

70 Gray's Inn Road, WC1X 8NH

Sustainability Note

This sustainability note has been prepared by Rolfe Judd on behalf of the applicant, Euro Gray's Inn Inc in support of the submission of a planning application 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, 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.

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 the land use mix both influence the energy use, and therefore the overall sustainability of development, both in terms of the construction process, the raw materials involved, and the energy used for transport.

Policy CC2 states that developers must demonstrate how measures and sustainable development principles have been incorporate into the design and implementation. This policy requires any development involving 5 or more residential units or 500sqm or more of any additional floorspace to demonstrate this in a Sustainability Statement.

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 change of use of the existing lower four floors of 70 Gray's Inn Road for alternative flexible use as either education (class F1) or retained use as office and minor elevational change for a door at ground floor. 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 500sq/m that requires a sustainability statement be submitted with the application.

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 directs growth and land uses that will generate a large number of journeys to the most accessible parts of the borough. The policy also 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) and provides 30 cycle parking spaces along with being car free, therefore adhering to local policy.

The occupier of the building is unable to dictate the method of travel used by any students, staff or other employees, but is able to ensure that sustainable methods of transport are available to those using the premises. The travel plan submitted alongside this application states that at the 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

Additionally, 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.

Local Policy and Publication London Plan Policy D3 states that the possibility to retain and refit buildings should always be considered before demolition is considered. The proposed development

at 70 Gray's Inn Road is seeking to reuse the existing building rather than demolish it. Therefore the proposal accords with local and national policy. The only change that will impact that external appearance of the building is the addition of a new entrance, in an already existing bay.

To conclude, the applicant is aware of the policy requirement to improve sustainability on any proposal where a change of use of 500sqm plus of floorspace is proposed. However, the applicant is proposing to improve the sustainability of the area by bringing four floors of vacant office floorspace into use with a development that is both car free and in an accessible location. The landlord has made changes to the building to improve energy efficiency and therefore the building would be more sustainable if used for educational purposes than in its current, vacant, state.