



## Planning Statement - incorporating other Supporting Statements

Application for a change of use from B1  
(Offices) to D1 (Education) on Floors 1-  
4 plus internal alterations at Ground  
Floor at 67-69 Lincoln's Inn Fields  
WC2A 3JB

Prepared on behalf of

**Queen Mary University of London**

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# 1 Introduction

- 1.1 This statement has been prepared by DTZ and is submitted on behalf of Queen Mary University of London (QMUL) in support of an application for planning permission under the provision of the Town & Country Planning Act 1990 (as amended).
- 1.2 The application seeks to allow a change of use from B1 (offices) to D1 (education) at 67-69 Lincoln's Inn Fields in order to facilitate the expansion of the University's Centre for Commercial Law Studies which comprises the University's Postgraduate Law School.
- 1.3 There are limited internal changes proposed as a result of the change of use and these are illustrated on the plans submitted with this planning application. No changes are proposed to the external appearance of the property.
- 1.4 This Planning Statement sets out the relevant planning context in relation to the proposed change of use. It reviews the planning policy context at the national, London and local levels and evaluates the pertinent planning considerations that have arisen from the relevant planning history records. This Statement also provides additional information required for a change of use planning application comprising over 1,000 sq m of floorspace.

## 2 Site and Surrounding Area

- 2.1 The application site is located on the western side of Lincoln's Inn Fields close to the High Holborn junction with Kingsway. The site is located within the administrative boundary of the London Borough of Camden. A site location plan is submitted with this application and can be viewed in Appendix 1.
- 2.2 The property is home to the Queen Mary University of London (QMUL) Centre for Commercial Law Studies which comprises the University's Postgraduate Law School. It forms a base for LLM teaching and postgraduate research students. This site is close to the Courts of Justice, national and international law firms, Government legal offices and the postgraduate library of the University of London, Institute of Advanced Legal Studies.
- 2.3 The property is a substantial 6-storey building plus basement situated on the corner of Lincoln's Inn Fields and Remnant Street. The accommodation provides a total of 2,879 sq m on floors basement to fourth as shown on the plan drawings. The fifth floor is not included in this application.
- 2.4 Part of the ground floor and basement are currently in Class D1 use and are occupied by the University. The remainder of the ground floor of the premises comprises the Britannia Building Society (Class A2) which fronts Kingsway. The lawful use for the rest of the building is Class B1 offices. The University occupy the first and second floors of the property as offices. The third and fourth floors have been occupied by a law firm as offices.
- 2.5 The basement, part of the ground floor, plus the first and second floors of the premises have been occupied by QMUL since 2006. The University wish to expand their Law School into the upper floors and propose the change of use of the first, second, third and fourth floors to Class D1 use to allow this. Whilst the premises have been occupied by the University for a number of years, it wishes to increase the size of its teaching space and private study areas.
- 2.6 The site is located within the Bloomsbury Conservation Area, specifically Sub Area 9 "Lincoln's Inn Fields/Inns of Court/High Holborn". The area has been a major centre for the legal profession and the training of barristers for over 500 years. The current activities associated with the area's history play a key role in its sense of place.
- 2.7 The Lincoln's Inn Fields were initially laid out in the 17<sup>th</sup> Century as a residential neighbourhood of predominantly townhouses and the central gardens. The Bloomsbury Conservation Area Statement reveals that over time the majority of townhouses were converted to other uses, in particular as offices. The buildings surrounding the square have become "*more varied in height, scale, plot size and architectural style, although they maintain a consistent building line*" (2011; Para 5.148).
- 2.8 The property itself is not listed, but there are a number of Grade II listed buildings in the vicinity which form an important part of the area's historic character.
- 2.9 The Lincoln's Inn Fields are registered as Parks and Gardens of Special Historic Interest and are a site of Nature Conservation Importance.
- 2.10 The premises are widely accessible by public transport and within short walking distance of Holborn Underground Station (Central & Piccadilly lines) and numerous bus stops on High Holborn, Kingsway and Strand.

### 3 Planning History

3.1 The are several planning history records related to the site, summarised in the following table:

Application ref.	Date of Decision	Description of Development
2009/2045/P	Approved 25-06-2009	Installation of a canopy structure above the entrance to the office building (Class B1).
2006/2260/P	Approved 05-06-2006	Change of use of basement and part of ground floor from office use (Class B1) to educational use (Class D1).
2006/1317/P	Approved 13-04-2006	Alterations to the ground floor façades including the installation of new windows and the provision of new glazed fire escape door on the Remnant Street elevation in connection with the existing office building (Class B1)
2006/0424/A	Approved 26-01-2006	Display of non-illuminated projecting sign on Remnant Street elevation to existing building society (Class A2).
2005/3192/P	Approved 02-09-2005	Installation of new plant and condenser units within first floor lightwell and at roof level of offices (Class B1).
2005/3402/P	Refused on Appeal 26-09-2005	Change of use of existing offices (B1) to a restaurant and retail premises (A3) at the basement and ground floors, associated alterations to the interior/exterior including new entrances and windows at ground floor level along Remnant Street, Gate Street and the corner of the building, together with uplighting to statues at first floor level, and the installation of mechanical plant to the rear and on the roof.
2005/3696/P	Approved 09-09-2005	Change of use of part ground floor and first to fifth floors from offices (Class B1) to educational (Class D1) use.

- 3.2 In relation to the above planning history records, there are two applications that are particularly relevant.
- 3.3 A planning application (Ref: 2005/3696/P) for change of use of part ground floor and first to fifth floors from offices (Class B1) to education (Class D1) was approved in September 2005. The B1 office use was subsequently retained and we believe that the planning permission for D1 education use was not implemented and therefore lapsed.
- 3.4 A subsequent application (Ref: 2006/2260/P) for change of use of basement and part of ground floor from office use (Class B1) to educational use (Class D1) was submitted in 2006 in order to extend the D1 consent to the rest of the building. The main issues that the Planning Officer considered were the loss of office space, the character of the Inns Court Area and the impact on local amenity.
- 3.5 In relation to loss of employment use, the Council considered that the change of use to D1 education was acceptable. With regard to new educational uses, the Council considered that the location of such use would be most appropriate in suitable locations where public transport was easily accessible and did not harm the existing transport system in terms of the demand associated with the development.

The reference to the proximity to Holborn Underground Station suggested that the proposed D1 use would not have a detrimental effect upon transport.

- 3.6 Although there was also a general presumption in favour of a new community use where retention of office use was not viable, the Council considered that this would not detrimentally impact upon the local amenity, given the limited residential uses in the area.
- 3.7 With regards to the site's location within the Inns of Court area, the Council concluded that the Law School contributed to the special character of the area.
- 3.8 In conclusion, it was considered that the applications for change of use of part or the whole building for D1 education use would not have a detrimental impact upon the existing employment uses, local amenities or the character of the Inns of Court Area and planning permissions were subsequently granted.
- 3.9 Since the granting of planning permission for the change of use to D1 education in 2005 and 2006, the planning policy framework now incorporates the various documents of the Camden Local Development Framework and the updated London Plan (2011) which is explored in Section 5.

## 4 Proposed Development

- 4.1 The application seeks planning permission for a change of use of the first, second, third and fourth floors of the premises to extend the existing use of the building as a University Law School (Class D1 Education). It is also proposed to make some internal alterations to the ground floor to remain in D1 use and to incorporate a lecture theatre in place of the staff administration area. These internal alterations do not require planning permission.
- 4.2 The University's Centre for Commercial Law Studies currently leases the basement to second floors and proposes to extend their lease to include the third and fourth floors.
- 4.3 The basement consists of three seminar rooms, a student common room and an area of private study space with computer workstations. The western part of the basement floor also houses the IT server room and three washrooms for student use. The proposed plans incur no change on the basement floor.
- 4.4 The ground floor hosts the main reception and administration area for the Law School. It is proposed that the present staff administration area and meeting room located behind the main reception will be replaced with a 132-seat lecture theatre. As a result, all of the current ground floor staff administrators will move to the upper floors.
- 4.5 The first floor is currently occupied by university staff and lecturers. There will be no physical changes to the layout of the first floor, although it is proposed that it will be accessible to students, plus university staff.
- 4.6 Similarly the second floor is also currently occupied by University staff and lecturers. It is proposed that the current staff common room which is located on the second floor will be converted into a seminar room for teaching purposes. In addition, the meeting room and the corner office will be amalgamated to form another seminar room. The two further offices to the left of the existing corner office will be merged to form a separate administration office for senior staff.
- 4.7 The third and fourth floors are currently occupied by a law firm. QMUL wish to seek planning permission to occupy the space for education use, in order to facilitate their expansion. It is proposed that the third and fourth floors will be occupied by University staff, academic corroborators and also used for teaching. The eastern end of the third floor will be converted into two separate seminar rooms for teaching purposes. It is proposed that the 4<sup>th</sup> floor will become a multi-purpose space which will include a staff common room and a hot-desking area for visiting scholars.
- 4.8 Following the continued successes in various league table rankings, The School of Law at QMUL recently excelled in the Guardian's University 2012 Guide. The School was ranked 4th in the UK for law. Queen Mary Law School also achieved the joint highest overall satisfaction ratings in the most recent National Student Survey (NSS) within the University of London law schools.
- 4.9 The use of the Lincoln's Inn Fields site would enable QMUL to enhance its excellent international reputation for academic research and postgraduate law studies in this established legal precinct.
- 4.10 The proposed change of use subject of this application will allow an active use to be re-introduced to a part of the property which has outgoing tenants who are relocating elsewhere within the Borough.
- 4.11 The Law School will also host several summer schools which will maintain an active use all year round including university vacations.

## 5 Planning Policy Context and Assessment

- 5.1 As required by s.38 of the Planning and Compensation Act 2004, planning applications must be determined in accordance with relevant policies set out in the appropriate development plan, unless material considerations indicate otherwise. In this section, we set out the key national, London and local planning policies relevant to this planning application.

### National Policy Guidance

- 5.2 Relevant national guidance in respect of this application is contained within Section 73 of the Draft National Policy Framework (July 2011) which encourages local planning authorities to support existing business sectors and to take into account whether they are expanding or contracting. It also advises that local planning authorities should plan for the expansion of clusters or networks of knowledge-driven industries.

### Replacement London Plan (2011)

- 5.3 Strategic guidance relevant to the site is contained within the replacement London Plan Spatial Development Strategy for Greater London adopted in July 2011.
- 5.4 Policy 4.10 (New and Emerging Sectors) supports the development of further education institutions and their role in enhancing the city's economic development. The policy recognises Bloomsbury as an established university precinct and the special status that further and higher education institutions bring to this area of London.
- 5.5 In addition, Policy 3.18 of the London Plan (Education Facilities) states that the provision of higher education facilities has an important role in meeting the demands of a growing population and providing greater educational choice. Development proposals which enhance existing education facilities will be supported and this includes "*expansion of existing facilities or change of use to educational purposes*". The supporting text specifies that the development of colleges in appropriate places will be essential to London's continued economic success. It also recognises the wider Bloomsbury area as an important University precinct and supports this function.
- 5.6 Paragraph 3.107 of the London Plan also acknowledges that higher education in London plays an important role in supporting business growth and professional development.

### London Borough of Camden Local Development Framework

- 5.7 Local planning guidance for the site is provided within the London Borough of Camden Local Development Framework (LDF). The Core Strategy (adopted November 2010), which forms part of the LDF forms a base framework against which all development proposals are to be considered.
- 5.8 Camden's Revised Planning Guidance for Central London (2007) shows that the site is located within Camden's Central London Area, which will be the Borough's economic core and will "*contribute to London's role as a major global city, and providing the majority of jobs within Camden*".
- 5.9 Core Strategy Policy CS9 (Achieving a Successful Central London) states that the Council will "*support and promote the Central London area of Camden as a successful and vibrant part of the capital to live in, work in and visit*". It specifies that one way of achieving this objective is to take into account "*the specific identity of the areas within Central London when taking decisions on planning applications and in relevant initiatives and works*".

### Inns of Court Area

- 5.10 The site falls within the Inns of Court Area which is located in the southern edge of the Borough.
- 5.11 Map 2.3 and Paragraph 13.6 of the London Plan describes the Inns of Court area as a cluster of "*mixed uses with a strong legal character*" and supports the strategic function of this specialised economic cluster.



- 5.12 Chapter 13 of Camden's Revised Planning Guidance for Central London (2007) acknowledges that the Inns of Court Area lies within the broader Central London legal area. Paragraph 13.6 of the Revised Planning Guidance document states that the legal character of the Inns of Court area has been long established for a considerable length of time and that the Council will seek to retain such legal uses. Paragraph 13.3 defines legal uses in this area as "*barristers chambers, solicitors offices, courts, government legal offices and law schools*" [DTZ emphasis].
- 5.13 Paragraph 13.11 of this document states that the Inns of Court "*require flexibility in order to provide the size and type of floorspace required in order to remain competitive and attractive to tenants in the legal profession. It is therefore sometimes necessary to swap uses around within buildings*". It is envisaged that the upper floors in the property are required to change to education use in order for the University to maximise its teaching capabilities, enhance the University's reputation and remain competitive as a global centre of excellence for legal studies.
- 5.14 The Bloomsbury Conservation Area Statement (2011) requires new development proposals to preserve or enhance the character or appearance of the Bloomsbury Conservation Area. The statement also refers to the expansion of the University of London into former terraces and into offices. Detrimental impacts that may have impacted upon the character of the Conservation Area have been the amalgamation of terraces and the loss of small scale specialist shops. Neither of these will arise as a result of this application.
- 5.15 In summary, planning policy seeks to protect the legal character of the area and law schools are recognised as an important legal use.

#### **Employment Policy – Loss of Office Floorspace**

- 5.16 Core Strategy CS8 (Promoting a Successful and Inclusive Camden Economy) supports the enhancement of skills, education and training in order to maximise job opportunities and help reduce the Borough's skills gap.
- 5.17 Policy CS8 is supported by Policy DP13 (Employment Premises and Sites) of the Camden Development Policies (2010) which states that there is a general presumption to retain buildings for continued business use unless:
- *it can be demonstrated that the building is no longer suitable for business use; or*
  - *that a possibility to re-use the building for similar or alternative business use has been explored for an appropriate period of time.*
- 5.18 Although there is a general resistance against the loss of premises in business space, Core Strategy Policy CS8 also states that the Council will "*recognise the importance of other employment generating uses, including retail, markets, leisure, education, tourism and health*" [DTZ emphasis].
- 5.19 In addition Paragraph 6.3 of Camden Planning Guidance 5 (Town Centres, Retail and Employment, 2011) states that a change of use from B1 offices to another non-business use will be allowed in some circumstances, for example where there are existing tenants intending to locate. This is the case with the current tenants of the office space on the third and fourth floors, who are relocating elsewhere in the Borough.
- 5.20 Whilst it is recognised that Paragraph 13.5 of Camden's Development Policies states that a change to a non-business use will require the applicant to demonstrate that there is insufficient demand to retain the use in employment use having marketed the site for business use for at least two years, given the support at national, London and local levels for education, and in particular the Law School use in this location, it is suggested that the marketing is not necessary.

#### **Transport & Amenity**

- 5.21 Policy CS1 of the Core Strategy stipulates that the Council expects that development that will significantly increase the demand of travel to be concentrated in:
- growth areas; and

- areas which are highly accessible by a range of means of transport.
- 5.22 The site at 67-69 Lincoln's Inn Fields is located on Map 1 (Key Diagram) in a highly accessible area. This confirms that the location is suitable for significant new development (Policy CS3: Other Highly Accessible Areas) and a range of land uses which attract a large number of journeys. The Council will request that all development in these locations is of a size and nature compatible with its site and the character of its surroundings.
- 5.23 Policy DP16 of Camden's Development Policies requires new development proposals to assess their accessibility by choice of means of transport and the likely effect that their increased demand will be placed upon on the existing transport network, travel patterns and car use.
- 5.24 The Council considers that any new D1 development proposal over the indicative threshold of 2,500 sq m generates significant new travel demand.
- 5.25 The Council considers that all proposals for D1 uses will require a Transport Assessment where justified by travel demand and transport conditions. This will examine the impact on transport movements arising from the development. As the proposal will result in a change of use from offices to education use of less than 2,500 sq m (the total floor area of the four floors is 2,085 sq m) and given that the premises are in a highly accessible location, and will substitute "office trips" for "education trips", A short Transport Assessment is provided in Section 7 of this Statement.

## 6 Justification for Education Use and Loss of Office Floorspace

### Principle of Education Use

- 6.1 The primary consideration in planning policy terms is the enhancement of the Inns of Court character area.
- 6.2 Any development proposals which enhance the QMUL University Law School are supported by the London Plan and Camden Development Policies.
- 6.3 By the definition of legal uses in paragraph 13.3 of the Revised Planning Guidance for Central London (2007) law schools are considered a legal use and the Council will seek to retain such legal uses in this strategic area. This is supported by Core Strategy Policy CS9 which stipulates that the specific identity *"of the areas within Central London should be considered when taking decisions on planning applications"*.
- 6.4 Further development of this site for legal use will play a crucial role in contributing to the enhancement of the University's national and international reputation as a centre of excellence for legal studies.
- 6.5 Planning history records (Ref 2005/3696/P and 2006/2260/P) reveal that the Council have previously granted planning permission for a change of use from B1 offices to D1 education at the property in 2005 and 2006 respectively. It is therefore considered that as this application seeks to enhance the legal character of the Inns of Court area which has previously been approved by Camden Borough Council in the past, the principal of education use in this area is acceptable.

### Loss of Office Floorspace

- 6.6 Planning policy contains a general presumption in favour of retaining office uses. The proposed development will change the existing use of the premises from office (B1) to education use (D1).
- 6.7 Policy DP13 of Camden's Development Policies states that there may be circumstances where the loss of office space may be justified, such as when an office is no longer required for business use, as in this case.
- 6.8 Although this application would seek a reduction in office space, it retains a vibrant legal use to this established character area and supports business growth of this strategic cluster. Specifically, the University Law School offers significant employment opportunities to local people and the high order skills which will be necessary for students to succeed in the changing economy. The role of London's world-renowned higher education institutions in generating the highest skilled workforce in Europe and the knowledge base of its businesses is supported by the London Plan.
- 6.9 Planning permission will be crucial to maintain Queen Mary's outstanding reputation in the legal field and to attract world class graduates to this legal area of Central London. This will supply new talent to established local law firms and major employers located in this legal core of Central London. Furthermore, the proposal will ensure that this strategic cluster remains globally competitive and will attract major new international firms to the area which will benefit from the University's research reputation.
- 6.10 In addition, as the loss of office space within the building is replaced by an active legally focused use within the premises, this raised no objections by the Council in both previous planning permissions relating to the property.
- 6.11 Taking into account the planning history and the relevant planning policies, it is concluded that the net loss of office space is outweighed by the primary benefits that the application would bring to this vibrant legal area of Central London.

## Proposed Employment Numbers

6.12 The table below sets out the proposed employment numbers as a result of the proposal.

Floor	Existing Employees	Proposed: Employees
First	24	24
Second	24	16
Third	30*	6
Fourth	30*	25
Visiting QMUL Employees	20*	52
<b>Total</b>	<b>128</b>	<b>123</b>

\* approx figures

- 6.13 The Table shows that at present there are around 128 employees on first to fourth floors (including visiting QMUL Staff). Approximately 60 of these employees currently work for the Law Firm on the third and fourth floors. As a result of the proposed change of use, there is estimated to be 123 employees, including around 52 visiting lecturers and scholars. This therefore shows that the proposed change of use will not have a significant impact on the number of employees working within the building.
- 6.14 For completeness, at present, there are 8 employees at basement and ground floors. As a result of the changes proposed, the staff numbers at ground and basement levels will reduce slightly to 4.
- 6.15 The expansion of the Law School will lead to an increase in the number of 'visiting employees'. It is estimated by the University that the expanded law school will accommodate 52 visiting employees including 19 visiting lecturers in addition to general honorary titles with research and teaching roles.
- 6.16 It is evident that the proposed number of employees is very similar to the existing number of employees within the building, which reinforces our case for the loss of office floorspace and addresses the perceived 'loss of employment' arising from the change of use.

## Marketing

- 6.17 The third and fourth floors of the property were marketed by Fairbrothers for approximately three months. The marketing particulars are attached in Appendix 2. No interest has been expressed to date.
- 6.18 Camden's Local Area Requirements for Planning Applications requires evidence of marketing for a period of 2 years to be submitted in support of a proposal to convert commercial property into residential use. However as this proposal does not involve conversion into a residential use, we do not feel that the marketing requirement is relevant to this application.
- 6.19 Whilst it is recognised that Camden's Development Policy DP13 states that a change of use to a non-business use requires the applicant to demonstrate that there is insufficient demand to retain for business use, given the support at national, London and local levels for education and, in particular, the Law School use in this location, it is our view that the marketing requirement is onerous and unnecessary. As detailed above, the proposed use will accommodate a substantial number of full-time and part-time staff / employees.

## 7 Business Transport Assessment

- 7.1 This section considers the impact of the proposed change of use upon transport and servicing arrangements.

### **Existing Transport Conditions**

- 7.2 The site is particularly well served by public transport. The nearest tube station is Holborn, which is situated approximately 150 metres to the northwest of the application site and provides underground services on the Central and Piccadilly lines (with links to the railway network).
- 7.3 A high frequency of bus services run through High Holborn, Kingsway and Strand, all of which are within easy walking distance of the application site. Holborn Station bus stop serves the routes 168, 188, 59, 68, 91, N91 and X68. The site is also less than 200 metres from Aldwych bus stop, which serves routes 1, 168, 171, 188, 59, 68, 91, N1, N171, N68, N91 and X68.
- 7.4 There are 12 public cycle parking locks at the north western corner of Lincoln's Inn Fields. There is also a London Cycle Hire Scheme station located adjacent to the Royal College of Surgeons on the southern side of Lincoln's Inn Fields.
- 7.5 There are no car or cycle parking spaces provided on site, and this will not change as a result of the proposed change of use.

### **Existing and Proposed Journey Modes, and Impact on Existing Transport Conditions**

- 7.6 At present, the significant majority of students and staff live within London, principally at the Mile End Campus or within private homes in and around London. As a result, the majority of students and staff (estimated at 90%) travel to the building by public transport i.e. tube and/or bus. A limited number of students and staff walk or cycle to and from the campus at present, whilst even fewer (if any) drive to and from the campus by private car given that no parking spaces are provided on site and the inconvenience of driving in central London.
- 7.7 Paragraph 16.7 of Camden's Development Policies states that development proposals will need to be accompanied by an indication of their implications for the transport network unless they involve minimal trip generation.
- 7.8 The proposed change of use will not have a material impact upon vehicular and pedestrian journeys. It is envisaged that staff and students will predominantly continue to use tube and/or bus services in order to travel to and from the campus, as these services are convenient and within easy walking distance of the building. On this basis, the proposal will have no impact upon existing transport conditions (as described above).

### **Proposed Bicycle Storage**

- 7.9 We are aware of the Council's requirements for bicycle storage. The University proposes to expand its Law School within an existing building. However the building does not have on site provision for bicycle storage. In addition, there is no basement or loading bay within the fabric of the building which could provide, or be converted into, a suitable area for the purposes of bicycle storage. As detailed above, there are 12 public cycle parking locks and a London Cycle Hire Scheme station in proximity to the application site, which could be used by students and staff for bicycle storage if required.

### **Proposed Travel Plan**

- 7.10 The University will promote the use of public transport by its students and staff. This includes tube and/or bus travel which, given the convenience and proximity of these services to the application site, are likely to be the favoured modes of travel by students and staff. Specifically, the University will promote the use of public transport (and other 'green' modes of travel) by:
- offering season ticket loans to encourage the use of public transport to and from the campus;

- making Students Oyster Cards available to students to provide them with reduced travel tariffs on all London public transport; and/or
- providing a limited number of lockers in the basement (albeit mainly reserved for PHD students) and a shower in order to promote cycling / running to the campus.

7.11 As detailed above, there are no car parking spaces provided on site (existing or proposed). The proposal would not therefore result in an increase in trips by private car and, in turn, a demand for parking associated with the proposal.

#### **Proposed Loading Areas and Servicing Arrangements**

- 7.12 The existing building has no loading bay. Any vehicles that need to load and unload goods for the premises currently reverse up Gate Street, which is a cul-de-sac and does not impede traffic flow. It is proposed that this arrangement continues. This has been the arrangement at the premises for a number of years and no problems to local traffic flow or public amenity have arisen.
- 7.13 The only vehicle movements generated by this development are occasional deliveries of academic materials and stationary. These will be delivered by smaller vehicles such as motorbike couriers and smaller vans.
- 7.14 There are no heavy vehicle movements generated as a result of this development.
- 7.15 Paragraph 2.3 of Camden Planning Guidance 7 (Transport) states that this information is required for *"planning applications that will alter how people or goods are moved, how many trips they make, and when the trips take place"*. As stated in Section 5 of this Planning Statement, the premises are located in an area defined by the Council as a highly accessible location. The proposal will substitute "office trips" for "education trips" and there will be no net additional goods moved or trips generated as a result of this proposed change of use.

## 8 Energy / Sustainability and Waste Statement

### Energy / Sustainability Statement

- 8.1 In accordance with the provisions of Camden's Development Policies (paragraph 24.9) and Policy CS13, the proposed change of use maintains the energy efficiency of the existing building. The *Energy Performance Certificate* appended to this Statement (Appendix 3) demonstrates that the building has an energy rating of 94 which is above the benchmark for similar 'newly built' buildings (60). The proposal will not impact upon the energy performance of the existing building and will therefore achieve highly acceptable energy standards.
- 8.2 The *Statement of Environment Policy* (Appendix 4) outlines the University's strategy to reduce energy consumption and carbon emissions across its assets (including the application site). The University proposes to implement this strategy (and others) through:
- investment in energy, water and environmental improvements;
  - environmental targets for water, energy use, recycling and waste; and
  - performance monitoring.
- 8.3 Further, the University's policy on *Implementation of Carbon Reduction in Capital Projects* (Appendix 5) concerns the sustainable energy management of its assets (including the application site). This policy applies to building alterations and refurbishments, and aims to reduce energy consumption and carbon emissions. It provides guidelines for all buildings to consider:
- incorporating passive solar design to maximise daylight and passive heating and cooling opportunities;
  - incorporating energy efficient design to minimise lighting, active heating and cooling requirements;
  - optimising opportunities to use renewable energy sources and incorporate renewable energy technologies wherever possible;
  - providing efficient control and effective maintenance systems that incorporate monitoring of energy consumption;
  - minimising embodied energy in construction materials; and
  - adopting a presumption against providing cooling plant and heating.
- 8.4 The proposal comprises an expansion of an existing Law School into additional floors of an existing building with no major construction work included as part of the proposal. The proposal is however highly sustainable and has consideration for the reduction of energy consumption and carbon emissions.

### Waste Statement

- 8.5 The proposal seeks to retain and adapt an existing building and, therefore, no new construction materials will be used for the proposed change of use.
- 8.6 In terms of proposed waste management and collection, most of the waste generated by the current education use consists of recyclable paper and paper cups. Such waste is stored on site and collected (and recycled) daily by Camden Council. As there is no canteen on site selling foodstuffs, the amount on non-recyclable material is very limited. Notwithstanding this, any non-recyclable material is collected daily. There will be no change to the existing waste collection arrangements as a result of this proposal.

- 8.7 The University's *Waste Disposal Policy and Procedure* (Appendix 6) outlines procedures for managing, and minimising the generation of, on site waste. These include:
- categorising various types of waste (including biological materials, chemicals, waste oils, batteries, radioactive substances and domestic-type waste); and
  - disposing of various types of waste in accordance with appropriate procedures.
- 8.8 On this basis, it can be demonstrated that the proposal makes appropriate arrangements for waste storage, collection and recycling / reduction.



## 9 Crime Impact Assessment

- 9.1 The University has considered the impact upon crime and anti-social behaviour resulting from this development. For the purposes of crime prevention, there is already adequate CCTV coverage at the rear of the building and throughout Kingsway.
- 9.2 There is no public access to the building and swipe cards will be required to access the upper floors, which are currently only held by a limited number of QMUL staff members. The reception is always staffed during opening hours and students are required to present identification cards to access the lower and upper floors.
- 9.3 In addition, Community Officers from the Covent Garden and Holborn Community Safety Neighbourhood Team give regular talks to incoming students on general safety.

## 10 Pre-Application Consultation

- 10.1 This application has not been subject to a public consultation. It involves the expansion of an existing Law School into additional floors of an existing building. The proposal includes no external change and limited internal reorganisation. It will not lead to any adverse impacts upon the surrounding area, and as a result this application has not sought pre-application consultation.

## 11 Conclusion

- 11.1 The proposal meets the objectives of the London Plan and the London Borough of Camden's LDF.
- 11.2 In particular, the proposed change of use complies with the Camden's Revised Planning Guidance for Central London (2007) which makes specific reference to the established legal character of the Inns of Court Area and the retention of legal uses.
- 11.3 The proposal accords with the relevant planning policies and the planning history records, and we therefore trust the Council is minded to grant planning permission accordingly.