

MAYOR OF LONDON

Richard McEllistrum
Development Control, Planning Services
London Borough of Camden
Town Hall
Argyle Street
London
WC1H 3ND

Our ref: D&P/3027/02
Your ref: 2013/1598/P
Date: 9 October 2013

Dear Mr McEllistrum

**Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008
University of London Halls, Cartwright Gardens, Bloomsbury**

I refer to your email of 1 October 2013 informing me that Camden Council is minded to grant planning permission for the above planning application, subject to completion of a Section 106 agreement. I refer you also to the notice that was issued on 2 October 2013 under the provisions of article 5(1)(b)(i) of the above Order.

Having now considered a report (copy enclosed) on this case I am content to allow Camden Council to determine the case itself, subject to any action that the Secretary of State may take, and do not therefore wish to direct refusal or to take over the application for my own determination.

Yours sincerely



Boris Johnson
Mayor of London

cc Andrew Dismore, London Assembly Constituency Member
Nicky Gavron, Chair of London Assembly Planning Committee
National Planning Casework Unit, DCLG
Alex Williams, TfL
Nick Belsten, CBRE, Henrietta House, Henrietta Place, London W1G 0NB

University of London Halls, Cartwright Gardens, Bloomsbury

in the London Borough of Camden

planning application no. 2013/1598/P

Strategic planning application stage II referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Partial refurbishment and partial redevelopment of the site to provide 1,200 student accommodation rooms, an uplift of 187 student rooms and additional ancillary uses. Public realm improvements to Cartwright Gardens and surrounding area.

The applicant

The applicant is **University of London** and the architect is **TP Bennett**.

Strategic issues

At consultation stage the application raised issues in relation to **student accommodation, urban design, inclusive design, transport, climate change and sustainable development**.

The Council's decision

In this instance, Camden Council has resolved to grant permission subject to the completion of a Section 106 agreement.

Recommendation

That Camden Council be advised that the Mayor is content for it to determine the case itself, subject to any action that the Secretary of State may take, and does not therefore wish to direct refusal or direct that he is to be the local planning authority.

Context

1 On 19 April 2013 the Mayor of London received documents from Camden Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. This was referred to the Mayor under Category 1B of the Schedule to the Order 2008:

- *"1B: Development which comprises or includes the erection of building(s): (b) in Central London and with a total floorspace of more than 20,000 square metres."*

2 On 29 May the Mayor considered planning report PDU/3027/01, and subsequently advised Camden Council that the application did not comply with the London Plan, for the reasons set out in paragraph 59 of the above-mentioned report; but that the possible remedies set out in that paragraph could address these deficiencies.

3 A copy of the above-mentioned report is attached. The essentials of the case with regard to the proposal, the site, case history, strategic planning issues and relevant policies and guidance are as set out therein, unless otherwise stated in this report. On 15 August 2013, Camden Council decided that it was minded to grant planning permission, subject to the completion of a section 106 agreement, and on 2 October 2013 it advised the Mayor of this decision. Under the provisions of Article 5 of the Town & Country Planning (Mayor of London) Order 2008 the Mayor may allow the draft decision to proceed unchanged, direct Camden Council under Article 6 to refuse the application or issue a direction to Camden Council under Article 7 that he is to act as the Local Planning Authority for the purposes of determining the application. The Mayor has until 14 October 2013 to notify the Council of his decision and to issue any direction.

4 The decision on this case, and the reasons will be made available on the GLA's website www.london.gov.uk.

Update

5 At the consultation stage Camden Council was advised that the application did not comply with the London Plan, for the reasons set out in paragraph 59 of the above-mentioned report; but that the possible remedies set out in that paragraph could address these deficiencies:

- **Principle of the development:** The principle of re-providing better quality and a higher density of student accommodation on this site does not raise any strategic planning concerns and is supported. In line with paragraph 3.53 of the London Plan, the student accommodation should be secured as such within the Section 106 agreement or by planning condition.
- **Heritage:** Whilst Canterbury Hall is a positive contributor to the Conservation Area and its loss will cause harm to the Conservation Area, this harm is less than substantial and is, on balance, outweighed by the replacement and refurbishment of the other, low quality buildings on the site, the provision of additional student rooms, and the high quality replacement building.
- **Urban design:** On balance, the proposal is considered acceptable in design terms. However, further information is required regarding the impact on the Blackheath Point panorama.
- **Inclusive design:** The application does not comply with London Plan inclusive design policy. The applicant should increase the number of wheelchair accessible bedrooms, revise the ground floor layout, provide details of blue badge parking and provide details of how the proposed raised table will be designed to meet the needs of disabled people.
- **Transport:** Further information is required to ensure the application complies with London Plan transport policy. The applicant should provide further information on the trip generation for the bus network and blue badge parking. Suggested improvements should be made to the Travel Plan and Student Management Plan and secured by condition. The level of cycle parking, a construction logistics plan and a delivery and servicing plan for the application should be secured by condition to be in accordance with the London Plan transport policies.

- **Climate change:** The carbon dioxide savings exceed the targets set within Policy 5.2 of the London Plan. However, further information is required to ensure the application complies with London Plan Policy. The applicant should provide the requested information regarding the nearby district heat network, the plant room and PV.
- **Sustainable drainage:** The application does not comply with London Plan Policy 5.13. The applicant should re-examine the drainage aspect of the proposals and include measures to divert or attenuate a higher proportion of the surface water run-off.

6 Since the Mayor made these initial representations, additional information has been provided. An updated assessment against the issues raised previously is provided under the corresponding headings below.

Principle of development

7 At Stage 1, the principle of re-providing better quality and a higher density of student accommodation was supported and did not raise any strategic concerns. In line with paragraph 3.53 of the London Plan, the student accommodation has been secured as such within the section 106 agreement. A draft of the section 106 agreement has been provided by the Council and negotiations on the final version are underway with the applicant.

Urban design

8 At Stage 1, the proposal was considered acceptable in design terms, however, further information was requested regarding the impact on the Blackheath Point panorama.

9 The site lies in the 'background wider setting consultation area' as defined in the London View Management Framework (LVMF) for the view from Blackheath Point (View 6A). The threshold plane for this viewpoint, where it passes over the site, is at a height of between 53 and 54.2 metres AOD. The applicant has demonstrated that as the maximum height of the proposed development is 51.70 metres AOD, it does not break the threshold plane and would therefore not impact upon this strategic view.

Inclusive design

10 At Stage 1, the applicant was advised that the application did not comply with London Plan Policy 3.8 'Housing Choice', which requires 10% of rooms to be wheelchair accessible. The proposal includes 60 (5%) fully wheelchair accessible rooms and states it will provide a further 5% at its own expense if required by students.

11 In response, the applicant has investigated alternative layouts but states that it is not possible to provide another 60 wheelchair accessible rooms without a major redesign of the proposal. The applicant has also provided a detailed methodology that demonstrates how two standard rooms would be converted into a single wheelchair accessible room, and states that the conversion could be easily undertaken by an institution. GLA officers recognise the efforts made by the applicant to reconfigure the layout, and accept the argument that 'easily adaptable' conversion for an institution such as the University of London may require more work than would be acceptable for a homeowner. The proposal is therefore deemed to conform to the requirements of Policy 3.8.

12 At Stage 1, the applicant was requested to consider some on-street disabled persons parking. As discussed in paragraph 17, TfL and Camden Council have agreed that this will be

delivered as part of highway works surrounding the site and a contribution has been secured for these works.

13 The applicant is proposing a raised table between the park and entrance of the proposal and also at the junction of Leigh Street and Marchmont Street. At stage 1, the applicant was asked to provide further details of how it will meet the needs of disabled people, including blind and partially sighted people. In response, the applicant has provided details of tactile paving to be located either side of the carriageway and centrally to the gates leading into Cartwright Gardens, which is acceptable.

14 The applicant is proposing two platform lifts to serve 35 rooms on the ground floor and at Stage 1 was asked to reconsider the ground floor layout to avoid the need for a level change. In response, the applicant has stated that the raised plinth has been incorporated in order to address 'safer by design' recommendations, thereby raising the window levels of rooms facing directly onto the street. As the applicant has confirmed that the platform lifts will be maintained to the same standard as the passenger lifts this is considered to be acceptable in this instance.

15 In summary, the proposal now conforms to London Plan inclusive design policy.

Transport

16 At Stage 1, additional information was requested in relation to the bus trips generated from the development. Although this information showed there was a slight increase, TfL considers that there is sufficient capacity to accommodate the minor uplift and no mitigation was therefore required.

17 The proposed car free nature of the development was welcomed, however TfL requested additional information on the Blue Badge parking spaces. It is now understood that the Blue Badge and taxi bays will be delivered by Camden as part of the highways improvements surrounding the site and a contribution of £151,829 has been secured for these works. The section 106 agreement also includes a car free clause, restricting residents from applying for parking permits in the surrounding area.

18 At Stage 1, additional cycle parking spaces were required for the application to be in accordance with London Plan Policy 6.9. This has been agreed with the applicant and secured via condition. A PERS audit was submitted with the application and the Council have secured monies in the section 106 towards pedestrian improvements and public realm.

19 The Travel Plan submitted with the application has been secured via the section 106 agreement along with a contribution of £5,561 towards monitoring. The Student Management Plan, Construction Management Plan and Servicing and Delivery plan have all been secured via section 106 agreement.

20 TfL is now satisfied with the application and considers it to be in accordance with the transport policies of the London Plan.

Climate change

21 The applicant is proposing a communal heating system to serve the whole development initially served by an on-site plant. The system will allow connection to the district heat network when this becomes available and at Stage 1 the applicant was asked to provide evidence of correspondence with the network operator. In response, the applicant has provided evidence of correspondence with SOAS and Arup confirming the status of the local district heating networks

and timescales for potential extension to the site. This confirms that it will be 5 years before the network is available.

22 The applicant is proposing to install a site heat network connecting both buildings and at Stage 1 the applicant was asked to confirm which one of the plant rooms shown on the plans would be the energy centre. This has been provided and is acceptable.

23 The applicant was also asked to clarify whether consideration has been given to potential shading of PV panels from adjacent buildings and plant equipment when quantifying the potential for PV installation. In response, the applicant has provided further information on the shading analysis carried out on the roof of the building, confirming that the majority of panels will not be shaded. Following progress in the design, it has also been stated that the PV installed capacity has increased from 50kW to 52.3kW and that the carbon savings estimated in the energy statement (23tCO₂) will still be achieved.

24 In summary, the proposal now conforms to London Plan energy policy.

Sustainable drainage

25 The Stage 1 report pointed out that the Sustainability Statement indicated only a small portion of the roof area would form a green roof, limiting the opportunity for attenuation of surface water, and insufficient to meet the Mayor's minimum standard of a 50% reduction in run-off rates contained within the Sustainable Design and Construction SPG. In response, the applicant has pointed out an error in the Sustainability Statement and provided a revised plan showing that the area of green roof is actually 441 sq.m., rather than 190 sq.m., as well as demonstrating that this is the maximum area achievable.

26 In terms of rainwater and greywater harvesting, Thames Water have advised that due to the local drainage infrastructure this raises the risk of back-charge flooding into the development and has therefore been discounted. The potential roof area available for rainwater collection is also considered insufficient to cater for demand from WC flushing. An attenuation tank will be included as part of the surface water collection system for the courtyard garden and basement level light-wells.

27 As discussed in paragraph 29 below, the Environment Agency have objected on grounds of insufficient attenuation storage, however the Council have confirmed that this will be dealt with by condition, as suggested by the Environment Agency.

28 Although the proposals do not fully comply with London Plan Policy 5.13, due to the constrained nature of this central urban site, the proposal is acceptable in terms of sustainable drainage. A planning condition secures agreement of a sustainable urban drainage system prior to commencement.

Response to consultation

Environment Agency

29 Object on the grounds that insufficient attenuation storage will be provided, however the Council have confirmed that conditions will be placed on the permission in agreement with, and as requested by, the Environment Agency.

English Heritage

30 As reported at Stage 1, English Heritage stated that while the loss of Canterbury Hall is regrettable, the benefits from the proposed scheme, including a high quality building, outweigh the 'less than substantial' harm caused by its loss.

Bloomsbury Conservation Area Advisory Committee

31 Object to the loss of Canterbury Hall, the scale and bulk of the new building, loss of light, noise and the retention of Hughes Parry Tower.

Police Crime Prevention Design Advisor

32 No objection, subject to the provision of further details through condition or section 106 agreement.

Marchmont Association

33 Object to the height and mass of the new building, loss of sunlight, and increased noise, although accepted the need for increased quality and quantity of student accommodation. Supports other aspects of the design as well as the introduction of public access and improvements to Cartwright Gardens.

Cartwright Gardens Committee

34 Made up of hotels surrounding the Gardens, objections raised to the justification of the benefits arising from opening up the gardens to public access; loss of business revenues arising from part loss of exclusive access to the Gardens; concern over future management of the Gardens; noise impact of removal of two tennis courts; crime concerns; need for new footpath and one way system; diversion of vehicular traffic; and demolition and construction impact.

Individuals/Local Groups

35 In response to 1,288 consultation letters, 6 letters of support were received, and 58 objections, plus one petition with 43 names. Main objections:

- Height, mass and architectural design of buildings.
- Loss of sunlight and daylight.
- Increase in noise and general disturbance from students.
- Inadequate student management arrangements.
- Harm to character and appearance of the area.
- Loss of privacy/overlooking.
- Disproportionate increase in floorspace compared to increase in student numbers.
- Need for conference facilities.
- Light pollution.

36 Strategic issues raised by objectors in relation to transport have been considered in this report and the stage 1 report, and local issues have been considered in the Council's committee report.

Article 7: Direction that the Mayor is to be the local planning authority

37 Under Article 7 of the Order the Mayor could take over this application provided the policy tests set out in that Article are met. In this instance, the Council has resolved to grant permission with conditions and a planning obligation, which satisfactorily addresses the matters raised at Stage 1, therefore there is no sound planning reason for the Mayor to take over this application.

Legal considerations

38 Under the arrangements set out in Article 5 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor has the power under Article 6 to direct the local planning authority to refuse permission for a planning application referred to him under Article 4 of the Order. He also has the power to issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application. The Mayor may also leave the decision to the local authority. In directing refusal the Mayor must have regard to the matters set out in Article 6(2) of the Order, including the principal purposes of the Greater London Authority, the effect on health and sustainable development, national policies and international obligations, regional planning guidance, and the use of the River Thames. The Mayor may direct refusal if he considers that to grant permission would be contrary to good strategic planning in Greater London. If he decides to direct refusal, the Mayor must set out his reasons, and the local planning authority must issue these with the refusal notice. If the Mayor decides to direct that he is to be the local planning authority, he must have regard to the matters set out in Article 7(3) and set out his reasons in the direction.

Financial considerations

39 Should the Mayor direct refusal, he would be the principal party at any subsequent appeal hearing or public inquiry. Government guidance in Circular 03/2009 (*Costs Awards in Appeals and Other Planning Proceedings*) emphasises that parties usually pay their own expenses arising from an appeal.

40 Following an inquiry caused by a direction to refuse, costs may be awarded against the Mayor if he has either directed refusal unreasonably; handled a referral from a planning authority unreasonably; or behaved unreasonably during the appeal. A major factor in deciding whether the Mayor has acted unreasonably will be the extent to which he has taken account of established planning policy.

41 Should the Mayor take over the application he would be responsible for holding a representation hearing and negotiating any planning obligation. He would also be responsible for determining any reserved matters applications (unless he directs the council to do so) and determining any approval of details (unless the council agrees to do so).

Conclusion

42 Further information and clarification has been provided to support the principle of development, urban design, inclusive design, transport, climate change and sustainable drainage, which together with conditions and planning obligations imposed by Camden Council, address the outstanding issues that were raised at Stage 1. On this basis there are no sound reasons for the Mayor to intervene in this particular case.

43 Having regard to the details of the application, the matters set out in Camden Council's committee report and its draft decision notice, this scheme is acceptable in strategic planning terms.

for further information, contact Development & Projects:

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29 May 2013

**University of London Halls, Cartwright Gardens,
Bloomsbury**

in the London Borough of Camden

planning application no. 2013/1598/P

Strategic planning application stage 1 referral (new powers)

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008

The proposal

Partial refurbishment and partial redevelopment of the site to provide 1200 student accommodation rooms, an uplift of 187 student rooms and additional ancillary uses. Public realm improvements to Cartwright Gardens and surrounding area.

The applicant

The applicant is **University of London** and the architect is **TP Bennett**.

Strategic issues

The principle of re-providing better quality and a higher density of **student accommodation** on this site does not raise any strategic planning concerns. The loss of a non-designated **heritage** asset does raise strategic concern, however, on balance, this is considered acceptable.

Further information is required regarding **urban design, inclusive design, transport, climate change** and **sustainable drainage**.

Recommendation

That Camden Council be advised that the application does not comply with the London Plan, for the reasons set out in paragraph 59 of this report; but that the possible remedies set out in paragraph of this report could address these deficiencies.

Context

1 On 19 April 2013 the Mayor of London received documents from Camden Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 1B of the Schedule to the Order 2008:

1B: Development which comprises or includes the erection of building(s): (b) in Central London and with a total floorspace of more than 20,000 square metres.

3 Once Camden Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

5 The rectangular site is located in Bloomsbury and is within the Bloomsbury Conservation Area. The site is bound by Cartwright Gardens, a Georgian residential crescent with a small park to the west; Leigh Street to the south, which is characterised by a mix of residential and small retail units at ground level; and Sandwich Street and Hastings Street, predominantly residential streets, to the east and north respectively.

6 The site is currently entirely occupied by University of London Student accommodation, arranged in three distinct elements dating from different periods and of differing architectural styles. This includes Hugh Parry House to the north of the site, a 15-storey Tower with a four-storey element fronting onto Cartwright Gardens dating from the 1960/1970s; Canterbury Hall in the centre of the site, comprising two parallel seven storey student blocks dating from the 1930s, which front both Cartwright Garden and Sandwich Street; and Commonwealth Hall, a modernist student accommodation block ranging from five to eight-storeys in height. Collectively the site provides around 980 student bedrooms to students affiliated with University of London institutions.

7 The site is just to the south of Euston Road (A501) part of the TfL road network. A total of 17 bus routes can be accessed from between 100 and 400m from the site. Three underground/mainline railways stations are located within 960m of the site, including Kings Cross St. Pancras, Russell Square, and Euston. The site is well served by Cycle Hire docking stations, the nearest is located directly outside the existing entrance on Cartwright Gardens. The site has therefore has an excellent public transport accessibility level (PTAL) of 6b, on a scale of 1-6 where 6b is most accessible.

Details of the proposal

8 The applicant is seeking full planning permission to redevelop the existing student halls. It is proposing to demolish Canterbury Hall and Commonwealth Hall and to partially demolish and refurbish Hughes Parry Hall to provide 1,200 students rooms, a net increase of 187 bed-spaces and also additional ancillary uses such as flexible teaching/study space, communal and catering spaces.

9 The proposal will also include public realm improvements, including improvement to Cartwright Gardens.

Case history

10 A pre-application meeting was held on 21 September 2012.

Strategic planning issues and relevant policies and guidance

11 The relevant issues and corresponding policies are as follows:

- Student Housing *London Plan;*
- Historic Environment *London Plan;*
- Tall buildings/views *London Plan, London View Management Framework SPG*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context, draft SPG; Housing SPG; London Housing Design Guide;*
- Inclusive design *London Plan; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)*
- Transport *London Plan; the Mayor's Transport Strategy;*
- Crossrail *London Plan; Mayoral Community Infrastructure Levy; Crossrail SPG*
- Parking *London Plan; the Mayor's Transport Strategy*
- Climate change *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy*

12 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 2010 Camden Core Strategy and the 2011 London Plan.

13 The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework and the draft Revised Early Minor Alteration to the London Plan.

Principle of development

14 The principle of re-providing better quality and a higher density of student accommodation on this site does not raise any strategic planning concerns and is supported.

15 The site is leased by University of London, an umbrella term for 18 self governing 'colleges' and ten research institutes, including a large number of the London based universities, such as UCL, Goldsmiths, Queen Mary's University, LSE and Birkbeck. Seven of the University's 18 colleges are based in Camden.

16 The applicant states that students from any of its colleges would be able to apply for the proposed accommodation and there is an urgent need to increase the number of bedrooms it can offer. Approximately 97,600 students are enrolled within the University of London federation but the University and colleges currently only provide 16,578 bed-space. It states that whilst private halls and the private-rented sector address are available to students, there is a strong preference, particularly among first year students to live in University run accommodation.

17 The redevelopment of this site is part of a wider programme in which the University is seeking to refurbish and expand its eight existing intercollegiate halls.

18 In line with paragraph 3.53 of the London Plan, the student accommodation should be secured as such within the Section 106 or by planning condition.

Heritage

19 Canterbury Hall, whilst not listed, is identified as a positive contributor to the Bloomsbury Conservation Area. In line with NPPF guidance, the issue is the level of harm the loss of the building will cause to the Conservation Area and whether the proposal outweighs any harm.

20 Canterbury Hall dates from the late 1930s and was originally built as a woman's hostel, funded by the Church of England. The Bloomsbury Conservation Area Appraisal and Management Plan describes the building as having *"a strong Art Deco-inspired symmetrical seven-storey façade*

in a ... brown brick with transomed steel encasement windows, and a stone rusticated base and central entrance feature."

21 The applicant's Heritage Assessment is critical of the building, describing the facades as *"in a brown stock brick with rather mean and crude art deco style detail"* and stating *"there is a strange gothic detail to the main entrance which appears at odds with the overall proportion and architectural style of the building."* Officers do not agree with this pejorative assessment of the building.

22 The applicant has also produced a Feasibility Report which assesses the feasibility and implication of retaining Canterbury Hall in its entirety or in part. The report states that the building is showing signs of deterioration and decay such as damp and it would very difficult to refurbish the existing building to meet modern standards. Equally, due to its relatively small floor to ceiling heights, it would be difficult to either incorporate the building into a larger development or retain the façade without compromising the quality of the internal accommodation. It states the block does not meet modern needs or expectation for student accommodation.

23 English Heritage has provided a letter setting out its view of the proposal and the impact on the Conservation Area. It states that the existing university buildings:

"as a group, detract from the surviving 19th Century formal layout and associated built form that is integral to the character of this part of the conservation area. The replacement of these buildings is therefore an opportunity to enhance the conservation area. The proposed replacement building... is of high quality, and responds appropriately to its context by reinstating some of the original formality of the urban layout around Cartwright Garden... Whilst the loss of the 1930s Canterbury Hall is regrettable, the benefits provided by a comprehensive approach to new development have to be balance against the harm caused by that loss, which in our view is less than substantial."

24 Officers broadly agree with English Heritage's assessment. Whilst Canterbury Hall is a positive contributor to the Conservation Area and its loss is will cause harm to the conservation area, this harm is less than substantial and is, on balance, outweighed by the replacement and refurbishment of the other, low quality buildings on the site, the provision of additional student rooms, and the high quality replacement building.

Urban design

25 At the pre-application stage it was set out that whilst there was concern about the loss of the historical Cantenbury Hall, the scheme did not present any significant strategic design concerns.

26 The current scheme also does not raise significant concerns. The proposed layout interfaces with all surrounding street well providing good levels of overlooking on to the public realm without compromising the privacy of the units. It successfully accommodates all servicing and back of house uses away from the street frontage which is also welcomed. The layout of the upper floors do not present any significant concern and achieve a reasonable internal quality of accommodation.

27 The seven storey shoulder height with the additional two storey mansard roof facing Cartwright Gardens is in keeping with the overall contextual height of the area and reflects the current street hierarchy, which is welcomed. The lower seven storey buildings facing Sandwich Street responds to the streets dimensions and is also in keeping with the overall contextual height. Whilst the refurbished 15 storey tower is an anomaly with regards to height, the proposal for its refurbishment is welcomed as it is not detrimental to the surrounding area.

28 The elevations of the scheme each respond to their respective street and are heavily derived from the historical context of surrounding buildings. The choice of brick as the main material and the simple gridded elevations create a subdued but elegant elevation which is welcomed. The differences between the elevations on each street contribute towards strengthening their individual character which is also welcomed.

29 The proposed demolition of Canterbury Hall is disappointing. It is part of the areas heritage and provides historical continuity which will be lost with its demolition. However, given the quality of the replacement building and given that the impact of a more unified block on this side of the Gardens would have benefits for the Conservation Area, as set out by English Heritage, the development is, on balance, considered to be acceptable.

30 The proposed site falls with Blackheath Point London Panorama 6A as identified in the London View Management Framework. Whilst it is unlikely to impact on the view, the applicant is required to demonstrate this by providing a visual assessment from the view point. Further information is required regarding the impact on the Blackheath Point panorama.

Inclusive design

31 At the pre-application stage, the applicant was advised that 10% of the units proposed should be designed for wheelchair users or larger enough to be 'easily adaptable' into wheelchair accessible units. The applicant is proposing 60 (5%) wheelchair accessible rooms and states it will provide a further 5% at its own expense if required by students. It has provided a plan of how additional rooms would be provided. It would essential require knocking two standards into one by removing the non-structural partition wall and replacing the bathroom and relocating the doors. This does not meet the definition of 'easily adaptable' as defined by the Mayor's Housing SPG (November 2012) i.e. not requiring structural alterations (such as removing walls to enlarge rooms) to make it suitable for wheelchair users.

32 The halls are located in an extremely accessible location and they are potentially available to 97,600 students, as such the applicant should to provide the full 10% wheelchair accessible rooms from the outset. Whilst it is not essential that all the room are be fitted out, they should be sufficiently sized to accommodate wheelchair users without structural changes.

33 It is appreciated that this is a car free development; however some disabled persons parking should be provided for disabled students on street and the applicant should provide details regarding the location, amount and designation of this parking.

34 The applicant is proposing a raised table between the park and entrance of the proposal and also are the junction of Leigh Street and Marchmont Street. The applicant has not provided any details of how it will meet the needs of disabled people, including blind and partially sighted people and is required to do so.

35 The applicant is proposing two platform lifts on the ground floor to serve 35 rooms on the ground floor. Platform lifts are not an inclusive solution and should be avoided in a new buildings (they are more appropriate in historic buildings where access for disabled people cannot be achieved by any other means). Platforms lifts can be unreliable and require additional maintenance and repair and it is more appropriate to 'design out' the requirement for a level change than rely on a platform lift. The applicant is required to reconsider the ground floor layout so that it meets the highest levels of accessibility and inclusion in line with London Plan Policy 7.2.

36 The application does not comply with London Plan inclusive design policy. The applicant should increase the number of wheelchair accessible bedrooms, revise the ground floor layout,

provide details of blue badge parking and provide details of how the proposed raised table will be designed to meet the needs of disabled people.

Transport

Parking

37 The car free nature of the proposed development and reduction of 20 car parking spaces is welcomed. The applicant states blue badge parking will be provided on street due to on site space constraints. However, additional information should be submitted on how the Blue Badge car parking spaces will be managed.

38 A total of 600 cycle parking spaces are proposed for the 1,200 beds and this is strongly supported. The applicant is encouraged to provide at least two spaces for visitors, in line with London Plan Policy 6.9. 'Cycling.'

Public Transport

39 The proposals may increase the demand for bus services where there is limited spare capacity. The applicant should provide additional data as to the destination of students occupying this accommodation. The trip generation and mode split assessment should be adjusted according to these figures. Depending on the outcome a contribution may be sought to mitigate the impact of additional trips in line with London Plan policy 6.3 'Assessing Effects of Development on Transport Capacity'.

Taxi & Private Hire Vehicles

40 A dedicated facility for taxi and private hire vehicles set down/pick up should be provided in a safe environment, close to the entrance/exit and with step free route to the building. It is also expected that taxis would be used by some students for moving in and out of the halls at the end of their tenancy and it is recommended that taxi travel is considered within the Student Management Plan. Unlike taxis, all private hire vehicles must be pre-booked and it is therefore important to ensure that there is a maximum waiting time restriction placed on any drop off bay to discourage illegal touting.

Walking & Cycling

41 As stated above, a 21 Cycle Hire docking station is located directly outside the site on Cartwright Gardens. This facility will have the capacity to deal with any additional demand generated from the development and therefore no additional capacity is sought. The travel plan should nevertheless promote the use of cycle hire as an alternative to short journeys by bus or underground for either students or staff.

42 The submission of a pedestrian (PERS) audit is welcomed and Camden Council should agree, secure and implement all the improvements identified through the section 106 or section 278 agreement.

Travel Planning

43 The submission of a travel plan is welcomed. The content of the plan was reviewed in accordance with the ATTrBuTE assessment tool and regrettably failed due to the lack of mode share and other targets set for the period three and five years after occupancy. Therefore, this matter must be addressed before the plan can be deemed acceptable. However, this can be undertaken at the implementation stage and the travel plan should be secured through section 106 agreement to

ensure conformity with London Plan policy 6.3 'Assessing effects of development on transport capacity'.

44 Whilst the submission of a student management plan is supported, it should be amended to include a comprehensive and detailed booking system, as follows:

- Contingency plans in place should students arrive on site later or earlier than their allotted time due to unforeseen circumstances.
- Information available that details nearby parking facilities for those visitors who require a longer time period than their allocated slot. Comprehensive travel information detailing the access routes to the residence (where possible avoiding Central London), parking and loading provision in the immediate locality inclusive of restrictions, length of stay and penalties and, in addition, information on congested traffic times should be made available. This will ensure that users are discouraged from causing any disruption to the local road network and encourage the use of public transport.
- Temporary signage placed at strategic locations on approaches to the site to reinforce routes and help avoid cases of drivers becoming lost in nearby neighbourhoods.

45 The plan should be subject to annual review and if it is found that the staff provision/implemented procedures are insufficient then additional resources should be provided for subsequent years. The plan should be secured by condition.

46 TfL welcome the draft construction logistics plan and delivery and servicing management plan. The construction logistic plan will need to identify efficient and sustainable measures that will be undertaken during construction of the development including measures which will reduce the conflict between pedestrians and cyclists. Both of these plans should be agreed with Camden Council in consultation with TfL and secured by planning conditions.

Community Infrastructure Levy

47 The Mayor has introduced a London-wide Community Infrastructure Levy (CIL) to help implement the London Plan, particularly policies 6.5 and 8.3. The Mayoral CIL formally came into effect on 1st April 2012, and it will be paid on commencement of most new development in Greater London that was granted planning permission on or after that date. The Mayor's CIL will contribute towards the funding of Crossrail

48 The Mayor has arranged boroughs into three charging bands. The rate for Camden is £50. The required CIL should be confirmed by the applicant and council once the components of the development or phase thereof have themselves been finalised. See the 2010 regulations: <http://www.legislation.gov.uk/ukdsi/2010/9780111492390/contents> as amended by the 2011 regulations: <http://www.legislation.gov.uk/uksi/2011/987/made>

Summary

49 Further information is required to ensure the application complies with London Plan transport policy. The applicant should provide further information is submitted on the trip generation for the bus network and blue badge parking. Suggested improvements should be made to the Travel Plan and Student Management Plan and secured by condition. The level of cycle parking, a construction logistics plan and a delivery and servicing plan for the application should be secured by condition to be in accordance with the London Plan transport policies.

Climate change

50 The applicant has broadly followed the energy hierarchy and is proposing to reduce carbon emissions by 28%, thus exceeding the London Plan requirement. In total, 8% savings will be achieved from energy efficiency measures, 20% savings from a combined heat and power site wide heat network and 2% savings from roof mounted PV.

51 The applicant has identified that the SOAS district heating network and other networks are planned in the area (i.e. Argent, Kings Cross, Euston Road, UCL Gower Street). The applicant has consulted with relevant stakeholders (the energy manager for SOAS, the consultants leading the masterplanning of the energy network in the Bloomsbury area and Harold Garner at Camden) and states that the SOAS network is at early development stage and there are currently no plans for its extension towards the application site. The applicant also states that there is currently no firm proposal for the extension of the Bloomsbury network towards the site. The applicant is proposing a communal heating system to serve the whole development initially served by on site plant. The system will allow connection to the district heat network when this becomes available at a future date. Connection to the network should continue to be prioritised and evidence of correspondence with the network operator should be provided.

52 The applicant is proposing to install a site heat network connecting both buildings and the applicant should confirm which one of the plant rooms shown on the plans (drawing no A10417 D099 rev P1) will be the energy centre. The applicant is also clarify whether consideration has been given to potential shading of PV panels from adjacent buildings / parts of building and plant equipment when quantifying the potential for PV installation.

53 The carbon dioxide savings exceed the targets set within Policy 5.2 of the London Plan. However, further information is required to ensure the application complies with London Plan Policy. The applicant should provide the request information regarding the nearby district heat network, the plant room and PV.

Sustainable drainage

Surface Water Run-off

54 The Sustainability Statement indicates that a small portion of the roof will be a green roof and this will, amongst other benefits provide for some attenuation of surface water. This alone is considered insufficient to meet the Mayor's minimum standard of a 50% reduction in run-off rates contained within the Sustainable Design and Construction SPG, and therefore it fails to comply with the London Plan sustainable drainage hierarchy contained within Policy 5.13. In particular the gardens should be designed to collect and absorb surface water and indeed could receive a high proportion of the residual surface water flow from the redeveloped Canterbury Hall building.

55 The application does not comply with London Plan Policy 5.13. The applicant should re-examine the drainage aspect of the proposals and include measures to divert or attenuate a higher proportion of the surface water run-off.

Local planning authority's position

56 Camden Council's position is not known.

Legal considerations

57 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

58 There are no financial considerations at this stage.

Conclusion

59 London Plan policies on student accommodation, heritage, urban design, inclusive design, transport, climate change and sustainable drainage are relevant to this application. The application complies with some of these policies but not with others and the suggested changes may remedy the deficiencies, and could possibly lead to the application becoming compliant with the London Plan:

- **Principle of the development:** The principle of re-providing better quality and a higher density of student accommodation on this site does not raise any strategic planning concerns and is supported. In line with paragraph 3.53 of the London Plan, the student accommodation should be secured as such within the Section 106 or by planning condition.
- **Heritage:** Whilst Canterbury Hall is a positive contributor to the Conservation Area and its loss will cause harm to the conservation area, this harm is less than substantial and is, on balance, outweighed by the replacement and refurbishment of the other, low quality buildings on the site, the provision of additional student rooms, and the high quality replacement building.
- **Urban design:** On balance, the proposal is considered acceptable in design terms. However, further information is required regarding the impact on the Blackheath Point panorama.
- **Inclusive design:** The application does not comply with London Plan inclusive design policy. The applicant should increase the number of wheelchair accessible bedrooms, revise the ground floor layout, provide details of blue badge parking and provide details of how the proposed raised table will be designed to meet the needs of disabled people.
- **Transport:** Further information is required to ensure the application complies with London Plan transport policy. The applicant should provide further information is submitted on the trip generation for the bus network and blue badge parking. Suggested improvements should be made to the Travel Plan and Student Management Plan and secured by condition. The level of cycle parking, a construction logistics plan and a delivery and servicing plan for the application should be secured by condition to be in accordance with the London Plan transport policies.

- **Climate change:** The carbon dioxide savings exceed the targets set within Policy 5.2 of the London Plan. However, further information is required to ensure the application complies with London Plan Policy. The applicant should provide the request information regarding the nearby district heat network, the plant room and PV.
- **Sustainable drainage:** The application does not comply with London Plan Policy 5.13. The applicant should re-examine the drainage aspect of the proposals and include measures to divert or attenuate a higher proportion of the surface water run-off.

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