

70 Gray's Inn Road London, WC1X 8NH

Planning Statement
prepared on behalf of University of Lincoln

October 2019

Contents

1. Introduction	3
2. Site and Surrounding Area	4
2.1. Site Constraints	4
2.2. Planning History	5
2.3. Pre-app Response	5
3. Proposal	8
4. Planning Policy	9
4.1. Camden Local Plan (2017).....	9
4.2. London Plan (2016)	12
4.3. Revised National Planning Policy Framework (NPPF) (2019)	13
4.4. Draft London Plan (2019).....	15
5. Planning Assessment	17
5.1. Principle of Development	17
5.2. Loss of Office Space	18
5.3. Design & Access	20
5.4. Transport.....	21
5.5. Noise	22
6. Conclusion.....	23

1. Introduction

This Planning 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 (hereby referred to as the application site).

This supporting planning statement contains 6 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:

- Design and Access Statement (Prepared by Shepherd Epstein Hunter)
- Noise Assessment (Prepared by RBA Acoustics Ltd)
- Transport Assessment (Prepared by Markides Associates)
- Transport Plan (Prepared by Markides Associates)
- Marketing Assessment (Prepared by Knight Frank)

The table below lists the drawings which are being submitted as part of this application;

Drawing	Drawing Reference
Site Location Plan	-
Ground Floor Proposal	000210
First Floor Proposal	000311
Second Floor Proposal	000412
Lower Ground Proposal	0000113
Sketch Section	000514

2. Site and 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 the lower four floors (whole of first and second floors and only parts of the ground and lower ground floors) thereby only resulting to a total floor area of 25,005 sq ft (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 Russell 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, an II* Park and Garden allocation. The site does border onto Bloomsbury Conservation Area and Hatton Garden, however the site itself does not fall within either Conservation Area. The site has no TPO's onsite.

The site is located within CIL Charging Zone A whereby office development incurs a charge of £45 per square and Educational uses incur nil.

2.1. Site Constraints

Air Quality

The site is located within a Smoke Control Order - you can't 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 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. Notably

2.3. Pre-app Response

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, however highlighted key planning considerations. 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. Proposal

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.

4. 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 2016.

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

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 o. carefully integrates building services equipment.

The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

Policy T1 Prioritising walking, cycling and public transport states the Council will promote sustainable transport by prioritising walking, cycling and public transport in the borough.

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 (2016)

Policy 2.1 London In Its Global, European And United Kingdom Context states the Mayor and the GLA Group will, and all other strategic agencies should, ensure:

- that 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; and
- that the development of London supports the spatial, economic, environmental and social development of Europe and the United Kingdom, in particular ensuring that London plays a distinctive and supportive part in the UK's network of cities.

The Mayor will continue to seek appropriate resources and investment from Government and elsewhere to ensure London excels among world cities and as the major gateway to Europe and the UK.

Policy 4.2 Offices states the Mayor will and boroughs and other stakeholders should: a support the management and mixed-use development and redevelopment of office provision to improve London's competitiveness and to address the wider objectives of this Plan, including enhancing its varied attractions for businesses of different types and sizes including small and medium sized enterprises.

Policy 3.18 Education Facilities states the Mayor will support provision of childcare, primary and secondary school, and 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 Mayor strongly supports the establishment of new schools, including free schools and opportunities to enable local people and communities to do this.

Development proposals which enhance education and skills provision will be supported, including new build, expansion of existing or change of use to educational purposes.

Development proposals which maximise the extended or multiple use of educational facilities for community or recreational use should be encouraged.

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.

4.3. Revised National Planning Policy Framework (NPPF) (2019)

The revised NPPF (2019) requires Local Planning Authorities to plan positively for the provision and use of shared space, community facilities and other local services to enhance the sustainability of communities and residential environments.

Paragraph 11 states plans, and decisions should apply a presumption in favour of sustainable development. For decision-taking this means:

- Approving development proposals that accord with an up-to-date development plan without delay; or
- Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
 - the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

Paragraph 20 states policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for community facilities (such as health, education and cultural infrastructure).

Paragraph 91 states planning policies and decisions should aim to achieve healthy, inclusive and safe places which promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;

- are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high-quality public space, which encourage the active and continual use of public areas; and
- enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.

Paragraph 117 states Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.

Planning policies and decisions should encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains.

Paragraph 121 states 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 and hospitals, provided this maintains or improves the quality of service provision and access to open space.

Paragraph 127 adds planning policies and decisions should ensure that developments: will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

- are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks;

- create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and
- where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

4.4. Draft London Plan (2019)

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)

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

Short Stay

- 1 space per 7 FTE students

5. 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 B1a office to a B1a and D1 use. 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 University of Lincoln is a public research university in Lincoln which obtained university status in 1992. Lincoln has in recent years rapidly moved up in the university rankings, as The Complete University Guide league table identifies the university having risen over 67 places since 2008. Furthermore, The Sunday Times newspaper, responsible for The Times Good University Guide, has also described the university's progression as 'the most dramatic transformation of a university in recent times'.

The university are further looking to improve their offerings to current and future students. The Strategic Plan 2021 articulates a Vision for the future that the University of Lincoln, which seeks to;

"be a global 'thought leader' for 21st Century higher education by 2021. We will be known for addressing the opportunities and challenges presented by the changing world by developing a new approach to education and knowledge development. We will build on our reputation for excellent student engagement which prepares our graduates for their future and we will work closely with our communities to ensure valuable impact from our research to make a meaningful contribution to our world".

As part of their vision the University of Lincoln has held a long-term ambition to open a London Hub for its students to provide flexible education, collaboration and business space. This will allow students to engage with potential employers, facilitate co-working space and help foster enterprise in its graduates and 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 University has already established this model in Lincoln, branded the 'Think Tank' and since December 2008, has offered business start-ups the best in high-tech, eco-friendly office space. The University has further created industry links with key stakeholders such as; The Guardian, Santander and Siemens to name a few. This falls part of the University's commitment to wider post-graduation vocational outreach, which is outlined in the Civic University statement

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.

The space will only be for students and will provide co-working/business space. The space is considered by the university a facilitator for students to apply their university knowledge in hopes for them to formulate key links with industry stakeholders and further secure jobs.

Policy 3.18 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 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 university purposes and is therefore complying with policy 3.18.

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

period of time.

The proposed scheme is seeking 600sqm of the 2,323sqm for lecturing/seminar (D1) 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 be 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.

Paragraph 117 of the revised NPPF (2019) 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 under Paragraph 121 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. Whilst the University is seeking permission to change part of the land use of the building to D1, 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 university is seeking to educate and provide the necessary skills and connections to students in hopes to propel their career and allow them the opportunity to be best in class. By encouraging and allowing the development of educational facilities such as the one proposed the council are directly supporting the evolution and betterment of our futures, as these students will be at the forefront of making changes and discovering cutting-edge international discoveries. The proposed development further adheres to the NPPF as it seeking to provide a mix of both office space and D1 space thereby ensuring a level of employment will stay on-site.

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

A Design and Access Statement has been undertaken by Shephard Epstein Hunter and is submitted as part of this application to assess any impacts which may occur due to the development.

The landlord is carrying 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 the University.

The University require the following core requirements;

- seminar rooms and teaching spaces, arranged as one communal space to facilitate social learning and shared workspace, with an emphasis on an open plan 'collaborative' environment and agile working, for an international student population (students will be Masters level so aged 21 plus), where London itself is part of the experience
- a modern, digital campus / building – everything from access to delivery should be 'digital' (such as access / room booking and tracking occupancy via phone code, charging devices, screen plug-ins to enable sharing of information with colleagues
- a memorable building interior with impact and a sense of place.
- possibly with co-worker space, so that students are in the same place as business people (possibly Lincoln-based businesses taking their first steps in London, thus serving the people of Lincolnshire, in accordance with the University's mission)
- library – plus the Business School gives access to other libraries in London access to concierge facilities (student support, access to services and events in London'
- coffee lounge as a social heart to the School
- some bookable meeting rooms, say for 8 to 10 people.
- academic work and touch down spaces
- space for business start-ups, including break out spaces, private works spaces and support facilities such as touch down spaces and kitchenette

With regards to access the landlord's refurbishment proposes a new dedicated corner entrance for the University. 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 University demise will be electronically controlled so that only University -permitted occupants can enter the University. Wheelchair access to the upper floors will require use of the lifts in the main stairs.

Furthermore, a number of changes have been made to include the comments raised by the council in regard to 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)

- this would apply to all of the University's permitted users within its curtilage (i.e. coworkers as well as students)
- the café will not be a retail café, and not available to occupants without passes
- the University has its own campus security manager with an ALO qualification that will be engaged in the design development process to ensure that the completed building is secure and complies with best practice
- the details of the strategy will take account of consultation with 'Design Out Crime' officers before being finalised for construction

To meet the University's likely aspirations for a London Business School campus building which is attractive and welcoming, and which encourages interaction and collaboration, a new open stair linking all four floors (possibly also with a dedicated University lift) is being adopted with the idea of a new stair running through the middle of the plan adjacent to the central structural spine beam, visually and socially connecting all floors. Structural advice has been provided by Edge Structures, which demonstrates that the existing structure can be adapted reasonably efficiently, and without new foundations, to provide the desired staircase arrangement.

For further information on design please refer to the Design and Access Statement and drawings submitted as part of this application.

5.4. Transport

A Transport Statement and Travel Plan has been undertaken by Markides Associates and is submitted as part of this application to assess any impacts which may occur due to the development.

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 university campus building 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 B1a requirement as opposed to D1. A total of 30 cycle parking spaces will be provided on-site. The spaces will be located to the rear of the building where a dedicated cycle store will be provided for the University as a tenant. This will provide space for a minimum of 30 cycle parking spaces, with the intention that this store would be used for both short and long stay cyclists. In addition to the above the applicant is also exploring the provision of Brompton Cycle Lockers within the Reception area of the building to accommodate users of flexi-bikes.

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 Draft London Plan (2019) 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.

For further information on transport please refer to the Transport Statement and Travel Plan submitted as part of the application.

5.5. Noise

A Noise Assessment has been undertaken by RBA Acoustics Ltd and is submitted as part of this application to assess any impacts which may occur due to the development.

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.

For further information on noise and vibration Noise Assessment submitted as part of the application.

6. Conclusion

Cushman and Wakefield have been instructed by University of Lincoln to submit a planning application for the change of use application from Class B1(a) to Class B1(a)/D1 at 70 Gray's Inn Road, London, WC1X 8NH.

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.

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

Policy 3.18 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 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 university purposes and is therefore complying with policy 3.18.

The proposed development is seeking to utilise a vacant building by providing a key service to the area. Whilst the University is seeking permission to change part of the land use of the building to D1, 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 university is seeking to educate and provide the necessary skills and connections to students in hopes to propel their career and allow them the opportunity to be best in class. By encouraging and allowing the development of educational facilities such as the one proposed the council are directly supporting the evolution and betterment of our futures, as these students will be at the forefront of making changes and discovering cutting-edge intonational discovers.

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.

If you have any further queries, please do not hesitate to contact Ian Anderson on ian.anderson@cushwake.com or Zainab Arshad on Zainab.arshad@cushwake.com in the first instance.