

paultcarter planning

Planning Statement

**Change of use and conversion of existing
building to eight residential apartments**

**Clifford Pugh House
Nos. 5-7 Lancaster Grove
London NW3 4HE**

Opticrealm Limited

Introduction

1. Planning permission is sought for the change of use and conversion of the existing building to eight residential apartments.
2. This statement is arranged in the following sections: A description of the site and surroundings; an outline of the proposed development; planning history of the site; the National Planning Policy Framework; relevant development plan components and other material considerations; pre-application advice received from the local planning authority; identification and assessment of key determining issues; and conclusions.

The Site and Location

3. The application site is Clifford Pugh House (Nos. 5 & 7) Lancaster Grove. It is located on the north side of the road opposite the junction with Crossfield Road.
4. The site is located within a predominantly residential area within the Belsize Park Conservation Area.
5. Originally a pair of semi-detached dwellings, the building was last used by University College London as residential accommodation for post-graduate students, with a total of 42 bed-spaces over five floors.
6. The building is substantial. It spans most of the width of the site. It is sited close to the road frontage; has a small front "garden" area set behind a low wall and hedge on the site boundary; and a larger rear garden. There is a pedestrian access from the street on the east side of the building and a vehicular access with dropped kerb on the west side of the building with a hard-standing providing an on-site parking space
7. The height and building line of the property generally respect those of the neighbouring buildings.
8. The external appearance of the building is the product of works undertaken in accordance with planning permission (reference No. 6916) granted in September 1956.
9. The exterior of the front portion of the building is rendered in a cream colour, with brick to the rear parts, all under a slate roof with large dormer features.
10. Properties in the vicinity are predominantly residential with buildings, often subdivided into two or more dwellings, spanning most of the site width, built close to the road frontage, and providing accommodation arranged over a total of four or five floors.

11. To the west the site adjoins a pair of semi-detached properties Nos. 9-11 Lancaster Grove. In common with many other pairs of semi-detached properties to the west of the site, on the north side of the road, little of the external appearance of these buildings has been altered. External materials include brick, render, stucco in walls and slate on roofs.
12. In common with a number of other properties in the area, Nos. 9 and 11 Lancaster Grove have been converted into smaller residential units.
13. The external appearance of the properties to the west of the site through to No. 35, and Nos. 2-10 on the opposite side of the road is also little altered.
14. Elsewhere in Lancaster Grove there are a number of modern buildings: Gabrielle Court (Nos.1-3 Lancaster Grove) adjoining the site to the east granted planning permission in 1978 and providing residential accommodation with seventeen dwellings with on site car parking; and on the south side of the road Jade House providing twenty residential dwellings on the site of the former No. 12 (granted planning permission in 1992); and another dwelling adjacent Jade House (granted planning permission in 2007).
15. The building line, boundary treatment, height and outline form of properties in Crossfield Road - with steps to entrances and bay - are similar to those in Lancaster Grove, but there is generally less ornamentation).
16. To the rear the site shares a boundary with the gardens of residential dwellings in Nos. 4, 5 and 6 Belsize Park.
17. While the area is predominantly residential there are other uses in the local area including a School in the basement of No. 13 and a detached single storey building in the rear gardens of Nos. 9, 11 and 13 that benefits from planning permission granted to the Polish Embassy in 1988 for use as an "Assembly room, library and Saturday School for Embassy staff".
18. On street trees contribute to the character of the area.
19. Lancaster Grove together with neighbouring streets is located within a controlled parking zone - with extensive resident parking permit on street car parking – but some properties in the local area, including Gabrielle Court, benefit from on-site car parking.
20. Access to public transport (buses and underground), and a range of shops and services is available within easy walking distance of the site.

The Proposal

21. Planning permission is sought for the change of use and conversion of the existing

building to a total of eight residential dwellings.

22. There is good variety of dwelling types and sizes ranging from 1-bed 2 persons units through to 3-bed 5 person units. The design of all of the dwellings comply with the Lifetime Homes standards and the Council's minimum floor area; further details are set out below under the discussion of residential planning policy.
23. No material alteration to the external appearance of the existing building is proposed.
24. The scheme is car-free. Secure covered storage space for bicycles is provided within the building.

Planning History

25. The council's planning records reveal a number of planning applications over the years. All but two (of which one was withdrawn) relate to No. 5 alone. These applications are:

Reference No.	Site	Proposal	Decision	Date
10643	No. 5	The conversion of No. 5 Lancaster Grove into two maisonettes and one flat, all self contained	Granted	27/02/1948
17710	No. 5	The conversion of No. 5 Lancaster Grove into three self contained flats and one self contained maisonette	Granted	24/02/1953
9965	No. 5	The redevelopment of the site of No. 5 Lancaster Grove by the erection of a two storey dwelling	Refused	03/12/1953
10115	No. 5	The redevelopment of the site of No. 5 Lancaster Grove by the erection of a two storey dwelling	Refused	??/09/1954
12403	No. 5	The redevelopment of the site of No. 5 Lancaster	Granted	01/11/1954

		Grove by the erection of a four storey block of flats and four garages and the formation of a new access to the highway		
13840	No. 5	The erection of a 3-storey building at No. 5 Lancaster Grove containing 11 one-room flats	Refused	30/11/1954
2394	No.5	The erection of a pair of three-storey houses at No. 5	Refused	15/07/1955
6916	Nos. 5 & 7	Change in the external appearance in the reinstatement after war damage of Nos. 5 and 7 Lancaster Grove	Granted	24/09/1956
9101146	No. 5	Retention of lean to structure and flue on side elevation to house replacement gas boiler	Granted	23/12/1991
9501781	Nos. 5 & 7	Change of use under houses in multiple occupation from category "A" to category "D"	Withdrawn	1995

National Planning Policy Framework

26. Paragraphs 2, 14 and 196 of The National Planning Policy Framework (March 2012) (NPPF) confirm that the NPPF is a material consideration in planning decisions.
27. Paragraph 215 of the NPPF provides that due weight should be given to relevant policies in development plans adopted before the publication of the NPPF according to the degree of consistency with the Framework.
28. Both the Camden Core Strategy Development Plan Document and the Camden Development Policies Development Plan Document were adopted in November 2010, before the publication of the National Planning Policy Framework in March

2012.

Principle of Sustainable Development

29. The NPPF refers to sustainable development as the golden thread running through both plan making and decision taking.
30. A presumption in favour of sustainable development is at the heart of the NPPF. For decision making this means, unless material considerations indicate otherwise, approving development proposals that accord with the development plan without delay. Where the development plan is absent, silent or relevant policies are out-of-date, granting planning permission unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the framework taken as a whole; or specific policies in the Framework indicate development should be restricted. (NPPF paragraph 14)
31. The purpose of the planning system is to contribute to the achievement of sustainable development. There are three dimensions to sustainable development: economic, social and environmental (NPPF, paragraph 7). Planning needs to perform:
 - An economic role – ensuring sufficient land of the right type is available in the right places and at the right time to support growth and innovation;
 - A social role – providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment with accessible local services that reflect the communities needs; and
 - An environmental role – that contributes to protecting and enhancing the, natural, built and historic environment, helps to improve biodiversity, uses natural resources prudently, minimises waste and mitigate and adapt to climate change.
32. Promoting sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment as well as in peoples quality of life, including: widening the choice of high quality homes. (NPPF, paragraph 9)
33. The Framework identifies 12 core-planning principles that should underpin plan making and decision taking (NPPF, paragraph 17). These include: to proactively drive and support sustainable economic development to deliver the development, including homes, the country needs and to make every effort to objectively identify and then meet the housing needs of an area and respond positively to wider opportunities for growth; to always seek a good standard of amenity; to support the transition to a low carbon future in a changing climate; to encourage the effective use of land by reusing previously developed land provided it is not of high environmental value; to conserve heritage assets in a manner appropriate to

their significance; and to actively manage patterns of growth to make fullest possible use of public transport, walking and cycling and focus development in locations which are sustainable.

Planning Policy

34. The law - Section 70(2) of the Town and Country Planning Act 1971 and Section 38(6) of the Town and Country Planning Act 2004 - requires a local planning authority to determine a planning application in accordance with the development plan, unless material considerations indicate otherwise.

Development Plan

35. The relevant components of the adopted development plan in this case are:
- The London Plan, July 2011, as Revised Early Minor Alterations (Consistency with the National Planning Policy Framework), October 2013
 - Camden Core Strategy 2010-2025, Development Plan Document, November 2010
 - Camden Development Plan Policies 2010-2025, Development Plan Document, November 2010
 - Camden Site Allocations Development Plan Document, September 2013

Designations

36. The site is located in the Belsize Conservation Area. The site is otherwise shown without notation on the Camden Policies Map 2014.
37. The site is not located in any approved or proposed Neighbourhood Area (Neighbourhood Planning (General) Regulations 2012).
38. The buildings are not listed as buildings of special architectural or historic interest, nor are they locally listed or otherwise identified as a non-designated heritage asset.

Other material considerations

39. In addition to The National Planning Policy Framework (March 2012) other material considerations include The Belsize Conservation Area Statement (2003) and Supplementary Planning Guidance (Camden Planning Guidance) published by Camden Council:
- CPG 1 Design, September 2013
 - CPG2 Housing, September 2013

- CPG3 Sustainability, September 2013
 - CPG6 Amenity, September 2011
 - CPG7 Transport, September 2011
 - CPG8 Planning Obligations, September 2011
40. The Greater London Authority has also adopted supplementary planning guidance and best practice guidance on numerous planning matters including Sustainable Design and Construction SPG (April 2014), Housing SPG (November 2012).

Emerging planning policy

41. Camden Council has started to review the Core Strategy DPD and the Development Policies DPD. This review work is at an early stage. The Council proposes to public a Draft Plan document for comment later in 2014. At this stage no weight can be afforded to either review in the consideration of this proposed development.
42. The Greater London Authority has consulted on Draft Further Alterations to the London Plan, January 2014. The public consultation exercise on these Alterations ran from the 15th January to the 10th April 2014. On the 7th July 2014 the Mayor published a schedule of “suggested changes to the draft Further Alterations to the London Plan”. This is intended to inform the Examination in Public that commenced on the 1st September 2014.
43. The GLA website explains that “These alterations have been prepared primarily to address key housing and employment issues emerging from an analysis of census data received since the publication of London Plan in July 2012, and also indicate a substantial increase in the capital’s population”. At this point the Alterations themselves can be afforded little weight in the planning process but the census information that prompted the Draft Alterations is a matter of fact and the need to increase the planned level of housing supply throughout London as a result is inevitable.
44. Reference to development plan policies and other material considerations are set out under the topics examined in the Assessment section below.

Pre-application advice

45. There have been three rounds of pre-application meetings regarding proposals for the residential redevelopment of this site: 13th August 2013, 13th June 2014 and 28th July 2014. The first of these was with University College London, the previous owner of the property and its advisors; the others with Opticrealm Limited and its advisors.

46. This proposal is for the change of use and conversion, without extension or material alteration to the external appearance, of the existing building. Key points of relevance from the pre-application advice are:
- 1) The existing building has a neutral affect on the appearance of the Conservation Area.
 - 2) Subject to justification for the loss of student accommodation development for permanent Class C3 housing is preferred.
 - 3) A good mix of dwelling sizes should be provided.
 - 4) All dwellings units and room sizes should meet development plan standards.
 - 5) All dwellings should comply with the Lifetime Homes standards.
 - 6) The development should be car-free.
 - 7) Secure, covered cycle parking is required.
 - 8) A Section 106 obligation will be required to cover the following issues: construction management plan; car-free; sustainability and energy plans; education contribution and open space contribution.

Assessment

47. The key determining issues in this case are:

Land Use

Is the loss of the existing use - student accommodation - acceptable?
Is residential development Use Class C3(a) appropriate?

Heritage

Will the development conserve or enhance the character and appearance of the Belsize Conservation Area?

Residential Policy

Are the tenure, mix, sizes and layout of the units acceptable?

Sustainability

Does the scheme satisfy sustainability requirements - BREEAM, energy and drainage?

Is satisfactory provision made for waste management?

Open Space

Does the scheme make adequate provision for open space – private and public?

Transport

Does the scheme make adequate provision for cycle storage and is a car-free development acceptable?

Land Use

Is the loss of the existing use - student accommodation - acceptable?

Is residential development Use Class C3(a) appropriate?

Planning policies

48. Camden Development Policies DP9 –Student housing, bedsits and other housing with shared facilities provides that the Council will resist development that involves the net loss of student housing unless either

k) Adequate replacement accommodation is provide in a location accessible to the higher education institutions that it serves; or

l) The accommodation is no longer required, and it can be demonstrated that there is no local demand for student accommodation to serve another higher education institution based in Camden or adjoining boroughs

Where the Council is satisfied that a development involving the loss of student housing is justified, it will expect the development to provide an equivalent amount of residential floorspace for permanent housing in Use Class C3, including an appropriate amount of affordable housing, having regard to policy DP3.

49. The site is shown without notation on the Development Plan Proposals Map.
50. The Camden Site Allocations Development Plan Document could not identify and allocate every site with development potential. Under the section headed “Criteria for Site Selection” the Council advises that because a site is not included in the DPD does not imply it is unimportant and in a densely built up area like Camden the Council relies on many smaller sites to deliver most of the Borough’s housing.
51. The site is located in a residential area with a purpose built block of flats – Gabrielle Court – to the west and other residential property to the east in Lancaster Grove, the south side of Lancaster Grove, Crossfield Road to the south and Belsize Square to the north (rear) of the site.
52. The NPPF states: the social dimension of sustainable development includes providing the supply of housing required to meet the needs of the present and

future generations (NPPF, paragraph 7); local planning authorities should ensure a five-year supply of deliverable housing sites is maintained (NPPF, paragraph 49); and encourages the effective use of land by re-using previously developed land (NPPF, paragraphs 17 and 111); and decisions should optimise the potential of a site to accommodate development ((NPPF, paragraph 58).

53. London Plan Policy 3.3 (Increasing housing supply) refers to the pressing need for more homes in London and calls upon the Boroughs to seek to exceed the relevant minimum borough annual average housing target, in particular through the potential to realise brownfield housing capacity.
54. Camden Plan Policy CS1 (Distribution of growth) states that the Council expects in the order of 12,500 additional homes to be delivered in Camden in the period 2010/11/ to 2024/25. Areas where development will be concentrated include highly accessible locations. Camden Plan Policy CS3 (Other highly accessible locations) confirms that for housing such areas include appropriate edge of town centre sites. Camden Plan Policy CS6 (Providing quality homes) confirms that housing is the priority land-use of Camden's Local Development Framework and the Council will make full use of the Borough's capacity to accommodate housing to meet or exceed a target of 8,925 homes in the period 2010-2025.
55. The Draft Alterations to the London Plan 2014 call for a significant increase in the provision of housing with the minimum ten-year target for Camden Borough in the period 2015 – 2025 increased from 6,650 to 8,892.
56. Camden Plan Policy DP1 (Mixed use development) requires a mix of uses in development where appropriate. Factors to be taken into account in determining whether the site is appropriate for mixed use include – the character of the development, the site and the area; the site size; and whether the sole or primary use proposed is housing.

The case for the development

57. The development is justified under sub-paragraph k) of Policy DP9. The property was owned by University College London. It comprised a five-storey building (including converted roof space) last used as 38 studio rooms and 4 self contained studios, providing post-graduate accommodation.
58. The accommodation is of poor quality. Fixtures and fittings are all dated and it is extremely unlikely that the building conforms to the current Building Regulations. The building inefficient and expensive to run. It would require extensive refurbishment with significant capital investment to achieve a decent standard.
59. UCL identified the site as being surplus to its student housing requirements and ceased its use as student accommodation in January 2014.

60. The UCL Note: Student Accommodation Strategy, set out at Appendix 1, explains the background to the UCL decision to sell the site and the provision that has been made for replacement accommodation. In summary:
- 1) UCL guarantees accommodation to all first-year undergraduate and first year international postgraduates entering UCL for the first time. UCL's strategy is to provide additional student accommodation to meet the growing demand for bed spaces and ensure the guarantee can be maintained and extended to all first year postgraduates.
 - 2) UCL student accommodation strategy seeks to focus investment in larger, more modern student accommodation in close proximity to the Bloomsbury Campus or easily accessible thereto by public transport. This encourages students to use sustainable modes of transport and creates a sense of community with a safe and secure environment.
 - 3) The building is of poor quality, inefficient and expensive to run. Essential repair work is estimated at a cost of between £1m and £2m.
 - 4) The site is not conveniently located to the Bloomsbury Campus. It is 4.1 km away and there is no direct bus or underground journey.
 - 5) UCL has a continuous programme of maintenance, with £117m expenditure projected over the next ten years to ensure its student accommodation properties remain in a good state of repair.
 - 6) Not all UCL student accommodation is considered suitable for refurbishment. Factors taken into account in reaching a decision include location, age and quality of the building and accommodation, condition, the scale of investment required and operating costs of the property.
 - 7) Funds arising from the sale of unsuitable accommodation will be used to invest in the retained and new student accommodation stock.
 - 8) Replacement modern student bedspaces have been provided at John Dodgson House, 24-36 Bidborough Street (49 additional bed spaces) in an accessible location within 400m (a 5 minute walk) of the Bloomsbury Campus and New Hall, 465 Caledonian Road (350 bedspaces) located approximately 2.6 km from the Bloomsbury Campus and enjoying excellent, public transport links being located adjacent to the Caledonian Road Underground Station.
 - 9) UCL has an allocation of 430 bed spaces at Garden Halls on Cartwright Gardens, which are owned and managed by University of London. Planning permission reference 2013/1598/P was granted in November 2013 for the redevelopment of these halls of residence to provide an increase of 187

bedrooms (from 1,013 to 1,200 rooms). On completion of this development UCL expects to secure an increased allocation of up to 500 beds.

- 10) Future provision is planned at: Aster College - an additional 75 bed spaces are planned in a location approximately 400m from the Bloomsbury Campus (5 minute walk); Ramsey Hall - an additional 70 bed spaces are planned in a location approximately 250m from the Bloomsbury Campus (3 minute walk); and Max Rayne House and Ifor Evans Hall with an emerging Master Plan for the two sites seeking to provide an additional 200 student bed spaces in a location 2.5 km from the Bloomsbury Campus (10 minute journey by the No.29 Bus).

- 61. Set out in table form the outworking of the UCL student accommodation strategy clearly shows that the terms of sub paragraph k) of Policy DP9 have been satisfied.

Property	Bed Spaces			
	Lost	Provided	Planned	Overall
Clifford Pugh House				
John Dodgson House		+ 49		+ 49
New Hall		+ 350		+ 350
Garden Halls			+ 70	+ 70
Aster College			+ 75	+ 75
Ramsay Hall			+ 70	+ 70
Max Rayne House & Ifor Evans Hall			+ 200	+ 200
Total bed spaces	- 42	+ 399	+ 420	+ 819
Grand Total bed spaces				+ 819

- 62. The loss of the 42 student bed spaces at Clifford Pugh House has been offset by the provision of 399 spaces, a net gain of 357 student bed spaces in modern accommodation in more sustainable locations to the Bloomsbury Campus, and a further 420 student bed spaces are planned.

- 63. The site is clearly suitable for permanent Class C3 residential redevelopment:

- 1) It is located in a residential area

- 2) The pre-application advice confirms that subject to justification for the loss of student accommodation in accordance with policy DP9, this is the Council's preferred use.
- 3) It is located in a highly accessible location with a PTAL (Public Transport Accessibility Level) rating of 6a.
- 4) The size is not suitable for a mixed-use development.
- 5) There is a need to increase housing supply throughout London.
- 6) The development makes efficient full use of previously developed land.

Heritage

Will the development conserve or enhance the character and appearance of the Belsize Conservation Area?

Planning policies

64. Section 72 of the Town and Country Planning requires that in the exercise of planning functions with respect to any buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.
65. The NPPF requires that in determining planning applications, local planning authorities should require an applicant to describe the significance of any heritage asset affected, including any contribution made by their setting. The level of details should be no more than is sufficient to understand the potential impact of the proposal on the asset's significance (NPPF, para. 128)
66. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to minimise conflict between the heritage asserts conservation and any aspect of the proposal. (NPPF, para. 129)
67. In determining planning applications local planning authorities should take account of:
 - The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - The positive contribution that conservation assets can make to sustainable communities including their economic viability; and
 - The desirability of new development making a positive contribution to local character and distinctiveness

(NPPF, para. 131)

68. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. (NPPF, para. 132)
69. These matters are reflected in development plan policies including London Plan Policy 7.8 - Heritage Assets and Archaeology, Camden Core Strategy Policy SC14 – Promoting high quality places and conserving our heritage and Camden Development Policies DP25 - Conserving Camden's heritage.
70. Policy CS14 provides that the Council will preserve and enhance Camden's rich and diverse heritage assets and their settings, including conservation areas.
71. Policy DP25 provides that in order to maintain the character of Camden's conservation areas, the Council will:
 - a. Take account of conservation area statements, appraisals and management plans when assessing applications within conservation areas;
 - b. Only permit development with conservation areas that preserves and enhances the character and appearance of the area; and
 - c. Preserve trees and garden spaces which contribute to the character of a conservation area and which provide a setting for Camden's architectural heritage.
72. Section 3 of Camden Planning Guidance 1 - Design sets out how the Council will apply policies CS14 and DP25.
73. The Belsize Conservation Area Statement (April 2003) defines and analyses what makes the area 'special' and provides important information about the types of alterations and development that are likely to be acceptable or unacceptable in the conservation area.
74. The Belsize Conservation Area Statement includes the following information:
 - A description and assessment of the area's special character
 - A list of listed buildings of special architectural or historic interest
 - A list of buildings that make a positive contribution to the conservation area
 - A list of buildings that make a negative contribution to the conservation area

- A management strategy providing a clear and structured approach to development and alterations which impact on the Belsize conservation area

The case for the development

75. The existing buildings are not listed as buildings of special architectural or historic interest; they are not included on the Camden Local List (Consultation Draft, October 2013); they are not identified in the Conservation Area Statement as making a positive contribution to the conservation area.
76. The designated heritage asset to be assessed in this case is the Belsize Conservation Area.
77. The application site lies within Sub-Area One; Belsize Park, as identified in the local planning authority's Conservation Area Statement, published in 2003. This notes:
 - The prevailing character of the area is of mid to late 19th century villas, many of Italianate architectural character and appearance, semi detached or detached, lining and enclosing streets with boundary walls and steps and mature planting.
 - The sub area plan denotes listed buildings and "buildings which make a positive contribution". Both Nos. 5-7 and the adjoining building Nos.1-3 (Gabrielle Court) are excluded from such designations, whereas the neighbouring buildings Nos. 2-10, 9-15 and 19-35 Lancaster Grove are identified in the Conservation Area Statement as "unlisted buildings which make a positive contribution to the special character and appearance of the area".
78. The prevailing land use in the areas is residential.
79. Nos. 5-7 Lancaster Grove is not identified as a heritage asset by the local planning authority but is an element within the overall designated heritage asset of the conservation area.
80. It is the contribution the building makes to the significance in terms of character and appearance of the conservation area that needs to be assessed.
81. Such contribution is derived from external appearance and use (character) rather than any interior/internal characteristics.
82. The Council's pre-application advice states that the building makes a neutral contribution to the character and appearance of the Conservation Area. The change of use to residential Class C3 Dwellinghouses will preserve the character of the Conservation Area. Although the conversion work will not materially alter the external appearance of the building, the refurbishment including replacement windows will secure investment in the maintenance of the building.

83. Accordingly, the proposals will preserve the character and enhance the appearance of the conservation area and thereby meet the objective of the duty of the 1990 Act, and comply with both the National Planning Policy Framework and the Development Plan.

Residential Policy

Are the tenure, mix, sizes and layout of the units acceptable?

Planning policies

84. Requirements and/or expectations in respect of housing tenure, mix, size and layout are set out in London Plan Policies 3.5 (Quality and design of new housing developments); 3.8 (Housing choice) and 3.12 (Negotiating affordable housing on individual private residential and mixed use schemes); London Plan 2011 Implementation Framework, Housing SPG (November 2012); Camden Plan Policies CS6 (Providing quality homes); DP3 (Contributions to the supply of affordable housing), DP5 (Homes of different sizes); DP6 (Lifetime homes and wheelchair housing); and Camden CPG2 Housing.

The case for the development

85. The size of the development, being less than 10 dwellings, falls below the threshold for the provision of affordable housing.
86. The scheme provides for a mix of dwelling sizes in accordance with Camden Plan policy DP5. The mix and design occupancy of the scheme are:
- | | |
|-----------------------------------|------------------------|
| 2 No. one-bed apartments | 2 persons per dwelling |
| 4 No. two-bed apartments | 4 persons per dwelling |
| 2 No. three-bed duplex apartments | 5 persons per dwelling |
87. This provides a development mix of:
- | | |
|-------------|-----|
| 2 No. 1 bed | 25% |
| 4 No. 2 bed | 50% |
| 2 No 3 bed | 25% |
88. The size of each of the dwellings is set out in the Design and Access Statement and complies with the minimum floorspace standards set out at Appendix 4 of the London Plan 2011 Implementation Framework Housing SPG, November 2012.

Apartment size	Maximum design occupancy	Minimum floorspace requirement m ²	Minimum design floorspace m ²
One Bedroom	2	48	56
Two Bedroom	4	75	82.5
Three Bedroom	5	84	130

89. In accordance with Policy DP6 all of the dwellings meet the Lifetime Homes standards.

Sustainability

**Does the scheme satisfy sustainability requirements - the Code for Sustainable Homes, energy and water and drainage?
Is satisfactory provision made for waste management?**

Planning policies

90. The NPPF explains that the environmental dimension of sustainable development includes designing to mitigate and adapt to climate change and moving towards a low carbon economy. Local planning authorities are advised that new development should be steered to areas with the lowest probability of flooding and they should expect new development to minimise energy consumption (NPPF, paragraphs 7, 49, 96 and 101).
91. London Plan Policies 5.2 (Minimising carbon dioxide emissions); 5.3 (Sustainable design and construction); 5.6 (decentralised energy in development proposals); 5.12 (Flood risk management); and 5.13 (Sustainable drainage); and Camden Plan Policies CS13 (Tackling climate change through promoting higher environmental standards); CS18 (Dealing with our waste and encouraging recycling); DP22 (Promoting sustainable design and construction); and DP23 (Water) together with CPG3 (Sustainability); refer to requirements in energy, water, BREEAM, drainage and waste management.
92. All new residential development of five or more dwellings achieved by way of conversion of existing buildings is expected/encouraged:
- To reduce carbon emissions in accordance with the energy hierarchy – Be Lean, Be Clean, Be Green

- Achieve 60% of the un-weighted credits in the Energy category of their BREEAM assessment
- To achieve BREEAM Excellent standard
- To target a 20% reduction in CO₂ emissions from renewable technologies unless it can be demonstrated that this is not technically feasible or viable, or would be harmful to a heritage asset

The case for the development

93. The Report prepared by Syntegra Consulting demonstrates that:
- 1) It is not feasible to provide the development with its own combined heat and power plant/
 - 2) There is no existing, or planned, district heating network in the proximity of the site.
 - 3) The carbon saving attributable to energy efficiency measures is 60.23%
 - 4) The carbon savings attributable to clean measures is 25.09%
 - 5) The carbon savings attributable to renewable energy technologies is 14.41%
 - 6) The overall improvement over the existing building baseline is 74.5%. This is well in excess of the 35% target.
 - 7) All of the Council's BREEAM requirements are secured with the development securing an overall score of 72.77 i.e. achieving BREEAM Excellent
94. While the carbon reduction attributable to renewable energy falls short of the objective of 20%, this is justified because the area available for the installation of PV panels without being intrusive visually from public vantage points (and hence potentially harmful to the character and appearance of the Conservation Area) is limited, and the overall carbon savings exceed the policy requirement.
95. The site is located in Flood Zone 1 [Land assessed as having a less than 1 in 1,000 annual probability of flooding (<0.1%). The development does not affect the existing drainage arrangements. There will be no increase in surface water run-off.
96. Details for waste management in the scheme are discussed in the Design and Access Statement.

Open Space

Does the scheme make adequate provision for open space – private and public?

Planning policies

97. London Plan Policy 3.5 (Quality and design of housing developments); and Camden Plan Policies DP24 (Securing high quality design); and DP31 (Provision of, and Improvements to open space and outdoor sport and recreation facilities) require the provision of appropriate amenity space within the scheme and a contribution to the supply of open space. Further guidance on these matters is set out in CPG2 (Housing) and CPG6 (Amenity).
98. Where practicable new dwellings should provide access to some form of outdoor amenity space e.g. balconies or communal gardens.

The case for the development

99. All of the dwellings will benefit from access to the rear garden providing a good level of communal open space.
100. A Planning Agreement will secure a financial contribution to public open space will in accordance with CPG6.

Transport

Does the scheme make adequate provision for cycle storage and is a car-free development acceptable?

Planning policies

101. The NPPF identifies the management of growth to make the fullest possible use of public transport, walking and cycling as one of twelve core planning principles (NPPF, paragraph 17)
102. London Plan Policies 6.9 (Cycling); 6.13 (Parking); and Camden Plan Policies CS11 (Promoting sustainable and efficient travel); DP17 (Walking cycling and public Transport); DP18 (Parking standards and limiting the availability of car parking); and DP19 (Managing the impact of parking) require development to:
 - Make provision to promote cycling and to meet the Council's minimum standards for cycle parking set out in Appendix 2 of the Development Policies DPD
 - Encourage the removal of surplus car parking spaces
 - Be car-free in areas within Controlled Parking Zones that are easily accessible by public transport

The case for the development

103. The Council's pre-application advice confirms that the site is well connected to public transport and the development must be car-free and incorporate secure, covered bicycle parking spaces in accordance with the London Plan.
104. The site is located within the a controlled parking zone – CA Belsize, with on-street parking on Lancaster Grove in front of the site limited to resident permit holders only Monday to Friday 9am to 6.30pm and Saturday 9.30am to 1.30pm.
105. The location of the site enjoys an excellent Public Transport Accessibility Level of 6a, with easy access to numerous bus routes with frequent services within 2 to 8 minutes walk of the site, and the underground system (Finchley Road Station (10 minutes walk), Swiss Cottage Station (8 minutes walk) and Belsize Park Station 12 minutes walk).
106. As required by Policy DP19 the development is car free.
107. The scheme incorporates a lockable bicycle store into the fabric of the building at ground floor level. Provision is made for a total of twelve bicycles i.e. one secure bicycle parking space per each one and two bedroom dwelling units and two secure bicycle parking spaces per each three bedroom dwelling unit as per the requirements of Policy 6.13 of the London Plan.

Planning Obligation

108. The Council's Planning Guidance indicates that a Section 106 Agreement covering the following matters will be required:
- Public open space contribution
 - Education contribution
 - Car-free housing
 - Sustainability
 - Payment of the Council's fees in preparation and monitoring the Agreement
109. The applicant is willing to enter into a Section 106 Agreement with the Council which accords with Regulation 122 of The Community Infrastructure Levy Regulations 2010.

Conclusions

110. The site is located in a predominantly residential area.
111. The student accommodation was surplus to the requirements of University College

London. Suitable replacement student accommodation has been provided/planned in accordance with Policy DP9 (k).

112. There is a need to increase housing supply throughout London.
113. Housing is the priority land use in Camden.
114. The development makes best use of this previously developed site.
115. The mix and size of the accommodation complies with the Councils requirements.
116. The development satisfies the Lifetime Homes Standards.
117. The development will conserve and enhance the character and appearance of the Belsize Conservation Area.
118. All of the Council's BREEAM requirements are secured with the development securing an overall score of 72.77 i.e. achieving BREEAM Excellent.
119. While the carbon reduction attributable to renewable energy falls short of the objective of 20%, this is justified because the area available for the installation of PV panels without being intrusive visually from public vantage points (and hence potentially harmful to the character and appearance of the Conservation Area) is limited, and the overall carbon savings exceed the policy requirement.
120. The site is located in Flood Zone 1.
121. The site is situated in a highly accessible location with a PTAL rating of 6a.
122. The development is car free.
123. Other impacts can be mitigated through a section 106 Agreement e.g. financial contributions to education and open space provision.
124. The development complies with the development plan.
125. Planning permission should be granted in accordance with the presumption in support of sustainable development.

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November 2014

APPENDIX 1

UCL Note: Student Accommodation Strategy



UCL

UCL Student Accommodation Strategy

1 Introduction

- 1.1 Student accommodation is an essential component of UCL's ability to attract high quality students. Students' choices are increasingly driven by the wider 'student experience' of which the provision of high quality accommodation is considered a key component. This trend is compounded by the increase in university tuition fees, which has significantly increased student expectations.
- 1.2 The University's accommodation strategy needs to respond to meet these increased expectations, with a renewed focus on investment to meet the needs of today's students.
- 1.3 This strategy outlines the current situation and expected growth in demand. It sets out UCL's approach to increase supply and identifies potential sites for provision of additional accommodation.
- 1.4 The strategy also identifies sites for disposal, which no longer meet the needs of students or UCL's criteria for investment. The sale of these sites including Clifford Pugh House will provide funds to invest in more modern accommodation, identified elsewhere in this strategy.

2 The Existing Situation

- 2.1 The provision of student residential accommodation by UCL is regarded as an essential component of our ability to attract high quality students, both from the UK and abroad. Our accommodation is principally targeted at first year undergraduates and international postgraduates and the offer comprises a mix of types, locations and prices.

Student Numbers and Accommodation Guarantee

- 2.2 Over the last five years (2009 to 2013) undergraduates have increased by 1,221 (+35%), and postgraduates by 2,800. In 2013 alone, the UK undergraduate intake increased by 19%. Over the same period an additional 400 bed spaces (+10%) of existing stock have been made available at Caledonian Road and John Dodgson House. Further growth of undergraduates and postgraduates is expected to be approximately 9% and 7% respectively over the next two years.
- 2.3 UCL guarantees accommodation to all first-year undergraduates and first year international postgraduates entering UCL for the first time.
- 2.4 This strategy takes into account projected growth in student numbers until 2022-23 and UCL's capacity to meet its existing guarantees to first year undergraduate and international postgraduates over this period. UCL has the ambition to extend this guarantee to all first postgraduates (not just international students).

Existing Stock

- 2.5 UCL has a diverse population and our current stock of accommodation enables us to offer catered and non-catered places, ensuite or non-ensuite accommodation, and choice about location and other factors which also enable us to offer a range of prices.
- 2.6 UCL currently owns and operates 4,100 bed spaces, and has access to approximately 1,000 beds provided by the University of London (UoL). A major refurbishment of UoL's property at Cartwright Gardens is proposed which will deliver additional rooms as well as better quality accommodation (see para 4.4 for details).
- 2.7 UCL has maintained its accommodation charges broadly in line with other London universities, and particularly those in the Russell Group.

Student Experience

- 2.8 The location and quality of student accommodation is considered an important aspect in the overall student experience. The University's accommodation strategy needs to respond to meet these increased expectations, with a renewed focus on investments in accommodation that meets the needs of today's students.

- 2.9 A recent student survey has highlighted that the most important factor when applying for accommodation is proximity to UCL. 60% of UCL applicants indicated they do not want to be spending more than half an hour travelling to UCL, with only 5% considering a walk of over 20 minutes or a commute of 40 minutes acceptable.
- 2.10 The quality of student accommodation is also a key concern for students. The private sector is investing a significant amount of money into the infrastructure and specification of new residences that offer a range of facilities and services. UCL has a number of dated residences and there is a need to strategically invest in the most popular residences. Careful consideration is also needed to assess whether it is viable or practical to invest in some outlying accommodation that may require significant investment and does not provide suitable or attractive accommodation.

3 Student Accommodation Strategy

- 3.1 UCL's student accommodation strategy seeks to focus investment in larger, more modern student accommodation within close proximity to the Bloomsbury Campus or which is easily accessible by public transport. It is essential that UCL continues to provide high quality student facilities to attract the best students. The location and quality of student accommodation is considered an important aspect in the overall student experience.
- 3.2 There are significant benefits of locating student accommodation close to university campuses. Students' choices of where to live are influenced by access to the teaching, research and social facilities of their university. Student accommodation that is well located for access to the core campus encourages students to use sustainable modes of transport, encourages a strong sense of community and creates a safe and secure environment for students.
- 3.3 This strategy seeks to implement the vision for the provision of UCL student accommodation going forward. It will inform UCL's approach to providing additional bed spaces and refurbishing existing residence. This is set out in the remainder of the document.

4 New and Proposed Accommodation

- 4.1 UCL's strategy to provide additional student accommodation seeks to meet the growing demand for bed spaces and ensure the guarantee offer can be maintained and extended to all first year postgraduates. It is considered essential to focus investment in larger, more modern student accommodation within close proximity to the Bloomsbury Campus or which is easily accessible by public transport. UCL has recently provided a number of additional bed spaces, which meet these criteria, with more in the pipeline. These are discussed in more detail below.

Recent Additional Provision

- 4.2 Planning permission (2012/0917/P) was granted in May 2012 for an extension to John Dodgson House to provide 49 additional student bed spaces. The student residence is in an accessible location and close to the institution (approximately 400m or a 5 minute walk from the Bloomsbury Campus).
- 4.3 UCL opened New Hall, 465 Caledonian Road in September 2013. The building provides 350 new bed spaces in modern facilities. The halls of residence are located approximately 2.6 km from the Bloomsbury Campus, but is located next to Caledonian Road London Underground Station and has excellent public transport links.
- 4.4 UCL currently has an allocation of 430 bed spaces at Garden Halls on Cartwright Gardens, which are owned and managed by University of London. Planning permission (2013/1598/P) was granted in December 2013 for redevelopment of the Halls of Residence to provide a net increase of 187 bedrooms (from 1,013 to 1,200 rooms). UCL expects to secure an increased allocation of up to 500 beds, once the Garden Halls development is complete.

Future Additional Provision

- 4.5 UCL has identified a number of sites in close proximity to its Bloomsbury Campus for the provision of additional student accommodation to meet demand in the medium term.
- Astor College is located approximately 400m from the Bloomsbury Campus (5 minute walk). The building currently contains 248 bed spaces. UCL is developing proposals to provide an additional 75 bed spaces by extending and refurbishing the existing building. Pre-application discussions began in late 2013.
 - Ramsay Hall is located approximately 250m from the Bloomsbury Campus (3 minute walk). The building currently contains 502 bed spaces. UCL are currently developing proposals for an extension to provide 70 additional bed spaces.
 - Max Rayne House and Ifor Evans Hall are located approximately 2.5km from the Bloomsbury Campus, but can be reached in less than 10 minutes via the No 29 bus. There is an emerging Masterplan for the two sites, which seeks to provide an additional 200 student bed spaces.

5 Disposal of Assets, which are Surplus to Requirements

- 5.1 A continuous programme of maintenance is required to ensure UCL's residential properties remain in a good state of repair, and over the next ten years expenditure of £117m is projected under the Strategic Maintenance Programme [SMP].
- 5.2 Not all existing UCL student accommodation residences are considered suitable for refurbishment. The SMP has identified which residential properties will generate sufficient revenue to ensure that the significant expenditure is required, viable and justifiable for the university. The SMP has considered the following when assessing the potential opportunities for refurbishment:
- Ensuring that the location of the property meets students' needs and is aligned with the student accommodation vision;
 - The age and quality of the existing building and the current student bed spaces;
 - The current condition of the building and the scale of investment required;
 - The constraints of the building and the quality of bed space provision created through refurbishment;
 - Potential economies of scale and whether refurbishment can improve internal efficiencies and generate additional bed spaces;
 - Operational costs of the property; and
 - The current and potential revenue generated by the property.
- 5.3 Sites which do not meet these criteria will be considered for disposal to raise funds to invest in UCL's existing and new stock.

Clifford Pugh House

- 5.4 Clifford Pugh House has been measured against these criteria and identified for disposal. The Site is located off Lancaster Grove in Belsize Park, North West London.
- 5.5 The Site comprises 38 studio rooms and 4 doubles providing post-graduate accommodation arranged over five floors.
- 5.6 The building is in a poor condition, with poor internal configuration. It does not meet current student expectations or standards set by other UCL properties. To do nothing is not a viable option. Refurbishment

of the building to a condition fit for continued student accommodation would require significant capital expenditure.

- 5.7 The estimate for essential repair work to provide adequate student accommodation is between £1m to £2m, although this would not remedy the poor configuration and dated nature of the premises
- 5.8 The small scale of the property (essentially two large semi-detached houses) means that operating costs are disproportionately high.
- 5.9 The property does not meet the criteria set out within this strategy for further significant expenditure and has been identified for disposal.
- 5.10 The loss of student accommodation at Clifford Pugh House was more than offset by the uplift in student accommodation at John Dodgson House. This accommodation is in a more accessible location and closer to UCL.