



**UNIVERSITY
OF LONDON**

GARDEN HALLS, UNIVERSITY OF LONDON

Planning Statement

March 2013

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1.0 Introduction

OVERVIEW

- 1.1 This Planning Statement has been produced by CBRE to accompany the planning and conservation area consent applications for redevelopment of the University of London's ("UoL") student accommodation at Cartwright Gardens (the "Garden Halls"). The proposed development aims to increase the quality, mix and number of student bed-spaces and ancillary facilities to meet the expectations of a world leading University.
- 1.2 The proposals comprise:

"Redevelopment of the existing student accommodation including the demolition of Canterbury (including York) and Commonwealth Halls, partial-demolition and refurbishment of Hughes Parry Hall and provision of new student accommodation (Sui Generis), to provide a net increase of 187 bed-spaces (from 1,013 to 1,200 student bed-spaces); associated ancillary uses (including flexible space for the University of London, communal and catering areas); two external courtyards; together with public realm improvements to Cartwright Gardens and the surrounding area".
- 1.3 The University of London is a globally recognised federal university. It acts as an umbrella institution for 18 self-governing colleges (including UCL which was ranked 4th best university globally by QS World University Ranking 2012-2013) and 10 other smaller specialist research institutes.
- 1.4 The University makes a significant contribution to London and Camden's educational capital, economy and community. Seven of the University's 18 colleges and the University's Administrative Centre, Senate House, are based in the London Borough of Camden. A considerable number more are located in close proximity to the site within other Central London boroughs, including the London School of Economics and King's College London.
- 1.5 Student accommodation is the most important non-academic supporting facility for the University. The quality and type of accommodation available is a primary consideration in attracting the world's elite students. There is a strong preference for Institutional Halls of Residence due to their affordability, security, pastoral support and opportunity to be part of the student community.
- 1.6 The University's Intercollegiate Halls form a crucial part of the accommodation provision for students and form a key offering to support colleges' needs. The proposals are a direct response to an identified shortfall in student housing provision, which has driven many students into unmanaged, private sector student housing and the private rental market. The background to student accommodation need is described in more detail in Section 2.0 of this Statement.
- 1.7 The Garden Halls, comprising Commonwealth, Canterbury (including York Hall) and Hughes Parry, collectively represent three of the University's eight Intercollegiate Halls. The Site and its planning history are described in full in Section 3.0 and 4.0 of this Statement.
- 1.8 The scheme comprises the redevelopment of the existing student accommodation to provide a net increase of 187 bed-spaces, through the part-demolition and redevelopment of the existing three, unconnected student halls on the site to provide modern, high quality accommodation. A full description of the proposals is provided in Section 5.0.

1.0 Introduction

- 1.9 The applicant and their development team have undertaken extensive pre-application discussions and consultation over the last 10 months. This has involved discussions with Camden Officers, Members and other statutory consultees, including the Greater London Authority (“GLA”), English Heritage, local amenity groups and surrounding occupiers. Full details, a summary of feedback and the applicant’s response are set out in Section 6.0 of this Statement.
- 1.10 The proposals accord with all key relevant planning policies and guidance (detailed in Section 7.0) and have responded to extensive feedback from Officers, other statutory consultees and public consultation. The compelling case for the proposals is set out in Section 8.0.

Scope of Submission

- 1.11 This Planning Statement should be read in conjunction with the other documents forming part of the same submission and comprise:
- Drawing Package (including Drawing Schedule, Existing, Demolition and Proposed Plans, Elevations and Sections) by tp Bennett and Maccreanor Lavington Architects (see Drawing Schedule on following page);
 - Design and Access Statement by tp Bennett and Maccreanor Lavington Architects;
 - Access and Inclusivity Statement by All Clear Designs;
 - Townscape, Visual Impact and Heritage Report by Peter Stewart Consultancy;
 - Statement of Community Involvement by Loadstone;
 - Daylight and Sunlight Assessment by GIA;
 - Traffic Impact Assessment and Green Travel Plan by Cundall Johnson and Partners LLP;
 - Delivery and Servicing Management Plan by Cundall Johnson and Partners LLP;
 - Acoustic Report by SRL Technical Services;
 - Air Quality Assessment by Air Quality Consultants Ltd;
 - Energy and Sustainability Statement (including BREEAM Pre-Assessment) by Mecserve;
 - Arboricultural Implications Assessment and Arboricultural Method Statement by Thomson Ecology;
 - Basement Impact Assessment by Cundall Johnson and Partners LLP; and
 - Archaeological Assessment by The Brigantia Archaeological Practice;
 - Draft Student Management Plan by University of London and University Partnerships Programme; and
 - Draft Construction Management Plan by McBains Cooper.

In response to issues arising out from pre-application meetings and consultation the applicant has also submitted during the pre-application process, and now also encloses updated copies of the:

1.0 Introduction

- Canterbury Hall Feasibility Analysis; and
- Statement on the Justification for Increased Student Bed-spaces.

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2.0 Background to the Proposals

- 2.1 This section provides an overview of the University of London, its role in student accommodation provision and the background to the development proposals. It provides an overview of the excess demand for institutionally run purpose built student accommodation and the importance of quality accommodation to attracting students, to which the proposals are a direct response. Further detailed assessment of these issues is provided within the Statement on the Justification for Increased Student Bed-spaces, which accompanies the planning application documents.

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- 2.2 The University of London is a globally recognised federal university. It acts as an umbrella institution for 18 self-governing colleges (including UCL which was ranked 4th best university globally by QS world University Ranking 2012-2013) and 10 other smaller specialist research institutes.
- 2.3 Camden, and Bloomsbury in particular, are home to a significant number of the University's academic and supporting facilities. The University's Administrative Centre, Senate House, and seven of its 18 colleges¹ are based in the Borough. Moreover, the London School of Economics and King's College London, amongst others, are located in close proximity to the site in adjacent Central London boroughs (see Table 2.1).

The University's Accommodation Provision

- 2.4 The University of London's Intercollegiate Halls of Residence form a crucial part of the accommodation provision for students, alongside college and private sector halls of residence; the private rented sector and living at home/ with parents.
- 2.5 The University has eight Intercollegiate Halls of Residence available to full-time students of the University. Details and the location of these are shown in Figure 2.1. The Garden Halls are the largest.
- 2.6 In 2012/13, 992² student bed-spaces were allocated to students of the University's colleges, with a further 5 specifically reserved for staff and 16 for lecturers and guests. The bed-spaces are split between three, adjacent but unconnected Halls: Commonwealth Hall, Canterbury Hall (including York Hall) and Hughes Parry Hall (see Table 2.2).
- 2.7 Each college is allocated an annual bed-space quota for each of the Intercollegiate Halls to assist in meeting its student requirements. In 2012-13, University College London, King's College London and the London School of Economics took the majority of the quota at the Garden Halls (804 rooms). Further information on existing provision is set out in the Statement on the Justification for Increased Student Bed-spaces.

¹ Birkbeck College, Central School of Speech and Drama, Institute of Education, London School of Hygiene and Tropical Medicine, the Royal Veterinary College, the School of Oriental and African Studies, University College London.

² Whilst 976 rooms were allocated via the college quota system in 2012/13, a further 16 of the total student rooms are for "Senior Members". Senior Members comprise post-graduate students who form part of the pastoral support team and do not pay rent for their residence in the Garden Halls.

2.0 Background to the Proposals

Table 2.1: University of London and Associates Colleges Main Campus Location

COLLEGE	MAIN CAMPUS ADDRESS	BOROUGH	CAMDEN WARD
Birkbeck College	Malet St Bloomsbury, London WC1E 7HX	London Borough of Camden	Bloomsbury
Royal Central School of Speech and Drama	Embassy Theatre 62-64 Eton Ave, London, Greater London NW3 3HY	London Borough of Camden	Belsize
Institute of Education	20 Bedford Way London WC1H 0AL	London Borough of Camden	Bloomsbury
University of London (Institutes and activities)	Senate House, Malet Street, London WC1E 7HU	London Borough of Camden	Bloomsbury
London School of Hygiene and Tropical Medicine	Keppel Street, London, WC1E 7HT	London Borough of Camden	Bloomsbury
The Royal Veterinary College	Royal College Street London, NW1 0TU	London Borough of Camden	St Pancras and Somers Town
The School of Oriental and African Studies	Thornhaugh Street Russell Square, WC1H 0XG	London Borough of Camden	Bloomsbury
University College London	Gower Street, London WC1E 6BT	London Borough of Camden	Bloomsbury
Courtauld Institute of Art	Somerset House Strand, London, Greater London WC2R 0RN	London Borough of Westminster	-
King's College London	The Strand, London, WC2R 2LS	London Borough of Westminster	-
London Business School	26 Sussex Pl, London NW1 4SA	London Borough of Westminster	-
Royal Academy of Music	Marylebone Road, London, NW1 5HT	London Borough of Westminster	-
London School of Economics and Political Science	Houghton Street, London, WC2A 2AE	London Borough of Westminster	-

2.0 Background to the Proposals

Queen Mary and Westfield College	Mile End Road, London, E1 4NS	London Borough of Tower Hamlets	-
Royal Holloway and Bedford New College	Egham Hill, Egham, Surrey, TW20 0EX	Runnymede Borough Council	-
Heythrop College	Kensington Square, London W8 5HN	Royal Borough of Kensington and Chelsea	
Institute of Cancer Research	123 Old Brompton Road, London SW7 3RP	Royal Borough of Kensington and Chelsea	
Goldsmiths College	Lewisham Way, New Cross, London SE14 6NW	London Borough of Lewisham	
St George's Hospital Medical School	Cranmer Terrace, Tooting London, SW17 0RE	London Borough of Wandsworth	-

2.0 Background to the Proposals

Figure 2.1: Location of University of London Intercollegiate Halls



2.0 Background to the Proposals

Table 2.2: Garden Halls Existing Provision

	BED-SPACES	STAFF ROOMS	LECTURER / GUEST ROOMS
Hughes Parry	315	4	6
Canterbury (including York)	235	1	4
Commonwealth	442	1	5
Total	992	6	15

Accommodation Shortfall

- 2.8 London is the most acutely undersupplied city in the UK for student accommodation. This is despite recent growth in private provision of student accommodation. The shortfall of purpose built student accommodation is acknowledged in London Plan policy which takes a cautious estimate of a 18,000 – 27,000 deficit. The University of London’s own research demonstrates the shortfall could be excess of 34,000 bed-spaces (see Statement on the Justification for Increased Student Bed-spaces for further details).
- 2.9 Undersupply leads to the continued proliferation of students in the private rented market housing sector, placing increasing pressure on the already inflated market and taking student management away from higher education institutions, resulting in the negative connotations of studentification.
- 2.10 In 2011/12, approximately 97,605 under-graduate and post-graduate students enrolled within the University of London federation. The availability of high quality, affordable and safe student accommodation is a crucial factor in students’ decisions on where to study. However, the University and its affiliated colleges have a total supply of only 16,578 bed-spaces and are unable to provide to all applicants.

How important is the quality of accommodation to attracting students?

- 2.11 Alternative accommodation, in the form of private student halls of residence and private rented sector, is available. However, there is an identifiable preference, particularly among first year undergraduates, to live in purpose built student accommodation provided by institutions due to typically lower rents, shorter tenancy lengths and overall student experience.
- 2.12 The average price for University of London en-suite accommodation is approximately £2,400 less expensive per annum than comparable private sector student accommodation³. In addition to affordability, issues such as improved cleanliness, maintenance, pastoral care and security, are aspects of university managed purpose built student accommodation which lead to it being favoured over alternative arrangements.

REDEVELOPMENT PROPOSALS

- 2.13 The University of London takes a strategic approach to the management of its intercollegiate hall provision, and recognises the need to provide additional

³ The average price of University of London accommodation 2012-13 for standard en-suite rooms was £8,498, whilst for private rented sector rent it was £10,833. See Statement on the Justification for Increased Student Bed-spaces for full details of figures derived.

2.0 Background to the Proposals

accommodation through a range of options. The redevelopment of its existing student accommodation is one of five routes being pursued⁴.

- 2.14 Over the past ten years, three of the University's eight intercollegiate halls have been refurbished to improve and expand capacity. Feasibility studies have been completed in respect of four of the five remaining halls which have not already recently been redeveloped. Garden Halls (Canterbury [including York], Commonwealth and Hughes Parry Halls) comprise three of the four.
- 2.15 The existing condition, central location and site characteristics of the Garden Halls make it a highly sustainable and viable site for redevelopment (see Section 8.0 of this Statement for a full assessment against relevant policies). The proposals will contribute towards the University of London's bed-space supply target to enable the University and its affiliated colleges to remain an attractive and affordable option to draw the world's best students in an increasingly competitive global higher education environment.

Relationship with UPP

- 2.16 The University of London has selected University Partnerships Programme ("UPP") as its delivery partner and development manager. This choice was based upon its strong partnering credentials and experience as a provider of student accommodation, including over 25,000 rooms nationally.

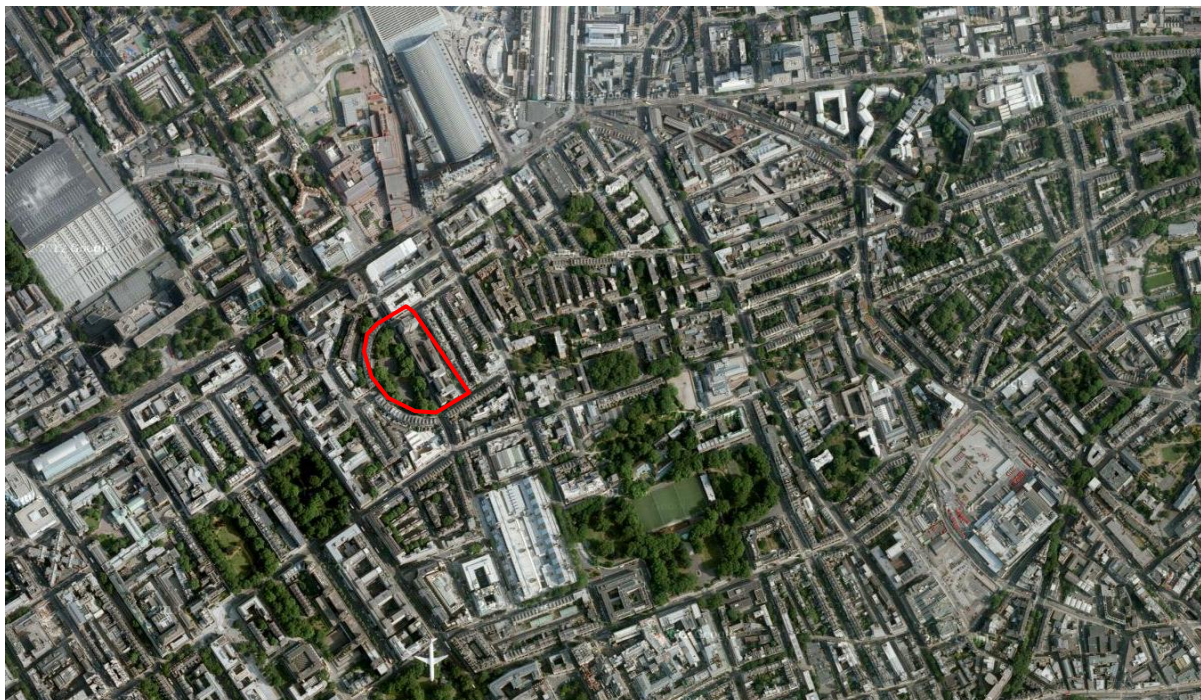
⁴ Alternative options being pursued include: (1) New build / acquisition of residences; (2) short-term nominations with private providers; (3) headed tenancy; (4) private landlord accommodation. These are explained in detail in the Statement on the Justification for Increased Student Bed-spaces.

3.0 Site and Surrounds

THE SITE

- 3.1 The application site is located on Cartwright Gardens, south of Euston Road in Bloomsbury (see Figure 3.1).

Figure 3.1: Site Location



- 3.2 The site covers an area of approximately 1.45 hectares and comprises two main components: the urban block bound by Cartwright Gardens to the west, Hastings Street to the north, Sandwich Street to the east and Leigh Street to the south; and the open space in the centre of the Cartwright Gardens crescent (known as Cartwright Gardens Open Space).

The Urban Block

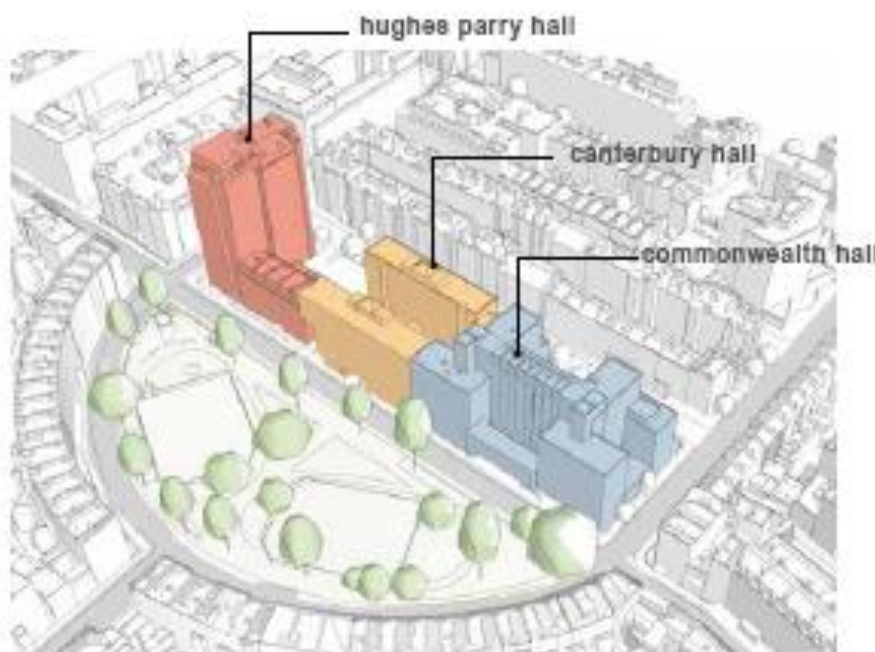
- 3.3 The urban block comprises three adjoining buildings built at different points in time, with two areas of hard-standing at the rear fronting Sandwich Street and an area of public realm in the north-eastern corner. The buildings are identified in Figure 3.2 and described below.
- Commonwealth Hall, 1-11 Cartwright Gardens – forms the southern block on the site, located at the junction of Cartwright Gardens, Leigh Street and Sandwich Street. It is between 5 and 9-storeys with the main bulk of building towards the centre of the block. The 1950s building is constructed from red brick with stone and concrete detailing, and steel casement windows. The building is set back from the pavement behind railings with a wide central entrance recess.
 - Canterbury Hall (including York Hall), 12-18 Cartwright Gardens – forms the middle block with frontage on Cartwright Gardens and Sandwich Street. It comprises two 7-storey rectangular blocks running north-south, connected at basement level with a canteen (south part) and by a central ground floor passage. The street facades are brown stock brick, with a gothic entrance to the main entrance. The Hall was built in

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1938 by the Church of England and acquired by the University in 1946 for use as student accommodation.

- Hughes Parry Hall, 19-26 Cartwright Gardens – forms the northern block on the site and comprises a 15-storey tower and 5-storey element to the south fronting Cartwright Gardens completed in 1969. The northern area of hard-standing used for car parking and refuse is located to the rear of the block along the Sandwich Street frontage.

Figure 3.2: Aerial Plan of Hughes Parry, Canterbury (including York) and Commonwealth Halls



- 3.4 Collectively the three blocks form the University of London’s Garden Halls intercollegiate student accommodation and provide a total of 1,013 rooms (comprising 992 student bed-spaces⁵, 5 staff rooms and 16 lecturers / guests rooms), amenity space (communal rooms, catering and flexible meeting space) and ancillary functions. Whilst adjacent, the three blocks are not interconnected and each Hall operates in isolation with individual pedestrian accesses from Cartwright Gardens. There is an additional staff and service entrance via Sandwich Street, however, this is not available to students.

The two areas of hard-standing front Sandwich Street and provide for car parking and refuse. 20 car parking spaces currently exist on the site, with controlled, gated access via Sandwich Street.

⁵ Whilst 976 rooms were allocated via the college quota system in 2012/13, a further 16 of the total student rooms are for “Senior Members”. Senior Members comprise post-graduate students who form part of the pastoral support team and do not pay rent for their residence in the Garden Halls.

3.0 Site and Surrounds

Cartwright Gardens Open Space

- 3.5 Cartwright Gardens Open Space comprises an area of private open space located between the urban block and the properties that line the crescent of Cartwright Gardens. The open space is lined with mature trees and contains a mix of planting, landscaping and amenity space, including four tennis courts. The Gardens also include the Statue of John Cartwright (1831, George Clarke) which was designated as Grade II Listed on 14 May 1974.

Access

- 3.6 The site achieves the highest Public Transport Accessibility Level (PTAL) of 6b. Russell Square London Underground Station is located approximately 450 metres south of the site; King's Cross St Pancras and Euston London Underground and Rail stations are located approximately 600 metres to the north along Euston Road. There are a large number of bus stops within the site environs, the closest being along Euston Road to the north and Upper Woburn Place to the west. In addition, a Transport for London Cycle Hire Docking Station is located on the carriageway outside the Gardens Halls (outside Commonwealth Hall).

Site Designations

- 3.7 The site is located within the Bloomsbury Conservation Area. None of the buildings on the site are statutory listed, but Canterbury Hall is identified as a positive contributor and the site is in close proximity to a number of listed buildings (see below, Section 7.0 of this Statement and the Townscape, Visual Impact and Heritage Report). As set out above, the statue of John Cartwright in Cartwright Gardens open space is Grade II Listed.

The site also falls within the Background Wider Setting Consultation Area for the Designated View 6A.1 from Blackheath Point to St Paul's Cathedral under the London View Management Framework (LVMF) (March 2012) (see Section 7.0 of this Planning Statement for further detail).

SURROUNDING AREA

- 3.8 The wider area surrounding the site comprises a mix of predominately residential and commercial development, as the original residential character of the area disappeared during the 20th Century when a significant amount of intervention occurred in the area. Nevertheless, the area immediately surrounding the site is predominately occupied by residential, Hotels and bed-and-breakfasts. In particular a number of Hotels operate on the opposite crescent of Cartwright Gardens and along Tavistock Place.
- 3.9 To the east of the site are a number of north-south running streets such as Sandwich Street, Thanet Street, Judd Street and Tonbridge Street, providing predominately residential uses including in a series of Edwardian mansion blocks of differing heights and scales.
- 3.10 A number of streets to the east and south, in particular Marchmont, Leigh and Judd Street, are characterised by four storey residential blocks with ground floor shop fronts inserted in the 19th Century which form part of the Marchmont Street/Leigh Street Neighbourhood Centre.
- 3.11 Whilst much of the original street layout, comprising interrelated grid of streets, continues to be a dominant characteristic there are numerous examples of significant 20th and 21st century intervention on entire urban blocks in the surrounding area, in particular to the north.

3.0 Site and Surrounds

- 3.12 Euston Road to the north forms a major east-west Central London route and connects three major train termini (Euston, St Pancras and King's Cross). Larger scale interventions are noticeable, including entire urban blocks and occupied by offices and institutions as well as temporary visitor accommodation including hotels and hostels.

Educational Context

- 3.13 A number of the University of London's administrative facilities and affiliated colleges' academic campuses are located to the west and south of the site. This includes the following within half a mile of the site:
- The University of London's primary campus (Senate House) and Birkbeck College on Malet Street;
 - University College London on Gower Street;
 - London School of Hygiene and Tropical Medicine on Keppell Street;
 - The School of Oriental and African Studies on Thornhaugh Street; and
 - The Institute of Education on Bedford Way
- 3.14 In addition, a number of additional educational resources are located in proximity to the site including the British Library, the Wellcome Trust and University College Hospital.

Heritage

- 3.15 The Bloomsbury Conservation Area was first designated in 1969, and last extended in April 2011. The most recent Bloomsbury Conservation Area Character Appraisal and Management Plan recognises the following Listed Buildings within close proximity to the site:
- Nos. 27-45 (Consecutive) and 46-63 (Consecutive) Cartwright Gardens;
 - Nos.1-19 (Consecutive) Leigh Street; and
 - Nos. 2-9 (Consecutive) Sandwich Street.
- 3.16 Further commentary is provided in Section 7.0 of this Report and within the Townscape, Visual Impact and Heritage Report.

4.0 Planning History

OVERVIEW

- 4.1 This Section provides an overview of the application site's planning history and any notable relevant developments within the immediately surrounding area.
- 4.2 Camden's Planning Application Register provides records of planning applications post-1947. The Bloomsbury Conservation Area Character Appraisal and Management Plan sets out that Canterbury Hall was constructed during the 1930s and thus there is no record of the development on Camden's Register. Further research undertaken by Peter Stewart Consultancy as set out within the Townscape, Visual Impact and Heritage Report which accompanies the planning application document, indicates Canterbury Hall was constructed in 1938 by the Church of England and acquired by the University in 1946.
- 4.3 The planning history relating to the remaining buildings on-site (Commonwealth Hall and Hughes Parry Hall), and any subsequent applications concerning minor external alterations to Canterbury Hall are detailed below:
- **Commonwealth Hall:** the following consents embody the existing Commonwealth Hall which forms the most southerly block on the site.
 - Planning was approved in principle on 8 June 1949 for redevelopment of the site bounded by Cartwright Gardens, Leigh Street and Sandwich Street for the erection of a six and eight-storey building with basement for use as a students' hostel (LPA Ref: TP2153/11914);
 - Planning was approved on 25 March 1959 for redevelopment of the site bounded by Cartwright Gardens, Leigh Street and Sandwich Street by the erection of a six and eight-storey building with basement for use as a students' hostel (LPA Ref: TP2153/12417);
 - Planning permission was granted on 3 February 1960 for erection of an eight and ten-storey building including basement on the vacant site at the site bounded by Cartwright Gardens, Leigh Street and Sandwich Street, for use as a students' Hall of Residence (LPA Ref: TP2153/11422); and
 - Planning permission was granted on 2 October 1964 for permission to form an electricity sub-station in part of an existing garage at Canterbury Hall and to carry out alterations to the existing garage doors on the Sandwich Street elevation. (LPA Ref: TP1662/20911).
 - **Hughes Parry Hall:**
 - Outline planning permission for the erection of a building comprising basement and ground floor with part-three and part-fourteen floors for use as a University Hall of Residence was granted on 20 October 1964 (LPA Ref: AR/TP/2153/C);
 - Permission was granted on agreement under Section 37 of the Town and County Planning Act 1962 that on the expiry of the lease in 1972 on The Plumber's Arms Public House, Hastings Street, that the building is demolished and site left open for use as amenity space of the Hall; and
 - Planning Permission for the erection of a rear extension to be used as storage by the existing Hughes Parry Hall of Residence was granted on 18 July 1974 (LPA Ref: L14/20/A 18674).

4.0 Planning History

- **Further minor applications:**
 - Planning permission was granted on 3 June 2003 for extensions to the Commonwealth Hall entrance, modifications to Canterbury Hall entrance and extensions to Hughes Parry Hall, including works to entrance hall, railings/fencing/gates, provision of disabled access and additional ancillary office floor space (LPA Ref: PSX0204639).
 - Planning permission was granted on 3 July 2009 for the installation of a cycle hire docking station on the carriageway adjacent to University of London Commonwealth Hall. Including a registration/payment terminal and maximum of 24 docking points for bicycles, in connection with the Transport for London Cycle Hire Scheme (LPA Ref: 2009/2133/P).
- 4.4 There are no records of any other major planning applications submitted for redevelopment of the site or immediate surrounds.

5.0 The Proposals

OVERVIEW

5.1 The planning and conservation area consent applications propose the redevelopment of the Garden Halls to increase the quality, mix and number of student bed-spaces to meet the expectations of the globally recognised University. The design has been informed by extensive pre-application discussions and community consultation that has taken place between May 2012 and March 2013 (discussed in full in Section 6.0).

5.2 The application seeks permission for:

“Redevelopment of the existing student accommodation including the demolition of Canterbury (including York) and Commonwealth Halls, partial-demolition and refurbishment of Hughes Parry Hall and provision of new student accommodation (Sui Generis), to provide a net increase of 187 bed-spaces (from 1,013 to 1,200 student bed-spaces); associated ancillary uses (including flexible space for the University of London, communal and catering areas); two external courtyards; together with public realm improvements to Cartwright Gardens and the surrounding area”.

Demolition

5.3 The proposed development includes, and seeks conservation area consent, for the demolition of:

- Commonwealth Hall;
- Canterbury Hall (including York Hall); and
- The 5 storey section of Hughes Parry Hall fronting Cartwright Gardens.

5.4 The buildings proposed for demolition contain circa. 750 student bedrooms, catering and conferencing facilities with the above blocks. The existing bedrooms and accompanying facilities are no longer considered to meet acceptable standards, whilst the services are inefficient and require substantial upgrading.

5.5 A further 315 bedrooms exist within Hughes Parry Hall. The main structure is proposed to be retained, refurbished and modernised to provide 246 self-catered en-suite rooms.

Redevelopment

5.6 The proposed development includes:

- 35,045 sq m GEA of student accommodation and ancillary floorspace (Sui Generis), comprising:
 - A net uplift of 187 bedrooms providing a total of 1,200 bedrooms (see below for breakdown);
 - 709 en-suite, catered bedrooms in the new Cartwright Gardens wing;
 - 73 en-suite, self-catered bedrooms in the new Leigh Street wing, including 12 disabled bedrooms;
 - 172 bedrooms within 8 town-houses along Sandwich Street;
 - 246 en-suite, self-catered bedrooms in the refurbished Hughes Parry Tower;
- New internal amenity space for residents, including 2170 sq m amenity space at lower and ground floor and 1658 sq m of kitchens and lounges on upper floors;

5.0 The Proposals

- 6,924 sq m of external amenity space in the form of Hughes Parry Pocket Park, the Southern and Northern Courtyards and Cartwright Gardens open space;
- New, efficient catering facilities within the Cartwright Gardens wing to serve the catered students;
- Flexible floorspace for the University of London’s ancillary on-site management operations and to activate the corner of Cartwright Gardens and Leigh Street;
- Enhancement of Cartwright Gardens open space, including opening the private gardens to the public between dawn and dusk;
- Creation of a raised table along Cartwright Gardens at the front of the proposed development facilitating pedestrian access between the urban block and open space;
- It is also the aspiration of the applicant to provide a pedestrian footpath on the western side of Cartwright Gardens. As a result of the impact this has on the carriageway area, it would be necessary for Cartwright Gardens to be made one-way between its junctions with Leigh Street and Hastings Street;
- High standards of sustainability and on-site renewable energy provision, seeking to achieve BREEAM “Excellent” and incorporating 3 no. CHP units, with circa. 109 kW heating output each, and circa. 50 kW of photovoltaics (“PVs”);
- New servicing and delivery access and facilities at lower ground floor, accessed via Sandwich Street and with egress via Cartwright Gardens, removing servicing from the streetscape; and
- On-site cycle provision for 600 bicycles.

PROPOSED FLOORSPACE

- 5.7 LB Camden’s CPG2 on Housing identifies (Paras 2.25) that there are different definitions of floorspace based on Gross External Area and Gross Internal Area. Each of these is used for different purposes, dependent upon the relevant primary and secondary legislative requirements.
- 5.8 A total of 35,045 sq m GEA floorspace is applied for. A breakdown of the Gross Internal Areas is provided in Table 5.1.

Table 5.1: Floorspace Breakdown

USE	GROSS INTERNAL AREA (GIA)
Student Accommodation (Sui Generis)	26,047 sq m
Amenity Leisure Space	3,828 sq m
Ancillary University of London flexible space	210 sq m
Basic ancillary service and plant room areas	2,403 sq m
Total	32,488 sq m

PROPOSED FORM AND DISTRIBUTION OF PROVISION

5.0 The Proposals

- 5.9 The built form of the proposed development can be divided into four main components:
- Cartwright Gardens Wing;
 - Leigh Street Wing;
 - Hughes Parry Wing (the refurbished Hughes Parry Tower); and
 - Sandwich Street Town Houses.
- 5.10 Two external courtyards are located between the Cartwright Gardens wing and Sandwich Street Town Houses in the centre of the urban block to the north and south of the main block. In addition a pocket park is located to the north of Hughes Parry Wing.
- 5.11 The layout, height and massing of the scheme arises from a detailed and comprehensive analysis of the urban and heritage environment and the relationship of the site and its component parts with the surrounding Conservation Area (and are described in full in the Design and Access Statement) in engagement with English Heritage, LB Camden, the Greater London Authority and other stakeholders (including Bloomsbury Conservation Area Advisory Committee (“CAAC”) and the 20th Century Society.
- 5.12 The four components are outlined below and described in more detail in the accompanying Design and Access Statement and illustrated in the Drawing Package.

Cartwright Gardens Wing

- 5.13 The Cartwright Gardens Wing forms the main element of the proposed development.
- 5.14 The principal entrance is located on the west elevation fronting Cartwright Gardens and comprises the main reception space, an entrance and two amenity lounges for students and any visitors, a central covered courtyard and flexible study area, as well as ancillary management and service spaces. North and south of this central space student cluster bedrooms are provided.
- 5.15 Catering facilities and the server are located at lower ground, alongside additional amenity space in the form of communal student lounges, a cafe, music rooms and laundry.
- 5.16 To the north, refuse, plant and ancillary space is located connecting to the internal service yard proposed between the Hughes Parry Wing to the north and Sandwich Street / Cartwright Garden wings to the south.
- 5.17 Above ground floor bedrooms and amenity space are located on each floor from first to eighth storey. A total of 709 en-suite, catered bedrooms are provided in the Cartwright Gardens wing.

Leigh Street Wing

- 5.18 The Leigh Street Wing comprises the southern new build element fronting Leigh Street and the south of Cartwright Gardens and Sandwich Street.
- 5.19 It comprises ancillary flexible space for the University of London at ground floor on the corner of Sandwich Street, accessed via Leigh Street to activate the frontage along Leigh Street. Student accommodation is provided on the remainder of the ground floor and on upper floors (1st – 6th floors) in the form of 73 en-suite, self-catered bedrooms in the new Leigh Street wing, including 12 disabled bedrooms and associated catering and lounge space.
- 5.20 The secure cycle store providing spaces for 600 bicycles, will be provided at the lower ground floor of the Leigh Street wing and will be accessible from the street via Cartwright Gardens and internally from the southern external courtyard.

5.0 The Proposals

Hughes Parry Wing

- 5.21 The Hughes Parry Wing forms the northern element of the proposed development, and comprises the retained and refurbished component of the Hughes Parry Tower. Entrance to the wing is via Cartwright Gardens, accessible via stairs and ramped access.
- 5.22 Communal amenity space is provided within part at ground floor, with student bedrooms on the remainder of the ground floor and on the upper floors (1st to 14th floors). 246 en-suite, self-catered bedrooms in the refurbished Hughes Parry Tower, including a dedicated warden flat.
- 5.23 Ancillary facilities, including refuse, and plant are provided at lower ground.

Sandwich Street Town Houses

- 5.24 A series of Town Houses are proposed to the north and south of the Cartwright Gardens wing along Sandwich Street. The eight town houses, provide a total of 172 self-catered student bedrooms.
- 5.25 The town houses are designed to operate separately from the main block of the proposed development with individual entrances to each of the houses provided from Sandwich Street during daylight hours. Outside these hours, the entrances along Sandwich Street will not be open and the town houses will be accessed via rear entrances from the lower ground courtyards of the main block. This solution has been reached as a compromise to achieve appropriate activation of Sandwich Street whilst ameliorating the concerns of residents along Sandwich Street regarding noise from students accessing accommodation in the evenings.
- 5.26 The design and layout of the proposed Halls are described in full in the Design and Access Statement and illustrated within the Drawing Package.

ACCESS, TRANSPORT AND SERVICING

Car and Cycle Provision

- 5.27 The development is proposed to be car-free and no on-site car parking spaces will be provided in the redevelopment proposals. Disabled users will be able to park close to the main entrance within the pay and display bays without paying if they are blue badge holders.
- 5.28 The secure cycle store, providing spaces for 600 bicycles, will be provided at the lower ground floor of the Leigh Street wing and will accessible from the street via Cartwright Gardens and internally from the southern external courtyard.
- 5.29 Further information is provided within the Design and Access Statement, illustrated on the floorplans within the Drawing Package and within the Transport Assessment and Travel Plan that accompany the planning submission.

Refuse and Servicing

- 5.30 The proposed development will include a new internal service yard located at lower ground between the Hughes Parry Wing to the north and Sandwich Street / Cartwright Garden

5.0 The Proposals

wings to the south. Access will be via Sandwich Street and egress to Cartwright Gardens. It will consolidate the three existing service locations.

- 5.31 Full details are set out within the Delivery and Servicing Plan, Transport Assessment and Travel Plan that accompany the planning submission.

Construction Management Plan

- 5.32 A Construction Management Plan has been produced and sets out the proposed strategy for implementing the development and ensuring environmental impacts on the surrounding occupiers are minimised as far as possible.

EXTERNAL AMENITY

Cartwright Gardens Open Space

- 5.33 The proposals provide for the enhancement of the existing Cartwright Gardens open space to the west of the block, including the introduction of new soft and hard landscaping, the upgrade of entrances and paths through the park.
- 5.34 The 0.62 hectare gardens will remain privately owned and managed however they will be made accessible to the public between the hours of dawn and dusk, to enable surrounding residents, workers and visitors to benefit from the improved open space.
- 5.35 Further details of the landscaping proposals are provided within the Design and Access Statement which accompanies the planning submission.

Hughes Parry Pocket Park and Courtyards

- 5.36 The proposed development introduces two central courtyards in the centre of the site between the block addressing Cartwright Gardens and the town houses fronting Sandwich Street. Together these will provide 532 sq m external amenity space.
- 5.37 In addition, it is proposed to enhance the area of open space at the base of Hughes Parry Wing to form Hughes Parry Pocket Park (188 sq m). Cumulatively these three spaces provide 720 sq m of external amenity space in addition to the provision at Cartwright Gardens open space.

SUSTAINABILITY AND ENERGY

Sustainable Design and Construction

- 5.38 The proposed development incorporates a high standard of sustainability that adheres to the principles of sustainable design and construction. The Energy and Sustainability Statements that accompany the planning submission provide further detail and assessment. In summary the scheme will:
- Achieve high standards of environmental performance in construction and use, through energy efficient heating and high levels of insulation, water saving measures, the use of environmentally friendly materials and the use of renewable technology;
 - Seek to achieve BREEAM "Excellent";
 - Incorporate Sustainable Urban Drainage (SUDS) where feasible to reduce flood risk;

5.0 The Proposals

- Integrate of soft landscaping where feasible, including green roofs for visual improvement and to enhance biodiversity on-site on the roofs of the Sandwich Street town houses;
- Be highly water-efficient, with sanitary ware and fittings selected to balance water efficiency with efficacy;
- Promote environmental initiatives, including the minimisation of waste and landfill and encouraging recycling and reuse; and
- Encourage the use of more sustainable mode of transport through the provision of cycle storage and close proximity to a number of public transport nodes.

Renewable Energy

- 5.39 The proposed development is designed to reduce carbon emissions, including through the generation of energy on-site using Combined Heat and Power and photovoltaics.
- 5.40 It will also be future proofed to connect to the Bloomsbury District Heating Network when this is brought forward.

6.0 Pre-Application Advice and Consultation

OVERVIEW OF PRE-APPLICATION ADVICE AND CONSULTATION

- 6.1 Extensive pre-application discussion on the proposed development took place between May 2012 and March 2013 with the LB Camden and other statutory consultees, including the Greater London Authority ("GLA") and English Heritage.
- 6.2 The current proposals have also been subject to extensive consultation with ward councillors, surrounding residents and other stakeholder groups (including Bloomsbury Conservation Area Advisory Committee and the Marchmont Association), providing multiple opportunities for the community to provide comments prior to submission of the application.
- 6.3 A raft of pre-application meetings have taken place with Planning, Design and Conservation Officers at LB Camden, residents and other stakeholders including three series of public exhibitions. A summary of the key activities undertaken and issues raised through pre-application advice and the feedback from community consultation are set out below (and within the Statement of Community Involvement).

PRE-APPLICATION ADVICE

- 6.4 The applicant has undertaken a series of pre-application meetings since May 2012 with LB Camden Officers, in addition to the formal DC Forum and Developers Briefing which are referred to within the consultation summary.
- 6.5 Over this period a series of breakout meetings have taken place, comprising:
 - Initial High Level Meeting – 30th May 2012;
 - Policy Meeting and site visit – 28th June 2012;
 - Design Workshop 1 - 5th September 2012;
 - Design Workshop 2 - 20th September 2012;
 - Design Workshop 3 - 26th October 2012;
 - Design Workshop 4 - 23rd November 2012;
 - Design Workshop 5 - 14th December 2012;
 - Design Workshop 6 - 14th January 2013;
 - Design Workshop 7 - 28th January 2013;
 - Secure by Design Meeting – 29th January 2013; and
 - Design Workshop 8 - 21st February 2013.
- 6.6 In response to issues arising out from these meetings the applicants have prepared during the course of pre-application a number of documents including:
 - Canterbury Hall Feasibility Analysis; and
 - Statement on the Justification for Increased Student Bed-spaces.
- 6.7 In addition, the following meeting with other statutory consultees have taken place:
 - English Heritage I – 4th October 2012;
 - GLA Stage 1 Pre-Application Meeting – 21st September 2012;
 - English Heritage II – 6th February 2013;

6.0 Pre-Application Advice and Consultation

- Correspondence with Transport for London (Steven Lugg) in respect to London Underground Tunnels (November – December 2012).

6.8 The principal issues raised through the series of pre-application meetings and the public consultation events are detailed in Table 6.1 below. A summary is provided of the applicants' response and cross-reference is made of the relevant section of the Planning Statement and documents accompanying the planning submission where the issue is considered in further detail.

PUBLIC CONSULTATION

6.9 The Statement of Community Involvement that accompanies the planning application provides a detailed record of the consultation activities and comments received during the recent consultation period. A summary of the consultation events is set out below, and the issues raised and subsequent responses are summarised in Table 6.1.

Public Exhibitions (July 2012, October 2012 and January 2013)

6.10 Three sets of public exhibitions have been held on the proposals through the scheme evolution:

- Preliminary public exhibition at London School of Hygiene & Tropical Medicine, 15 – 17 Tavistock Place, WC1H 9SH about 300 metres from the site on:
 - Saturday 21st July – 10 am – 1 pm; and
 - Thursday 26th July – 6 – 8 pm.
- Second public exhibition on-site at Hughes Parry Hall, 19 – 26 Cartwright Gardens, WC1H 9EF on:
 - Saturday 13th October – 10 am – 1 pm; and
 - Wednesday 17th October – 5 pm – 8 pm.
- Third public exhibition on-site at Hughes Parry Hall, 19 – 26 Cartwright Gardens, WC1H 9EF on:
 - Thursday 31st January – 1 – 8 pm.

6.11 55 people attended the first exhibition, 60 attended the second and 40 people attended the third public exhibition.

6.12 The exhibitions were attended by members of the Applicant's project team to answer detailed questions. Feedback forms were made available to attendees. Full details are provided within the Statement of Community Involvement which accompanies the planning submission, however a summary of the main issues and design team responses are set out in Table 6.1.

Development Management Forum – 9th October 2012

6.13 The scheme proposals were presented to the Development Management Forum on 9th October 2012.

6.14 The key issues arising out of this included:

- Needs for increased student numbers at the site and wider University of London strategic approach to accommodation;

6.0 Pre-Application Advice and Consultation

- Provision of ancillary functions (including teaching spaces);
 - Student management (in particular, in respect to noise);
 - Height, scale and massing:
 - In respect, to Cartwright Gardens and response to the Bloomsbury Conservation Area;
 - In respect, to impact on daylight and sunlight of surrounding residents.
 - Construction Management Arrangements;
 - Combined Heat and Power and the potential to connect to Euston Road; and
 - Treatment of Cartwright Gardens Open Space.
- 6.15 In addition to the above list of key issues, a summary of the main issues and the design team responses are set out in Table 6.1.

Developers Briefing – 15th October 2012

- 6.16 The scheme proposals were presented to Members of the Development Control Committee at a briefing on 15th October. The key issues and feedback arising out of this comprised:
- Justification for Demolition of Canterbury Hall;
 - Quality of design;
 - Justification for increased student numbers;
 - Impact of proposals on residential amenity (related to student management);
 - Quality and access of Cartwright Gardens, including making access public; and
 - Scope for reducing vehicular access from Sandwich Street.

A summary of the main issues and design team responses are set out in Table 6.1.

Heritage Groups - English Heritage, 20th Century Society and Bloomsbury CAAC

- 6.17 An initial meeting and site visit was held with Richard Parish of English Heritage on 4th October 2012 to discuss the proposals for demolition with the Bloomsbury Conservation Area and present the initial scheme.
- 6.18 Following further scheme evolution, a second formal meeting was held with Michael Dunn and Richard Parish of English Heritage on 6th February 2013. In a subsequent email (13th February 2013) English Heritage set out:

“In general, we are supportive of the approach as presented. We believe that the emerging design for the new building facing Cartwright Gardens is an appropriate response to the surrounding urban context, and that the new building is of the right scale and has sufficient architectural gravitas to complete the eastern part of the square. We also considered the emerging designs for the buildings facing Sandwich Street to be acceptable in principle, although we understand that more work is to be done on matters of detail and materials etc.”

6.0 Pre-Application Advice and Consultation

Finally, we support the emerging proposals for the open space of Cartwright Gardens, although the proposals depend on future decisions relating to the retention of one or both of the tennis courts”.

6.19 A site visit and initial meeting were also held with the 20th Century Society in respect to the proposed demolition within the Bloomsbury Conservation Area and the proposed replacement blocks. The 20th Century Society did not raise any objections to the proposed demolition.

Local Amenity Groups

6.20 In addition, to the public exhibitions and events organised by LB Camden, the applicants have also held a series of breakout public meetings with surrounding amenity groups, including:

- Bloomsbury Conservation Area Advisory Committee (CAAC) – 18th July 2012 and 6th February 2013;
- Sandwich Street Residents’ Meeting (Sinclair Sandwich Thanet Limit and Sinclair Sandwich Thanet Management Limited) – Thursday 27th September at Hughes Parry Hall;
- University of London’s Student Union; and
- Cartwright gardens Hotel owners.

KEY ISSUES RAISED DURING PRE-APPLICATION AND CONSULTATION

Table 6.1 – Key Issues and Design Responses

Issue	How Addressed	Reference within Planning Statement (and other planning application documents)
Principle of Increased Student Accommodation	<p>The proposed development will result in an increase of 187 bed-spaces. This is a direct response to an identified short-fall in London and the University of London’s purpose built student accommodation supply.</p> <p>The applicant submitted a Report providing evidence and justifying the increased bed-spaces at the site to LB Camden in February 2013.</p> <p>This set out why more rooms are necessary, due to the current market undersupply and resultant proliferation of students in the private rented market housing sector which places increasing pressure on the market and takes student management away from higher education institutions.</p>	<p>Planning Statement – Section 8</p> <p>Student Management Plan</p> <p>Statement on the Justification for Increased Student Bed-spaces.</p>

6.0 Pre-Application Advice and Consultation

	<p>It also highlights the importance of the quality of accommodation to attracting students to the world-class University, including cost, cleanliness, maintenance, pastoral care and security.</p> <p>It then explains the University of London’s strategic approach to education and the selection of Garden Halls as one of a number of expansion routes being pursued.</p>	
Student Management (including Noise, Safety and Security)	<p>Draft Student Management Plan prepared to address student code of conduct and management.</p> <p>24-hour dedicated security and pastoral support team (wardens) on-site to respond to student management needs to both students and surrounding residents.</p> <p>Introduction of increased CCTV around the building.</p> <p>Restricting access to Sandwich Street Townhouses during evenings to eliminate any impacts of anti-social behaviour from students at night.</p>	<p>Planning Statement – Section 8</p> <p>Student Management Plan</p>
Noise	<p>In addition to the above-referenced draft Student Management Plan which is intended to manage individual student behaviour and includes the disciplinary procedure should students fail to meet expectations on behaviour, the design of the proposed development has had regard to minimising any acoustic disturbance.</p> <p>A glazed roof has been introduced over the central internal courtyard to reduce noise emanating from this part of the development. The two remaining external courtyards benefit from built form on all sides minimising the travel of any noise disturbance.</p> <p>Throughout high quality materials will be used to maximum acoustic insulation and thus further mitigate against any noise impacts.</p>	
Sunlight and Daylight to	Through the design evolution, the number of town-houses to the northern end of	Planning Statement – Section 8

6.0 Pre-Application Advice and Consultation

<p>surrounding properties</p>	<p>Sandwich Street have been reduced to respond to the concerns of residents at Sandwich House (see commentary below on Design of Sandwich Street).</p> <p>A daylight and sunlight assessment was commissioned by the University to assess the impact of the scheme on surrounding properties on Sandwich Street. This indicates the scheme will cause only isolated breaches to a minority of neighbouring properties, which is not unusual in a dense urban environment.</p>	<p>Daylight and Sunlight External Assessment</p>
<p>Demolition in Conservation Area, in particular loss of Canterbury Hall</p>	<p>The applicant submitted an initial Canterbury Hall Feasibility Report to LB Camden in November 2012 assessing the heritage context and the significance of Canterbury Hall against the site and structural constraints and benefits of comprehensive redevelopment, following engagement with LB Camden, English Heritage and the 20th Century Society. It explored a range of options, including full retention, facade retention and demolition to demonstrate the restrictions and limitations of retaining the building on-site.</p> <p>The applicant updated this document in March 2013 in response to further information requests from Camden.</p>	<p>Planning Statement – Section 8 Heritage Assessment Design and Access Statement Canterbury Hall Feasibility Report (November 2012) and Update Report (March 2013)</p>
<p>Proposed height, scale and massing</p>	<p>The applicant’s design team have tested a number of responses to the height scale and massing through the course of the design evolution.</p> <p>The design has evolved from the initial response set at ground plus eight storeys with the existing Hughes Parry Tower serving as the leading edge with scale and massing dropping at the Leigh Street corner, through a series of tested iterations.</p> <p>The scale of the main building has reduced to seven storeys with a two storey mansard roof, and revisions have taken place to reduce the height and add greater variety to the massing at Leigh Street.</p> <p>The massing of the domestic townhouses response along Sandwich Street has also been tested. Consequently through the</p>	<p>Planning Statement – Section 8 Design and Access Statement</p>

6.0 Pre-Application Advice and Consultation

	<p>evolution, the height and massing have reduced with the final massing ranging from five to storeys, including set-back top floors.</p> <p>Further testing of the Leigh Street block has taken place to introduce a series of massing changes from the corner with Cartwright Gardens to Sandwich Street.</p>	
<p>Design – Addressing Cartwright Gardens</p>	<p>Responding to feedback, the applicant appointed a second set of architects (Maccreanor Lavington) to assist in developing an appropriate design response to the Cartwright Gardens facade.</p> <p>Extensive studies have been undertaken in respect to the height, scale and massing of the facade (including the mansard), as well as elevation treatment.</p> <p>Maccreanor Lavington have conducted a series of studies to assess the architectural composition of the Cartwright Gardens facade and its relief, including appropriate fenestration, banding and entrance proportions.</p> <p>Studies and materials have been presented to LB Camden Design Officers and independent Townscape experts, Peter Stewart Consultancy, in developing the Final design solution.</p>	<p>Planning Statement – Section 8 Design and Access Statement Townscape, Visual Impact and Heritage Report</p>
<p>Design – Addressing Sandwich Street</p>	<p>The design responds to the surrounding built context by introducing town houses along Sandwich Street, which step down in scale from the main Cartwright Gardens Wing.</p> <p>Through the design evolution, the number of town-houses to the north of Sandwich Street have been reduced to respond to the concerns of residents at Sandwich House.</p> <p>Furthermore, the modelling of the Leigh Street Wing on its Sandwich Street frontage has been subject to further design scrutiny. As such, the design seeks to sensitively respond to the smaller scale buildings and Sandwich Street and Light Street. In particular, height has been lost on this block and a set-back introduced. The facade treatment has been updated</p>	<p>Planning Statement – Section 8 Design and Access Statement Townscape, Visual Impact and Heritage Report</p>

6.0 Pre-Application Advice and Consultation

	accordingly, to run the Town House character to the south end of the street.	
Retention of Hughes Parry Tower	<p>Hughes Parry Tower is an existing building, consequently planning and conservation area consent for its retention are not required.</p> <p>The proposals seek to refurbish the block internally to provide en-suite accommodation that meets modern demands and building standards.</p> <p>In re-designing the internal layout and selecting materials the applicant has sought to had to regard to surrounding residents along Sandwich Street to mitigate any impacts of residential amenity related to students and plant.</p>	
Cartwright Gardens Open Space	<p>The proposed development will enhance the existing open space provision within Cartwright Gardens which is considered to be in need of an upgrade, in particular to planting, surfaces and facilities.</p> <p>It is proposed to also open access to the private gardens to the public between dawn and dusk, enabling surrounding residents and visitors to share in the benefits of the improved facilities.</p>	<p>Planning Statement – Section 8</p> <p>Design and Access Statement</p>
Construction Management Plan	<p>The applicant has prepared a draft Construction Management Plan which details how impacts to the local community and on the surrounding road network will be mitigated,</p> <p>The applicant’s contractor will commit to Community Liaison requirements to be secured within the S106.</p>	<p>Planning Statement – Section 8</p> <p>Construction Management Plan</p>

7.0 Planning Policy Overview

PLANNING POLICY FRAMEWORK

- 7.1 The Town and Country Planning Act 1990 (the “1990 Act”) and the Planning and Compulsory Purchase Act 2004 (the “2004 Act”) establish the legislative basis for town planning in England and Wales. Together these acts establish a “plan led” system which requires local planning authorities to determine planning applications in accordance with the statutory development plan (the development plan) unless material considerations indicate otherwise (section 38(6) of the 2004 Act). In assessing and determining development proposals, the National Planning Policy Framework (March 2012) sets out that local planning authorities should apply the presumption in favour sustainable development.
- 7.2 In London the development plan comprises the Borough plan and the London Plan.
- 7.3 This section identifies the principal policies applicable to the determination of these proposals and the principal material considerations.
- 7.4 The statutory development plan for the application site comprises:
 - The London Plan (July 2011);
 - The LB Camden Core Strategy (November 2010); and
 - The LB Camden Development Policies Document (November 2010).

Policy LU1 (Proposals Sites) of the now superseded UDP also remains part of the statutory development plan, however its policies are not relevant to this application.
- 7.5 The Mayor and LB Camden have also published a suite of Supplementary Planning Guidance on specific planning issues, including of pertinence the Mayor’s Housing SPG (November 2012) and London View Management Framework (February 2012). Where relevant these are also considered below.
- 7.6 In addition to the statutory and supplementary planning policy documents, emerging policy also has the ability to be considered as a ‘material consideration’ in the determination process but this depends on the stage it has reached in the adoption process. Of pertinence is the Early Minor Alterations to the London Plan (2012).

CENTRAL GOVERNMENT GUIDANCE

National Planning Policy Framework (NPPF)

Presumption in Favour of Sustainable Development

- 7.7 National planning guidance is contained within the National Planning Policy Framework (NPPF) (March 2012). It introduced a presumption in favour of sustainable development where development proposals that accord with up-to-date development plan should be approved without delay.
- 7.8 It sets out the core planning principles that underpin the planning system (Para 17), which include:
 - proactively driving and supporting sustainable economic development to deliver homes. Every effort should be made objectively to identify and then meet the housing needs of an area and respond positively to wider opportunities for growth;
 - the effective use of land should be encouraged by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental quality; and

7.0 Planning Policy Overview

- conserving heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.

High Quality Homes

- 7.9 Section 6 sets out guidance to deliver a wide choice of high quality homes. In order to deliver high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should:
- plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community; and
 - identify the size, type, tenure and range of housing required in particular locations, reflecting local demand.

Good Design

- 7.10 Section 7 requires good design in all development, planning decisions should aim to ensure that developments (Para 58):
- will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
 - establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;
 - optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses and support local facilities and transport networks;
 - respond to local character and history and reflect the identify of local surroundings and materials, while not preventing or discouraging appropriate innovation;
 - create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and
 - are visually attractive as a result of good architecture and appropriate landscaping.
- 7.11 Local planning authorities should not refuse planning permission for buildings or infrastructure which promote high levels of sustainability because of concern about incompatibility with an existing townscape, if those concerns have been mitigated by good design (Para 65).
- 7.12 Applicants will be expected to work closely with those directly affected by their proposals to evolve designs that take account of the views of the community, Proposals that can demonstrate this in developing the design of the new development should be looked on more favourably (Para 66).

Conserving and enhancing the Historic Environment

- 7.13 Section 12 sets out policy guidance in respect to conserving and enhancing the historic environment. In determining applications, LPAs should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting (Para 128).
- 7.14 Para 131 sets out that in determining applications, LPAs should take into account:
- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;

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- the positive contribution that conservation of heritage assets can make to sustainable communities, including their economic viability;
 - the desirability of new development making a positive contribution to local character and distinctiveness.
- 7.15 Proposals that preserve elements of the setting that make a positive contribution to or better reveal the significance of Heritage Assets (including Conservation Areas) should be treated favourable (Para 137).
- 7.16 Not all elements of a Conservation Area will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area should be treated either as substantial harm (and policies of paragraph 133 applied) or less than substantial harm (and policies of paragraph 134 applied), as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area as a whole (Para 138).
- 7.17 Accordingly, Para 133 sets out that where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, LPAs should refuse consent, unless it can be demonstrated that the substantial harm or less is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:
- the nature of the heritage asset prevents all reasonable uses of the site; and
 - no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
 - conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and
 - the harm or loss is outweighed by the benefit of bringing the site back into use.
- 7.18 Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighted against the public benefits of the proposal, including securing its optimum viable use (Para 134).
- 7.19 The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset (Para 135).

STATUTORY DEVELOPMENT PLAN

- 7.20 The statutory development plan for the application site comprises:
- The London Plan (July 2011);
 - The LB Camden Core Strategy (November 2010);
 - The LB Camden Development Policies Document (November 2010).

London Plan (July 2011)

- 7.21 The London Plan sets out the Mayor's vision until 2031 to:

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“excel among global cities, expanding opportunities for all its people and enterprises, achieving the highest environmental standards and quality of life and leading the world in its approach to tackling the urban challenges of the 21st century, particularly that of climate change.”

- 7.22 The objectives are to ensure London is a city that; meets the challenges of economic and population growth; is internationally competitive and successful; is diverse strong, secure and has accessible neighbourhoods; delights the senses; is a world leader in improving the environment; and where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities. Specifically it is recognised that all Londoner’s, including students, should be able to realise and express their potential, in a high quality environment (Para 1.53 – Objective 3).

The Central Activities Zone (“CAZ”)

- 7.23 The Central Activities Zone (“CAZ”) covers London’s geographic, economic and administrative core. It brings together financial and business services, a third of London’s jobs, Central Government and a range of related legislative and administrative organisations. It is the culture centre, contains a range of retail centres, houses 275,000 Londoners and embraces much of iconic London, with a mix of ancient heritage and modern architecture (Para 2.44). The Mayor is committed to continuing to support its unique functions.
- 7.24 Strategic priorities for the Central Activities Zone (Policy 2.10) include enhancing its international, national and London-wide role, supporting its distinct offer and strategic uses; bringing forward development capacity and supporting infrastructure and services; and supporting and improving the retail offer. The supporting text recognises that the CAZ has a number of specialised economic clusters, including the university precinct in Bloomsbury/The Strand which should also be enhanced.
- 7.25 Policy 2.11 promotes a mix of uses in the CAZ including continual support for strategic important clusters including academia.

London’s Housing, including student accommodation

- 7.26 Strategic and local requirements for student housing should meet a demonstrable need, and be addressed through stakeholders in higher and further education were closely with the Mayor and boroughs (Policy 3.8). Importantly, student accommodation should not compromise capacity for conventional homes.
- 7.27 Policies 3.18 and 4.10 recognise the significant contribution that London’s universities make to its economy and labour market. The supporting text to Policy 3.8 (Para 3.52), recognises that universities’ attractiveness and potential growth should not be compromised by inadequate provision for new student accommodation.
- 7.28 While there is uncertainty over future growth in the London student population and its accommodation needs, the London Plan sets out that there could be a requirement for some 18,000 – 27,000 places over the 10 years to 2021. The SHLAA/HCS has identified capacity for over 17,000 student places 2011–2021.
- 7.29 Addressing student accommodation demands should not compromise capacity to meet the need for conventional dwellings, especially affordable family homes, or undermine policy to secure mixed and balanced communities (Para 3.53). The London Plan recognises this may raise particular challenges locally, and especially in parts of inner London where almost three quarters of the capacity for new student accommodation is concentrated. However, it

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also highlights that new provision may reduce pressure on other elements of the housing stock currently occupied by students, especially in the private rented sector.

- 7.30 Student accommodation should be secured as such by planning agreement or condition relating to the use of the land or to its occupation by members of specified educational institutions. If the accommodation is not robustly secured for students, it will normally be subject to the requirements of affordable housing policy (London Plan policies 3.10-3.13).

London's Education Base

- 7.31 Provision of education facilities, including further and higher education facilities, adequate to meet the demands of a growing and changing population and to enable greater education choice will be supported by the Mayor (Policy 3.18).
- 7.32 The Plan recognises that higher education in London provides an unparalleled choice of undergraduate and postgraduate degrees (Para 3.107). Furthermore, it recognises that universities also play a vital part in ensuring Londoners have the higher order skills necessary to succeed in a changing economy, and for the capital to remain globally competitive (Policy 4.12).

London's Economy

- 7.33 The Mayor will give strong support for London's higher and further education institutions and their development, recognising their needs for accommodation and the special status of the parts of London where they are located, particularly the Bloomsbury/Euston and Strand university precincts (Policy 4.10).

London's Response to Climate Change

- 7.34 The Mayor's energy hierarchy is to: be lean, use less energy; be clean, supply energy efficiently; and be green, use renewable energy (Policy 5.2). Targets are proposed for minimum improvements over the Target Emission Rate: 44% improvement on 2006 Building Regulations (residential and domestic buildings between 2010-2013), the equivalent to the energy requirements of Code for Sustainable Homes level 4 for residential buildings. Where targets cannot be met on site any shortfall can be provided offsite or through payment in lieu.
- 7.35 Sustainable design and construction standards include minimising carbon dioxide emissions, avoiding pollution, minimising waste and maximising recycling and avoiding impacts from natural hazards (Policy 5.3).
- 7.36 Regard should be had to sustainable retrofitting of existing buildings. Opportunities for reducing carbon dioxide emissions from the existing building stock should be taken by identifying potential synergies between new developments and existing buildings through the retrofit of energy efficiency measures, decentralised energy and renewable energy opportunities (Policy 5.4).
- 7.37 The Mayor's objective is that 25% of energy supply should be decentralised by 2025 (Policy 5.5). Boroughs are encouraged to undertake energy masterplanning and development of networks for development to connect to.
- 7.38 Policy 5.6 sets out the approach to decentralised energy in development proposals, prioritising connection to existing systems, followed by site wide CHP and communal heating and cooling.
- 7.39 Policy 5.7 seeks that a proportion of energy is generated from renewable sources.

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Major developments should reduce potential overheating (Policy 5.9).

- 7.40 Policy 5.10 promotes urban greening with green infrastructure being integrated from the beginning of the design process to contribute to urban greening, including tree planting, green roofs and walls and soft landscaping. Developments should include green roofs and walls where feasible (Policy 5.11).

London's Transport

- 7.41 The Mayor will encourage closer integration of planning and development and will encourage development that reduces the need to travel and encouraging walking by improving the urban realm (Policy 6.1).
- 7.42 Development proposals should ensure that impacts on transport capacity are assessed (Policy 6.3).
- 7.43 Developments should provide secure cycle facilities (Policy 6.9). Maximum parking standards are set out in table 6.3.
- 7.44 Maximum car parking standards are set out in Table 6.2. In addition, developments must ensure that 1 in 5 spaces (both active and passive) provide an electrical charging point to encourage the uptake of electric vehicles.

London's Living Places and Spaces

- 7.45 Developments should be designed so that the layout, tenure and mix of uses interface with the surrounding land and improve people's access to social and community infrastructure, including green spaces, local shops and public transport (Policy 7.1). The design of new buildings and the spaces they create should help reinforce or enhance the character, legibility, permeability and accessibility of the neighbourhood.
- 7.46 Development should be of the highest standards of accessible and inclusive design (Policy 7.2) and consistent with the principles of 'secured by design' (Policy 7.3).
- 7.47 Development should have regard to the form, function or structure of an area (Policy 7.4). In areas of poor character it should build on positive elements that can contribute to establishing character.
- 7.48 Development should make the public realm comprehensible with gateways and focal points (Policy 7.5).
- 7.49 Architecture should contribute to a coherent public realm, streetscape and wider cityscape (Policy 7.6). Buildings should:
- Be of the highest architectural quality;
 - Be of a proportion, composition, scale and orientation that enhances, activates and appropriately redefines the public realm;
 - Comprise details and materials that complement, not necessarily replicate the local architectural character;
 - Not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and micro-climate;
 - Incorporate best practice in resource management and climate change adaptation and mitigation;

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- Provide high quality indoor and outdoor spaces and integrate well with the surrounding streets and open spaces;
 - Be adaptable to different activities uses, particularly at ground floor;
 - Meet the principles of inclusive design; and
 - Optimise the potential of sites.
- 7.50 Tall and large scale buildings should not have an unacceptable harmful impact on their surroundings (Policy 7.7). Tall and large scale buildings include those that are larger than the threshold sizes set for the referral of planning applications to the Mayor (Para 7.25).
- 7.51 Applications for tall or large scale buildings should include an urban design analysis. Such buildings should:
- Generally, be in the Central Activities Zones, opportunity area or area of intensification or town centre;
 - Only be considered in areas whose character would not be affected adversely by the scale, mass or bulk of a tall or large building;
 - Relate well to the form, proportion, composition, scale and character of surrounding buildings, urban grain and public realm, particularly at street level;
 - Individually, or as a group, improve the legibility of an area, by emphasising a civic or visual significance where appropriate and enhance the skyline and image of London;
 - Incorporate the highest standards of architecture and materials, including sustainable design and construction practices;
 - Have ground floor activities that provide a positive relationship to the surround streets;
 - Contribute to improving the permeability of the site and wider area, where possible;
 - Incorporate publicly accessible areas on the upper floors, where appropriate; and
 - Make a significant contribution to local regeneration.
- 7.52 New development in the setting of heritage assets, and conservation areas should be sympathetic to their form, scale, materials and architectural detail. It should make provision for the protection of archaeological resources (Policy 7.8).
- 7.53 Policy 7.12 sets out the policies concerning the implementation of the London View Management Framework. New development should not harm, and where possible make a positive contribution to, the characteristics and composition of the strategic views and their landmark elements. The site falls within the middle ground of the designated Blackheath Point London Panorama (Assessment point 6A.1) (see below for commentary on the London View Management Framework SPG). Development in the foreground and middle ground of a designated view should not be overly intrusive, unsightly or prominent to the detriment of the view.
- 7.54 Developments should promote sustainable design and construction methods to reduce emissions (Policy 7.14) and should aim to be 'air quality neutral' and not lead to further deterioration of existing poor air quality. Offsetting should be used to ameliorate negative impacts associated with development proposals.
- 7.55 Existing and potential adverse noise impacts should be minimised in development proposals, separating new noise sensitive development from major noise sources and promoting new technologies and improved practices to reduce noise at source (Policy 7.15).

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A proactive approach should be taken to the protection, promotion and management of biodiversity in support of the Mayor’s Biodiversity Strategy (Policy 7.19).

Affordable housing and transport are strategic planning obligations (Policy 8.2).

LB Camden Local Development Framework

Site Designations

7.56 The site is not subject to any site specific allocations, however, it falls subject to the following designations:

- Central London Area (“CLA”);
- Bloomsbury Conservation Area (“BCA”), within which Canterbury Hall is identified as making a positive contribution and the Statue of John Cartwright within Cartwright Gardens open space is Grade II Listed;
- Designated Viewing Corridor from Blackheath Point to St Paul’s Cathedral; and
- Cartwright Gardens Open Space;

Relevant Policies

7.57 The relevant policies from LB Camden Core Strategy (November 2010) comprise:

- CS1 - Distribution of growth
- CS3 – Other Highlight Accessible Areas
- CS5 - Managing the impact of growth and development
- CS6 - Providing quality homes
- CS8 - Promoting a successful and inclusive Camden economy
- CS9 – Achieving a Successful Central London;
- CS10 - Supporting community facilities;
- CS11 - Promoting sustainable and efficient travel;
- CS13 - Tackling climate change;
- CS14 - Promoting high quality places and conserving our heritage;
- CS15 - Protecting and improving open spaces & encouraging biodiversity;
- CS16 - Improving Camden’s health and well-being;
- CS17 - Making Camden a safer place;
- CS18 - Dealing with waste; and
- CS19 - Delivering and monitoring the Core Strategy.

7.58 The relevant policies from LB Camden Development Policies Document (November 2010) comprise:

- DP1 - Mixed use development;
- DP2 - Making full use of Camden’s capacity for housing;
- DP3 - Contributions to supply of affordable housing;

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- DP6 - Lifetime homes and wheelchair homes
- DP9 - Student housing, bedsits and other housing with shared facilities;
- DP15 – Community and Leisure Facilities;
- DP16 – The transport implications of development;
- DP17 - Walking, cycling and public transport;
- DP18 - Parking standards and the availability of car parking;
- DP19 - Managing the impact of parking;
- DP20 - Movement of goods and materials;
- DP21 - Development connecting to highway network;
- DP22 – Promoting sustainable design and construction;
- DP23 – Water;
- DP24 - Securing high quality design;
- DP25 - Conserving Camden’s heritage;
- DP26 - Managing the impact of development on occupiers and neighbours;
- DP27 – Basement and Lightwells;
- DP28 - Noise and vibration;
- DP29 - Improving access;
- DP31 - Provision of and improvements to public open space;
- DP31 – Air Quality and Camden’s Clear Zone

7.59 The relevant policies are set out by topic below.

Growth Distribution

- 7.60 The most efficient use of land should be promoted: Camden will focus growth in the most suitable locations, including highly accessible locations, in particular Central London (Policy CS1). Housing is considered a priority land use in the LDF and the Council will expect 12,250 additional homes to be provided in Camden between 2010/11 and 2024/25.
- 7.61 Development should make full use of the site, taking into account quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the site (Policy CS1). Within Central London high density development will be expected. Good design can increase density while protecting and enhancing the character of an area (Para 1.22). Through using this approach the Council expects to be able to deliver its new homes targets (see below).
- 7.62 King’s Cross and Euston, to the north of the site, and Holborn to the south, are identified at specific growth areas for the largest amount of Camden’s growth (Policy CS2)
- 7.63 The site falls within the Central London Area where appropriate development will be promoted by the Council (Policy CS3). Development should be of suitable scale and character for the area where it is situated and contribute to other Council aspirations including provision of appropriate community and environmental benefits, and takes into account amenity and community safety.

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- 7.64 The impact of growth and development will be managed (Policy CS5). In particular, the Council will ensure development provides uses that meet the needs of Camden’s population and contributes to the borough’s London-wide role. Infrastructure and facilities needed to support Camden’s population and those who work in and visit the borough should be given consideration. Sustainable buildings and spaces of the highest quality should be provided, that protect and enhance the environment and heritage and the amenity and quality of life of local communities.

Central London Area

- 7.65 The site falls within Camden’s Central London Area. Camden’s CLA is a key part of the nation’s capital and a major international city. Its unique cluster of activities contribute to London’s role as a ‘world city’. It is recognised, amongst other things for its concentration of nationally important higher education institutions (Para 9.1).
- 7.66 The Council recognise its “unique role, character and challenges” and will support its focus for future growth, including in homes (Policy CS9). In taking decisions on planning applications, the Council will “(f) take into account the specific identity of area within the CLA; ...and (h) support the concentration of medical, educational, cultural and research institutions within central London”. They will support the concentration of institutions, including educational ones and preserve and enhance its historic environment.

Providing Quality Homes (Including Student Accommodation)

- 7.67 ‘Camden share the government’s goal of seeking to ensure that everyone has the opportunity to live in a decent home at a price they can afford in a community where they want to live’ (Para 6.3).
- 7.68 Camden aim to make full use of its capacity for housing including by “supporting the supply of additional student housing”, providing this does not prejudice: the Council’s ability to meet the target for supply of additional self-contained homes; the balance of uses in the area; and the quality of residential amenity or the character of the surrounding area (Policy CS6).
- 7.69 Over the period 2010-25 the Council anticipate that student housing will make up most of Camden’s supply of homes that are not self-contained. They have set a 15-year target for 1,500 non self-contained homes (CS Para 6.13).
- 7.70 Camden will seek a range of housing including homes for young adults and students in higher education (CS Para 6.29). It will not be feasible, nor appropriate, to include a full range of homes wide enough to meet all needs within every development; on individual sites, a mix will be sought that takes into account the characteristics and constraints of the site and the area (CS Para 6.31).
- 7.71 CS Para 6.34 recognises that the turnover of occupier of market rented housing tends to be rapid (particularly given its popularity amongst young adults and students), so localised concentrations of private renting can harm the stability of a community.
- 7.72 The Young adult age group (16 – 24 year olds) represented around 14% of Camden’s population at the 2001 census, around half (8%) being full-time students aged 19 and over (CS Para 6.49).
- 7.73 In 2001, over 15,000 full-time students aged 19 and over were normally resident in Camden during term-time. Many more living outside the Borough were registered at higher education institutions with a Camden base (CS Para 6.50). Camden Housing Needs Survey

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Update (2008) indicated that over 28,000 full-time students were registered in Camden based institutions in 2006/7. Whilst, The 2001 Census indicated that the private rented sector housed a third of Camden's full-time students in term-time (CS Para 6.51).

- 7.74 The Council recognise that, if protected, the existing stock of cheap housing such as bedsit rooms could support modest projected increases in young adults. However, the growth of student numbers is recognised as placing severe strain on the stock of private rented housing (Para 6.52). The Council acknowledge that purpose-built student housing has the potential to mitigate pressure on the stock of private rented homes in Camden.
- 7.75 Policy DP9 sets out that the Council will support development of housing with shared facilities (other than housing designated for older people, homeless people or vulnerable people) and student housing provided that the development:
- Will not involve the loss of permanent self-contained homes;
 - Will not prejudice the supply of land for self-contained homes, or the Council's ability to meet the annual target of 437 additional self-contained homes per year;
 - Does not involve the loss of sites or parts-of-sites considered particularly suitable for affordable housing or housing for older people or for vulnerable people, particularly sites identified for such provision in our Camden Site Allocations Local Development Framework document;
 - Complies with any relevant standards for houses in multiple occupation (HMOs);
 - Will be accessible to public transport, workplaces, shops, services, and community facilities;
 - Contributes to creating a mixed and inclusive community; and
 - Does not create an over-concentration of such a use in the local area or cause harm to residential amenity or the surrounding area.
- 7.76 Furthermore, student housing development should:
- Serve higher education institutions based in Camden or adjoining Boroughs;
 - Be located where it is accessible to the institutions it will serve;
 - Include a range of flat layouts including flats with shared facilities.
- 7.77 Camden's Housing SPG (Para 3.18) goes further to set out that where there is an existing concentration of resident students the Council considers that the proposals for student housing may harm the mix and balance of the community if they provide more than 100 spaces. However, it then goes onto state that "in some instances it may be appropriate to allow additional student housing schemes in locations where there is an existing concentration of such accommodation" (Para 3.19). Specifically, it sets out that Camden may accept student housing serving a HEFCE institution as an alternative to self-contained housing. In such contexts, student housing should:
- form part of a mixed use development;
 - be located on a site already owned by the HEFCE institution or a provider with an agreement for nominations;
 - be in close proximity to the institution it serves.
- 7.78 Furthermore, the additional accommodation should not:
- exacerbate the existing balance of the student population in the area;

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- place additional demand on public transport; and
- increase the impacts on existing permanent residential communities.

7.79 According to figures from the HESE (Higher Education Statistics Agency) contained within Camden's Housing SPG (Draft Amendments, 2012) in 2010/11 there were 23,495 higher education students residing in Camden. 3,755 (16.0%) of those were in the King's Cross Ward, which had the second highest share of full-time Higher education students after Bloomsbury (4,370 or 18.6%).

Education in Camden

- 7.80 Policy CS8 promotes a successful and inclusive Camden economy. This includes recognising the importance of all employment generating uses, including education.
- 7.81 Camden will support the higher education sector, balancing its requirements with those of other sectors and local community (Policy CS10). The concentration of higher and further education facilities in Camden's Central London Area, particularly Bloomsbury and Fitzrovia is identified at Para 10.7. University College London and its associated medical institutions and the University of London, including King's College, the School of Oriental and African Studies and the School of Pharmacy are specifically recognised.

Heritage and Conservation

- 7.82 In managing the impact of development the Council will protect and enhance the environment and heritage and the amenity and quality of life of local communities (Policy CS5). Development should be of the highest standard of design that respects local character and context (Policy CS14). It should preserve and enhance heritage assets, including Conservation Areas. The site falls within the Bloomsbury Conservation Area (Area (the character of which is described in more detail below and assessed in depth in the Townscape, Visual Impact and Heritage Report).
- 7.83 In order to maintain the character of Camden's conservation areas (Policy DP25), LB Camden will:
- Take account of conservation area statements, appraisals and management plans when assessing applications with conservation areas;
 - Only permit development within conservation areas that preserve and enhances the character and appearance of the area;
 - Prevent the total or substantial of an unlisted building that makes a positive contribution to the character or appearance of a conservation area where this harms the character or appearance of the conservation area, unless exceptional circumstances are shown that outweigh the case for retention;and
 - Preserve trees and green spaces which contribute to the character of a conservation area and which provide a setting for Camden's architectural heritage.
- 7.84 The Bloomsbury Conservation Area was first designated in 1969, and last extended in April 2011, at which point the application site was included for the first time in the Conservation Area. At this stage Canterbury Hall was formally identified as a positive contributor to the Conservation Area.
- 7.85 The Bloomsbury Conservation Area Character Appraisal and Management Plan ("BCAAMP") (April 2011) describes the character and appearance or significance of the Conservation Area, and sets out a management strategy for its future.

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- 7.86 The BCAAMP identifies a number of character sub-areas within the BCA.
- 7.87 The Site lies within 'sub area 13'. Its interest is described as deriving from 'the formal early 19th century street pattern and layout of open spaces, and the relatively intact surviving terraces of houses. Developed mainly by James Burton, it was one of the later areas of Bloomsbury to be completed, and in its early 19th century parts retains a remarkably uniform streetscape. The mature trees to be found in the large formal gardens soften the urban area and provide a foil for the built environment in the summer months' (Para 5.225).
- 7.88 The Site is described at para 5.240 of the BCAAMP. It does not differentiate between the three buildings in terms of their contribution to the significance of the BCA and the three are assessed as 'a group' in the final sentence:

'On the east side of Cartwright Gardens are three mid-20th century University of London student halls of residence, which back onto Sandwich Street. Hughes Parry Hall on the corner of Hastings Street was completed in 1969, and comprises a fourteen-storey brown brick tower on the north side, which has distinctive windows with two-tone painted frames and horizontal concrete banding reflecting the storey heights which echoes the classical detailing of earlier surrounding buildings. Its southern section comprises a lower five storey element with large areas of glazing enlivening the street frontage, and sculpturally cantilevered upper floors. The neighbouring 1930s Canterbury Hall, which is located on the central axis of Cartwright Gardens dates from the 1930s, and has a strong Art Deco-inspired symmetrical seven storey facade in a similar brown brick with transomed steel casement windows, and a stone rusticated base and central entrance feature. To the south, the seven-storey 1950s Commonwealth Hall is constructed from red brick with stone and concrete detailing, and steel casement windows. It has a wide central entrance recess which lightens the impact of the building's bulk and height. The building turns the corner into Leigh Street. These buildings are out of scale with original development surrounding Cartwright Gardens, but each is architecturally symbolic of its era, and is set back from the pavement behind railings, respecting traditional boundary treatments in the street'.

- 7.89 The townscape character of that part of the BCA relevant to the consideration of the proposals is set out at paras. 2.7 to 2.16. The significance of the BCA and in particular that part within which the Site lies, is derived from the historic street pattern, the surviving early 19th century Georgian terraced houses (earlier in date to the south) and the resultant grain and character of the street frontages and townscape. The majority of these terraced houses are statutorily listed in recognition of their special architectural and historic significance.
- 7.90 The following are designated heritage assets within the BCA:
- Nos. 27-45 (consec) & 46 – 63 (consec.) Cartwright Gardens and attached railings were listed grade II on 14 May 1974. Terrace of town houses c1809-11 by James Burton.
 - Statue of John Cartwright (political reformer) listed grade II on 14 May 1974. 1831 by George Clarke sculptor.
 - Nos. 2 – 9 (consec) Sandwich Street and attached railings were listed grade II on 14 May 1974. Terrace of town houses c1813-24.

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- Nos. 1 - 19 (consec.) Leigh Street and attached railings were listed grade II on 14 May 1974. Terrace of town houses c1810-13.
 - Nos. 7 – 19 & 27-43 (odd) and 12 – 36 & 46 - 66 (even) Burton Street were listed grade II on 11 August 1972 and 14 May 1974. Terraced town houses c1810-20 by John Burton
 - Nos. 4, 5, 6 & 7 Burton Place were listed grade II on 11 August 1972. Terrace of town houses c1820-22 by James Burton.
 - Nos. 8 & 7 Thanet Street were listed grade II on 19 November 1990. Terrace of town houses c1809-133 by James Burton.
 - Nos. 61 & 63 Judd Street were listed grade II on 14 May 1974. Terrace of town houses c1808-11.
 - Nos. 87 - 103 (odd) Judd Street were listed grade II on 19 November 1970. Terrace of town houses c1816.
 - Nos. 81-89 (odd) Marchmont Gardens were listed grade II on 14 May 1974. Terrace of town houses c1801-6.
 - Nos. 18 - 46 (even) Tavistock Place were listed grade II on 14 May 1974. c1807.
 - The Brunswick Centre was listed grade II on 14 September 2000. 1967-72 by Patrick Hodgkinson for Marchmont Properties and LB Camden, completed by L Brian Ingram and T P Bennett and Partners. Two linked blocks of 560 flats, incorporating rows of shops at raised ground level over basement car –parking on two levels, with attached workshops, ramps and steps.
- 7.91 There are a large number of positive contributor buildings identified in the BCAAMP, including the Site’s character sub-area which includes a wide variety of age and type of buildings. Facing the Site these include:
- All buildings (not listed) on east side of Sandwich Street
 - All buildings (not listed) on Leigh Street
 - All buildings on Hastings Street

Design

- 7.92 The Council will require all developments, including alterations and extensions to existing buildings, to be of the highest standard of design and will expect developments to consider (Policy DP24):
- Character, setting, context and the form and scale of neighbouring buildings;
 - The character and proportions of the existing building, where alterations and extensions are proposed;
 - The quality of materials to be used;
 - The provision of visually interesting frontages at street level;
 - The appropriate location for building services equipment;
 - Existing natural features, such as topography and trees;
 - The provision of appropriate hard and soft landscaping including boundary treatments;
 - The provision of appropriate amenity space; and

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- Accessibility.
- 7.93 Camden will seek to encourage outstanding architecture and design, both in contemporary and traditional styles. Innovative design can greatly enhance the built environment and, unless a scheme is within an area of homogenous architectural style that is important to retain, high quality contemporary design will be welcomed (DPD, Para 24.6).
- 7.94 In particular development should consider:
- The character and constraints of its site;
 - The prevailing pattern, density and scale of surrounding development;
 - The impact on existing rhythms, symmetries and uniformities in the townscape;
 - The compatibility of materials, their quality, texture, tone and colour;
 - The composition of elevations;
 - The suitability of the proposed design to its intended uses;
 - Its contribution to public realm, and its impact on views and vistas; and
 - The wider historic environment and buildings, spaces and features of local historic value DPD, Para 24.7).

Access

- 7.95 Policy CS14 seeks the highest standards of access in all buildings and places and requiring scheme to be designed to be inclusive and accessible.
- 7.96 All housing should meet lifetime homes standards: 10% of homes development should either meet wheelchair housing standards, or be easily adapted to meet them (Policy DP6).
- 7.97 All buildings should meet the highest practicable standards of access and inclusion, secure car parking for disabled people; and secure accessible homes (Policy DP29).

Transport and Servicing

- 7.98 LB Camden will minimise provision of private parking in new developments through car free development in the most accessible locations and car capped developments (Policy CS11).
- 7.99 Development should be integrated with the transport network and be supported by adequate walking, cycling and public transport links (Policy DP16).
- 7.100 Policy DP18 sets out that development should provide the minimum necessary car provision. Developments in the Central London Area will be expected to be car free. Development should also meet cycle parking requirements (Policy DP18). However, the London Plan (2011) supersedes Camden's DPD and its parking policies should take precedence.
- 7.101 LB Camden will seek to ensure that the developments will not have negative impacts of parking, highways or the environment and will encourage the removal of surplus car parking (Policy DP19).
- 7.102 Developments should include facilities for storage and collection of waste and recycling (Policy CS18).
- 7.103 Development that would generate significant movement of goods and materials during construction should minimise the movement of goods and material by road, and consider the use of more sustainable alternatives, such as rail and canal links (Policy DP20).

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7.104 Policy DP21 seeks that any development connecting to the highway network should ensure the use of the most appropriate roads by each form of transport. Direct vehicular access to the Transport for London Road Network (TLRN) and other major roads should be avoided.

Sustainability and Energy

- 7.105 All development is expected to take measures to minimise the effects of, and adapt to, climate change and is encouraged to meet the highest feasible environment standards that are financially viable during construction and occupation (Policy CS13).
- 7.106 Land use should minimise the need to travel by car and help support local energy networks. The efficient use of land and buildings should be promoted and carbon emissions minimised from redevelopment, construction and occupation. Buildings should be designed to cope with, and minimise the effects of, climate change.
- 7.107 Policy CS13 sets out that developments of 10 units or more, or 1000 sq m or more, are expected to reduce their carbon dioxide emissions by 20% through the generation of renewable energy on-site unless it can be demonstrated that such provision is not feasible.
- 7.108 Schemes must demonstrate how they have incorporated sustainable design and construction measures and incorporate green or brown roofs and green walls wherever suitable (Policy DP22). Specifically, new build housing must meet the Code for Sustainable Homes Level 3 by 2010 and Level 4 by 2013.
- 7.109 Development will be required to be resilient to climate change by ensuring schemes include appropriate climate change adaptation measures, such as:
- Summer shading and planting;
 - Limiting run-off;
 - Reducing water consumption;
 - Reducing air pollution; and
 - Not locating vulnerable use in basements in flood-prone areas.
- 7.110 Developments will be expected to connect to decentralised energy networks and use the heat unless developers can demonstrate it is not technically feasible or financially viable.
- 7.111 The Council will require developments to reduce their water consumption, the pressure on the combined sewer network and flood risk (Policy DP23). Developments should incorporate water efficient features and equipment and capturing, retaining and re-using surface water and grey water on-site. Reducing the amount and rate of run-off and waste water entering the combined storm water and sewer network and other sustainable urban drainage methods should reduce the risk of flooding.

Open Space

- 7.112 Where developments create an additional demand for open space improvements to open spaces will be sought (Policy CS15).
- 7.113 LB Camden will only grant planning permission for development that is likely to lead to an increased use of public open space where an appropriate contribution to the supply of open space is made (Policy DP31). Schemes over 30,000 sq m floorspace will be expected to contribute on-site open space.

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Basement and Lightwells

7.114 In determining proposals for basement and other underground development, LB Camden will require an assessment of the scheme’s impact on drainage, flooding, groundwater conditions and structural stability, where appropriate. Basement development will only be permitted where it does not cause harm to the built and environment and local amenity and does result in flooding or ground instability (Policy DP27). Further guidance on Basement Impact Assessments is set out in Camden’s dedicated supplementary planning guidance (CPG 4 Basements and Lightwells).

Amenity

7.115 The Council will protect the amenity of residents and those working and visiting the Borough from growth and development (Policy CS5). In particular, Camden will make sure that the impact of developments on their occupiers and neighbours is fully considered. Development should contribute towards strong and successful communities by balancing the needs of development with the needs and characteristics of local areas and communities and where necessary mitigation measures will be required.

7.116 The Council will only grant permission for development that does not cause harm to amenity. The factors to be considered will include:

- Visual privacy and overlooking;
- Overshadowing and outlook;
- Sunlight, daylight, and artificial light levels;
- Noise and vibration levels;
- Odour, fumes and dust;
- Microclimate; and
- Inclusion of appropriate attenuation measures.

7.117 Developments will also be required to provide acceptable standards of accommodation in terms of internal arrangements, dwelling and room sizes and amenity space; facilities for the storage, recycling and disposal of waste; facilities for bike storage and outdoor space for private or communal amenity space as set out above (Policy DP26).

7.118 Policy DP32 sets out that air quality assessment will be required when development could potentially cause harm to air quality.

7.119 The Amenity SPG sets out more detailed require in respect to:

- Air Quality
 - new developments should endeavour to be air quality neutral;
 - an air quality assessment will be required for developments that including CHP/CCHP, should this reveal negative impact to surrounding air quality mitigation measures will be required.
- Noise
 - Where noise levels for new developments potentially exceed existing noise levels natural screening should be considered to buffer the noise levels.
- Construction

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- Regarding the phasing element of the development a Construction Management Plan will be necessary as the construction process will have a significant impact on adjoining properties;
- With new developments the Council expects that at least one window of a habitable space to face within 90 degrees of south.
- **Rights to Light and Privacy**
 - For existing buildings the principal concern is the overall loss of daylight as opposed to the minimum acceptable levels of daylight;
 - If an existing property has experienced uninterrupted light for more than 20 years then by law they are entitled to maintain the same levels of light irrespective of any new developments.

MATERIAL CONSIDERATIONS

Revised Early Minor Alteration to the London Plan (February 2012)

- 7.120 The Revised Early Minor Alterations to the London Plan were published for public consultation in June 2012. The alterations address policy changes in line with the NPPF (March 2012), the introduction of the Community Infrastructure Levy (CIL) and enactment of the Health and Social Care Act 2012. This revision also incorporates the Early Minor Alterations issued for consultation in February with regard to guidance provided by the Mayor through the London Housing Strategy, supplementary guidance and the London Plan Annual Monitoring Report.
- 7.121 The Revised Early Minor Alterations proposes the following changes to reflect the NPPF and recent published policy:
- London Plan Policy 3.10 amendments in relation to the definition of affordable housing to fully reflect the NPPF;
 - London Plan Policy 3.8 and its supporting text dealing with housing choice in relation to the Planning Policy for Traveller Sites published March 2012;
 - London Plan Policy 3.8 and supporting text (paragraph 3.57A) to refer to the housing needs of service families and to people wishing to build their own homes to reflect the NPPF;
 - London Plan Policy 3.10 and policies 3.11-3.12 and their supporting text to clarify the Mayor’s approach to the new affordable rent product and the affordable housing investment decisions;
 - Additional justification in paragraph 3.74 to strengthen policy regarding cash contributions in lieu of on/offsite affordable housing provision to reflect the NPPF and points raised at public consultation; and
 - The introduction of cycle parking standards to student accommodation.

London Plan Housing SPG (November 2012)

- 7.122 The Mayor’s Housing SPG supplements the housing policies of the London Plan (2011), providing detail on the quality and design of good homes. The guidance broadly deals with housing provision, design standards, housing choice and affordable housing.

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7.123 The SPG notes that household spaces in non self-contained (NSC) accommodation, which includes student accommodation, count towards overall housing provision targets. The document further outlines 'Good practice' standards, however these do not apply to student accommodation as a specialist form of housing.

London View Management Framework (March 2012)

7.124 The London View Management Framework SPG forms a key part of the Mayor's strategy to preserve the character and built heritage of London. The SPG details the policy framework and Management Plans providing a comprehensive approach to managing the impact of development on key panoramas, river prospects and townscape views.

7.125 Designated views comprise:

- Viewing places;
- Foreground and middle ground (the area between the Viewing Location and a specified landmark or the general skyline); and
- A Background.

7.126 The applicant site falls within the middle ground of the designated Blackheath Point London Panorama (Assessment point 6A.1) within the Landmark Viewing Corridor and Consultation area. The LVMF sets out that "there is considerable opportunity, however, to introduce new development if it is sympathetic to the composition and character of the view".

Camden Supplementary Planning Guidance (CPG1 – 7)

7.127 Camden have produced a raft of supplementary planning guidance which provides further detail on how policies will be implemented for specific topics:

- CPG1 Design (April 2011);
- CPG2 Housing (Under amendment, November 2012);
- CPG3 Sustainability (April 2011);
- CPG4 Basement and Lightwells (April 2011);
- CPG6 Amenity (September 2011);
- CPG7 Transport (September 2011); and
- CPG8 Planning Obligations (September 2011).

7.128 Regard has been had to the additional guidance, and is referred to where relevant in both the above description of the statutory development plan and the policy assessment within the next section (Section 8.0).

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INTRODUCTION

- 8.1 This section of the Planning Statement provides an assessment of the proposed development in relation to planning policy and material considerations relevant to the determination of the application. The Planning Assessment is considered to address that information required to be included in a Regeneration Statement as per Camden's list of planning application requirements, and consequently it is not submitted as a separate document.
- 8.2 It is considered that the key planning issues, arising from discussions with officers, members and following on from the public consultation, are:
- Principle of Redevelopment;
 - Principle of Student Accommodation Uses;
 - Heritage, Design and Townscape;
 - Transport, Access and Parking;
 - Amenity Impacts;
 - Energy and Sustainability;
 - Basement and Lightwells
 - Ecology and Biodiversity; and
 - Planning Obligations (Section 106 Heads of Terms and Mayoral Community Infrastructure Levy).

PRINCIPLE OF REDEVELOPMENT

- 8.3 The proposed development will provide 1200 student bedrooms to increase the quality and number of student bed-spaces to meet the expectations of a world-class University. The proposals are a direct response to an identified shortfall in the quantity and type of accommodation provision by the University of London.
- 8.4 The existing student accommodation was built between circa. 1940s and the 1970s and the range and quality of accommodation and ancillary facilities is considered outdated. The overall layout of the accommodation is poor and inefficient which impacts on the Hall's operations. In particular, because the three blocks were constructed independently and are unconnected, circulation, access and servicing are inefficient. Furthermore, they fail to facilitate a shared student community experience. Redevelopment is necessary to ensure that the quality of facilities provided by the University meet the standards expected of a leading World University to maintain its status and competitiveness, and the contribution it makes to London in accordance with London Plan policies 2.10, 2.11 and 4.12.
- 8.5 The proposals will result in an overall net uplift of 187 rooms at the existing site (which has the highest level of public transport accessibility (PTAL 6b)) and is located in close proximity to the educational institutions it is intended to serve, many of which are within the university precinct in Bloomsbury and the Strand, identified in the London Plan. In particular, it is in close proximity to the University of London's Administrative Centre, Senate House; a significant number of its primary campuses for its affiliated colleges both within Camden and other parts of Central London; and other academic facilities, including the British Library (see Table 2.1 and Policy DP9 test below for further information).

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- 8.6 Furthermore, the site lies within London’s Central Activities Zone (CAZ), Camden’s Central London Area (CLA) and falls between a number of Camden’s targeted growth areas, including King’s Cross and Euston to the north and Holborn to the south. All of these areas are identified as promoted areas for growth by Camden and in the London Plan.
- 8.7 The redevelopment proposals are therefore considered entirely appropriate to the site’s location and accordance with the NPPF (Para 37), the strategic policies of the London Plan and Camden’s spatial policies (Policies CS1 and CS3).
- 8.8 The proposals seek to optimise use of an existing site. The proposed intensity of uses has been balanced with providing an appropriate design response to the site. In particular, the design has had regard to the surrounding heritage context and the amenity of surrounding occupiers in accordance with Camden Policies CS1 and CS5. Through the design evolution the density of the proposed development has reduced (see following sections for full assessment of design against policy).
- 8.9 The principle of redevelopment to optimise use of the brownfield site is therefore considered entirely appropriate. The applicant’s response to managing the impact of the growth, including design and student management responses, is assessed in detail the following sections.

PRINCIPLE OF PROPOSED USES - STUDENT ACCOMMODATION

- 8.10 The proposals to increase the quality, mix and number of student bed-spaces at the Garden Halls are a direct response to an identified short-fall in purpose built student accommodation supply by the University in London, in accordance with London Plan Policy 3.8.

Addressing the Student Housing Shortage

- 8.11 The purpose built student accommodation will contribute towards the London Plan requirement for some 18,000 – 27,000 additional places to be provided up to 2021. The University of London’s own research demonstrates the deficit could be in excess of 34,000 bed-spaces (see Statement on the Justification for Increased Student Bed-spaces for further detail).
- 8.12 The proposals will continue to secure the attractiveness and growth of the world-class University, and its affiliated colleges, in accordance with London Plan Policy 3.8. In this way, the significant contribution that the University of London makes to the economy and labour market can continue to be realised in accordance with London Plan Policies 3.18 and 4.10.
- 8.13 In accordance with London Plan and Camden policies, the accommodation will be built to serve the applicant, the University of London (and its affiliated self-governing colleges), a globally recognised and respected higher education institution. It is thus not subject to the requirements of affordable housing policy (London Plan policies 3.10-3.13).

Mitigating Pressure on Private Sector Stock

- 8.14 In redeveloping an existing student accommodation site the proposals will not compromise capacity for conventional homes in accordance with London Plan Policy 3.8 and Camden Policies CS6 and DP9. Furthermore, the new provision may reduce pressure on other elements of the housing stock currently occupied by students, especially in the private rented sector, contributing to Camden’s overall supply of housing as recognised in Para 6.52 of Camden’s Development Policies Document.

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- 8.15 HESA figures for 2009-10 indicate that of 22,900 higher education students residing in Camden at least 32% were distributed in privately owned or rented accommodation, whilst 34% were in Halls or flats⁶. 6% resided with parents and guardians and the remaining 28% was unknown, raising the possibility that the private sector distribution is higher.
- 8.16 In the King’s Cross ward, 59% were in Halls or flats compared to 22% in the private sector rented or owned, and 3% with parents of guardians. The remaining 16% was unknown. The historic cluster of University academic campuses and their institutional accommodation within the King’s Cross ward and the type and availability of private owned / rented accommodation and higher comparative rent levels given the Central London location of the Ward are factors influencing this distribution.
- 8.17 The 187 additional bed-spaces proposed would represent bed-spaces for 4.8% of the student residents in the King’s Cross ward in 2009-10 (which the above referenced figures are based upon⁷). Therefore, the proposed development could offer the opportunity to release almost a quarter of the students in the King’s Cross ward from the private owned/ private rented sector, releasing this private stock.

Meeting Camden’s Student Housing Criteria and Objectives

- 8.18 Camden policy supports the development of student housing, subject to the criteria and objectives set out in Policy DP9. Table 8.1, below, sets out how the proposed development will fully accord with the criteria and objectives of Policy DP9.

Table 8.1 Assessment against Policy DP9

POLICY CRITERIA	ASSESSMENT
The Council will support development of housing with shared facilities (other than housing designated for older people, homeless people or vulnerable people) and student housing provided that the development:	
(a) Will not involve the loss of permanent self-contained homes;	The proposals comprise the redevelopment of existing halls of residence and therefore will not result in the loss of any permanent self-contained homes.
(b) Will not prejudice the supply of land for self-contained homes, or the Council's ability to meet the annual target of 437 additional self-contained homes per year	The proposals will neither prejudice existing supply nor the Council’s annual housing targets. The proposals will provide for much needed additional student accommodation at an existing site. Through redeveloping an existing site used for student accommodation, rather than acquiring a new site within the Borough, the proposals use land positivity and do not compromise Camden’s supply of land for self-contained

⁶ As cited in Camden’s Student Housing Report to the Development Control Committee on 10th November 2011 (Dated: 31 October 2011).

⁷ King’s Cross Ward higher education student resident count was 3,860 in 2009-10 as per the HESA figures referenced in the abovementioned Committee Report. A breakdown of higher education student residents by accommodation type is not available for any more recent academic year.

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	housing.
(c) Does not involve the loss of sites or parts-of-sites considered particularly suitable for affordable housing or housing for older people or for vulnerable people, particularly sites identified for such provision in our Camden Site Allocations Local Development Framework document;	The site is already in use for student accommodation. Redevelopment will optimise the existing uses at the site and reduce pressure on the University to seek alternative sites. It will not involve the loss of a site suitable for affordable or housing for older or vulnerable people identified in the SSAD Proposed Submission (December 2012).
(d) Complies with any relevant standards for houses in multiple occupation (HMOs);	The proposals comprise dedicated purpose built student accommodation and are not houses in multiple occupation, which form a separate planning use class.
(e) Will be accessible to public transport, workplaces, shops, services, and community facilities;	<p>The site is located in an optimum location to provide student accommodation. It is located in close proximity to one of the most accessible locations in London (PTAL 6b) and a cluster of the University’s academic and ancillary facilities and shops and services. Further expansion on these points is provided below:</p> <ul style="list-style-type: none"> ■ The Garden Halls have an excellent public transport accessibility level of 6b (the highest). Russell Square London Underground Station is located approximately 450 metres south of the site; King’s Cross St Pancras and Euston London Underground and Rail stations are located approximately 600 metres to the north. There are a large number of bus stops within the site environs, the closest being along Euston Road to the north and Upper Woburn Place to the west. In addition, a Transport for London Cycle Hire Docking Station is located on the carriageway outside the Halls. Given the proximity of many of the University’s colleges, the Transport Assessment sets out that a relatively low number of students will require use of public transport. Where public transport use is required, given the range of options available, it is anticipated the additional 187 students would not result in any adverse impact on public transport. ■ The Halls are excellently located for academic institutions and facilities, in particular the university prescient in Bloomsbury

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	<p>and the Strand which is identified in the London Plan.</p> <ul style="list-style-type: none"> ■ The University’s Administrative Centre, Senate House, and 7 of 18 of its colleges⁸ are based in the London Borough of Camden. A considerable number more are located in adjacent Boroughs in Central London within close proximity to the site, including the London School of Economics and King’s College London (both in the City of Westminster). ■ The site is located in London’s Central Activities Zone / Camden’s Central London Area where a diverse range of shops, services and community facilities to meet the student’s needs are readily available. In particular, Marchmont Street/Leigh Street Neighbourhood Centre provide for convenience needs and provide independent restaurants, cafes and book shops.
<p>(f) contributes to creating a mixed and inclusive community, and</p>	<p>The University makes a significant contribution to London and Camden’s educational capital, economy and wider community. As above mentioned, Senate House and a considerable number of the University’s colleges are based in the London Borough of Camden and adjacent Central London boroughs.</p> <p>Student accommodation is the most significant non-academic supporting facilities for the University. The proposals will provide an additional 187 student bed-spaces at affordable rates (see below and Statement on the Justification for Increased Student Bed-spaces for details on affordability).</p> <p>Whilst providing primarily for the University’s students, the proposals will also contribute to the creation of a mixed and inclusive community through:</p> <ul style="list-style-type: none"> ■ Opening Cartwright Gardens Open Space to the public between dawn and dusk; ■ Providing new flexible communal facilities available for use by the surrounding community; ■ Introducing individual entrances to the townhouses during daylight hours to activate Sandwich Street and encourage interaction between the students and Sandwich Street residents; ■ Providing an additional 187 student bed-spaces. Through directing students to purpose built accommodation, the proposals may reduce pressure on other elements of the housing stock currently occupied by students, especially in the private rented sector, re-opening this residential option to

⁸ Birkbeck College, Central School of Speech and Drama, Institute of Education, London School of Hygiene and Tropical Medicine, the Royal Veterinary College, the School of Oriental and African Studies, University College London.

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	<p>alternative user groups;</p> <ul style="list-style-type: none"> ■ Contributing to the vitality and vibrancy of the Marchmont Street/Leigh Street Neighbourhood Centre; ■ Ensuring good neighbourliness and respect for the local environment through the student management plan, which will be secured through the S106.
<p>(g) Does not create an over-concentration of such a use in the local area or cause harm to residential amenity or the surrounding area;</p>	<p>The site falls within Camden’s King’s Cross Ward. According to figures from the HESA (Higher Education Statistics Agency) contained within Camden’s Housing SPG (Draft Amendments, 2012) in 2010/11 there were 23,495 higher education students residing in Camden. 3,755 (16.0%) of those were in the King’s Cross Ward, which had the second highest share of full-time Higher education students after Bloomsbury (4,370 or 18.6% of students).</p> <p>In 2001 students made up 22.97% of the King’s Cross Ward population. Census figures for 2011 are not provided within the SPG and the percentage of the population has not been calculated.</p> <p>The Office for National Statistics 2011 Census results indicates the total population of King’s Cross Ward at 11,843⁹. Using the 2011 Census and HESA figures, residents in full time higher education made up 31.7% of King’s Cross ward population in 2011.</p> <p>Camden’s Housing SPG defines a “concentration” of student bed-spaces as more than 250 bed-spaces.</p> <p>The proposals comprise an additional 187 student rooms. This would result in an increase of 1.6% of the student share of the population¹⁰. This figure assumes the overall population remains at 11,843 and the additional students on the site were new to the ward, rather than relocating from elsewhere within the ward, for example private rented sector (see above for breakdown and analysis of impact on private rented sector stock).</p> <p>It is not therefore considered that the proposals would result in a substantial increase in the student population in the Ward at a site where the principle of student accommodation is already established (the issue of overconcentration is assessed in more detail against the guidance in Camden’s Housing SPG below). Moreover, when compared against intensification of other uses occurring in this Central London location which is identified as the preferred area for Camden’s growth, the increase in bed-</p>

⁹ <http://www.ons.gov.uk/ons/publications/re-reference-table>

¹⁰ Assuming a student resident population of 3,942 students against an overall Ward population of 11,843.

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	<p>spaces is considered wholly appropriate.</p> <p>The site has been used for student accommodation since 1946, and previously the number of students at the site has increased through the development of Commonwealth (1960s) and later Canterbury Hall (late 1960s). The Halls have therefore co-existed alongside the existing residential community for at least 50 years with management arrangements in place to mitigate any impacts on residential amenity for surrounding occupiers.</p> <p>The redevelopment proposals offer an opportunity to improve the standards of existing student management. Through appropriate design responses (including new internal layouts and installation of CCTV), the Student Management Plan and provision of high quality on-site student amenity space the quality of on-site student facilities and management will be substantially improved. As a consequence this will significantly improve conditions and associated impacts for surrounding residents. (Please see below for further commentary on Student Management).</p>
<p>Student housing development should:</p>	
<p>(h) Serve higher education institutions based in Camden or adjoining boroughs;</p>	<p>The applicant is the University of London. The proposals comprise Intercollegiate Halls to serve the federal University and its self-governing colleges.</p> <p>The University’s Administrative Centre, Senate House, and 7 of 18 of its colleges¹¹ are based in the London Borough of Camden. A considerable number more are located in adjacent Boroughs in Central London within close proximity to the site, including the London School of Economics and King’s College London (both in the City of Westminster).</p>
<p>(i) Be located where it is accessible to the institutions it will serve; and</p>	<p>As set out above, the Garden Halls are located in close proximity to a cluster of the University’s colleges with seven of eighteen located within Camden, including 6 within the immediately adjacent Bloomsbury ward and St Pancras and Somers Town wards. A further five colleges have their main campus’ in the City of Westminster (see Table 2.1). The majority are therefore located within walking or cycling distances.</p> <p>The remainder of the institutions are easily accessible by public transport through the multiple London underground and bus routes outlined above.</p>

¹¹ Birkbeck College, Central School of Speech and Drama, Institute of Education, London School of Hygiene and Tropical Medicine, the Royal Veterinary College, the School of Oriental and African Studies, University College London.

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<p>(i) Include a range of flat layouts including flats with shared facilities.</p>	<p>The proposed development will introduce a greater range of student accommodation provision including the introduction of a mix of catered and self-catered rooms in a combination of corridor, en-suite, cluster and townhouse bedrooms.</p> <p>The proposals include the provision of new shared facilities, including catering facilities (where self-catered rooms are provided).</p> <p>In total the proposals will provide 2,170 sq m amenity space at lower and ground floor and 1,658 sq m of kitchens and lounges on upper floors. A further, 6,924 sq m of external amenity space the form of Hughes Parry Pocket Park, the Southern and Northern Courtyards and Cartwright Gardens open space.</p>
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8.19 As above mentioned, the Housing SPG (Para 3.18) sets out that where there is an existing concentration of resident students the Council considers that the proposals for student housing may harm the mix and balance of the community if they provide more than 100 spaces. However, it then goes onto state that:

“in some instances it may be appropriate to allow additional student housing schemes in locations where there is an existing concentration of such accommodation” (Para 3.19).

8.20 Specifically, it sets out that Camden may accept student housing serving a HEFCE institution as an alternative to self-contained housing in specific contexts. The scheme is compared against these contexts and specific criteria in Table 8.2 (below).

Table 8.2 Assessment against criteria in Housing SPG

<ul style="list-style-type: none"> ■ form part of a mixed use development; 	<p>The predominant uses on the developed element of the site will continue to be student housing (Sui Generis). The proposals also include the provision of ancillary flexible space for the University of London at ground floor on the corner of Cartwright Gardens, accessed via Leigh Street to activate this frontage..</p> <p>It is not considered appropriate to introduce additional new uses at the site. Through the design evolution the applicant investigated the possibility of introducing a health facility or retail unit within the ground at Leigh Street. Initial enquiries did not result in any interested appropriate occupiers and consequently the space was reduced. It is now proposed to be occupied for ancillary administrative functions in respect to the University of London.</p>
<ul style="list-style-type: none"> ■ be located on a site already owned by the HEFCE institution or a provider with an agreement 	<p>The applicant is the University of London. The proposals comprise Intercollegiate Halls to serve the federal University and its self-governing colleges.</p>

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for nominations;	The University of London has the long-lease hold on the site (see Ownership Certificates and Site Ownership Plan).
<ul style="list-style-type: none"> be in close proximity to the institution it serves. 	Please see Table 8.1 Policy DP9 Assessment (h) and (i) for assessment.
Furthermore, the additional accommodation should not:	
<ul style="list-style-type: none"> Exacerbate the existing balance of the student population in the area; 	Please see Table 8.1 Policy DP9 Assessment (g) and section on Mitigating Pressure of Private Sector Stock.
<ul style="list-style-type: none"> Place additional demand on public transport; and 	Please see Table 8.1 Policy DP9 Assessment (e) and Transport Assessment.
<ul style="list-style-type: none"> Increase the impacts on existing permanent residential communities. 	Please see Table 8.1 Policy DP9 Assessment (e), (f) and (g).

8.21 In sum, Table 8.1 and Table 8.2 demonstrate that the redevelopment of the site for continued use of student accommodation resulting in a net uplift of 187 student bed-spaces fully accords with Camden’s criteria and objectives as set out in Policy DP9 and the Housing SPG.

Alternative Site Potential

- 8.22 The University of London takes a strategic approach to the management of its intercollegiate hall provision, and recognises the need to provide additional accommodation through a range of options. The redevelopment of its existing student accommodation is one of five routes being pursued. Alternative options being pursued include: (1) New build / acquisition of residences; (2) short-term nominations with private providers; (3) head tenancy; (4) private landlord accommodation. These are explained in detail in the Justification for Student Bed-Spaces Note.
- 8.23 Over the past ten years, three of the University’s eight intercollegiate halls have been refurbished to expand capacity. Moreover, the University has undertaken feasibility studies to investigate the redevelopment capacity of those Halls which have not already been redeveloped.
- 8.24 The existing condition, central location and site characteristics of the Garden Halls make it a highly sustainable and viable site for redevelopment as detailed in Tables 8.1 and 8.2.
- 8.25 The University has also investigated the possibility of acquiring alternative sites, both with existing Halls and suitable for development to provide new student accommodation. However, the University is often unable to compete with the private sector in the acquisition of new sites and student residences, although the orientation of planning policy in favour of higher education institutions is helping to boost the case.
- 8.26 Notwithstanding this, the financial implications of acquiring new sites against redeveloping existing has implications on financial considerations, which could consequently compromise the affordability of student accommodation (see below for further assessment on affordability).

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- 8.27 Through redeveloping an existing site the proposed development will contribute towards the University of London’s bed-space supply target, whilst enabling the University and its affiliated colleges to remain an attractive and affordable option in an increasingly competitive higher education environment.

Maintaining Affordability and Pastoral Care

- 8.28 The proposals will provide an additional 187 student bed-spaces at affordable rates. In 2012/13 the average price for University of London en-suite accommodation was approximately £2,400 less expensive per annum than comparable private sector student accommodation¹², achieved through a combination of lower weekly rents and shorter tenancy periods.
- 8.29 The proposed development will enhance both the number of students able to access dedicated University accommodation and the quality of facilities for their pastoral care, in providing increased rooms in dedicated accommodation run and operated by the University (further details are set out within the draft Student Management Plan, which accompanies this submission and would be secured through the S106).

Summary

- 8.30 In sum, the proposed continued student accommodation uses at the site are considered in principle to entirely accordance with NPPF objectives, and the London Plan and Camden’s policies.

HERITAGE, DESIGN AND TOWNSCAPE

- 8.31 The design has been informed by extensive pre-application and consultation with LB Camden Officers and other key stakeholders, including the GLA, English Heritage and the Bloomsbury CAAC. As part of the design evolution, Maccreanor Lavington were appointed as a second set of architects to develop and build upon the initial work undertaken by tp Bennett on the Cartwright Gardens and Leigh Street elevations to deliver a high quality scheme sympathetic to its heritage environment.
- 8.32 The design has evolved around the constraints of the site with the main considerations being:
- The character of the conservation area and the opportunity for enhancement;
 - The massing and height of the proposal, including responding appropriately to the different surrounding context along Cartwright Gardens, Leigh Street and Sandwich Street; and
 - The quality of the student accommodation and supporting amenity space, including Cartwright Gardens open space.

Principle of Demolition

- 8.33 The proposed development includes, and seeks conservation area consent, for the demolition of:

¹² The average price of University of London accommodation 2012-13 for standard en-suite rooms was £8,498, whilst for private rented sector rent it was £10,833. See Justification for Increased Student Bed-Spaces Statement for full details of figures derived.

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- Commonwealth Hall;
 - Canterbury Hall (including York Hall); and
 - The 5 storey section of Hughes Parry Hall fronting Cartwright Gardens.
- 8.34 None of the existing buildings on the site are statutory listed, however, Canterbury Hall was identified as a positive contributor to the Bloomsbury Conservation Area when it was extended and the Bloomsbury Conservation Area Character Appraisal and Management Plan was updated in April 2011. Full details of the extent of the buildings to be demolished are provided within the application drawings.
- 8.35 As part of the pre-application discussions the Canterbury Hall Feasibility Report was produced. It examined the feasibility and implications of retaining Canterbury Hall (both in its entirety and facade only retention) on redevelopment proposals, and assessed the benefits of a new build scheme involving demolition of the Hall against any negatives resulting from its loss.
- 8.36 The Feasibility Report concluded that retention was not justified given the existing condition and general state of decline, as a result of dated construction techniques already showing signs of deterioration; the failure of the existing block to meet modern needs or expectations; and the neutral contribution of the Hall to the Bloomsbury Conservation Area; and coupled with the constraints of either retaining the entirety of the Hall or its facade on the overall redevelopment proposals (see Canterbury Hall Feasibility Report for further information).
- 8.37 The NPPF recognises that not all elements of Conservation Area will necessarily contribute to its significance (Paragraph 138). The Townscape, Visual Impact and Heritage Report accompanying this application assesses the Heritage Significance of this part of the CA and the buildings within the site, particularly Canterbury Hall in accordance with paragraph 128 of the NPPF and applying English Heritage Guidance in respect to amongst other issues:
- If the buildings have landmark quality;
 - If the buildings reflects a substantial number of other elements in the CA in age, style, materials, form or other characteristics;
 - Whether the buildings relate to adjacent heritage assets in age, materials or in any other historically significant ways;
 - Its contribution to the setting of adjacent heritage assets;
 - Its association with any designated landscape;
 - Its historic associations with local people or past events;
 - Whether it reflects the traditional functional character or former uses in the area;
 - Its contribution to the character or appearance of the area.

Significance of Canterbury Hall

- 8.38 The Townscape, Visual Impact and Heritage Report has assessed Canterbury Hall against the English Heritage guidance and questions outlined above. It concludes that:

“whilst inoffensive in its own right, Canterbury Hall does not contribute to the prevailing characteristics of the Bloomsbury Conservation Area. It does not meet any of the criteria that English Heritage suggest to assess whether a building makes a positive contribution to the significance of a Conservation Area... its identification as

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a positive contributor is in our view at odds with the prevailing character and significance of the Bloomsbury Conservation Area”.

Significance of Hughes Parry Tower and Commonwealth Hall

- 8.39 The Townscape, Visual Impact and Heritage Report also sets out the position in respect to Hughes Parry and Commonwealth Halls. It set outs that:

“we agree with the Council’s assessment that Commonwealth Hall and Hughes Parry hall do not make a positive contribution to the significance of the Bloomsbury Conservation Area”.

Assessment of Harm

- 8.40 Having regard to the conclusions of the Townscape, Visual Impact and Heritage Report it is considered that the proposed demolition of Commonwealth Hall, Canterbury Hall (including York Hall) and the 5 storey section of Hughes Parry Hall fronting Cartwright Gardens will lead to less than substantial harm to the significance of the Conservation Area. Therefore the policies of Paragraph 134 of the NPPF should be applied, which set out that any harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

- 8.41 This position was reaffirmed by English Heritage in their formal pre-application response (Letter dated: 13th December 2012) where they set out:

“... In our view, this loss would result in less substantial harm to the Conservation Area as set out in Paragraph 134 on the NPPF. As such, any scheme would need to be outweighed by the public benefits of the proposal, and measured against Camden’s own policies for the area”.

- 8.42 These public benefits can be summarised as including, but not limited to:
- A high quality architectural and urban design response that improves on the buildings it replaces;
 - Reestablishment of a coherent streetscape through the introduction of a continuous full height built edge to three street frontages, following the perimeter block pattern of the Bloomsbury Conservation Area;
 - The provision of new high quality modern student accommodation, comprising a mix of bedroom typologies at below private market rents and including dedicated accessible bedrooms;
 - Improvements to the public realm surrounding the site, including the provision of new connections across the Highway and a new pedestrian footpath around Cartwright Gardens open space and re-landscaped space to the north-east of Hughes Parry Hall;
 - Enhancement of Cartwright Gardens open space through landscape improvements, provision of new planting and seating and improved accessibility; and
 - Opening of the Gardens to the public during the hours between dawn and dusk.
- 8.43 It is also the aspiration of the applicant to provide a pedestrian footpath on the western side of Cartwright Gardens. As a result of the impact this has on the carriageway area, it would be necessary for Cartwright Gardens to be made one-way between its junctions with Leigh Street and Hastings Street.

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Retained Buildings (Hughes Parry Hall)

- 8.44 The proposals seek to retain and refurbish the majority of Hughes Parry Hall. The Tower was constructed in the late 1960s and is structurally sound and adaptable for modern student accommodation requirements. Its retention offers significant benefits in respect to embodied energy, in accordance with the London Plan (Policy 5.3) and Camden’s sustainability policies, which are considered later in this Section of the Planning Statement.
- 8.45 It is proposed to refurbish externally (and internally) to broadly match the appearance of the Tower as existing.

New Buildings, Public Realm and Landscaping

- 8.46 In accordance with London Plan Policy 7.6 the architecture of the new build element of the proposed development contributes to and enhances the coherency of the public realm, streetscape and wider cityspace and is of the highest architectural quality.
- 8.47 London Plan Policy 7.7 deals with the criteria against which large scale buildings will be assessed and should be applied to buildings that are larger than the threshold sizes set for the referral of planning application to the Mayor. In redeveloping an entire urban block, the proposed development is likely to be considered a large scale building and for completeness is assessed against the criteria of Policy 7.7 (see Table 8.3, below).
- 8.48 It is proposed to retain and refurbish the existing highest building on site (Hughes Parry Hall) and no new higher elements are proposed. Given it is existing Hughes Parry Hall is not assessed individually against the tall building criteria.

Table 8.3 Assessment against London Plan Location and Design of Tall and Large Buildings Criteria (Policy 7.7)

POLICY CRITERIA	ASSESSMENT
Tall and large scale buildings should:	
(a) Generally, be in the Central Activities Zones, opportunity area or area of intensification or town centre;	The application site is situated within the Central Activities Zone in a highly accessible location (PTAL level 6b) and is thus considered an entirely appropriate location for a large scale building.
(b) Only be considered in areas whose character would not be affected adversely by the scale, mass or bulk of a tall or large building;	<p>The Bloomsbury Conservation Area is typified by a number of large-scale institutional buildings fronting urban squares, surrounded by largely Georgian terraced townhouses (See Section 6.0 of this Statement, the Design and Access Statement and Townscape, Visual Impact and Heritage Report for a more detailed description of the surrounding Bloomsbury Conservation Area).</p> <p>The scale and massing of the proposed development is considered entirely appropriate to the nature of the</p>

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	<p>immediate and wider Conservation Area. Moreover, it provides a more rational response to the massing of the existing buildings on the site to optimise the site’s potential.</p>
<p>(c) Relate well to the form, proportion, composition, scale and character of surrounding buildings, urban grain and public realm, particularly at street level;</p>	<p>The proposed development has sought to have regard to the varying character and proportions of the surrounding buildings.</p> <p>Cartwright Gardens</p> <p>The scale of the building along Cartwright Gardens responds to the prevailing character of the Conservation Area in distributing the greatest height and massing facing the open space. The clear vertical hierarchy to the facade helps to break down the building’s height. It is composed of three key elements: the base (ground and first floors), the middle (ordered in groups of three lower storeys and two upper storeys above) and finished by a two storey set-back mansard, behind a parapet.</p> <p>The robust façade will provide a regular rhythm (with subtle variety) of a sympathetic grain that is responsive to the rhythm and grain established by the 19th century listed terraced crescent buildings opposite.</p> <p>The simple overall form and the elegant architectural treatment will provide a sense of cohesion, order and calm to the backdrop to Cartwright Gardens.</p> <p>Leigh Street</p> <p>The Leigh Street corner building mediates the change in scale between the main new building to the north and the historic terraces to the south. It appears as a hybrid between the nearby early -mid 19th century terraces, and the later larger mansion or commercial blocks in the area. The grain, rhythm and materiality of the façade share a synergy with the surrounding listed terraces.</p> <p>The Sandwich Street corner building is a continuation of the line of the new terraced town houses along the southern</p>

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	<p>part of the Sandwich Street side of the Site. It provides variety to the southern edge of the Site, and responds directly to the terrace on the south side of the Street.</p> <p>Sandwich Street</p> <p>The proposed development presents 3 different but related elevations to Sandwich Street. The two terraces are similar in design and provide a direct reference to the listed terrace opposite. They frame the larger scale central block to ensure it sits comfortably within the wider townscape of the street.</p> <p>Summary</p> <p>The design of the proposed development is of an appropriate response to the surrounding</p> <p>urban context. The new building is of the right scale and is of high architectural quality to complete Cartwright Gardens having regard to the form, proportion, composition, scale and character of surrounding buildings. This was also the view reached by English Heritage and reaffirmed in their abovementioned pre-application feedback following review of the proposals (18th February 2013).</p> <p>The Design and Access Statement and Townscape, Visual Impact and Heritage Report that accompany the planning application set out in full how the design has been informed by and responds to the character of the local area.</p>
<p>(d) Individually, or as a group, improve the legibility of an area, by emphasising a civic or visual significance where appropriate and enhance the skyline and image of London;</p>	<p>The design of the Cartwright Gardens frontage will provide a civic quality, as befits a building associated with the University which has a long history in the area.</p>
<p>(e) Incorporate the highest standards of architecture and materials, including sustainable design and construction practices;</p>	<p>The high quality design represents a considerable improvement on the building it replaces, in respect to urban design and architectural quality.</p> <p>The palette of traditional materials will</p>

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	<p>ensure that the development sits well in its context. The predominant facing material is brick. This is used in a skilful and well considered way, colour, bonding and mortars to provide a fine grain, richness and texture to the elevations.</p>
<p>(f) Have ground floor activities that provide a positive relationship to the surround streets;</p>	<p>Along Cartwright Gardens the ground floor includes active uses such as the main building entrance and accompanying reception spaces and flexible study space.</p> <p>The proposed development seeks to activate Sandwich Street during appropriate hours through the introduction of entrances to the townhouses.</p> <p>Through the design evolution the applicant investigated the possibility of introducing a health facility or retail unit within the ground at Leigh Street. Initial enquiries did not result in any interested appropriate occupiers. The space has subsequently been reduced and it is now proposed to be occupied for ancillary administrative functions in respect to the University of London that will activate the Leigh Street frontage.</p>
<p>(g) Contribute to improving the permeability of the site and wider area, where possible;</p>	<p>The proposals will improve the public realm and permeability of the site and wider area, including the provision of new connections across the Highway and a new pedestrian footpath around Cartwright Gardens open space.</p> <p>The landscape improvements to Cartwright Gardens open space include improved accessibility through new and widened gates.</p>
<p>(h) Incorporate publicly accessible areas on the upper floors, where appropriate; and</p>	<p>The proposed development comprises student accommodation above ground floor level. It is not therefore considered appropriate to have publicly accessible areas above ground floor, and provision is limited to communal areas for the occupants of the development.</p>

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<p>(i) Make a significant contribution to local regeneration.</p>	<p>The proposed development replaces twentieth century buildings of mediocre architectural quality that have an unsatisfactory relationship with their surroundings and contribute little to the local townscape. As a group these existing buildings fail to positively address or contribute to a sense of place.</p> <p>The proposals will significantly enhance the quality of the townscape of the area, the character and appearance and significance of the Bloomsbury Conservation Area and the setting of listed buildings in the surrounding streets.</p> <p>In doing so, the proposals will improve the buildings it replaces and re-establish a coherent streetscape, deliver new high quality student accommodation, improvements to the public realm surrounding the site and enhancement and public opening of Cartwright Gardens open space. All of these will contribute significantly to local, physical, social and environmental regeneration.</p>
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8.49 Camden Policy DP24 sets out that the elements which the Council will consider in assessing standards of design. The design of the proposed development is considered against the in Table 8.4.

Table 8.4 Assessment against Camden Design Standards (Policy DP24)

POLICY CRITERIA	ASSESSMENT
<p>(a) Character, Setting, Context and the form and scale of neighbouring buildings</p>	<p>In addition to the above assessment against London Plan Policy 7.7 (Table 8.3),</p> <ul style="list-style-type: none"> ■ Height, Scale and Massing: The proposed development has sought to have regard to the varying character and proportions of the surrounding buildings, in particular along Cartwright Gardens, Sandwich Street and Leigh Street immediately adjacent to the site. It has also had regard to the appearance of the proposed new buildings in views of the site which are assessed in full in the Townscape, Visual Impact and Heritage Report. ■ Through the design evolution a number of responses to the height, scale and massing have been tested. The design has evolved from the

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	<p>initial response set at ground plus eight storeys with the existing Hughes Parry Tower serving as the leading edge with scale and massing dropping at the Leigh Street corner, through a series of tested iterations.</p> <ul style="list-style-type: none"> ■ The scale of the main building has reduced to seven storeys with a two storey mansard roof, and revisions have taken place to reduce the height and add greater variety to the massing at Leigh Street. ■ The massing of the domestic townhouse response along Sandwich Street has also been tested. Consequently through the evolution, the height and massing have reduced with the final massing reduced to five storeys. ■ Further testing of the Leigh Street block has taken place to introduce a series of massing changes from the corner with Cartwright Gardens to Sandwich Street. ■ Character: The proposed development has had regard to the character of surrounding buildings within the Bloomsbury Conservation Area. The design has sought to respond to the diverse character of the Conservation Area in its mix of large-scale institutional buildings fronting urban squares, surrounded by largely Georgian terraced townhouses. Consequently, the proposed development can be divided into different components designed to provide an institutional response to Cartwright Gardens, with a more residential response to Sandwich Street. ■ Extensive analysis has also been taken of the patterns, rhythms, symmetries and uniformities in the townscape to inform the elevational relief of Cartwright Gardens in particular. ■ The Design and Access Statement and Townscape, Visual Impact and Heritage Report that accompanies the planning application set out in full how the design has been informed by and responds to the character of the local area.
<p>(b) Quality of Materials to be Used</p>	<ul style="list-style-type: none"> ■ The proposed palette of high quality materials draws on surrounding buildings to complement and enhance the Conservation Area. The materials are selected for their visual attractiveness and physical durability to ensure a

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	<p>sustainable construction.</p> <ul style="list-style-type: none"> ■ The use of a variety of different brick colours and materials across the block reinforces the different elements of the scheme and responds to the varied surrounds. Along Cartwright Gardens an off-white brick with a subtle variation is proposed, drawing on colours within the surrounding area. Glazed terracotta will be used in the top mansard storeys, with projecting cast masonry for the dormers, to differentiate the upper storeys from the main mass of the building. A dark brick is selected for the Leigh Street wing to further differentiate it from the main Cartwright Gardens building. Along Sandwich Street varied brick colours are proposed in contrast to the regular and ordered form of townhouses, drawing on variety in the existing palette along the Street.
<p>(a) Provision of visually interesting frontages at street level</p>	<ul style="list-style-type: none"> ■ The proposed development has sought to contribute to the street frontage, through the distribution of entrances and windows. ■ In particular, along Cartwright Gardens the ground floor includes active uses such as the main building entrance and accompanying reception spaces and flexible study space. ■ The proposals include a dedicated facility for ancillary University of London office and management functions at the corner with Leigh Street.
<p>(b) Appropriate location for building services equipment</p>	<ul style="list-style-type: none"> ■ The majority of new building services equipment will be contained either within the building envelope on the lower ground floor. Any external equipment will be located at roof level in a visually inconspicuous position and its location has been tested in the Townscape Assessment.
<p>(c) Existing nature features, such as topography and trees</p>	<ul style="list-style-type: none"> ■ The proposed development responds to the Cartwright Gardens open space to the front of the main urban block. The mature trees which line the open space provide an important contribution to the setting of the gardens and the main elevation, reducing views of the facade from surrounds. ■ The landscaping plan proposes the retention of all the mature trees within the gardens and surrounding the site.

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<p>(d) The provision of appropriate hard and soft landscaping including boundary treatments</p>	<ul style="list-style-type: none"> ■ The proposals include for the upgrade of hard and soft landscaping treatments within and surrounding the site. The proposals include the upgrade of Cartwright Gardens open space and the existing open space to the north-east of Hughes Parry Hall, the introduction of a raised table to the front of the Cartwright Gardens block to the gate to the open space and the re-surfacing of public footways surrounding the urban block. ■ Internally, two external courtyards will be provided, the southern of which in particular is proposed to have softer landscaping, including evergreen clipped hedges and shrub plantings.
<p>(e) The Provision of appropriate amenity space</p>	<ul style="list-style-type: none"> ■ The proposed development will include new internal and external amenity space. ■ New internal amenity space for residents, including 2,170 sq m amenity space at lower and ground floor and 1,658 sq m of kitchens and lounges on upper floors; ■ The proposed development introduces two new central courtyards in the centre of the site between the block addressing Cartwright Gardens and the town houses fronting Sandwich Street. It is also proposed to enhance the area of open space at the base of Hughes Parry Wing to form Hughes Parry Pocket Park (188 sq m). Cumulatively these three spaces provide 720 sq m of external amenity space in addition to the provision at Cartwright Gardens open space. ■ In addition, the existing 0.62 hectare Cartwright Gardens open space to the west of the block, including the introduction of new soft and hard landscaping, the upgrade of entrances and paths through the park. ■ The proposed development is therefore considered to provide appropriate internal and external amenity space for the occupants of the new development. In addition, through making the gardens accessible to the public between the hours of dawn and dusk, to enable surrounding residents, workers and visitors to benefit from the improved open space.
<p>(f) Accessibility</p>	<ul style="list-style-type: none"> ■ In accordance with Camden Policies DP24 and DP29, the proposed development achieves the highest level of inclusive design, given the

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	<p>constraints of the site and the existing buildings.</p> <ul style="list-style-type: none"> ■ The Access and Inclusivity Statement which accompanies the planning application submission describes the key access provisions for the proposed development. It sets out how the proposed development meets the required design standards, good practice guidance and Building Regulations access requirements. ■ It is proposed that the scheme would deliver 5% wheelchair adapted bedrooms in the first instance (within the Cartwright Gardens main building), with a further 5% adaptable on demand, in accordance with Camden policy DP6. The on-demand units would be adapted by the applicant at their own expense on request and on demand by a disabled student. ■ It is proposed that the identified 5% of rooms are cluster rooms in their un-adapted state within the Cartwright Gardens main building, and in their adapted state two adjacent cluster rooms would be altered to become one accessible unit. The Access and Inclusivity Statement provides further details on how this will be achieved. ■ In addition to accessible bedrooms, other bedrooms have been designed to be visitable by disabled people. Common rooms and terraces will deliver accessible facilities through step free access, positioning of fittings and varied types of furniture.
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Townscape and Visual Impact

- 8.50 Whilst the site falls within the designated Blackheath Point London Panarama, the new build element of the proposed development will not be visible in the foreground and middle ground of the protecting viewing corridor.
- 8.51 Nevertheless a full Townscape and Visual Impact Assessment accompanies the planning submission to assess local views. It provides a detailed assessment of the effect of the proposed development from seven viewpoints agreed in consultation with LB Camden and provides representative townscape locations from which the development will be visible.
- 8.52 The proposed development is similar in height and scale to that existing on the site and the Assessment highlights that the proposed development will have limited impact on views of the surrounding area and where visible will enhance local views.

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Summary

- 8.53 The Design and Access Statement Statement and Townscape, Visual Impact and Heritage Assessment that accompany the application provide a full explanation for the design and its evolution.
- 8.54 The design of the proposals has been carefully informed through an extensive programme of pre-application engagement with LB Camden's Planning and Design and Conservation Officers, other key stakeholders including the GLA, English Heritage, 20th Century Society and Bloomsbury CAAC. Further details on the pre-application consultation are set out in the Statement of Community Involvement and Section 6 of this Statement.
- 8.55 The proposals comprise a design that has carefully taken into account the design related policies of the London Plan and Camden's LDF. In particular, the proposals will promote a development of the highest architectural standards that improves on the buildings it replaces, promoting high quality landscaping and incorporating the highest standards of access.
- 8.56 The site's existing heritage assets have been assessed and conserved in a manner appropriate to their significance in line with the NPPF. The scale and massing of new blocks and detailed design has had regard to the setting of the immediate and wider Bloomsbury Conservation Area, and sensitively responds to this context to enhance the character and appearance of the area in line with London Plan Policy 7.8 and Camden policies DP24 and DP25.

TRANSPORT, ACCESS AND PARKING

Location and Impact of Proposals

- 8.57 The proposal site benefits from excellent public transport accessibility (PTAL 6b). It is in close proximity to King's Cross / St Pancras International and Euston mainline stations (both approximately 625 metres from the site) and Euston, King's Cross and Russell Square (approximately 400 metres from the site) London Underground Stations served by six underground lines. There are also over ten different bus routes within 400 metres of the site.
- 8.58 Given the variety of options in proximity to the site students taking public transport will disperse between the various nodes. The Garden Halls are also centrally located in respect to the University of London colleges and facilities (Figure 2.1), increasing the likelihood of students to travel by foot or cycle in accordance with London Plan Policies 6.09 and 6.10.
- 8.59 It is therefore considered that the proposals accord with London Plan (Policy 6.1) and Camden (Policies DP16 and DP17) policies for development to be integrated with the transport network and be supported by adequate walking, cycling and public transport links and support the priorities established in Camden's Green Transport Strategy.
- 8.60 Furthermore, the proposed to be car free and will be secured by a Section 106. The existing 20 staff car parking spaces provided on the site will be removed as part of the redevelopment proposals, encouraging car-free lifestyles, promoting sustainable ways of travelling and helping to reduce the potential impact of traffic in accordance with Camden Policies CS11 and DP18.
- 8.61 In accordance with London Plan Policy 6.3 the transport impact of the proposals of transport capacity are assessed in the Transport Assessment which accompanies the planning application submission. This concludes that:

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- The likely trips generated by the proposal will be accommodated within the local network without any adverse impact;
- A predicted 427 additional trips will be generated for all modes of transport;
- Due to the close proximity of the development to many local transport facilities it is likely that the increase in trips can be accommodated without any demonstrable harm.

Car Parking

- 8.62 The proposed development will be car free. The existing 20 staff car parking spaces provided on the site will be removed as part of the redevelopment proposals, in accordance with Policy DP19 which seeks the removal of surplus car parking.
- 8.63 The removal of the car parking spaces promotes alternative, more sustainable forms of transport and frees space on the existing site to allow for additional student accommodation in the redevelopment proposals, in accordance with Camden Policies CS11 and DP18.
- 8.64 Any blue badge holders will be able to park close to the main entrance within the pay and display bays without paying if they are blue badge holders.

Cycle Parking

- 8.65 600 secure cycle parking spaces will be provided as part of the proposed development in accordance with London Plan Policy 6.9 and standards in Table 6.3, which are understood to supersede the cycle parking policies in Camden's LDF. This represents a net increase of 560 cycle spaces.
- 8.66 The cycle stores are provided within the undercroft car parking areas with additional visitor parking provided within the landscaping using Sheffield stands in accordance with London Plan Policy 6.9 and Camden Policy DP19.

Walking

- 8.67 The proposed development will upgrade the pedestrian crossing facility linking the existing student accommodation with Cartwright Gardens open space, through the creation of a raised table along Cartwright Gardens at the front on the proposed new main block. This will enhanced the pedestrian environment and reducing the dominance of vehicular traffic.
- 8.68 It is also the aspiration of the applicant to introduce a pedestrian footpath alongside the western side of Cartwright Gardens, where there is no existing footpath to create a safer pedestrian environment. As a result of the impact this has on the carriageway area, it would be necessary for Cartwright Gardens to be made one-way between its junctions with Leigh Street and Hastings Street, and is subject to ongoing discussions with Camden Highways.
- 8.69 In accordance with London Plan Policy 6.10 the proposed development is therefore considered to make a significant contribution to improving pedestrian movement and safety.

Construction Management

- 8.70 A draft Construction Management Plan accompanies this planning application submission in accordance with Camden Policy DP20 and DP26. This identifies the constraints of the site, construction access arrangements and phasing and models the resulting vehicle generation and impacts. Against this, mitigation measures are proposed.

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AMENITY IMPACTS

- 8.71 The design and management of the proposed development has had regard to the impact on occupiers and neighbours in accordance with Camden Policies CS5 and DP26. In particular, it has regard to those closest residential occupiers along Sandwich Street, Leigh Street and Cartwright Gardens.
- 8.72 The following section assesses the proposed development against a range of amenity issues, in addition to the abovementioned issues of servicing and construction management, including:
- Daylight / Sunlight and Overshadowing;
 - Noise and Vibration; and
 - Air Quality.

Daylight/ Sunlight and Overshadowing

- 8.73 Internal and External Daylight and Sunlight Reports are submitted as part of the planning application documents to analyse the impact of the proposals of neighbours as well as the acceptability of the proposed accommodation in accordance with the guidelines of the Building Research Establishment ("BRE") Report 2011.
- 8.74 The External Daylight and Sunlight Report concludes that the proposed massing is consistent with the surrounding buildings and that the incorporation of elements such as mansard roofs with the design, will minimise the daylight/sunlight losses within existing properties.
- 8.75 The proposed development will cause only isolated breaches to a minority of neighbouring properties. This is not unusual, particularly in a dense urban environment such as this and where they occur they are generally minor in nature.
- 8.76 There will be no alteration to the quantum of hours in the sun that will be available to the public amenity space in Cartwright Gardens. Full details are provided in the External Daylight and Sunlight Report.
- 8.77 The Internal Daylight and Sunlight Report concludes that the proposed development will provide student accommodation considered acceptable in terms of daylight. In particular, 90% of all proposed habitable rooms will meet or exceed the levels of Average Daylight Factor ("ADF") recommended by the BRE.
- 8.78 The rooms falling short of the recommended levels of ADF are mainly located at the lowest floors or in the corners of the courtyard. The layouts have been designed so that the rooms considered to be temporary are located in the most obstructed areas, where the sky visibility is restricted, whilst good levels of daylight will generally be enjoyed in the main amenity areas, study areas and bedrooms.
- 8.79 The levels of No Sky Line ("NSL") generally comply with the BRE's recommendations in the rooms facing the streets, whilst lower levels will be achieved in the rooms looking into the courtyards. This is typical of courtyard aspects and means that most of the available daylight will be seen closer to the windows. To have better use of it, all desks have been placed just beside the windows.
- 8.80 Every room across the scheme has been designed to meet the BRE's Room Depth Criterion where this is applicable, and this has resulted in acceptable quantities of daylight even in the rooms with limited sky visibility.

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Noise and Vibration

- 8.81 In accordance with London Plan Policy 7.15 and Camden Policies DP26 and DP28 and Camden's CPG6 Amenity, the issue of noise has been carefully considered in the design of the proposed development and an Acoustic Report is submitted as part of the package of planning application documents.
- 8.82 This sets out mitigation measures that will be used to achieve suitable internal noise levels according to guidance contained in BS 8233: 1999. It also provides details of internal acoustic design to create sound insulation between individual bedrooms and within townhouses.
- 8.83 Furthermore, the design of proposed development has responded to comments on noise raised during public consultation, in particular the following measures have been incorporated into the design, including:
- Introduction of a glazed roof over the central internal courtyard to reduce noise emanating from this part of the development. The two remaining external courtyards benefit from built form on all sides minimising the travel of any noise disturbance.
 - Restricted opening on windows, with windows in the common rooms and kitchens fixed shut and ventilation to the space will be via acoustically treated vents.
 - Throughout high quality materials will be used to maximum acoustic insulation and thus further mitigate against any noise impacts.
- 8.84 Moreover, the draft Student Management Plan sets out the strategy to manage student behaviour having regard to a range of amenity issues.

Air Quality

- 8.85 In accordance with London Plan Policy 7.14 and Camden Policy DP32 an Air Quality Report is submitted as part of the package of planning application documents.
- 8.86 This assesses the existing air quality at the site, the potential impacts of construction and the mitigation required for the proposed development which will be exposed to concentration of nitrogen oxide and other particulate matter which already exceed Camden's objectives for the site.
- 8.87 Through the introduction of new, efficient low-emission boiler and CHP plant it is anticipated that the air quality impacts in the local area will be reduced. Furthermore, it is judged that the filtered ventilation system and low NO_x boiler and CHP plant will lead to improved air quality for occupiers of the proposed development.

ENERGY AND SUSTAINABILITY

- 8.88 The proposed development has sought to incorporate the highest standards of design and construction in accordance with London Plan Policy 5.3. The proposed development had adhered to the Mayor's Be Lean, be Clean, Be Green Energy Hierarchy to reduce total carbon dioxide emissions over the Building Regulations (2010) be approximately 28%, exceeding the requirements of the London Plan (Policy 5.2). In particular it has:
- (g) Reduced the energy demand through passive designs strategies and provision of high quality building envelope;
 - (h) Reducing the energy consumption through best practice design of building services, lighting and control; and

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- (i) Installation of on-site renewable energy technologies, including site wide Combined Heat and Power and photo-voltaics panels.

BREEAM

- 8.89 The proposed development will seek to achieve BREEAM “Excellence”, exceeding the requirements of Policy DP22.
- 8.90 The planning application is accompanied by a preliminary BREEAM Assessment that indicates an “Excellent” rating will be achieved, exceeding policy requirements.
- 8.91 Camden’s CPG goes beyond this requiring a minimum 60% score in the energy, water and minerals categories for the BREEAM Assessment.
- 8.92 Strategy due to different in refurbished Hughes Parry Tower and the new build elements.
- 8.93 The applicant are seeking to refurbish the existing Hughes Parry Hall, the majority of which is proposed to be retained, to very high standards in line with the new buildings proposed.

Sustainable Design and Construction

- 8.94 The proposed development has incorporated sustainable design principles and through the BREEAM Assessment process is intended to monitor sustainable construction measures in accordance with Camden Policy DP22. As above mentioned, the proposed development will seek to achieve BREEAM “Excellence”. Details can be found within the BREEAM Pre-Assessment is appended to the Sustainability Statement, which accompanies the planning application documents.

In accordance with the guidance contained within Camden’s CPG3, the proposed development has sought to have regard to use of Sustainable Materials. In particular, through retaining and reusing the majority of the existing structure at Hughes Parry Hall it is considered a significant proportion of the materials used in the development will be sustainably sourced. The BREEAM Assessment process will be used to monitor and track this through the development.

Energy

- 8.95 In accordance with London Plan Policy 5.6 the connection to existing district heat networks, site wide Combined Heat and Power (CHP) and incorporation of CHP in the buildings has been considered in the design.
- 8.96 The Energy Statement sets out in full the discussions that have taken place in respect to district heat networks in the local area, in accordance with London Plan and Camden Policies CS13. It concludes that connection to an expanded Bloomsbury district heating network may be possible in the future, however, there is currently no clear information available on completion date and details of the operation of the district heating.
- 8.97 It is therefore proposed that the building will have a stand-alone site-wide combined heat and power system, but will be designed to technically allow future connection to district heating network when the network becomes operational.
- 8.98 The proposed development will also include on-site renewable energy in the form of photovoltaic panels in accordance with London Plan Policy 5.7. A total of 250 PV panels are proposed to be installed over an area of circa 400 sq m on the roof.

Urban Greening and Green Roofs

8.0 Planning Assessment

- 8.99 In accordance with London Plan Policy 5.11 and Policy DP22 the proposals will integrate soft landscaping and incorporate green roofs where possible. (Further details are provided in the landscaping strategy within the Design and Access Statement).
- 8.100 The combination of green roofs with PVs provides the additional benefit of increasing the energy efficiency of the PVs through the localised cooling effect of the living roofs.

Overheating and Cooling

- 8.101 In accordance with Policy 5.9, the design of the propose development has followed the overheating and cooling hierarchy. In particular the proposed development:
- (j) Minimises the internal heat-gain through efficient design, including highly efficient design of lighting fittings and the selection of efficient A rate equipments to reduce the small power and internal gain;
 - (k) Reduces solar and heat gain through balancing the proportion of solid wall glazing in order to seek an optimum amount of daylight and winter solar heating, without excessive solar gain in summer;
 - (l) Management of heat within the building through the internal leaf of the walls and optimising the area of windows so that the internal temperature will benefit from the wall's thermal mass where possible;
 - (m) Incorporating passive ventilation including the use of open-able windows to provide natural ventilation to the building where feasible;
 - (n) Minimising use of mechanical ventilation to only kitchens and bathrooms;
 - (o) Restricting use of active cooling systems to areas that are not suitable for natural ventilation.

Water and Surface Water Drainage

- 8.102 In accordance with London Plan Policy 5.15 and Camden Policies CS13, DP22 and DP23 and guidance within CPG3, water efficiency measures and devices will be installed throughout the scheme. The student units are designed to meet a target of 105 litres of less per head per day and all other sanitaryware installed for the building will be fitted out with water efficient fittings.
- 8.103 Consideration has been given to the incorporation of rainwater harvesting and greywater harvesting within the development. The Sustainable Statement details in full that the site's location is not conducive to either approach and that provision of green roof areas has been given priority over areas set aside for rainwater collection.

BASEMENT AND LIGHTWELLS

- 8.104 A Basement Impact Assessment Screening Study accompanies the planning application documents in line with Policy DP27, DP31 and CPG4. This follows the flowcharts in CPG4 and concludes that a full Basement Impact Assessment is not required for the Cartwright Gardens proposals.

ECOLOGY AND BIODIVERSITY

- 8.105 An Arboricultural Survey, Impact Assessment and Method Statement are submitted as part of the package of planning application documents. No trees within the site are covered by Tree Preservation Orders.

8.0 Planning Assessment

8.106 A total of seven trees will require removal as part of the development (six of which are either Category C or U). Full details are set out within the Arboricultural Survey, Impact Assessment and Method Statement.

S106 HEADS OF TERMS

8.107 The proposals include a package of planning obligations that will be secured through a Section 106 / 278 Agreement. These obligations will secure the necessary infrastructure improvements to meet the needs of prospective residents and should indirectly benefit the existing local community. In identifying the level and scope of planning obligations to be secured, the Council’s supplementary planning guidance has been followed.

8.108 A summary of the Heads of Terms that will be secured through the S.106 Agreement is set out below:

- Community Access and Engagement Plan;
- Community Facilities Contribution;
- 10% Wheelchair Compliant;
- Pedestrian, Public Realm and Environmental Improvements ;
- Highways Works (through Section 278);
- Healthcare contribution;
- Employment and Training;
- Green Travel Plan;
- Construction Management Plan;
- Servicing Management Plan;
- Student Management Plan;
- Local Procurement;
- Renewable Energy & Energy Efficiency Plan;
- Sustainability Plan; and
- S.106 Monitoring.

9.0 Conclusion

- 9.1 The proposals seek to replace the existing University of London Garden Halls with a new built development that will increase the quality, mix and number of student bed-spaces and all that is entailed to meet the expectations of a leading, globally recognised University.
- 9.2 The site forms an existing student accommodation site, that is situated in close proximity to a cluster of educational institutions that it serves and one of the most accessible locations within London. It is therefore considered to be an entirely appropriate location for the additional accommodation the proposed development.
- 9.3 The proposed development represents the highest quality of design which will make a considerable improvement on the building it replaces, in respect to design and architectural quality. The proposals will significantly enhance the quality of the townscape, the character and appearance of the area and the significance of the Bloomsbury Conservation Area and the setting of the surrounding listed buildings.
- 9.4 Student accommodation is the most important non-academic supporting facility for the world leading University, which makes a significant and recognised contribution to London and Camden's educational capital, economy and community.
- 9.5 The quality of accommodation available is a primary consideration in attracting the World's elite students. Institutional Halls are preferred by students due to their affordability, security, pastoral support and opportunity to be part of the student community.
- 9.6 The University's Intercollegiate Halls form a crucial part of the accommodation provision for students and form a key offering to support colleges' needs. The proposals to increase the quality, type and quantity of provision at the Garden Halls are part of the University of London's strategic approach to managing its accommodation.
- 9.7 In particular, the proposals are a direct response to an identified shortfall in student housing provision. This shortfall has driven many students into unmanaged, private sector student housing and the private rental market. This impact is recognised in the London Plan, Camden's Local Development Framework and by the University.
- 9.8 The 187 additional bed-spaces proposed at the existing site will offer the opportunity to reduce the number of student residents within privately owned or rented accommodation without comprising land for self-contained homes and ensuring the price of accommodation for the University's students remains affordable.
- 9.9 This Planning Statement has assessed the proposed development against national planning policy guidance (NPPF), the London Plan, Camden's Local Development Framework and both the Mayor and Camden's Supplementary Planning Guidance.
- 9.10 It details how the applicants have responded to the extensive pre-application discussions and consultation held between May 2012 and March 2013 with LB Camden Officers and other key stakeholders, including the Greater London Authority, English Heritage and other local amenity groups and surrounding residents.
- 9.11 The Planning Statement and accompanying planning application documents demonstrate the wide-ranging benefits of the proposed development and that it substantially accords with planning policy and guidance. In particular, the proposals will:
 - **Enable continued provision of affordable student accommodation** – the redevelopment of a site already under the leasehold by the University of London enables the University to be able to continue to provide accommodation at levels below private sector student accommodation that would otherwise be compromised through acquiring a new site;

9.0 Conclusion

- **Enhance the quality of student accommodation** - to meet the standards expected of a world leading University to maintain its status and competitiveness, including the provision of new shared facilities and new dedicated internal and external amenity space;
- **Increase the variety of accommodation available** – through introducing an improved mix of catered and self-catered rooms in a combination of corridor, en-suite, cluster and townhouse bedrooms, and providing up to 10% wheelchair adaptable bedrooms depending on demand;
- **Optimise the use of a brownfield site** – through redeveloping an existing student accommodation site the proposals will use land positively and not compromise Camden’s supply of land for self-contained housing;
- **Mitigate pressure on private sector housing stock** - the 187 additional bed-spaces proposed at the existing site will offer the opportunity to reduce the number of student residents within the King’s Cross Ward in privately owned or rented accommodation by 4.8%;
- **Create a high quality setting** - that respects the prevailing pattern, density and scale of the surrounding development having regard to existing rhythms, symmetries and uniformities in the townscape;
- **Provide high quality external facades** - that are visually interesting, made of robust high quality materials that are attractive and suitable for the setting that will weather and wear well and that are sustainable and environmentally friendly;
- **Enhance Cartwright Gardens open space** - including the introduction of new soft and hard landscaping and the upgrade of entrances and paths through the park. The Gardens will be opened to the public between the hours of dawn and dusk, to enable surrounding residents, workers and visitors to benefit from the improved open space;
- **Incorporate principles of sustainable design and construction** – including the incorporation of on-site renewable energy, provision of green roofs and water and waste reduction measures; and
- **Promote sustainable transport methods** – through the provision of a car-free scheme, in a highly accessible and sustainable location (PTAL 6b), providing an additional 560 cycle spaces and enhanced pedestrian routes, including the provision of a pedestrian footpath of the western side of Cartwright Gardens.

In conclusion, the proposed development is critical to enabling the University and its affiliated colleges to remain an attractive option in an increasingly competitive higher education environment. It substantially accords with the aims and objectives of the National Planning Policy Framework and the Development Plan policies. In line with the Presumption in Favour of Sustainable Development the planning and conservation area consent applications should be approved without delay.