

70 Gray's Inn Road, WC1X 8NH

Energy Note

This energy note has been prepared by Rolfe Judd on behalf of the applicant Euro Grays Inn Inc in support of the submission of a planning application for change of use of the existing lower four floors for alternative flexible use as either education (class F1) or retained use as office and minor elevational change for a door at ground floor at 70 Gray's Inn Road, London, WC1X 8NH.

Policy

Development proposals are assessed against the statutory development plans, in this case the Camden Local Plan (2017) and London Plan (2016). The Publication London Plan (2020) is also a material consideration for determining planning decisions across London. The Revised NPPF (2019) is also a material consideration for determining planning applications.

Camden Local Plan (2017)

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

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

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

The Council's energy hierarchy is outlined below:

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

line with stage one of the energy hierarchy 'Be lean'.

2. Be clean - The second stage of the energy hierarchy 'Be clean' should demonstrate how the development will supply energy efficiently through decentralised energy. Please refer to the section below on decentralised energy generation.

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

Publication London Plan (2020)

Policy SI2 (minimising greenhouse gas emissions) states Major development should be net zero-carbon. This means reducing greenhouse gas emissions in operation, and minimising both annual and peak energy demand in accordance with the following energy hierarchy:

- 1) be lean: use less energy and manage demand during operation.
- 2) be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly.
- 3) be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site.
- 4) be seen: monitor, verify and report on energy performance.

Policy D3 (Optimising site capacity through the design led approach) shows the hierarchy for building approaches which maximises use of existing materials. Retain and refits are the preferred options with the least preferable option being recycling materials produced by the building or demolition process.

Assessment

The applicant is seeking planning permission for the change of use of the existing lower four floors for alternative flexible use as either education (class F1) or retained use as office and minor elevational change for a door at ground floor at 70 Gray's Inn Road. The proposal only relates to the lower ground floors and involves the change of use of a total of 1,646sqm of floorspace. This exceeds the local policy threshold of 500sqm that requires an energy statement be submitted with the application.

Recent alterations have been undertaken by the landlord to improve overall efficiencies. The following works have been conducted:

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

In summary, although the proposed change of use application meets the policy threshold that requires changes be made to improve energy efficiency the policy isn't fully applicable in this instance, as there are no extensions proposed to the existing building and no changes are proposed that alter the fundamental makeup of the building.