

PLANNING, DESIGN & ACCESS TECHNICAL NOTE

In Respect Of:

FULL PLANNING APPLICATION

**CHANGE OF USE OF THIRD-FIFTH FLOORS
OFFICE TO FLEXIBLE OFFICE / EDUCATIONAL USE**

With Regard To:

**70 GRAY'S INN ROAD
LONDON
WC1X 8NH**

On Behalf Of:

EURO GRAYS INN INC

**CREATE Ref: JL/BS/450
Date: NOVEMBER 2023**

1.0 Introduction

This supporting Planning, Design and Access Technical Note (“Note”) has been prepared by CREATE Planning, on behalf of Euro Grays Inn Inc. (“Applicant”), in support of the submission of a planning application for the change of use of the third to five floor from Class E to Class E and / or Class F1 at 70 Gray’s Inn Road, London, WC1X 8NH (“Site”).

This supporting planning statement contains six sections:

- Section 1 provides an introduction and outlines the list of supporting documents;
- Section 2 provides a summary of the site, the surrounding area and its relevant planning history;
- Section 3 describes the proposal;
- Section 4 reviews the relevant national and local planning policy;
- Section 5 assesses the key planning considerations; and
- Section 6 provides a conclusion to the Statement.

The application is supported by a full set of plans and the following documents:

- Marketing Update Prepared by Cushman and Wakefield

The table below lists the drawings (prepared by CREATE Design), which are submitted as part of this Application:

- 743-CDA-ZZ-00-DR-A-00-0100-REV 01-SITE LOCATION PLAN
- 743-CDA-ZZ-00-DR-A-01-0100-REV 01-EXISTING GROUND FLOOR PLAN
- 743-CDA-ZZ-00-DR-A-05-0100-REV 01-PROPOSED GROUND FLOOR PLAN
- 743-CDA-ZZ-01-DR-A-01-010L-REV 01-EXISTING LOWER GROUND FLOOR PLAN
- 743-CDA-ZZ-01-DR-A-01-0101-REV 01-EXISTING FIRST FLOOR PLAN
- 743-CDA-ZZ-01-DR-A-05-010L-REV 01-PROPOSED LOWER GROUND FLOOR PLAN
- 743-CDA-ZZ-01-DR-A-05-0101-REV 01-PROPOSED FIRST FLOOR PLAN
- 743-CDA-ZZ-02-DR-A-01-0102-REV 01-EXISTING SECOND FLOOR PLAN
- 743-CDA-ZZ-02-DR-A-05-0102-REV 01-PROPOSED SECOND FLOOR LAYOUT
- 743-CDA-ZZ-03-DR-A-01-0103-REV 01-EXISTING THIRD FLOOR PLAN
- 743-CDA-ZZ-03-DR-A-05-0103-REV 02-PROPOSED THIRD FLOOR LEVEL
- 743-CDA-ZZ-04-DR-A-01-0104-REV 01-EXISTING FOURTH FLOOR PLAN
- 743-CDA-ZZ-04-DR-A-05-0104-REV 02-PROPOSED FOURTH FLOOR LEVEL
- 743-CDA-ZZ-05-DR-A-01-0105-REV 01-EXISTING FIFTH FLOOR PLAN
- 743-CDA-ZZ-05-DR-A-05-0105-REV 02-PROPOSED FIFTH FLOOR LAYOUT
- 743-CDA-ZZ-ZZ-DR-A-01-0200-REV 01-EXISTING ELEVATION A
- 743-CDA-ZZ-ZZ-DR-A-01-0201-REV 01-EXISTING ELEVATION B
- 743-CDA-ZZ-ZZ-DR-A-01-0202-REV 01-EXISTING ELEVATION C
- 743-CDA-ZZ-ZZ-DR-A-01-0203-REV 01-EXISTING ELEVATION D
- 743-CDA-ZZ-ZZ-DR-A-01-0204-REV 01-EXISTING ELEVATION E
- 743-CDA-ZZ-ZZ-DR-A-01-0205-REV 01-EXISTING ELEVATION F
- 743-CDA-ZZ-ZZ-DR-A-05-0200-REV 01-PROPOSED ELEVATION A
- 743-CDA-ZZ-ZZ-DR-A-05-0201-REV 01-PROPOSED ELEVATION B

- 743-CDA-ZZ-ZZ-DR-A-05-0202-REV 01-PROPOSED ELEVATION C
- 743-CDA-ZZ-ZZ-DR-A-05-0203-REV 01-PROPOSED ELEVATION D
- 743-CDA-ZZ-ZZ-DR-A-05-0204-REV 01-PROPOSED ELEVATION E
- 743-CDA-ZZ-ZZ-DR-A-05-0205-REV 01-PROPOSED ELEVATION F

The following supporting documents (associated with Application Ref. 2019/5592/P) should be read alongside this proposal:

- 70 Grays Inn Road - Letting Performance - 16.10.19 (Reda
- Appendix II 70 Grays Inn Road WC1
- Appendix III EGI 70 GRAYS INN ROAD DETAILS
- Appendix III REALLA COSTAR 70 GRAYS INN ROAD DETAILS
- Appendix III RIGHTMOVE 70 GRAYS INN ROAD DETAILS
- Appendix III
- Energy Statement 2020
- Noise Assessment
- Sustainability 2020
- Transport Statement
- Travel Plan

The supporting documents (associated with Application Ref. 2020/5980/P) should be read alongside this proposal:

- Marketing Report with appendices
- 70 Grays Inn Road Energy Note
- 70 Grays Inn Road Sustainability Note
- 19282-01 TP01 70 Grays Inn Road Travel Plan
- GM11595 002 Air Quality Letter Report
- Acoustic Report
- TA01 Transport Statement with appendix

2.0 Site & Surrounding Area

The development site is located on Gray's Inn Road, London, WC1X 8NH and is wholly situated within the administrative boundary of Camden Council. The site's principal access is on Gray's Inn Road (A52500) which is a two-way dual carriageway, providing access to: Holborn / 9A40), Calthorpe Street (B502) and Swinton Street (A501). 70 Gray's Inn Road is located on the east side of Gray's Inn Road, bounded by Portpool Lane to the north, Verulam Street to the south.

The site consists of a large six storey office building and comprises of office use (Class B1) at lower ground – fifth floor levels. The lower two floors of the building clad in grey stone and form a plinth level, the upper floors are predominately brick clad, except for the three central bays that form an understated stone clad portico styled entrance from ground to fifth floor. However, this application is in relation to floor three to five thereby resulting in the loss of 1,958 sq.m floorspace (GIA).

The Site is well connected by road, with A40 only 0.2 miles away and dual carriageway Euston Road is only 0.9 miles away. Holborn is located 0.5 miles; Kings Cross is located 1.2 miles and Oxford Street is located 1.6 miles from the site. The site further has good public transport links.

The Site is located approximately 0.2 miles from Chancery Lane Station (Central Line), 0.4 miles from Farringdon Station (Thameslink) , 0.5 miles from Holborn Station (Central and Piccadilly Line) , 0.7 miles from Russel Square station (Piccadilly Line), 0.9 miles from Covent Garden Station (Piccadilly Line), Tottenham Court Station (Northern and Central Line) and Kings Cross Station (Circle, Hammersmith and City Line, Metropolitan, Northern, Piccadilly, Victoria Lines, Grand Central, Great Northern, Hull, LNER and Thameslink) and 1.3 miles from Euston Station (Caledonian Sleeper, Overground, Virgin Trains and West Midlands Trains). The site is further located close to several bus stops which provides access into and around the wider area. The site has a PTAL rating of 6b (best).

With regards to the surrounding area the Site is occupied by a mixture of land uses, some of which include; ground floor retail and upper floor office and / or residential, wholly residential buildings, office building and a private park and garden to the east.

The Site is not listed, nor is the site locally listed. The site is not situated close to any listed or locally listed building, however is located opposite Gray's Inn Park, a Grade II* Park and Garden allocation. The site borders the Bloomsbury Conservation Area and Hatton Garden, however the site itself does not fall within either Conservation Area.

The Site has no TPO's on-site.

The Site is located within CIL Charging Zone A whereby office development incurs a charge and Educational uses incur nil.

2.1 Site Constraints

Air Quality: The Site is located within a Smoke Control Order - you cannot emit smoke from a chimney unless you're burning an authorised fuel or using 'exempt appliances.

Flooding: The Site is located in Flood Zone 1 and assessed as having less than 1 in 1,000 annual probability of river or sea flooding.

Height: The Site is located within the Heathrow Safeguarding Heights Consultations Area, which states any structure exceeding 45 meters will need to be consulted on.

Contamination: The Site is not identified as being contaminated.

2.2 Planning History

We have undertaken an online search of any planning application history of the site using Camden Council's website.

Application Reference	Description	Date	Decision
2019/1153/P	External elevational alterations to the property at ground and first floor levels to facilitate the creation of a cafe space ancillary to the office use, no.3 new entrances with canopy above, replacement and enlargement of external windows and doors and removal of railings. Internal alterations to form dedicated cycle and refuse stores.	11/09/2019	Granted
2006/2137/9	Alterations to entrance of office building (Class B1) involving the installation of new entrance door, alterations to fascade above entrance, and the installation of two external light fittings.	03/07/2006	Granted
9380065	Continued display of two joined non-illuminated estate agents signs 1.5m x 4m erected on a welded aluminium frame approximately 3.5m above the main entrance of the building and projecting 1.3m from the front elevation as shown on three un-numbered drawings	27/04/1993	Granted

The limited planning history above illustrates the council's support for the development of 70 Gray's Inn Road.

2.3 Pre-App Response

We note a pre-app was undertaken with case-officer Jaspreet Chana on 13th September 2019. The meeting was attended by the client (University of Lincoln), client's agent (C&W) and the client's planners (C&W). The case-officer confirmed the in-principle support for the change of use.

The Case-officer's full pre-app response is included below:

Economic development: Local Plan policy notes that we will resist development of business premises and sites for non-business use unless it is demonstrated to the Council's satisfaction: a. the site or building is no longer suitable for its existing business use; and , b. that the possibility of retaining, reusing or redeveloping the site or building for similar or alternative type and size of business use has been fully explored over an appropriate period of time.

On the first point, there is no evidence to suggest that, with sympathetic refurbishment, the premises could not continue to support a B1 / employment use.

On the second point, the building was vacated in March 2019 and marketing commenced in September 2018. The marketing evidence needs to set out the steps taken to market the premises in relation to section 46 of CPG Employment sites and business premises.

We recognise that there are other planning considerations to consider. And the potential impact of the university locating within the borough should be considered. If we were minded to approve the scheme on the basis of the broader set of planning considerations, we'd be keen to ensure that, in the long-term, the B1 / employment potential of the premises is not lost and a strong package of employment and skills-related benefits is secured to ensure that Camden residents benefit - as well as to mitigate the reduced employment generating potential of the site.

We have seen similar recent schemes, including Cambridge House (2017/7079/P), where Birkbeck located, following a change of use from B1, and following a commitment to delivering a strong package of opportunities for local residents, including a long-term commitment to delivering scholarships.

We have considered the comments provided and have included as part of this submission a more compressive review of the marketing information which addresses the issues raised by the policy officer.

Planning policy: Policy E2 (Employment premises and sites) sets out that Council will resist the loss of business premises unless the building is no longer suitable or the premises has been appropriately marketed, see policy extract below.

We will resist development of business premises and sites for non-business use unless it is demonstrated to the Council's satisfaction:

- The site or building is no longer suitable for its existing business use; and,
- That the possibility of retaining, reusing or redeveloping the site or building for similar or alternative type and size of business use has been fully explored over an appropriate period of time.

Section 46 of CPG Employment sites and business premises also set out steps that are required to be taken for marketing evidence. Please refer to economic development comments regarding the marketing evidence.

We have considered the comments provided and have included as part of this submission a more compressive review of the marketing information which addresses the issues raised by the policy officer.

Transport: We would ask for a transport assessment (or transport statement) to be submitted with any subsequent planning application. This would include a trip generation assessment as well as details on car parking, cycle parking and servicing. Cycle parking would need to be provided in accordance with CPG Transport and the minimum requirements of the New London Plan. Ideally the building would be car-free except for any disabled parking requirements. Please ask the applicant to refer to Policies A1, T1, T2, T3 and T4, and CPG Transport when preparing the transport assessment (or transport statement) to be submitted with any subsequent planning application.

We have considered the comments provided and have included as part of this submission a Transport Statement which addresses the issues raised by the policy officer.

3.0 Proposal

The client is seeking the partial change of use from office to part Class E and part F1 at 70 Gray's Inn Road, to allow a London Hub for students. The proposal only relates to the third to fifth floors only (1,958 sq.m of the 3,147 sq.m) would be used for lecturing/seminar (flexible F1/E use) space including hub space for both students and SME's and collaborative working stations. The remaining building will be used for office use.

The vision is for the proposed space floorspace is to allow students to engage with potential employers, facilitate co-working space and help foster enterprise in its graduates and therefore provide:

- A base for students who are studying 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 policy compliant cycle spaces and will be a car-free development.

4.0 Planning Policy

In this section, we set out the key planning policies 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 2021. The National Planning Policy Framework (NPPF) (2023) is also a material consideration.

4.1 Camden Local Plan (2017)

Policy G1 Delivery and location of growth states the Council will create the conditions for growth to deliver the homes, jobs, infrastructure and facilities to meet Camden's identified needs and harness the benefits for those who live and work in the borough.

The Council will deliver growth by securing high quality development and promoting the most efficient use of land and buildings in Camden by:

1. Supporting development that makes best use of its site, taking into account quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the site;
2. Resisting development that makes inefficient use of Camden's limited land;
3. Expecting the provision of a mix of uses where appropriate, in particular in the most accessible parts of the borough, including an element of self-contained housing where possible; and
4. Supporting a mix of uses either on site or across multiple sites as part of an agreed coordinated development approach, where it can be demonstrated that this contributes towards achieving the strategic objectives and delivers the greatest benefit to the key priorities of the Plan.

Policy C2 Community facilities states the Council will work with its partners to ensure that community facilities and services are developed and modernised to meet the changing needs of our community and reflect new approaches to the delivery of services.

The Council will support the investment plans of educational, health, scientific and research bodies to expand and enhance their operations, taking into account the social and economic benefits they generate for Camden, London and the UK. In assessing proposals, the Council will also balance the impact proposals may have on residential amenity and transport infrastructure.

Policy E1 Economic development states the Council will secure a successful and inclusive economy in Camden by creating the conditions for economic growth and harnessing the benefits for local residents and businesses. Support the development of Camden's health and education sectors and promote the development of the Knowledge Quarter around Euston and King's Cross while ensuring that any new facilities meet the other strategic objectives of this Local Plan.

Policy E2 Employment premises and sites states the Council will encourage the provision of employment premises and sites in the borough. We will protect premises or sites that are suitable for continued business use, in particular premises for small businesses, businesses and services that provide employment for Camden residents and those that support the functioning of the Central Activities Zone (CAZ) or the local economy. We will resist development of business premises and sites for non-business use unless it is demonstrated to the Council's satisfaction: a. the site or building is no longer suitable for its existing business use; and b. that the possibility of retaining, reusing or redeveloping the site or building for similar or alternative type and size of business use has been fully explored over an appropriate period of time.

Policy A1 Managing the impact of development states the Council will seek to protect the quality of life of occupiers and neighbours. We will grant permission for development unless this causes unacceptable harm to amenity. We will:

- Seek to ensure that the amenity of communities, occupiers and neighbours is protected;
- Seek to ensure development contributes towards strong and successful communities by balancing the needs of development with the needs and characteristics of local areas and communities;
- Resist development that fails to adequately assess and address transport impacts affecting communities, occupiers, neighbours and the existing transport network; and require mitigation measures where necessary.

The factors we will consider include:

- Visual privacy, outlook;
- Sunlight, daylight and overshadowing;
- Artificial lighting levels;
- Transport impacts, including the use of Transport Assessments, Travel Plans and Delivery and Servicing Management Plans;
- Impacts of the construction phase, including the use of Construction Management Plans;
- Noise and vibration levels;
- Odour, fumes and dust;
- Microclimate;
- Contaminated land; and,
- Impact upon water and wastewater infrastructure.

Policy A4 Noise and vibration states the Council will seek to ensure that noise and vibration is controlled and managed. Development should have regard to Camden's Noise and Vibration Thresholds. We will not grant planning permission for:

- Development likely to generate unacceptable noise and vibration impacts;
- Development sensitive to noise in locations which experience high levels of noise, unless appropriate attenuation measures can be provided and will not harm the continued operation of existing uses.

We will only grant permission for noise generating development, including any plant and machinery, if it can be operated without causing harm to amenity. We will also seek to minimise the impact on local amenity from deliveries and from the demolition and construction phases of development.

Policy D1 Design states the Council will seek to secure high quality design in development. The Council will require that development:

- Respects local context and character;
- Preserves or enhances the historic environment and heritage assets in accordance with Policy D2 Heritage;
- Is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;
- Is of sustainable and durable construction and adaptable to different activities and land uses;
- Comprises details and materials that are of high quality and complement the local character;
- Integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage; g. is inclusive and accessible for all;
- Promotes health;
- Is secure and designed to minimise crime and antisocial behaviour;
- Responds to natural features and preserves gardens and other open space;
- Incorporates high quality landscape design (including public art, where appropriate) and maximises opportunities for greening for example through planting of trees and other soft landscaping
- Incorporates outdoor amenity space;
- Preserves strategic and local views;
- For housing, provides a high standard of accommodation; and,
- Carefully integrates building services equipment.

Walking: In order to promote walking in the borough and improve the pedestrian environment, we will seek to ensure that developments:

- Improve the pedestrian environment by supporting high quality public realm improvement works;
- Make improvements to the pedestrian environment including the provision of high-quality safe road crossings where needed, seating, signage and landscaping;
- Are easy and safe to walk through ('permeable');
- Are adequately lit;
- Provide high quality footpaths and pavements that are wide enough for the number of people expected to use them. Features should also be included to assist vulnerable road users where appropriate; and
- Contribute towards bridges and water crossings where appropriate.

Cycling: In order to promote cycling in the borough and ensure a safe and accessible environment for cyclists, the Council will seek to ensure that development:

- Provides for and makes contributions towards connected, high quality, convenient and safe cycle routes, in line or exceeding London Cycle Design Standards, including the implementation of the Central London Grid, Quietways Network, Cycle Super Highways and; provides for accessible, secure cycle parking facilities exceeding minimum standards outlined within the London Plan and design requirements outlined within our supplementary planning document Camden Planning Guidance on transport. Higher levels of provision may also be required in areas well served by cycle route infrastructure, taking into account the size and location of the development;
- Provides for accessible, secure cycle parking facilities exceeding minimum standards outlined within the London Plan and design requirements outlined within our supplementary planning document Camden Planning Guidance on transport. Higher levels of provision may also be required in areas well served by cycle route infrastructure, taking into account the size and location of the development;
- Makes provision for high quality facilities that promote cycle usage including changing rooms, showers, dryers and lockers;
- Is easy and safe to cycle through ('permeable'); and k. contribute towards bridges and water crossings suitable for cycle use where appropriate.

Public Transport: In order to safeguard and promote the provision of public transport in the borough we will seek to ensure that development contributes towards improvements to bus network infrastructure including access to bus stops, shelters, passenger seating, waiting areas, signage and timetable information. Contributions will be sought where the demand for bus services generated by the development is likely to exceed existing capacity. Contributions may also be sought towards the improvement of other forms of public transport in major developments where appropriate.

Where appropriate, development will also be required to provide for interchanging between different modes of transport including facilities to make interchange easy and convenient for all users and maintain passenger comfort.

Policy T2 Parking and car-free development states the Council will limit the availability of parking and require all new developments in the borough to be car-free. We will:

- Not issue on-street or on-site parking permits in connection with new developments and use legal agreements to ensure that future occupants are aware that they are not entitled to on-street parking permits;
- Limit on-site parking to:
 - Spaces designated for disabled people where necessary, and/or
 - Essential operational or servicing needs;
- Support the redevelopment of existing car parks for alternative uses; and d. resist the development of boundary treatments and gardens to provide vehicle crossovers and on-site parking.

4.2 London Plan (2021)

Policy S3 Education and childcare states council must ensure there is a sufficient supply of good quality education and childcare facilities to meet demand and offer educational choice, boroughs should:

- Prepare Development Plans that are informed by a need's assessment of education and childcare facility needs. Needs should be assessed locally and sub-regionally, addressing cross-boundary issues. Needs assessments should include an audit of existing facilities.
- Identify sites for future provision through the Development Plan process, particularly in areas with significant planned growth or need for school places (including Special Educational Needs and Disability places)
- Ensure that development proposals for housing and commercial facilities incorporate suitable childcare provision and encourage nursery provision within primary schools, where there is a need.

Development proposals for education and childcare facilities should:

- Locate facilities in areas of identified need
- Locate facilities in accessible locations, with good public transport accessibility and access by walking and cycling
- Locate entrances and playgrounds away from busy roads, with traffic calming at entrances
- Link to existing footpath and cycle networks to create healthy routes to schools, and other education and childcare facilities, to enable all children to travel actively to school (walk, cycle or travel by public transport)
- Maximise the extended or multiple use of educational facilities for community or recreational use, through appropriate design measures
- Encourage the shared use of services between schools, colleges, universities, sports providers, and community facilities, and between early years and health and social care providers.
- Ensure that new developments are accessible and inclusive for a range of users, including disabled people, by adopting an inclusive design approach
- Ensure that facilities incorporate suitable, accessible outdoor space
- Locate facilities next to parks or green spaces, where possible

Paragraph 6.8.4 states the Mayor also supports measures to secure and develop London's leading role as a centre of higher and further education of national and international importance. London's higher and further education providers have considerable potential for innovation supported by collaboration between businesses, the public sector and other relevant research organisations. These initiatives can act as a catalyst for economic growth and promote social mobility in areas with high levels of deprivation by creating new jobs and training opportunities for local residents, as well as supporting the growth of emerging sectors in London. The Mayor will support higher and further education providers and boroughs to identify opportunities to work in partnership to benefit from the development of higher and further education facilities.

Policy T5 Cycling states:

Office, Long stay:

- Areas with higher cycle parking standards: 1 space per 75 sqm
- Rest of London: 1 space per 150 sqm (GEA)

Office, Short stay:

- First 5,000 sqm: 1 space per 500 sqm
- Thereafter: 1 space per 5,000 sqm (GEA)

University, Long Stay

- 1 space per 4 FTE staff + 1 space per 20 FTE students

University, Short Stay

- 1 space per 7 FTE students

4.3 National Planning Policy Framework (“NPPF”) (2023)

Paragraph 95 states it is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:

- a. Give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications;
- b. Work with school promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.

Paragraph 96 states, to ensure faster delivery of other public service infrastructure such as further education colleges, hospitals and criminal justice accommodation, local planning authorities should also work proactively and positively with promoters, delivery partners and statutory bodies to plan for required facilities and resolve key planning issues before applications are submitted.

5.0 Planning Assessment

This section considers the proposals against the overarching development plan policy context for the site, and other 'material considerations' for the development.

5.1 Principle of Development

Development proposals for the site are assessed against the statutory development plan, which comprises of the Camden Local Plan 2017.

The proposed development is seeking the change of use from office (Class E) to office and F1 (education). 1,958 sq.m of the 3,147 sq.m. The proposal only relates to the third to fifth floors only.

The space would be for students and will provide co-working/business space.

Policy S3 of the London Plan states the Mayor will support provision further and higher education facilities adequate to meet the demands of a growing and changing population and to enable greater educational choice, including in parts of London with poor educational performance. The policy adds development proposals which enhance education and skills provision will be supported, including those which seek to use existing space or change of use buildings. The policy further goes on to add development proposals that encourage co-location of services between schools and colleges and other provision should be encouraged in order to maximise land use, reduce costs and develop the extended school or college's offer. On-site or off-site sharing of services between schools and colleges should be supported. The proposed development is seeking the part change of use of 70 Grays Inn Road from B1a to part D1 and B1a, thereby using an existing vacant building for educational purposes and is therefore complying with policy.

Furthermore, London retains and extends its global role as a sustainable centre for business, innovation, creativity, health, education and research, culture and art and as a place to live, visit and enjoy; Paragraph 6.8.4 of the London Plan states the Mayor supports measures to secure and develop London's leading role as a centre of higher and further education of national and international importance. London's higher and further education providers have considerable potential for innovation supported by collaboration between businesses, the public sector and other relevant research organisations. These initiatives can act as a catalyst for economic growth and promote social mobility in areas with high levels of deprivation by creating new jobs and training opportunities for local residents, as well as supporting the growth of emerging sectors in London. The Mayor will support higher and further education providers and boroughs to identify opportunities to work in partnership to benefit from the development of higher and further education facilities. Therefore, by approving the university request to operate from the site, the council will be supporting the mayor's vision to further extend London's position globally and being able to offer exemplary educational facilities.

The Council further support the development of educational development as Policy C2 states the Council will work with its partners to ensure that community facilities and services are developed and will further support the investment plans of educational bodies to expand and enhance their operations, taking into account the social and economic benefits they generate for Camden, London and the UK.

5.2 Loss of Office Space

Policy E2 of the Local Plan states the council will protect premises or sites that are suitable for continued business use, in particular premises for small businesses, businesses and services that provide employment for Camden residents and those that support the functioning of the Central Activities Zone (CAZ) or the local economy. The policy further goes on to state they will resist development of business premises and sites for non-business use unless it is demonstrated to the Council's satisfaction:

- The site or building is no longer suitable for its existing business use; and
- That the possibility of retaining, reusing or redeveloping the site or building for similar or alternative type and size of business use has been fully explored over an appropriate

The proposed scheme is seeking 1,958 sq.m of the 3,147 sq.m for flexible office / F1 use (education space).

The building was vacated in March 2019 and has since been vacant. The marketing report submitted as part of this submission states the reason for this is due to the occupier take-up of Central London office space has been at an average level for six consecutive quarters up to the end of 2018 but has deteriorated since then. The sub 50,000 sq ft office market is still slow and the sub 20,000 sq ft market has been hardest hit due to the rise in competition from serviced office accommodation over 500,000 sq ft.

Despite the building being listed on CoStar and EGI websites along with the KF website since September 2018 and for it to be circulated to all 650 Central London office agents through City and West Agents Club on two separate occasions and been sent to 91 specific active requirements including the serviced office sector, which is the most dominant in terms of take up, only 12 inspections were undertaken with 9 different parties. Thereby illustrating the lack of desire for traditional office occupiers to occupy the space. Furthermore, the marketing report states of the 5 different parties that began negotiations, the university was the only conventional tenant to engage as all the other parties were serviced office occupiers. The report concludes that despite the considerable push traditional office occupiers are not interested due to the competition/uncertainty in the market. The development left as is would incur a considerable void period in the current market and it is unlikely it will be let as a whole again due to changes in working practises.

An Marketing Report and Udpate has been commissioned prepared by Cushman and Wakefield.

Verulam Gardens, 70 Grays Inn Road is a self-contained office building on an island site on the Eastern side of Grays Inn Road between its junction with Holborn and Theobalds Road in the London Borough of Camden. The building is opposite Grays Inn and a short walk from both Chancery Lane and Farringdon Stations.

The building is owned on a freehold basis and was purchased in 2018 by the current owners, Euro Properties.

The office space, 34,000 sq ft in total, is located over Lower Ground, Ground and 5 upper floors. The Lower Ground – 2nd floors, as well as reception and common parts, have recently undergone a comprehensive refurbishment. These works required significant investment and were carried out on a wholly speculative basis. The building specification includes:

- Flexible CAT A floors
- New four pipe fan air conditioning
- Fully accessible raised floors
- Partially exposed ceilings
- 2 fully modernised passenger lift
- New end of trip facilities
- Self-contained entrances to the ground floor unit
- Newly refurbished manned reception

The building's construction and configuration with column-free floorplates and potential for interlinking staircases between floors, as well as its close proximity to other universities such as Fordham University, City University of London, Queen Mary University and Anglia Ruskin University makes the building an attractive proposition for educational users.

The NPPF (states planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, and should encourage multiple benefits from urban land, including through mixed use schemes. The NPPF further goes on to add local planning authorities should also take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs. In particular, they should support proposals to make more effective use of sites that provide community services such as schools.

The proposed development is seeking to utilise a vacant building by providing a key service to the area.

A provider has been earmarked but unless consent is provided, they will not commit.

The Camden Plan under paragraph 5.33 further identifies other employment generating uses and recognises that jobs are provided by many types of uses within the borough, not just those based in offices or industrial premises. These include shops and markets, hotels and restaurants, leisure and tourism uses, as well as knowledge-based sectors such as health and education.

For further information on marketing and comparables in the area please refer to the marketing report issued as part of this submission.

5.3 Design & Access

The landlord has carried out a refurbishment which is likely to be able to accommodate the University's requirements and is intending to provide new corner entrances from the street, one of which will be solely for the use of an educational provider.

The existing stairs are part of the common parts of the building and will be used by the occupants of the third and fourth floor for means of escape, but access to the educational demise will be electronically controlled so that only permitted occupants can enter the educational facility. Wheelchair access to the upper floors will require use of the lifts in the main stairs.

Furthermore, a number of changes have been made regarding security;

- There will be a security strategy controlling access to the building. The details are still to be developed, but it is likely to ensure controlled access at the ground floor entrance, or close to it, either through a staffed reception barrier, or electronic access passes which are linked to the identities of individual users, or both (there may be different daytime and outside hours strategies).
- The details of the strategy will take account of consultation with 'Design Out Crime' officers before being finalised for construction

5.4 Transport

The space is intended to allow students to engage with potential employers, facilitate coworking space and help foster enterprise in its graduates. As a result, in transport terms, the trip characteristics of students and staff will more closely resemble that of an office than a traditional educational facility with likely arrival in the AM peaks and departures in the PM peaks with dwell times within the building across the majority of the day.

The cycle parking provisions have therefore been reviewed against office (Class E) requirement as opposed to F1. Up to 30 cycle parking spaces could be provided on-site. The spaces could be located to the rear of the building where a dedicated cycle store would be provided.

The proposed change of use will not alter the existing footprint of the building, with existing and permitted pedestrian access into the building remaining unaffected by the proposals. The building will remain car-free in nature with cycle parking provided in accordance with the London Plan (2021) standards. Servicing, delivery and refuse activity will be conducted in line with the existing delivery and servicing strategy of the site. The site is located in a highly accessible area for sustainable transport modes. It has a PTAL rating of 6b demonstrating excellent access to public transport whilst it is within a reasonable walking and cycling distance of a wide range of facilities, stations and bus stops facilitating easy sustainable travel.

The proposed change of use is not considered to materially affect the number or mode share of trips entering and exiting the site in relation to the existing permission given that the proposed use, whilst associated with a University, will operate more like a traditional workplace with various co-working spaces, learning centers and offices for both students and staff without any formal teaching facilities.

The report concludes the development proposals are not considered to result in a significant impact upon the wider local transport networks with no significant change to the number of trips across the local transport networks. The impact of the proposals are therefore considered to be negligible requiring no further mitigation other than that proposed as part of the application.

A Travel Plan is also submitted as part of this application and achieve an 80% sustainable mode share. The Travel Plan will be continually monitored, and it will additionally be measured annually in consultation with all stakeholders who will approve its contents and fully support the measures being maintained/proposed. The proposed change of use is therefore considered acceptable in transport terms.

5.5 Noise

In order to support the planning application an environmental noise monitoring of the prevailing noise conditions at the site has been undertaken. Based on the results of the environmental sound survey, and the plant noise contra requirements of the Local Authority, noise emission limits for the future items of noise generating plant servicing the new facility have been derived. Subject to the required recommendation highlighted in the report are complied with, it is not considered that there will be any impacts on residential or commercial amenity on the nearby surrounding properties due to the proposed noise and vibrations caused by the development.

6.0 Conclusion

The Client is seeking the partial change of use from Class E (office) to part Class E (office) and part Class F1 (educational purpose) at the Site. The proposal only relates the change of use of the third to five floor. There has been a continued interest for University providers and

The client is seeking the partial change of use from Class E office to part office and part F1 (education) at 70 Gray's Inn Road. The proposal only relates to the third to fifth floors.

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

London Plan states the Mayor will support provision further and higher education facilities adequate to meet the demands of a growing and changing population and to enable greater educational choice, including in parts of London with poor educational performance. The policy adds development proposals which enhance education and skills provision will be supported, including those which seek to use existing or change of use buildings. The policy further goes on to add development proposals that encourage co-location of services between schools and colleges and other provision should be encouraged in order to maximise land use, reduce costs and develop the extended school or college's offer. On-site or off-site sharing of services between schools and colleges should be supported. The proposed development is seeking the part change of use of 70 Grays Inn Road from office (Class E) to part F1 (education) and office, thereby using an existing vacant building for university purposes and is therefore complying with policy.

The proposed development is seeking to utilise a vacant building by providing a key service to the area. Whilst the Applicant is seeking permission to change part of the land use of the building to F1, the operation of the building will more closely align to that of an office with the majority of the space being used as student and staff workspace with a series of working desks, meeting rooms and communal spaces.

The proposed development is in accordance with local and national policy and the applicant would seek to implement the proposed use as soon as possible upon the grant of planning permission.

It is therefore respectfully requested that this Application be granted.