

70 Gray's Inn Road
London,
WC1X 8NH

Energy Statement
prepared on behalf of University of Lincoln

January 2020

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1. Introduction

This Energy Statement has been prepared by Cushman and Wakefield on behalf of University of Lincoln in support of the submission of a planning application for the change of use from Class B1(a) to Class B1(a)/D1 at 70 Gray's Inn Road, London, WC1X 8NH at (hereby referred to as the application site).

2. Policy

In this section, we set out the key planning policies which relate to sustainability and are relevant to this planning application.

Development proposals for the site are assessed against the statutory development plans comprising the Camden Local Plan 2017 and the London Plan 2016.

The Revised National Planning Policy Framework (NPPF) (2019) and the draft London Plan is also material considerations in the determination of planning applications.

2.1. Camden Local Plan (2017)

Policy CC1 states the Council will require all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation. We will:

- promote zero carbon development and require all development to reduce carbon dioxide emissions through following the steps in the energy hierarchy;
- require all major development to demonstrate how London Plan targets for carbon dioxide emissions have been met;
- ensure that the location of development and mix of land uses minimise the need to travel by car and help to support decentralised energy networks;
- support and encourage sensitive energy efficiency improvements to existing buildings;
- require all proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building; and
- expect all developments to optimise resource efficiency. For decentralised energy networks, we will promote decentralised energy by:
 - working with local organisations and developers to implement decentralised energy networks in the parts of Camden most likely to support them;
 - protecting existing decentralised energy networks (e.g. at Gower Street, Bloomsbury, King's Cross, Gospel Oak and Somers Town) and safeguarding potential network routes; and requiring 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.

The construction process and new materials employed in developing buildings are major consumers of resources and can produce large quantities of waste and carbon emissions. The possibility of sensitively altering or retrofitting buildings should always be strongly considered before demolition is proposed.

The council follow an energy hierarchy which has been summarised below;

Be lean

Proposals should demonstrate how passive design measures including the development orientation, form, mass, and window sizes and positions have been taken into consideration to reduce energy demand, demonstrating that the minimum energy efficiency requirements required under building regulations will be met and where possible exceeded. This is in line with stage one of the energy hierarchy 'Be lean'.

Be clean

The second stage of the energy hierarchy 'Be clean' should demonstrate how the development will supply energy efficiently through decentralised energy.

Be green

The Council will expect developments of five or more dwellings and/or more than 500 sqm of any gross internal floorspace to achieve a 20% reduction in carbon dioxide emissions from on-site renewable energy generation (which can include sources of site related decentralised renewable energy), unless it can be demonstrated that such provision is not feasible. This is in line with stage three of the energy hierarchy 'Be green'. The 20% reduction should be calculated from the regulated CO2 emissions of the development after all proposed energy efficiency measures and any CO2 reduction from non-renewable decentralised energy (e.g. CHP) have been incorporated.

2.2. London Plan (2016)

Policy 5.1 states the Mayor seeks to achieve an overall reduction in London's carbon dioxide emissions of 60 per cent (below 1990 levels) by 2025. It is expected that the GLA Group, London boroughs and other organisations will contribute to meeting this strategic reduction target, and the GLA will monitor progress towards its achievement annually.

Policy 5.3 states the highest standards of sustainable design and construction should be achieved in London to improve the environmental performance of new developments and to adapt to the effects of climate change over their lifetime.

Policy 5.4 states the environmental impact of existing urban areas should be reduced through policies and programmes that bring existing buildings up to the Mayor's standards on sustainable design and construction. In particular, programmes should reduce carbon dioxide emissions, improve the efficiency of resource use (such as water) and minimise the generation of pollution and waste from existing building stock. Within LDFs boroughs should develop policies and proposals regarding the sustainable retrofitting of existing buildings. In particular they should identify opportunities for reducing carbon dioxide emissions from the existing building stock by identifying potential synergies between new developments and existing buildings through the retrofitting of energy efficiency measures, decentralised energy and renewable energy opportunities.

2.3. National Planning Policy Framework (2019)

Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right

time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy

3. Assessment

The client is seeking the partial change of use from B1a office to part Class B1(a) and part D1 at 70 Gray's Inn Road, to allow a London Hub for its students. The proposal only relates to the lower four floors (whole of first and second floors and parts of the ground and lower ground floors) only. 600sqm of the 2,323sqm will be used for lecturing/seminar (flexible D1/B1a use) space whilst the remaining building will be used for flexible B1a use such as hub space for both students and SME's and collaborative working stations.

The space will only be for students and will provide co-working/business space. The space is intended to allow students to engage with potential employers, facilitate coworking space and help foster enterprise in its graduates and therefore provide:

- A base for students who are studying subjects such as business, journalism and fashion and who need the experience of working in London to develop their careers and portfolios while studying; and
- A home for business innovation for entrepreneurs from the local area - the best in high-tech, affordable co-worker office space with University business experts on hand to provide support and mentoring

The development will provide 30 cycle spaces and will be a car-free development.

Local policy states an energy statement needs to be submitted where any development involving 5 or more residential units or 500 sqm or more of any additional floorspace including change of use is proposed. The proposed development is seeking a change of use which involves over 500 sqm of floorspace. Whilst the application triggers the requirement for a comprehensive energy statement, the proposed development and the relationship of the applicant with the building limits the ability to submit the required details and initiatives outlined in local policy.

The applicant, University of Lincoln, is seeking occupation of four floors only for an agreed period of time, they, under their agreement, have the right to occupy the building but have no authority to make material changes to the building itself. This includes installation of additional plant, PV panels and any changes to the construction of the walls or windows. Therefore, whilst the applicant understands the requirement, they are legally unable to, given their tenancy.

Whilst the applicant is unable to undertake any alterations to the building to improve efficiencies, the landlord has recently undertaken a number of changes to the building to improve overall efficiencies. The following energy efficiency measures

- Replacement of the existing fluorescent lighting with new high efficiency LED lighting
- New energy efficient Dali lighting controls with Day light dimming control
- Replacement on the existing fan coil units with new energy efficient EC Motor fan coil units
- Replacement of the existing electrical distribution boards with new distribution boards incorporating check metering in accordance with the latest Part L requirements
- Replacement of the existing air-cooled chiller with new and more energy efficient air cooled chiller with better seasonal energy efficiency ratio.

The design of the existing central Building Services Installation has not been changed as part of the landlord work nor is it proposing to change as part of this application. Therefore, whilst the works undertaken by the landlord follow the 'Be Lean' requirement the "Be Clean" and "Be Green" requirements are outside the scope of the current minor refurbishment works undertaken by the landlord and are outside the applicants legal relationship with the building.

To conclude whilst the applicant understands there is policy which dictates changes need to be made in order to improve energy efficiencies, they are unable to provide such changes given their relationship with the building. Other changes have been made to the building to improve energy efficiency which have been undertaken by the landlord, however the Energy Hierarchy is not fully applicable for this change of use application as there is no extensions proposed to the existing building nor any changes to the fundamental makeup of the building.