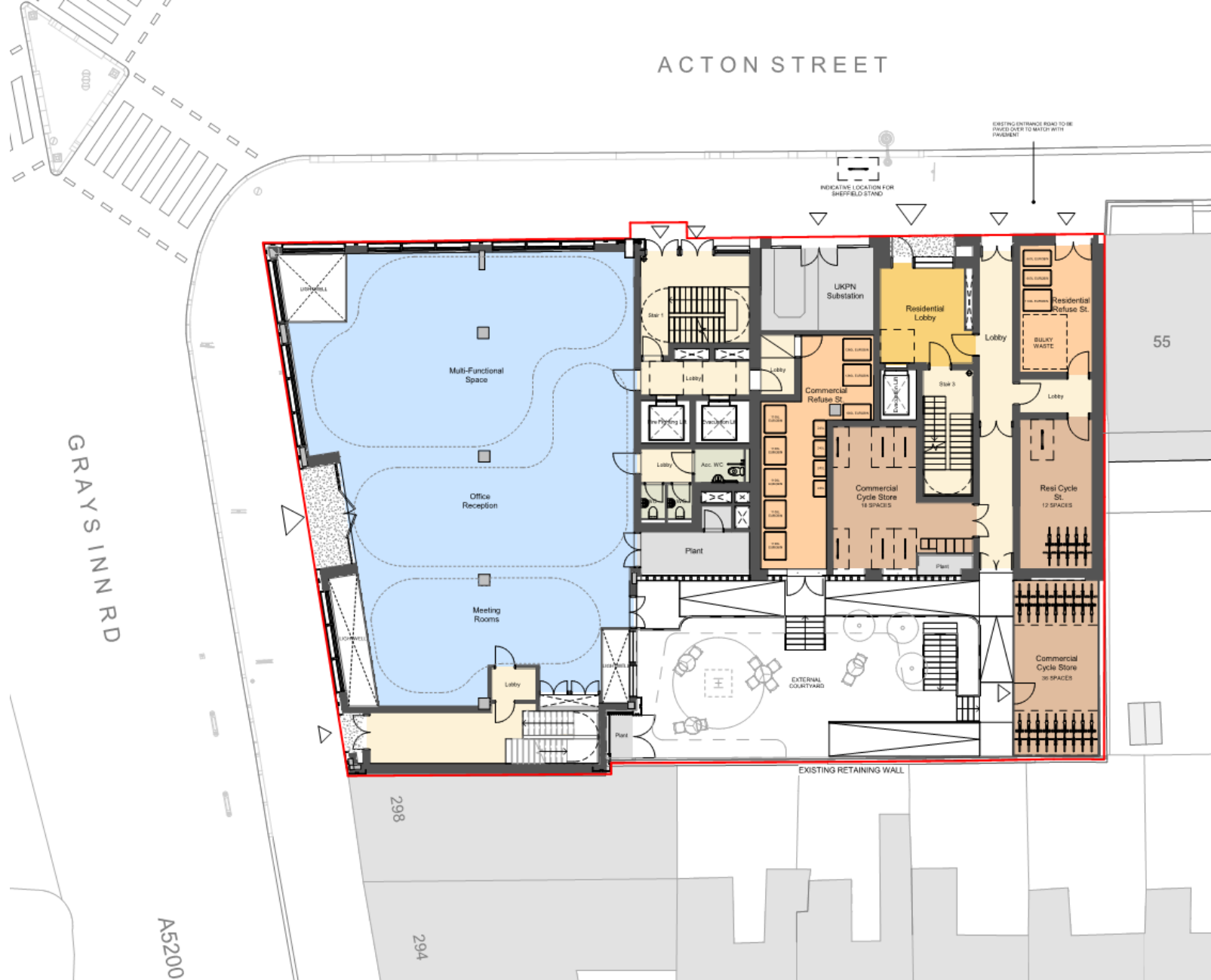
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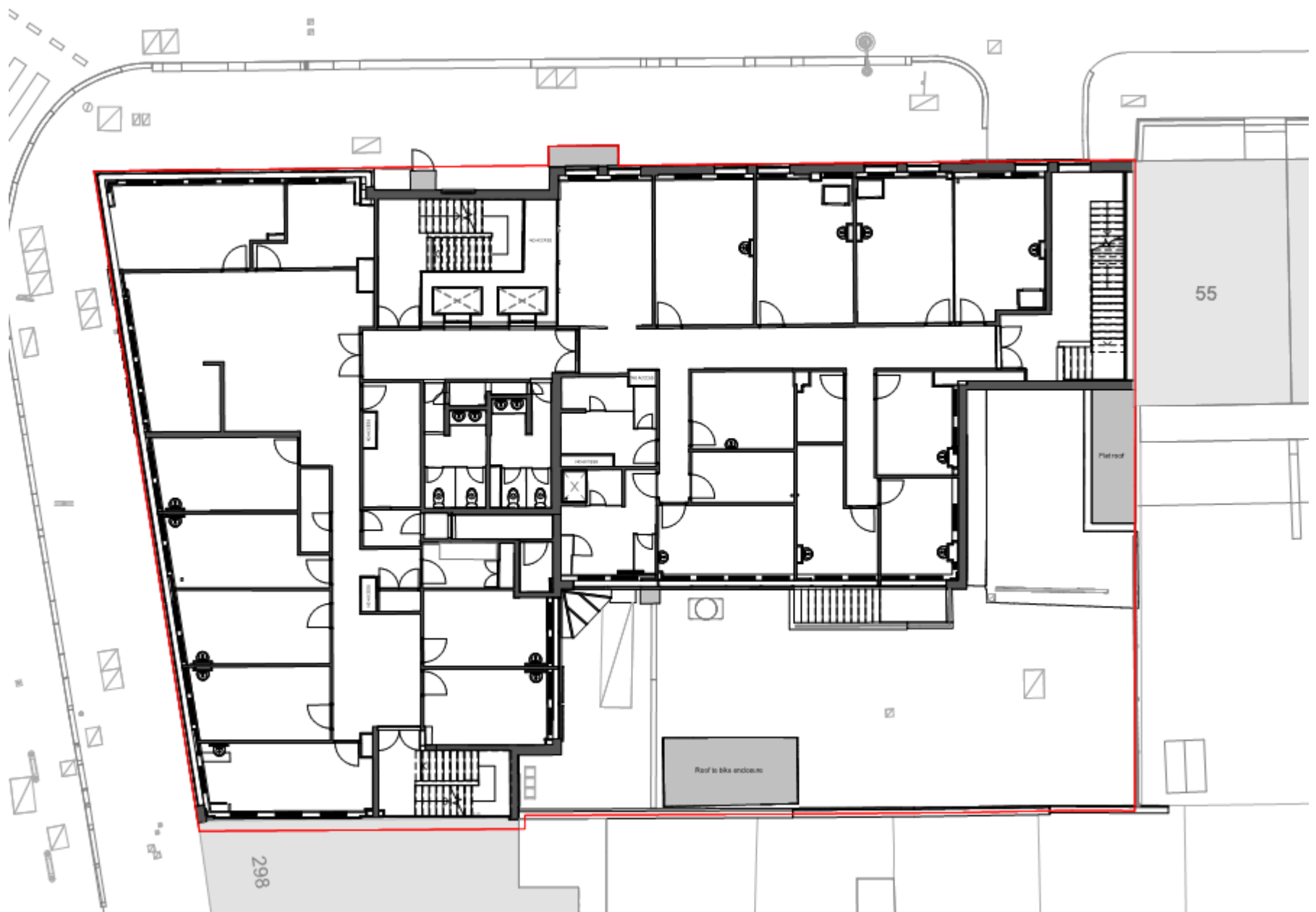
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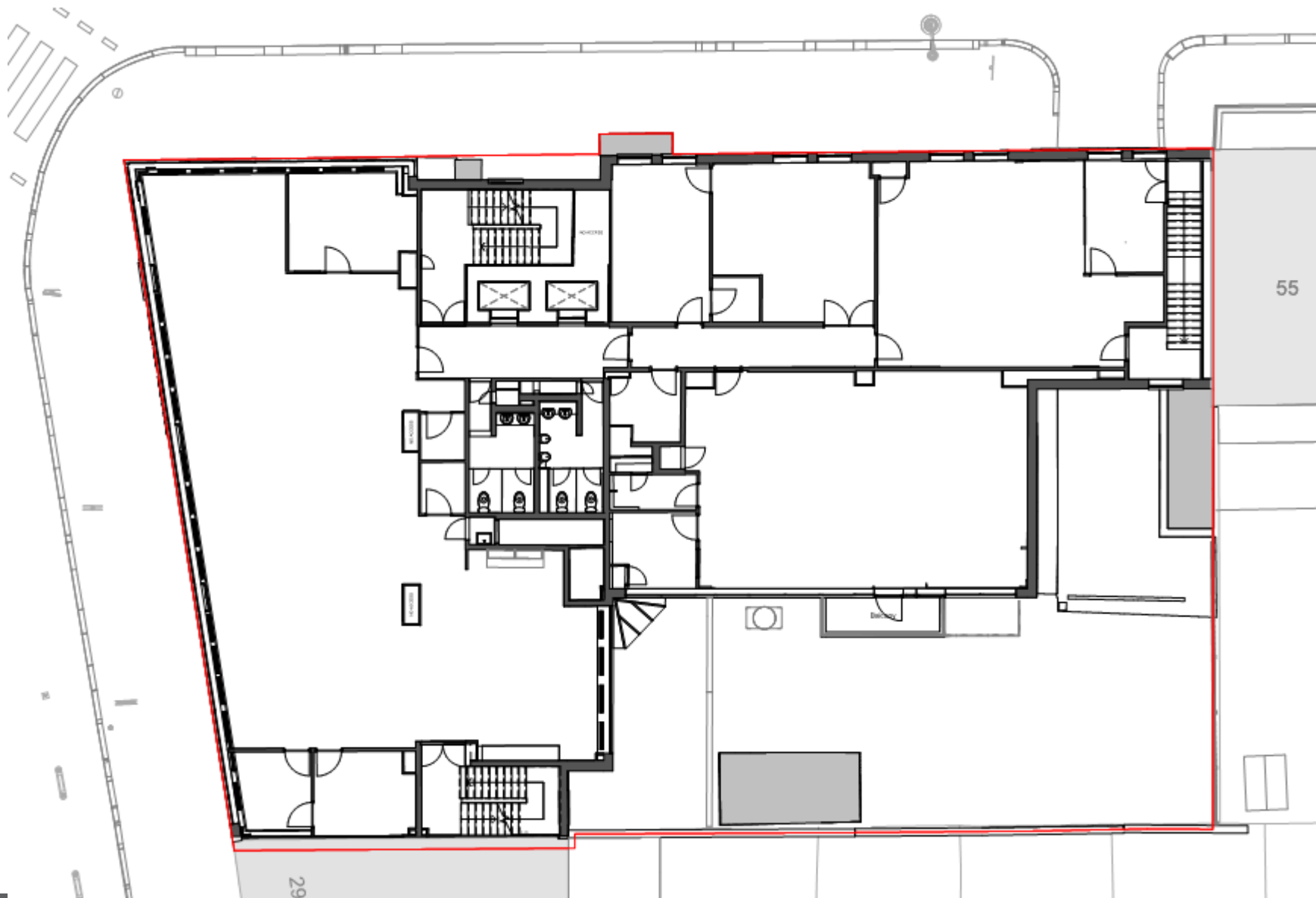
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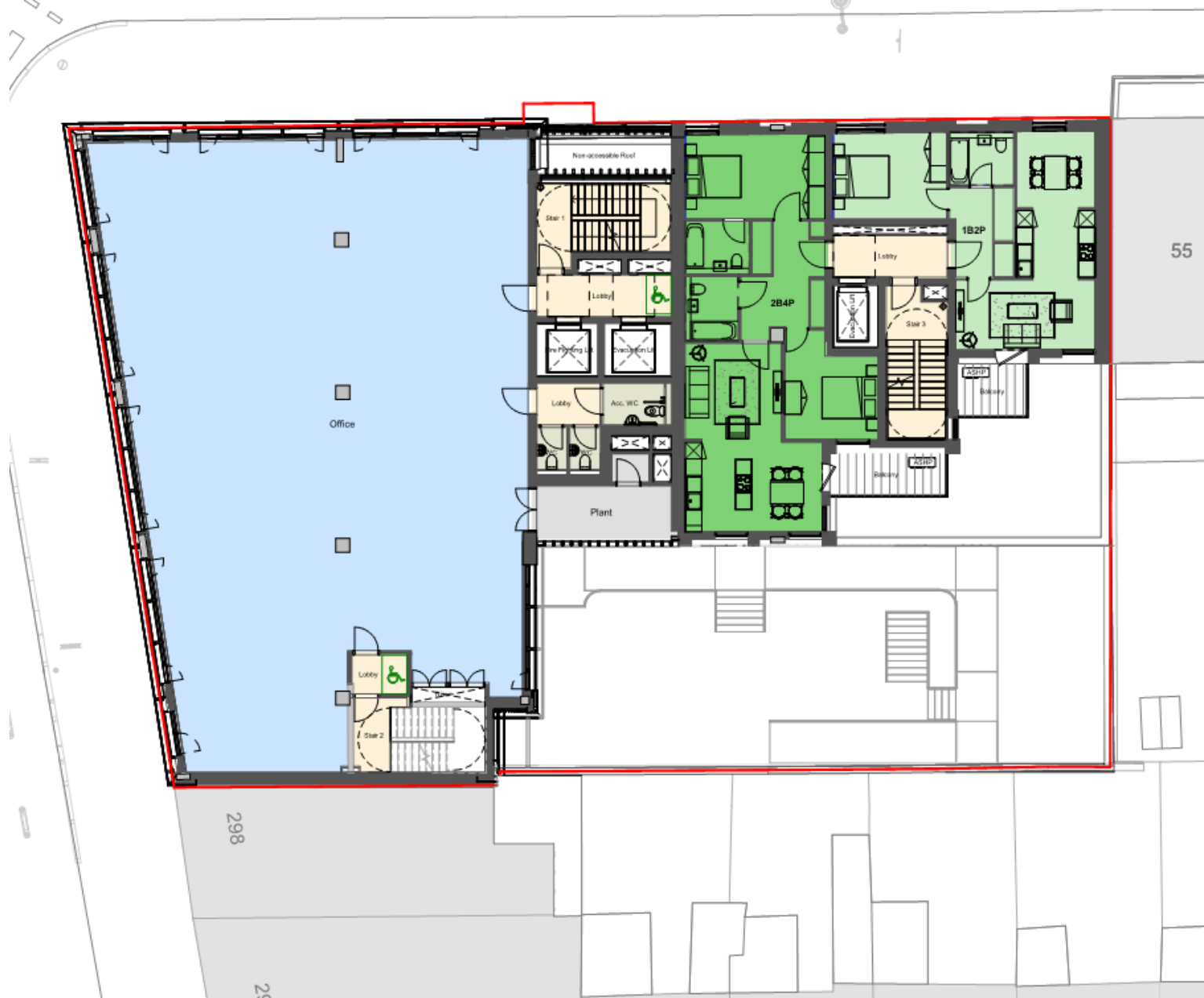
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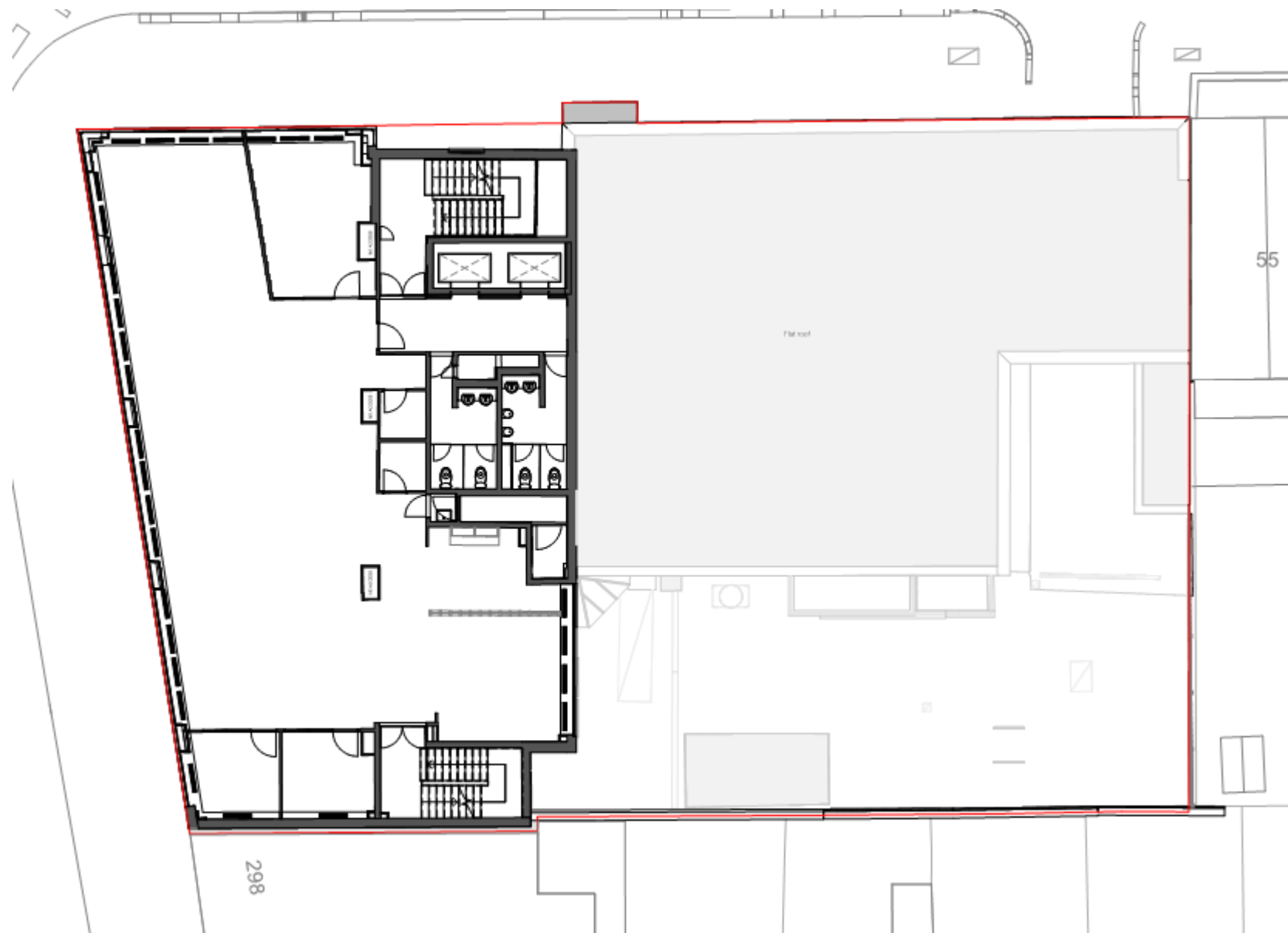




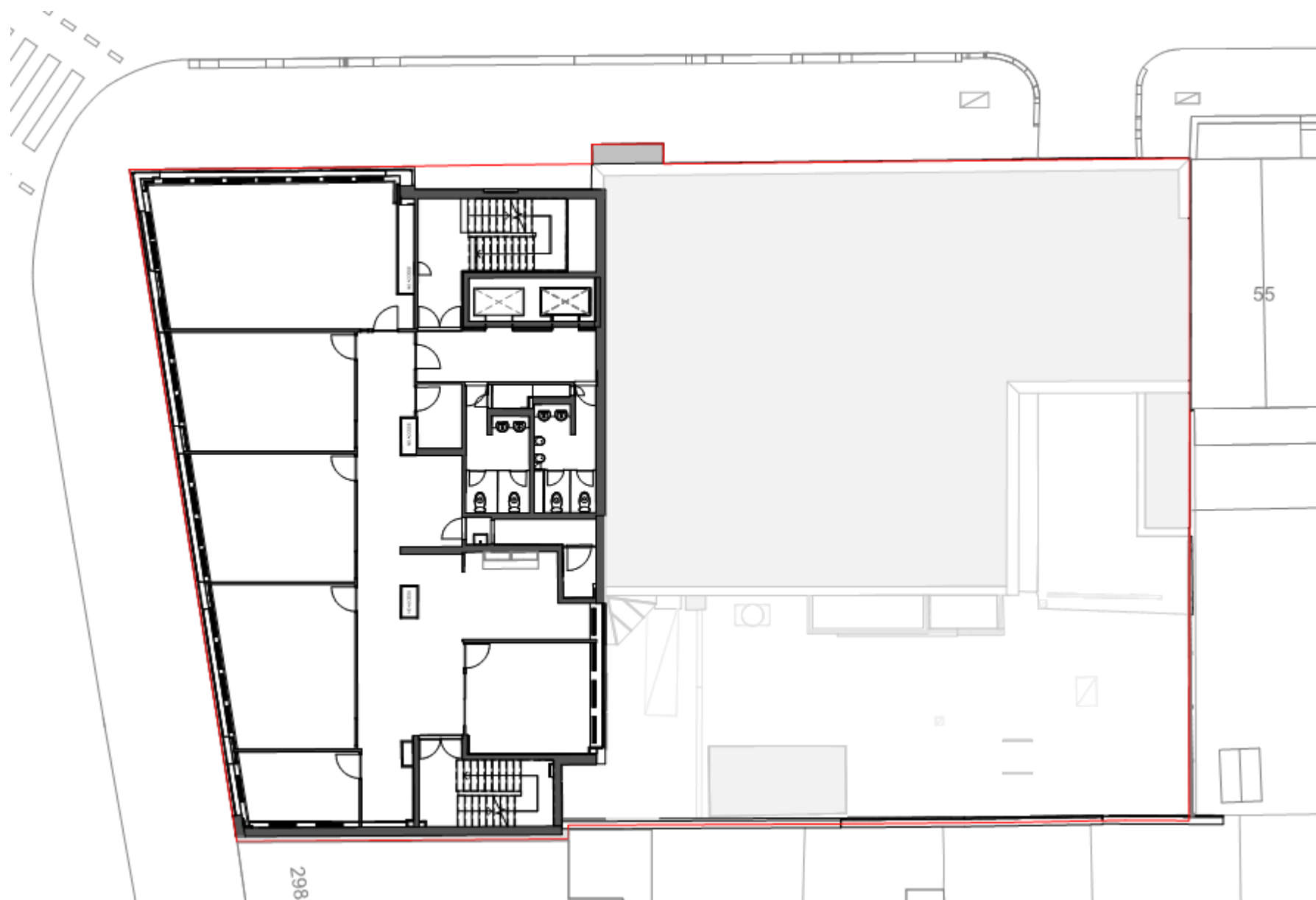


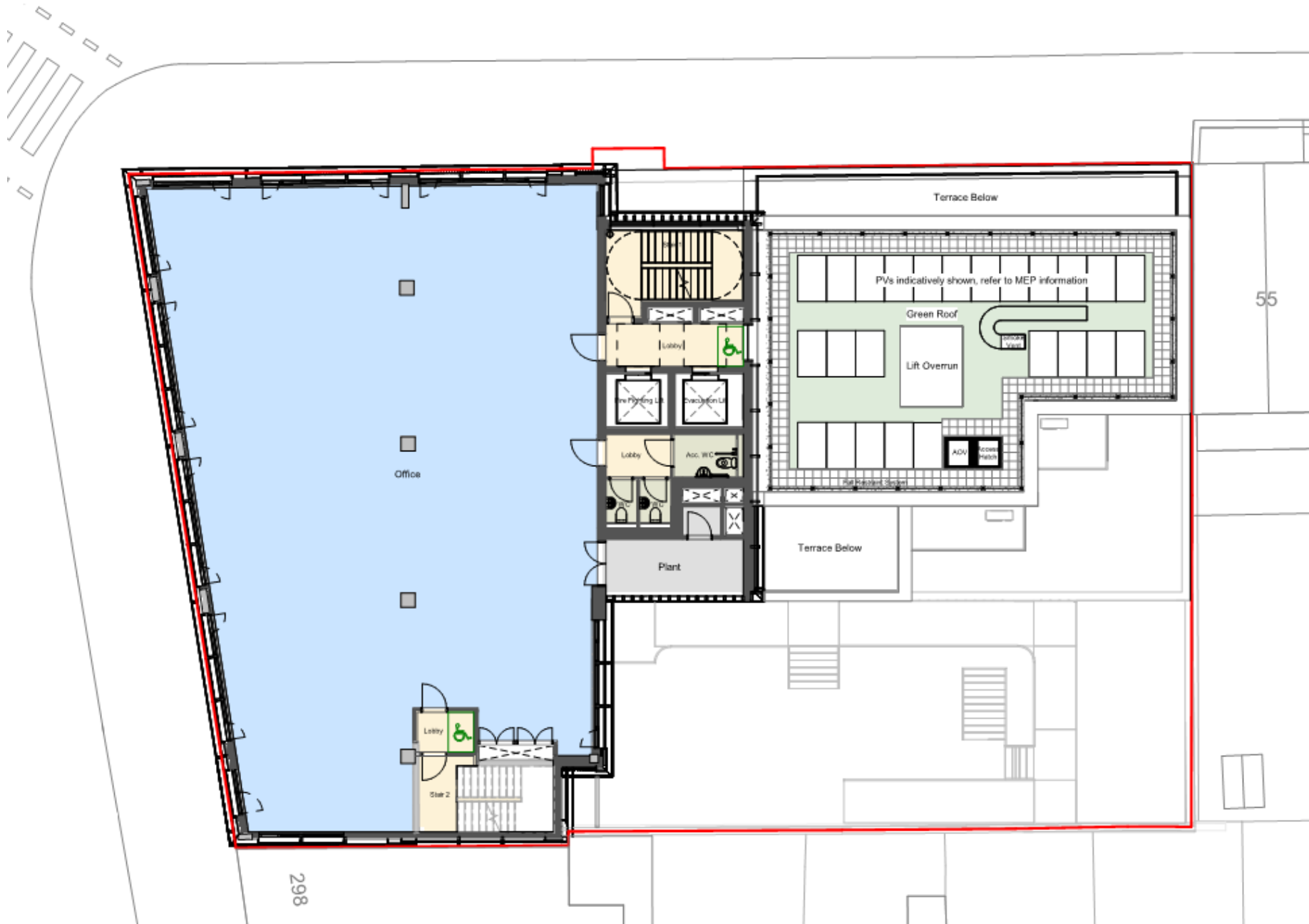


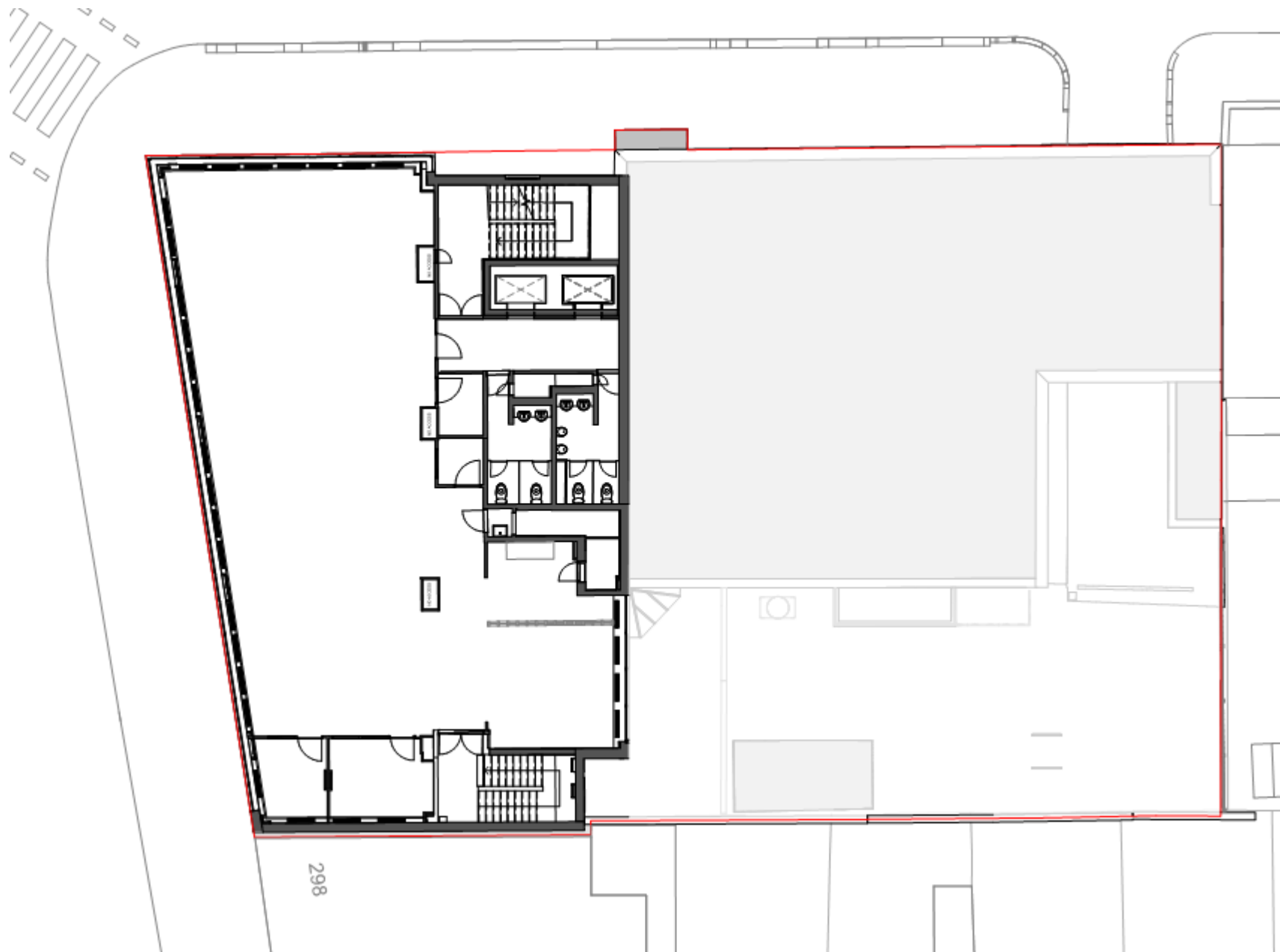


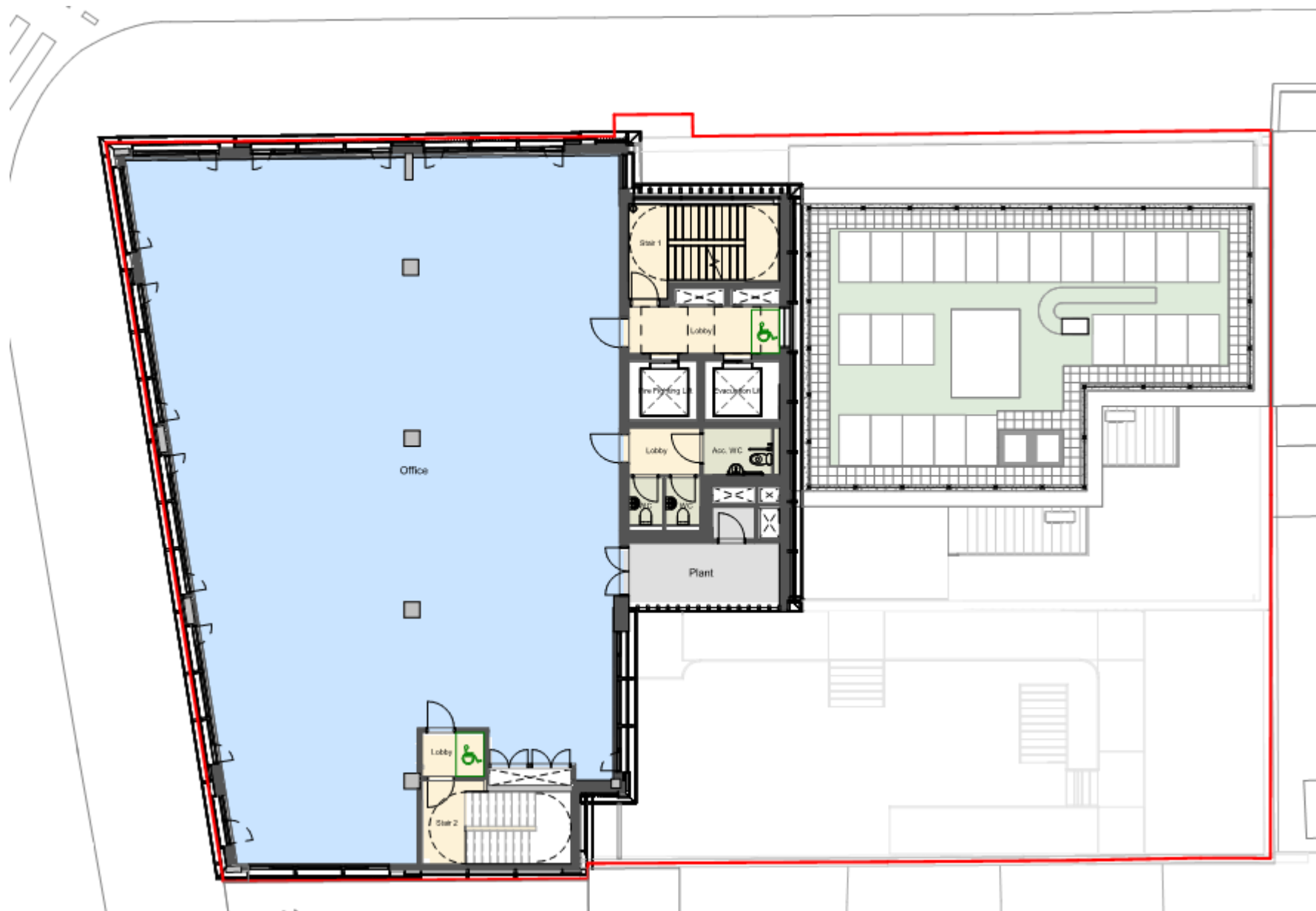


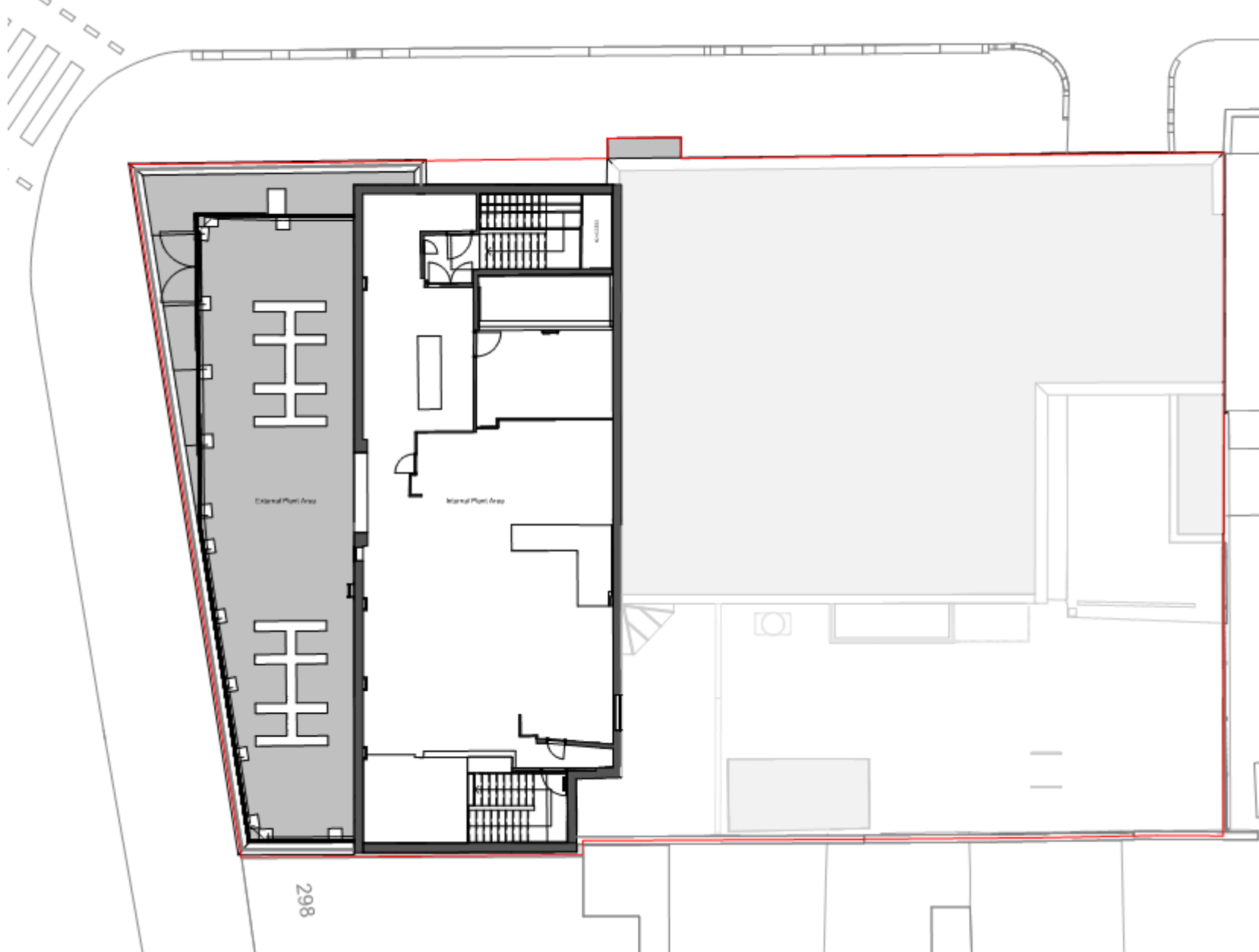


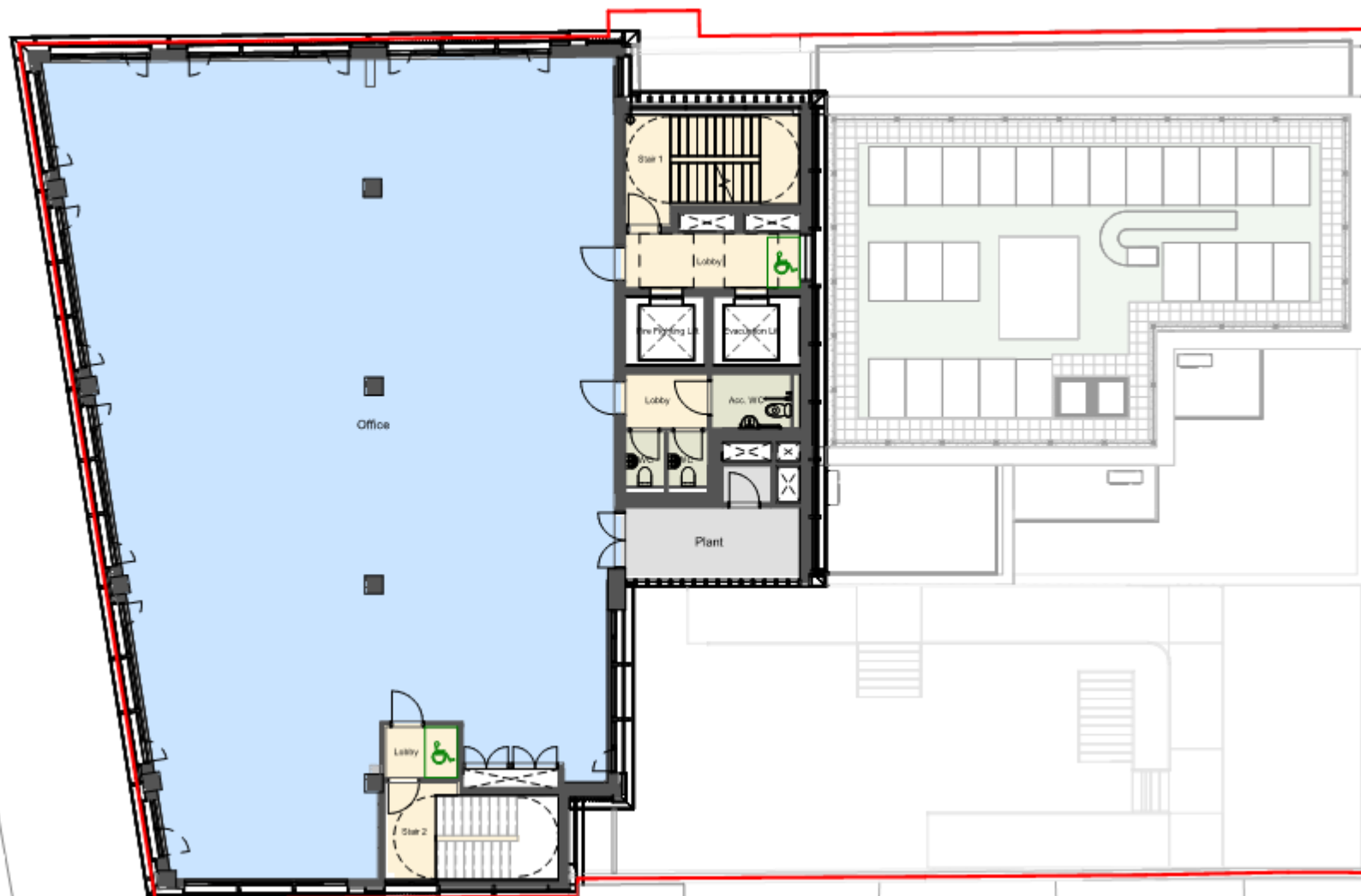




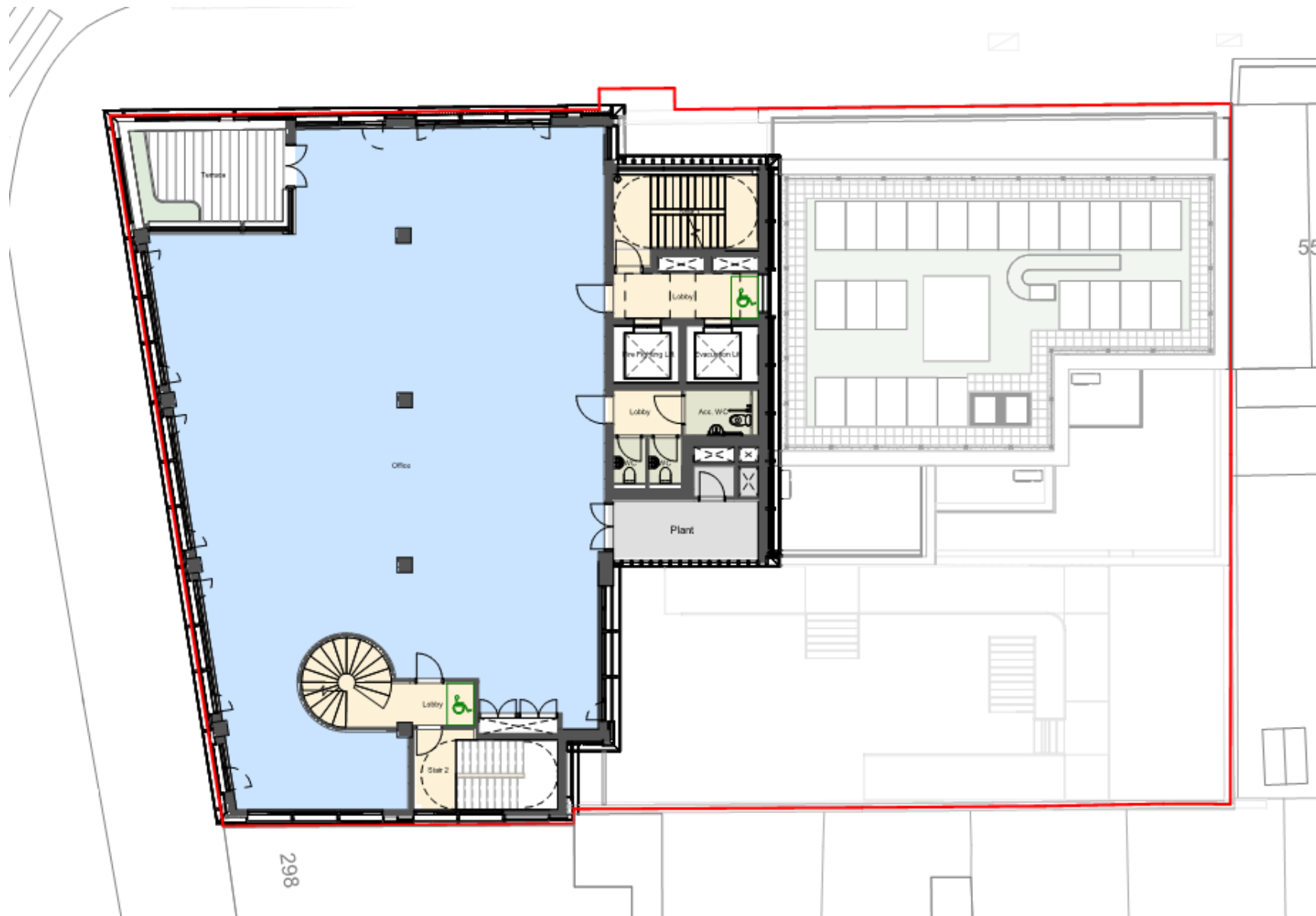


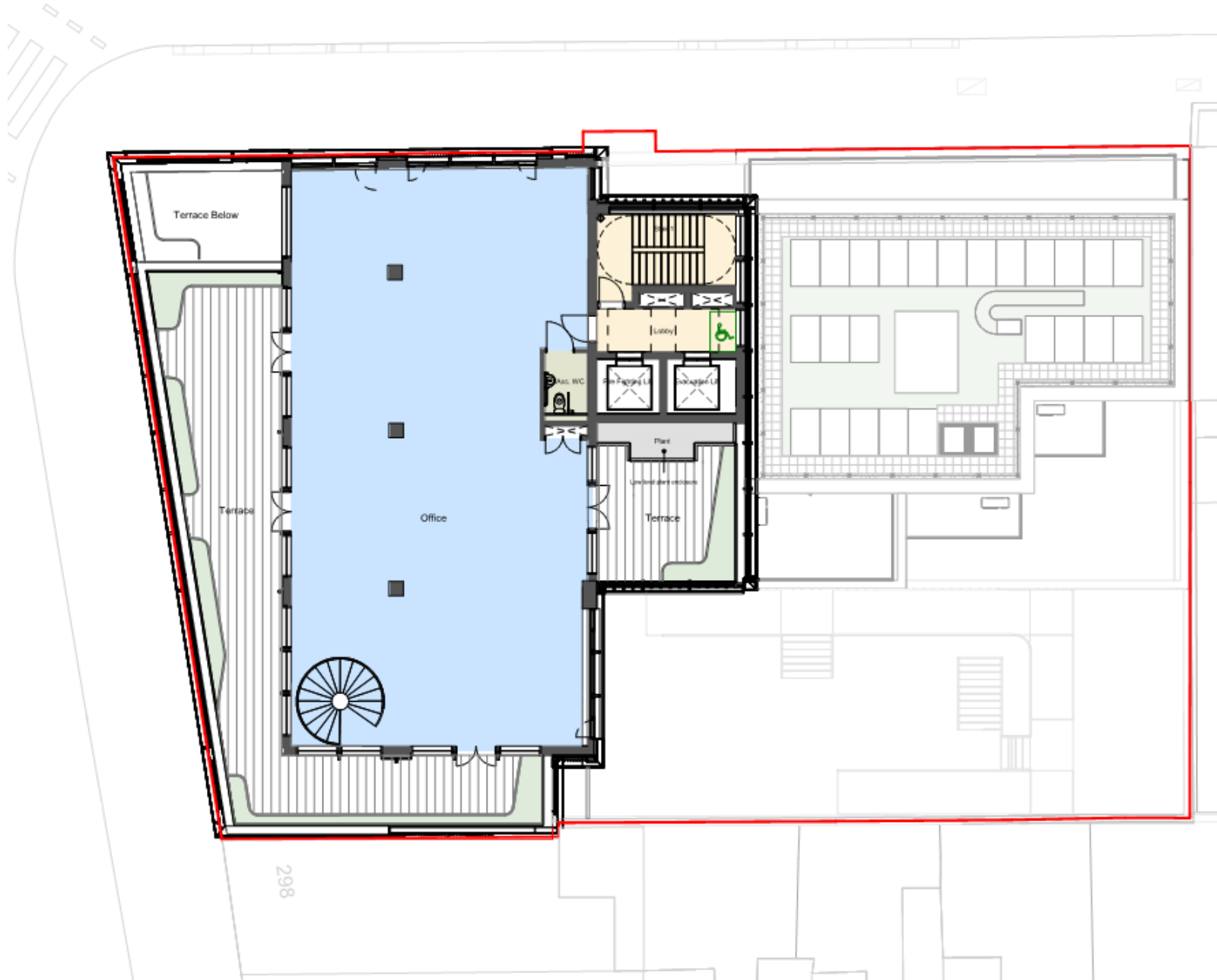


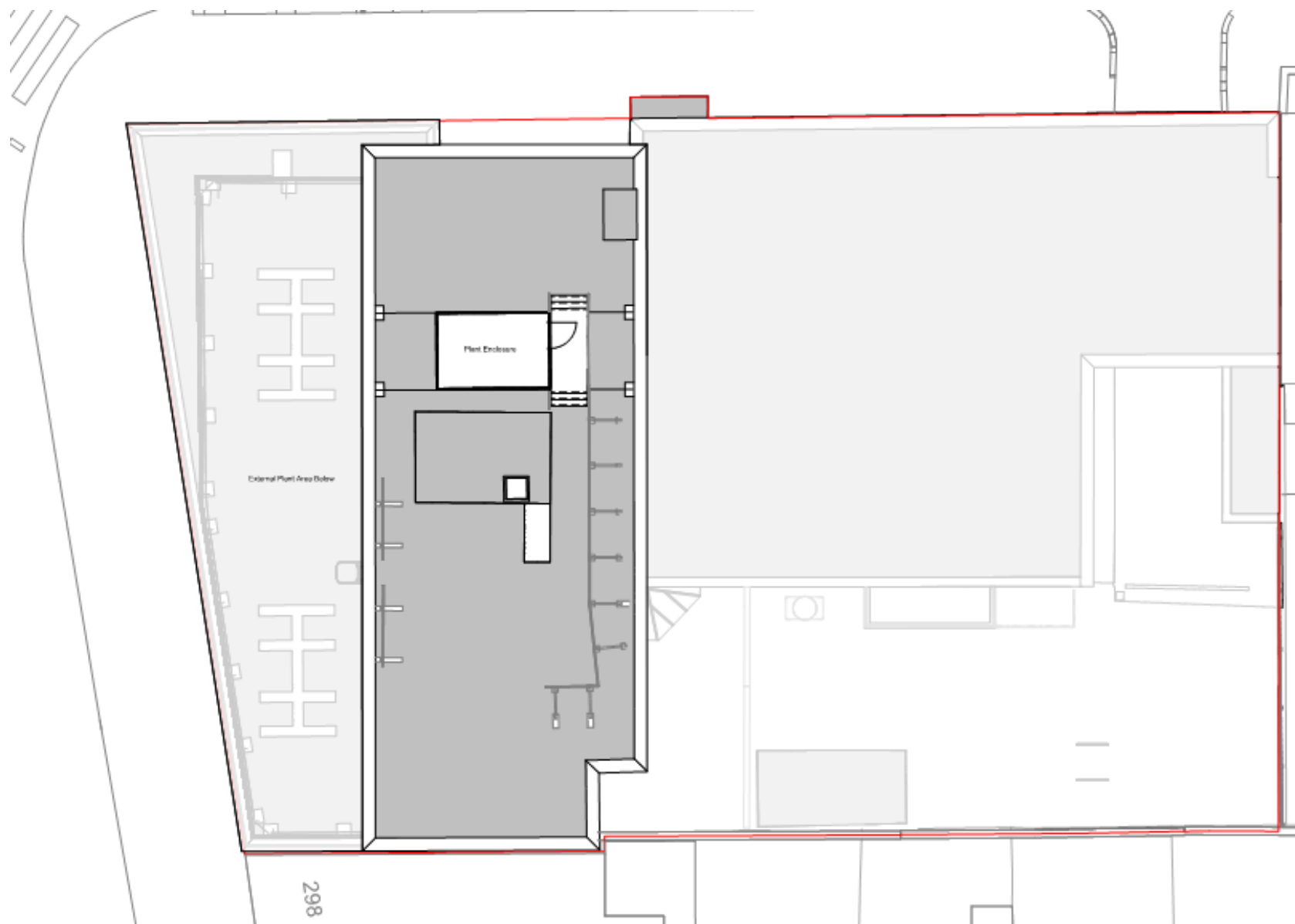


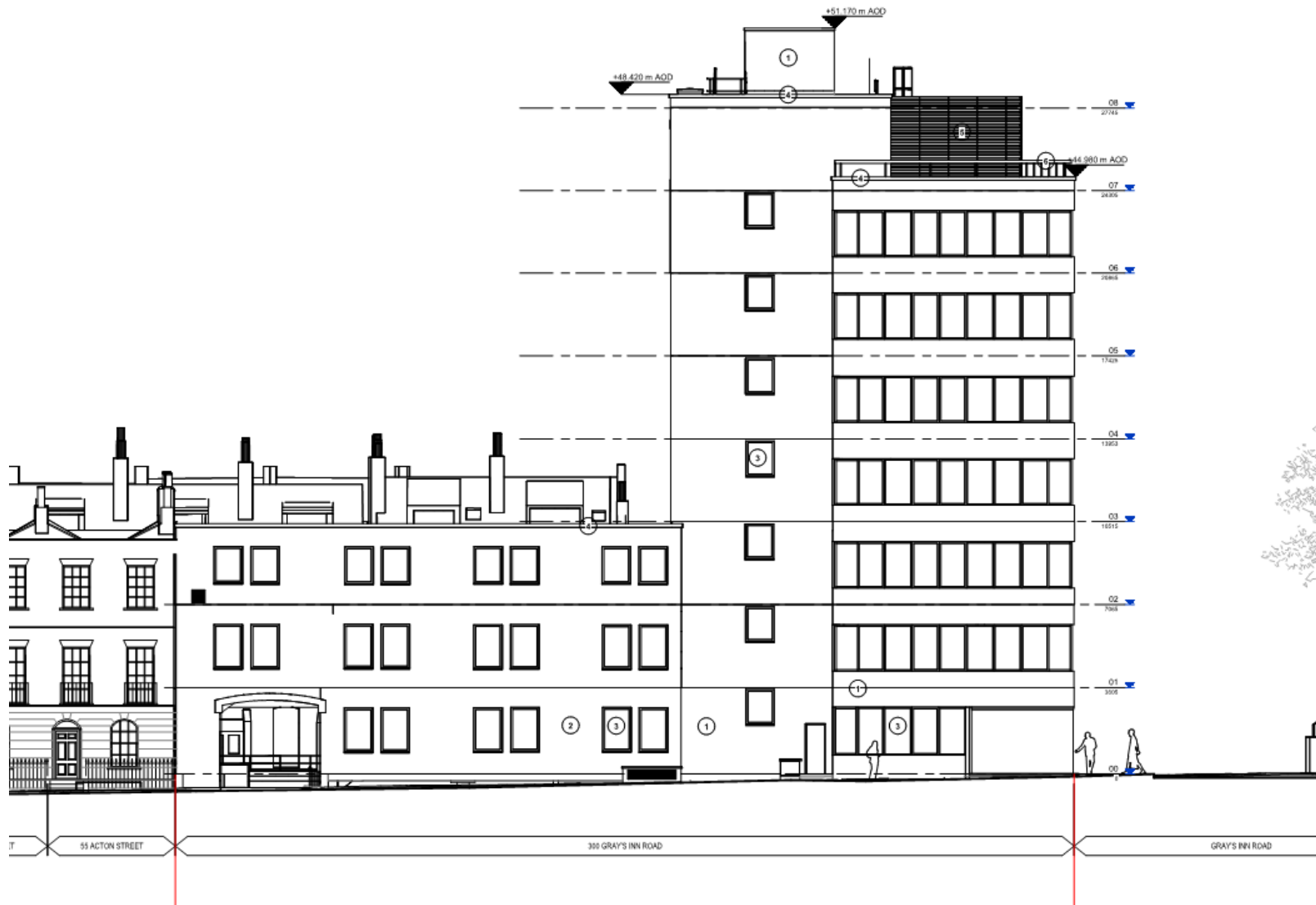


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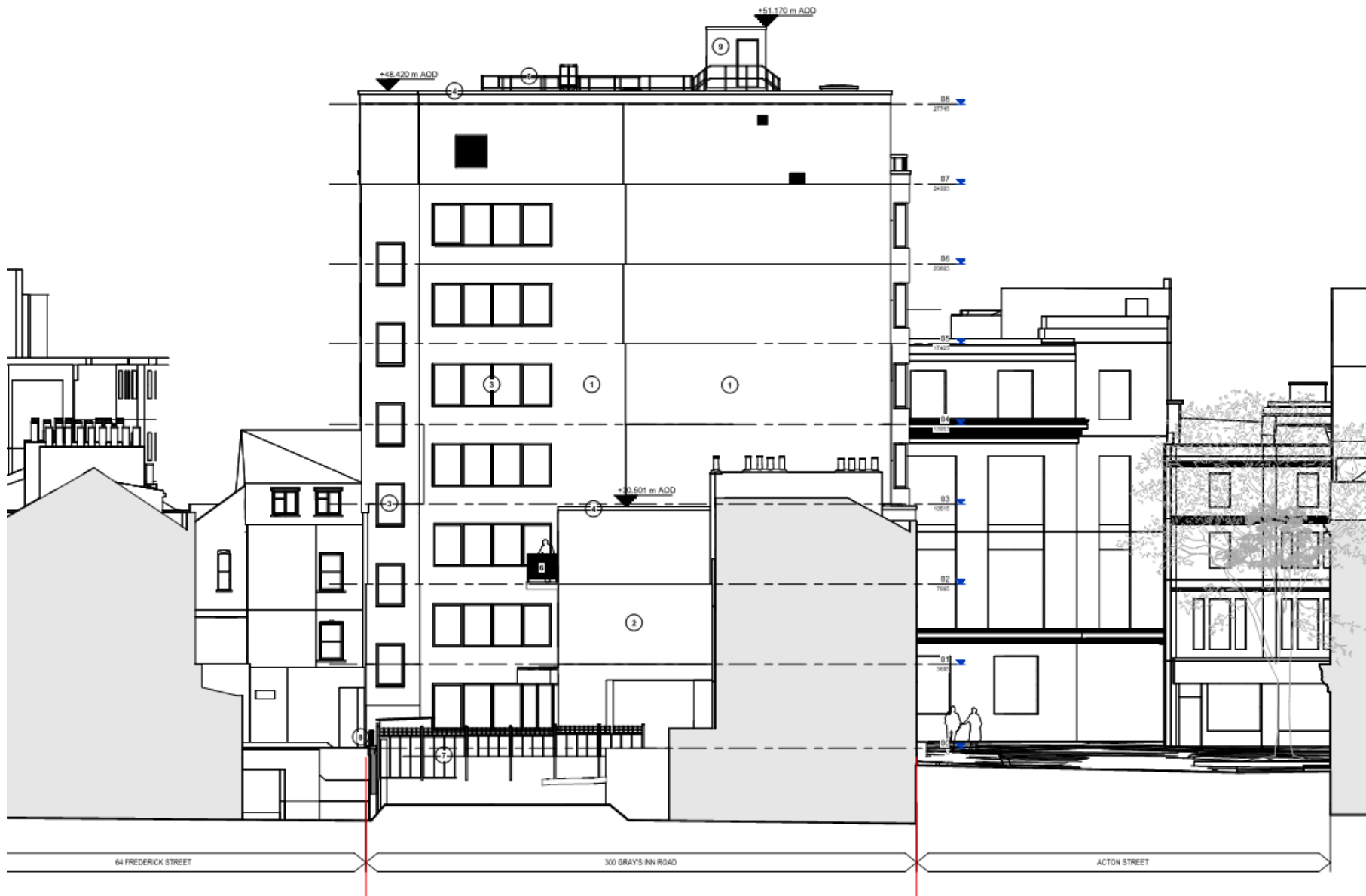




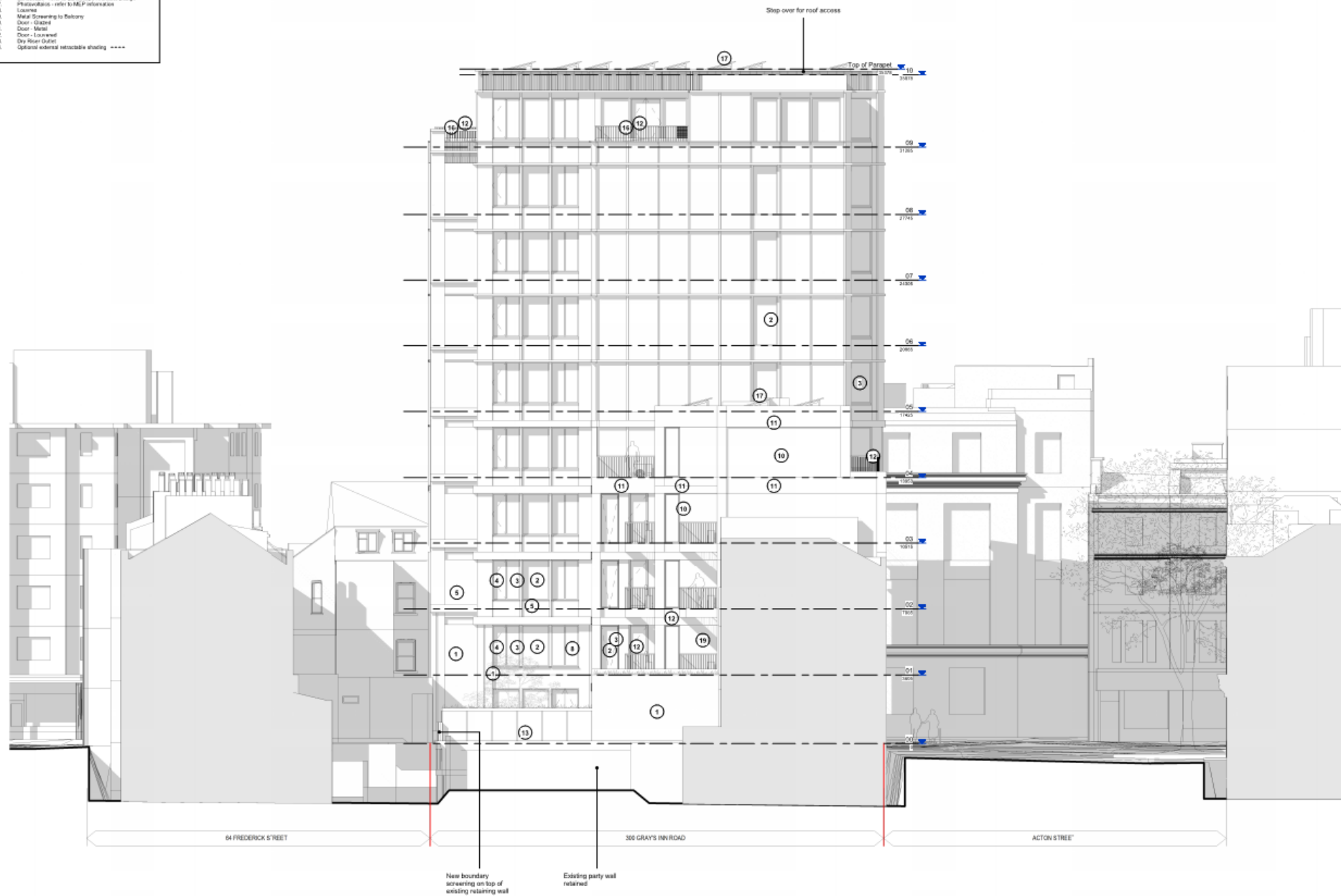


- 22. Door - Louvered
- 23. Dry River Outlet
- 24. Optional external retractable shading - - - -





14. Solid Gate Closure with Reinforced concrete
15. Air Source Heat Pump
16. Thermocouple Fluted Laminate
19. Landscaping - refer to Landscape Architect Design
17. Photovoltaics - refer to MEP information
18. Louvers
19. Metal Screening to Balcony
20. Door - Glazed
21. Door - Metal
22. Door - Louvered
23. Dry River Outfall
24. Optional external retractable shading ----





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Serial retractable shading *****

