

██████████
24th December 2020

London Borough of Camden
Regeneration and Planning
5 Pancras Square
London
N1C 4AG

Dear Sir or Madam,

70 Gray's Inn Road, London, WC1X 8NH

Full Planning Application for change of use of the lower ground to fourth floor from Class E to alternative flexible use as either Class F1 (Education) or retained Class E and minor elevational change.

Planning Portal Ref: PP-09373856

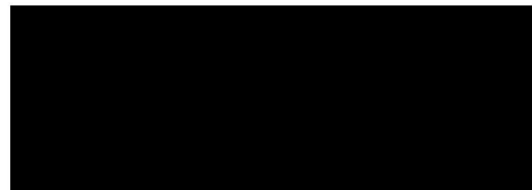
On behalf of the applicant, Euro Grays Inn Inc, we hereby submit an application for planning permission for the change of use of the existing lower four floors of 70 Gray's Inn Road for alternative flexible use as either education (class F1) or retained use as office and minor elevational change for a door at ground floor. This application relates to the lower ground, ground, first and second floors of 70 Gray's Inn Road. The requisite planning portal fee of £462- has been paid online.

The planning application has been submitted online via the planning portal along with the following documents for the Council's consideration:

- Competed application forms
- Site Location Plan
- Existing floorplans (provided by Rolfe Judd Architecture)
- Proposed floorplans (Provided by Rolfe Judd Architecture)
- Existing elevations (Provided by Rolfe Judd Architecture)
- Proposed elevations (Provided by Rolfe Judd Architecture)
- Transport Assessment and Travel Plan (Provided by Markides Associates)
- Air Quality Assessment (Provided by Wardell Armstrong)
- Acoustic Assessment (Provided by RBA Acoustics)
- Marketing Report and Appendices (Prepared by Cushman & Wakefield)
- Sustainability Note (Provided by Rolfe Judd Planning)
- Energy Note (Prepared by Rolfe Judd Planning)

Site Location

The site is located on Gray's Inn Road, London, WC1X 8NH and falls under the administration of London Borough of Camden. The site fronts onto Gray's Inn Road and is bounded by Portpool Lane to the north and Verulam Street to the south.



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The site consists of a large six storey office building and is currently used as office space (Use class E, formerly use class B1). This application relates solely to the lower four floors, the entirety of the first and second floors and parts of the lower ground and ground floors) equating to a total floor area of 1646sqm.

The site is well connected by road and has good public transport links with Chancery Lane, Holborn and Kings Cross Stations being in close proximity. Due to these links the site has the highest PTAL rating available (6b).

The area surrounding the site is occupied by a mix of land uses with ground floor retail/commercial and upper floor office space being commonplace. Gray's Inn Gardens, located to the west of the application site, is a Grade II * listed park and garden and is surrounded by offices belonging to many of the preeminent legal firms in London.

The application site is not nationally or locally listed but a number of the properties opposite in and around Gray's Inn Square and the neighbouring Verulam Buildings are Grade II listed. The Bloomsbury and Hatton Garden conservation areas border the site but the application site itself does not fall in either Conservation area.

The site is located in CIL charging zone A (central) where offices incur a charge of £110 per sq/m and education facilities incur no charge. The application site has been occupied for more than six months in the last three years.

Relevant Planning History

There have been a number of planning applications for the site and the ones relevant to this application are outlined below:

- App ref: 2019/5592/P - The change of use of lower ground to fourth floor from Class B1a (office) to part Class B1a (office) and part D1(non-residential institution). - Application withdrawn by the applicant
- App ref: 2019/1153/P - External elevational alterations to the property at ground and first floor levels to facilitate the creation of a café 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. – Granted 11th September 2019
- App ref: 2006/2137/P - Alterations to entrance of office building (Class B1) involving the installation of new entrance door, alterations to facade above entrance, and the installation of two external light fittings.- Granted 3rd July 2006
- App ref: 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. – Granted 27th April 1993

The planning history indicates the council's support for redevelopment at 70 Gray's Inn Road. Most notably the most recent application (ref: 2019/5592/P) that was referred to the Camden Planning committee in February 2020 with a recommendation to grant (subject to a S106 agreement). However the applicant, the University of Lincoln, withdrew the application. This withdrawn application sets the precedent for the current planning application, establishing the principle of the

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change of use and was supported by the Planning Committee. The withdrawal of the application related to a change of circumstances by the previous applicant related to the current pandemic crisis.

The Proposal

This application is for planning permission for change of use of the existing office floorspace on the lower four floors of the building (the lower ground, ground, first and second floors) from office floorspace (use class E(g)(i) formerly B1) to either alternative flexible education floorspace (use class F1) or retained as office floorspace. The upper two floors of the building (floors three and four) are retained as office floorspace.

Details of the application can be summarised as follows:

- The change of use of the existing office floorspace (use class E, formerly use class B1) to alternative flexible education use (use class F1, formerly use class D1) or retained as office, in line with the floor areas outlined in the table below:

Floor Level	Change of use Area (sqm) Either Class E or Class F1
Lower Ground Floor	332
Ground Floor	257
First Floor	527
Second Floor	530
Total	1,646

- External changes are minimal with the addition of a new door to be included in the existing bay on the Portpool Lane elevation being the only proposed external works.

For further details, please refer to the submitted drawings from Rolfe Judd Architecture.

Planning Policy Considerations

Policy E2 (Employment premises and sites) states that the Council will resist the loss of sites that are suitable for continued business use unless it's demonstrated that the site is no longer suitable for its existing business use or alternative uses have been explored. The Council state that higher intensity redevelopment will be considered as long the level of employment floorspace is increased or at least maintained.

The existing office (use class E, formerly B1) floorspace on the lower four floors of the building is to either be retained as Class E or used as flexible education (class F1) use. This is carried out under Town and Country (General Permitted Development) Order 2015 Schedule 2 Part 3 Class V which allows development consisting of a change of use of a building or other land from a use permitted by planning permission granted on an application, to another use which that permission would have specifically authorised when it was granted.

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This allows the applicant a degree of flexibility with regards to the future use the lower four floors and this is deemed to be sensible owing to the current COVID-19 pandemic and the likely reduced need for office space post 2020, as highlighted in the Marketing Report (prepared by Cushman & Wakefield) that is submitted alongside this application.

Camden Local Plan Policy E2 has regard to proposals involving the loss of business premises and sites (paragraph 5.37) and states that when assessing proposals that involve the loss of a business use to a non-business use the Council will consider whether there is potential for that use to continue. Various factors will be taken into account including:

- the suitability of the location for any business use;
- whether the premises are in a reasonable condition to allow the use to continue;
- the range of unit sizes it provides, particularly suitability for small businesses; and
- whether the business use is well related to nearby land uses

The attached Travel Plan reiterates the highly accessible location of the site, with established public transport, pedestrian and cycle networks which allows future users of the site the opportunity to adopt the most sustainable forms of travel.

The flexibility Under Class V of the GPDO 2015 to utilise the lower floors as either education (class F1) or as office space (class E) will provide the owner with the greatest opportunity of securing a tenant for the floors and ensuring the floorspace is not vacant, benefiting the local economy. The flexibility allows the letting of the lower floors to adapt to the needs of any future occupiers, be that small business or otherwise, allowing the proposal to accord with policy E2.

The provision of education (class F1) floorspace would provide a land use compatible with the established character in the area. The surrounding area is characterised by retail or commercial on the ground floor and offices on the floors above. As such it is considered that the proposed addition of flexible educational use (class F1) or the retention of office floorspace (class E) would maintain the buildings' relationship to nearby land uses.

Local Plan Policy C2 (Community facilities) notes that the Council will work to ensure that community facilities and services are developed and modernised to meet the changing needs of the community and reflect new approaches to the delivery of services. In order to achieve this the Council will support the investment plans of educational bodies to expand and enhance their operations

Policy T2 (Parking and car free development) notes the Council will limit the ability of parking and require all new development in the borough to be car-free. To accord with this the proposal does not have any provision for car parking.

Publication London Plan (2020) Policy S3 (Education and childcare facilities) states that development proposals for education 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 facilities next to parks or green spaces, where possible
- ensure that there is not a net loss of facilities, unless it can be demonstrated that there is no ongoing or future need

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Publication London Plan Policy E8 (Sector growth opportunities and clusters) states that innovation including London's role as a location for research and development should be supported, and collaboration between businesses, higher education providers and other relevant research and innovation organisations should be encouraged.

The application for the change of use at 70 Gray's Inn Road is located in an accessible location (with the highest possible PTAL rating of 6b), is located opposite a nationally listed park (Gray's Inn Gardens) and would provide flexible educational floorspace. It is therefore considered to be in line with draft London Plan policies S3 and E8.

Sustainability Implications

Local plan policy states that a sustainability statement needs to be submitted where any development involves 5 or more residential units or 500 sq/m or more of any additional floorspace. The proposed development seeks the change of use of over 500 sq/m of floorspace and therefore triggers the need for a sustainability statement. However the nature of proposed development means that no changes are proposed that would alter the efficiency of the building.

Camden Local Plan Policy CC1 states that the council will require all development to minimise the effects of climate change and encourage all development to meet the highest feasible environmental standards that are financially viable during construction and occupation. The policy also indicates that where possible the sensitive altering or retrofitting of buildings should be strongly considered before demolition is proposed.

The space will be used by, mainly students, and provides co-working/business space. The nature of the proposal and the planned use as class F1, but with no formal teaching or lecture space, means that the space will operate in a way that closely resembles an office environment.

The travel plan submitted with this application outlines the methods chosen that will reduce the overall environmental impact of the proposal. It recognises that fact that the occupiers of the building will be unable to dictate the methods that any students and staff take to travel to and from the site but that a 'welcome pack' will be provided at first occupation. Included in this will be details of distance, travel time and routes for travelling to and from the site to key local destinations by public transport, on foot and by bike.

Energy Implications

The Camden Local Plan requires development to minimise the effects of climate change and encourage all development to meet the highest feasible environmental standards (policy CC1). The construction process and new materials employed in developing buildings are a major consumer 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.

The Council follow an energy hierarchy which is summarised 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'.*

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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 500 sqm 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.*

The proposed change of use at the site relate to the internal arrangement of the lower four floors (with one minor external alteration being the addition of a door) but no changes are proposed that would alter the energy strategy and this is proposed to continue as it is currently.

Whilst this application does not propose any alterations to the building to improve the efficiency, the landlord has recently undertaken a number of changes to improve the energy efficiency. These include:

- Replacement of the existing fluorescent lighting with new high efficiency LED lights
- New energy efficient DALI lighting controls with day light dimming control
- Replacement of 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.

Local plan policy requires the submission of an energy strategy that states the changes that will be introduced to improve efficiency, it is considered that the energy hierarchy is not entirely applicable to this change of use application as there are no extensions proposed nor are there any changes proposed that would fundamentally alter the building.

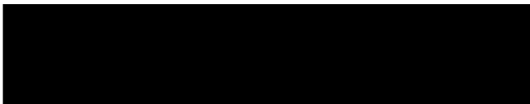
Summary

This application is for planning permission for the change of use of existing lower four floors of 70 Gray's Inn Road for alternative flexible use as either education (class F1) or retained use as office. The application scheme proposes one minor external alteration to the existing property (the inclusion of a new entrance door out onto Portpool Lane). It is not considered that the scheme may present any unacceptable impacts on the surrounding built environment.

We trust that the enclosed information is sufficient for you to validate our client's planning application and we look forward to a swift and positive outcome. Should you require any further information and would like to arrange a site visit please do not hesitate to contact the undersigned.

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Yours faithfully



For and on behalf of
Rolfe Judd Planning Limited