

70 Gray's Inn Road  
London,  
WC1X 8NH

Sustainability Statement  
prepared on behalf of University of Lincoln

January 2020

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# 1. Introduction

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

## 2. Policy

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

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

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

### 2.1. Camden Local Plan (2017)

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

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

The location of development and mix of land uses have a significant influence on the amount of energy used for transport, as well as whether we can generate or supply local energy efficiently. The Council will seek to make the most efficient use of Camden's limited land and steer growth and uses that will generate a large number of journeys to the most accessible parts of the borough. Development will be focused in Camden's growth areas, with other highly accessible locations, such as Central London and most of our town centres, also considered suitable for development that significantly increases travel demand.

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

Policy CC2 states developers must demonstrate how adaptation measures and sustainable development principles have been incorporated into the design and proposed implementation.

## **2.2. London Plan (2016)**

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

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

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

## **2.3. National Planning Policy Framework (2019)**

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

a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

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

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

### 3. Assessment

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

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

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

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

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

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

Notwithstanding the paragraph above, the applicant is still keen to provide sustainable measures where possible as sustainability has and always will form part of their core values;

*As a rapidly growing University with over 14,000 students and 1,500 staff, we know that our activities will have an impact on the environment. This is why we're working to become a more sustainable organisation and using our resources to make a positive contribution to environmental sustainability; through student engagement, biodiversity enhancement and research.*

#### **Creating Sustainable Futures**

*Our sustainability strategy sets out our ambition for sustainability at the University of Lincoln and introduces our priorities up until 2021. The three key themes that form the basis of our sustainability strategy are:*

- *Sustainable Campus*
- *Sustainable Culture*
- *Collaboration for Change*

*As a University looking to the future, we aim to develop our approach around environmental sustainability and provide our students and staff with opportunities to help tackle environmental issues through volunteering opportunities, operational changes or their own research. By engaging our students, local communities and partner organisations in such initiatives, we can make a meaningful contribution to both our local and global environment.*

The University has recently achieved ISO 14001 accreditation and EcoCampus Platinum for its environmental management systems. The University has also declared a climate emergency in line with many other national and international institutions and is working positively to reduce its overall environmental impact.

Given the university's position on sustainability, they are insistent the proposed development is a car free development which seeks to promote sustainable methods of transport by providing cycle parking and changing facilities onsite.

Furthermore, the location of developments has an impact on the amount of energy used for transport and it is for that reason Camden seeks to make the most efficient use of its limited land and steer growth and uses that will generate a large number of journeys to the most accessible parts of the borough. The policy further states development will be focused in Camden's growth areas, with other highly accessible locations, such as Central London and most of their town centres. The site is located next to both bus and train routes, as well as excellent pedestrian access. The site has a PTAL rating of 6b (highest), therefore adhering to local policy.

Whilst as occupies the university are unable to dictate the methods students and staff travel to the site, they are ensuring enough information on sustainable modes of transport are made available to guests, students and staff. The travel plan submitted as part of this application states at first occupation, all students and staff will be provided with a 'Welcome Pack' (potentially in the form of online material), which will include the following information:

- Location map of the site;
- A description of distance, time, and (where relevant) routes for travelling from the site to key local destinations on foot, bicycle and public transport;
- Site specific public transport information including rail and bus timetables for local services;
- Details of any site-specific measures such as Bicycle User Group;
- Details of cycle training

Furthermore, an information sheet will be produced and displayed within the on-site notice boards to promote the travel plan, including specific initiatives associated with it and its objectives.

The university will further seek to use soft measures to promote sustainability. Such as; marketing initiatives and campaigns to promote a shift away from the private and promoting participation in local and national sustainable travel-based initiatives including Bike Week and Walk to Work Week.



Moreover, local policy and Policy 5.4 of the London Plan states the possibility of sensitively altering or retrofitting buildings should always be strongly considered before demolition is proposed. The proposed development is seeking to use the current building rather than demolishing and starting afresh. Thereby complying with local and national policy. The only material change that are being adopted as part of this application is a new entrance. The entrance will be constructed sustainably, by seeking to ensure appropriate glazing is used which retains heat and where possible reduce an onsite waste.

Whilst the applicant is unable to undertake any alterations to the building to improve efficiencies, the landlord has recently undertaken a number of changes to the building to improve overall efficiencies. This included changing and improving the chiller, lifts and all fan coil units on all 4 floors, therefore illustrating the building's adaptation to overall becoming a more sustainable building. Further information on energy efficiencies is provided in the Energy statement submitted as part of this application.

The NPPF defines sustainability as an economic, environmental and social objective. Whilst often both environmental and economic objectives are considered in detail, social objectives are overlooked. Not only is the proposed development sustainable in terms of economic and environmental objectives, but it also meets social objectives too. The proposed development is seeking to provide a hub for students to learn skills and educate themselves in hopes for a better future. The development further enables the opportunity to increase employment in the local area and provide locals with a new skill set through apprenticeship schemes. Further information on what the university are providing is included in the letter addressed to the council submitted as part of this application.

To conclude whilst the applicant understands there is policy which dictates changes need to be made in order to improve sustainability, they are unable to provide such changes given their relationship with the building. However, they are within their own remit trying to improve sustainability by developing a carfree development and further looking to provide social change to the area. Other changes have been made to the building to improve energy efficiency which have been undertaken by the landlord, therefore overall the building is far more sustainable with university occupying the building in comparison to perhaps other tenants.