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1 Introduction

Introduction

- 1.1 This planning statement ("the Statement") has been prepared by Deloitte LLP in support of a planning application submitted on behalf of University College London (UCL) for the refurbishment of Astor College ("the Site").
- 1.2 UCL is seeking planning permission for:
 - "Refurbishment of Astor College comprising front and rear extensions for student accommodation (Sui Generis), elevational alterations, relocation of main access, provision of ground floor café (Class A3) and associated works."
- 1.3 This Statement sets out the planning justification for the proposed development and assesses the proposals against the Development Plan for the Site and other relevant material considerations.

Application Documents

The application includes or is supported by the following documents, which have been agreed with the Local Planning Authority:

Document	Prepared By
Planning application, certificates and notices	UCL and Deloitte
Site Plan (1:1250)	Levitt Bernstein
Existing and proposed plans, section and elevations to describe the scheme	Levitt Bernstein
Design and Access Statement	Levitt Bernstein
Planning Statement	Deloitte
Energy and Sustainability Statement (including BREEAM Pre-assessment)	Parsons Brinckerhoff
Noise Impact Assessment	Parsons Brinckerhoff
Daylight/Sunlight and Overshadowing Assessment	Deloitte
Transport Statement	Iceni
Planning Obligations Statement (part of this Planning Statement)	Deloitte
CIL Additional Information Form	Deloitte

Structure of the Planning Statement

- 1.5 The remainder of the Statement is structured as follows:
 - Section 2 background to the proposals;
 - Section 3 Site and surrounding area;
 - Section 4 details of the proposed development;
 - Section 5 pre-application consultation process;
 - Section 6 planning policy context;
 - Section 7 key planning considerations of the proposals against planning policy and relevant material considerations;
 - Section 8 planning obligations; and
 - Section 9 summary and conclusions.

2 Background to the Proposals

Introduction to UCL

- 2.1 UCL is London's leading multidisciplinary university, with over 11,000 staff and nearly 28,000 students. It was ranked fifth in the QS World University Rankings 2014/15 and provides excellence and leadership in teaching and research. UCL's main Bloomsbury Campus is located in LB Camden.
- 2.2 The University is embarking on an ambitious programme of renovation and redevelopment of its Bloomsbury Campus. An estate-wide masterplan (http://www.ucl.ac.uk/masterplan) sets out a vision for the long term development and improvement of the core Campus over the next ten to fifteen years, with expected investment of well over £500 million. The masterplan identifies a range of projects to deliver this vision and the best possible teaching, learning and living environment for its students.

Project Background and Brief

- 2.3 These proposals will contribute to UCL's ongoing investment into improving its Campus, facilities and buildings that underlies its intent to maintain a competitive edge amongst Higher Education Institutions.
- 2.4 In order to meet three of the key strategies set out in the Bloomsbury Masterplan (below), UCL must seek to improve its offering of student accommodation:
 - The provision of flexible and adaptable accommodation;
 - Enhancement of the user experience student, staff and public; and
 - Responsiveness to future changes in the student demographic.
- 2.5 Through a refurbishment and extension strategy, the University is ensuring that it makes the most of its existing assets and on site provisions in order to meet the objectives set out in its Masterplan.
- 2.6 More detailed information on how this strategy will be achieved is provided in Section 4 'Outline of Proposals'.

Halls of Residence

- 2.7 Three guarters of UCL's student accommodation is within 10-30 minutes' walk of the UCL Bloomsbury Campus and the University makes a guarantee that all first year undergraduates will have a residential place.
- 2.8 There are four categories of accommodation:
 - UCL Halls of residences;
 - Student Houses;
 - Intercollegiate Halls; and
 - Alternative accommodation (including halls provided by private organisations and private lettings).
- 2.9 UCL has twelve halls of residence, nine of which are located in LB Camden. Astor College, Ramsay Hall and Ifor Evans Hall are all Halls for which UCL has plans for major investment.
- 2.10 Astor College is a purpose-built student residence within five minutes' walk of the UCL Bloomsbury Campus. It currently offers 227 single rooms and 4 twin bedrooms equating to residential places for 235 students.

- 2.11 The existing college currently provides the following facilities: bicycle storage; computer cluster room; wired network connection point in rooms; couple accommodation; fridge in rooms; lift access; recycling facilities; TV room; vending machines; wash basins in rooms; and a laundrette.
- 2.12 UCL owns and manages 4,135 bedspaces and has access to approximately an additional 1,000 via the University of London owned Intercollegiate Halls of Residences. UCL needs a further circa 1,000 bedspaces over the next three years. This will be achieved through a combination of developing its own Estate and Nominations Rights from private sector Student Housing providers.

The Changing Markets of Higher Education

Increasing Student Applications

- 2.13 Over a number of years, Higher Education applications have been steadily increasing. With the exception of 2012, where the introduction of higher fees saw the first national drop in applicant numbers for many years. However, in 2013 these application figures recovered.
- 2.14 Table 1 demonstrates this national trend.

Year	2008	2009	2010	2011	2012	2013	2014
Applicants	588,689	639,860	697,351	700,161	653,637	677,375	699,685
Accepted applicants	456,627	481,854	487,329	492,030	464,910	495,595	512,370

Table 1: UK Higher Education Applicant Figures (Produced by UCAS)

2.15 Table 2 below displays statistics produced by UCL on their undergraduate student intake from 2010 through to a projected figure for 2015.

Year	2010	2011	2012	2013	2014	2015 (Projected)	Projected % Increase
UK/EU	2780	2574	2822	3380	3416	3638	31%
Overseas	1093	1137	1248	1293	1309	1424	30%
Total	3873	3711	4070	4673	4725	5062	31%

Table 2: UCL Undergraduate Full-time Intake Figures (Produced by UCL)

- 2.16 The figures show a significant increase year on year, apart from a minor drop in intake numbers in 2011.
- 2.17 There are similar trends for the post-graduate taught full-time cohort, with an overall increase between 2010 and 2014 of 26%, representing a 17% and 39% increase in UK/EU and Overseas students respectively.
- 2.18 According to the 'End of Cycle Report 2014' released by UCAS in December 2014, this academic year's application cycle saw a record number of applications and applicants representing a 3.4% increase on 2013 figures (the 2014 cycle figures would represent the students starting university for the 2015/16 academic year).
- 2.19 In 2013 the Chancellor, George Osborne, announced in the Autumn Statement that there would be an extra 30,000 student places in 2014-2015 as a prelude to abolishing the cap on student numbers completely in 2015-16. The resulting government prediction is for an increase of 60,000 students entering into Higher Education year on year.
- 2.20 Given the existing data, trends and current predictions, it is therefore likely that both the national and UCL specific applicant figures are likely to increase above and beyond the record figures released by UCAS for the 2014 cycle.

An Increasing Student Population

- 2.21 According to the 2011 Census, there were 28,367 full time students in LB Camden compared to 20,841 in 2001. This represents a 36% increase in students in the Borough between 2001 and 2011.
- 2.22 According to the 'Camden Education Commission: Interim Report' (Sept 2011) and Camden Core Strategy, Camden has the largest proportion of students in London.
- 2.23 Indeed, the Camden DPD states that the Council anticipates a growth in full time students in the Borough.

Impact on Student Accommodation & Demand

- 2.24 According to the GLA's London Strategic Housing Market Assessment 2013 Report, only 21% of fulltime students are living in purpose built accommodation.
- 2.25 The Camden Core Strategy states: "it is apparent that the growth of student numbers could place severe strain on the stock of private rented housing" (Core Strategy p.43).
- 2.26 The demand for student accommodation has risen, reflecting the increasing number of students in Camden and London. Consequently, there has been an increase in the development of private sector student accommodation provision with investors capitalising on this increasing demand.
- 2.27 Alongside increased fees, the significant proportion of international students (26% in 2012 of London's student population according to the UK Council for International Student Affairs) means that the nature of the demand is also changing. Students expect higher standards of living from their student Halls and this expectation has been driven by the choice of accommodation options offered by the private sector market blocks, each competing for rent paying students.
- 2.28 As a consequence, university-owned Halls are now in a position where they must compete with the open market. In this context, UCL must consider the current provisions of it's existing stock and how to make the best of these existing assets.
- 2.29 Moreover, universities are entering a period of increasing competition in Higher Education, both domestically and overseas, and therefore UCL must strive to ensure that it's students' university experience is of the highest quality.

3 Site and Surroundings

Location

- 3.1 The Site is located in the London Borough of Camden at the northern end of Charlotte Street. It is not located on the main UCL Bloomsbury Campus, although it is part of the wider UCL Bloomsbury Estate.
- 3.2 The Site shares a boundary with the Windeyer Institute Building to the north which has been developed to provide the Sainsbury Wellcome Centre, a neuroscience facility, and a Georgian terrace of mixed quality and age to the south.
- 3.3 To the west is the vacant, Grade II listed Cleveland Street Workhouse, the former Middlesex Hospital Annex (MHA) Site. This site is subject to redevelopment proposals but does not yet benefit from planning permission for this.
- 3.4 Directly to the south is a private access which is close to the former route of Bedford Passage. Historically, this connected Charlotte Street to a rear entrance of the MHA.
- 3.5 To the east of the Site, is the Saatchi & Saatchi building.
- 3.6 Please refer to Site Location Plan drawing ref. 2869 L047.

The Surrounding Area

- Whilst land uses in the surrounding area are varied, the area is dominated by UCL Campus buildings and a range of other uses, such as commercial, residential and health uses.
- 3.8 To the East of the Site is Tottenham Court Road, characterised by retail uses.
- 3.9 The site is adjacent to, but outside of, the LB Camden Charlotte Street Conservation Area. It is also close to the City of Westminster's East Marylebone Conservation Area.
- 3.10 The terraces adjacent to the South are categorised by LB Camden as positive contributors to the conservation area. The BT Tower to the North of the Site is Grade II listed.
- 3.11 The architectural character of the area is varied. At the southern end of Charlotte Street, the prevailing character is of terraced town houses with commercial uses, typically restaurant and cafes. Further to the North, the townscape changes to incorporate the larger and substantially taller modern blocks, including Astor College.

The Site and Existing building

- 3.12 The existing eight storey building sits on a 0.18 Ha site.
- 3.13 The building is currently in use as a Halls of Residence for students enrolled at UCL.
- 3.14 There is a private area of open space at the back of the site and a private access on the Southern perimeter of the site.
- 3.15 Astor College is owned by UCL and provides residential accommodation for students.
- 3.16 It was constructed in the 1970s of a composition of dark grey machined brickwork and exposed horizontal framing. It stands eight storeys above street level and is set back from Charlotte Street by 8

- metres. The ground floor sits 1.5 metres above street level above a substation which provides a dead frontage to the street.
- 3.17 The upper basement level houses most of the shared communal facilities, such as the changing rooms, TV room, games room, reading room and music room. An extension at a lower level in the rear courtyard of the building houses a sports hall.
- 3.18 Astor College currently provides accommodation for a total of 235 students (227 single rooms, 4 twin rooms). The rooms are accessed off two cores that serve long internal double banked corridors.
- 3.19 The building currently does not offer accommodation for students with restricted mobility.
- 3.20 Externally, the building is largely utilitarian in character. Internally, the existing building is no longer fit for purpose and needs considerable modernisation in order to meet today's students' accommodation demands.
- 3.21 The building currently provides limited activity onto Charlotte Street and the main entrance has poor legibility as it is set back and raised from the street.
- 3.22 The building's age and design means its environmental performance can be optimised through refurbishment.
- 3.23 There are two trees on site and these are not subject to Tree Preservation Orders.
- 3.24 There are 90 covered cycle parking spaces on site and these are severely underused. There are 5 existing car parking spaces on site. The Site has a PTAL rating of 6b.

Planning History of Site

3.25 There is no planning history of note on the Site.

Recent Development in the Surrounding Area

Windeyer Building, 46 Cleveland Street

3.26 This development was permitted on 31st August 2011 and is now complete. The description of the development is as follows:

"Demolition of existing academic research and teaching building (Class sui generis) and erection of a six storey building with two basement levels to accommodate a new scientific academic research and teaching building (Class sui generis), including plant enclosures at roof level and a new area of public open space."

Saatchi Block, 80 Charlotte Street

3.27 This proposal received permission on 4th May 2012 and it is understood that construction will begin in early 2015. The description of development follows:

"Creation of additional floorspace through the infilling of the existing courtyard, the extension of the existing basement, seven storey extension to the Chitty Street elevation and the construction of two additional storeys (creating a nine storey building in total, with existing buildings to be partially demolished) in association with the existing office use (Use Class B1); the creation of new public open space, change of use from office (B1) to create flexible units at ground and lower ground floor levels (Class B1, A1 or A3 use); and the change of use and extensions to 67-69 Whitfield Street to create 19 residential units (Use Class C3) all to the site"

4 The Proposals

Overview

- 4.1 This section should be read in conjunction with the application drawings and Design and Access Statement prepared by Levitt Bernstein.
- 4.2 In order to meet the objectives required of the Bloomsbury Masterplan, the UCL Sustainability Statement and student demands and expectations, UCL must ensure that it is making the most of its existing assets.
- 4.3 Broadly, the proposals comprise:
 - An 8 storey extension to the rear for student accommodation;
 - A 1.5 storey extension to the front of the building to activate the building at the street level (Charlotte Street) including the provision of an A3 unit (café);
 - Recladding to create a new façade;
 - Reconfiguration of the internal layout;
 - Re-opening of the Bedford Passage; and
 - Landscaping to the rear to provide outdoor amenity space.

Use

- 4.4 The proposals will not alter the existing principal use of the buildings for student accommodation (sui generis). The proposals include the provision of a new café (Use Class A3), which will be situated on the corner of Charlotte Street and Bedford Passage. The existing Sports Hall facility (Use Class D2) will remain unchanged, apart from the relocation of one fire escape and the access route.
- 4.5 Ancillary communal facilities will also be re-provided on site following the internal reconfiguration.
- 4.6 There will be a flexible study/social learning area near reception which will be flexible to allow use for lectures during summer lets. It will contain 4 fixed computers. Similarly, the screen for tv/games can be used for teaching when required.
- 4.7 All social learning areas and communal lounges will be accessible, in addition to the provision of one accessible kitchen and WC on each floor. All external landscaping will be accessible.
- 4.8 Table 3 outlines the schedule of existing and proposed floor-spaces for each use on site.

Use	Existing Floorspace (GIA sqm)	Proposed Floorspace (GIA (sqm)	Uplift
Student Residential	6,662	8,515	1,853
Retail	0	67	67
Sports Hall	163.6	163.6	0

Table 3: Floorspace Schedule

Amount

- 4.9 The proposed extension to the rear of the building will enable the creation of 60 new single bedrooms.
- 4.10 A summary of the proposed accommodation schedule is set out in the table below. For more detail please refer to the detailed accommodation schedule in the accompanying DAS.

Floor	Existing Number of Units	Proposed Number of Units
Lower Ground	0	9
Upper Ground	4	25
Typical Upper Floor (2 nd - 6 th)	34	39
Seventh Floor	23	23
Total	231	291

Table 4: Accommodation Schedule

Layout

- 4.11 The general layout of the building at ground floor level will be rationalised and improved. The main entrance, as well as relocating approximately 15m to the south, will be reinforced with legible design and a welcoming interior, clear reception area and inviting front doors. The reception area will be reconfigured to better suit current needs. A ramp will be provided onto Charlotte Street to negotiate the change in levels from the street to the ground floor.
- 4.12 The four ground floor student flats will be reconfigured to provide en-suite bedrooms. One flat will be retained for the on-site caretaker.
- 4.13 There will be improvement of circulation routes, where existing long corridors suffer from a lack of natural light and kitchens will be increased in size to allow for better socialisation amongst students.
- 4.14 Existing community areas will be upgraded or replaced to allow for flexibility of use during summer lets.

Scale and Massing

- 4.15 The proposals include two extensions: the first, a seven storey rear extension that will be positioned perpendicular to the existing building. The second, a generous 1.5 storey extension on the front elevation fronting Charlotte Street to align with the building line of the Sainsbury's Wellcome Centre to the north.
- 4.16 The proposed café will align with the terraces to the south of the Site.

Appearance

- 4.17 External works are proposed. It is proposed that the primary framework is formed from high quality Portland Stone coloured pre-cast facing concrete panels and fins and handmade brick panel infills.
- 4.18 The front extension will consist of large format glazed ceramic cladding and glazing, with significant areas of full height glazing fronting Charlotte Street in response to Camden Planning Officer's comments in pre-application feedback regarding the Charlotte Street glazing.

- 4.19 An improved treatment of the front façade will be achieved using a new layered and highly modelled approach. The existing plinth will be retained and re-clad with the same material as the front extension.
- 4.20 The rear extension will be clad with a light brick and the existing rear elevation will be re-clad similarly.

Landscaping, Public Realm and Amenity Space

- 4.21 The proposals include landscaping of the rear of the Site to provide a high quality outdoor amenity space for students.
- 4.22 A new, active façade will be created with the remodelling and completion of the front extension. This façade will continue around onto Bedford Passage to the south of the building which will be opened up.
- 4.23 Existing internal amenity space will be reprovided in the retained communal lounge and billiard room at lower ground level and the new foyer and social learning area at upper ground level plus the proposed larger kitchens.

Pedestrian Access/ Access

- 4.24 The proposals seek to relocate the main entrance by approximately 15m to the South. This will enable the bin store and fire escape corridor to be incorporated into the design.
- 4.25 The proposals include provisions to re-open the Bedford Passage as pedestrian through way (which will allow for fire engine access also). It is planned that the passage would remain private until such time as the neighbouring MHA Development is brought forward, in order to maintain safety and privacy of those students in residence in the meantime.
- 4.26 5 bedrooms will be designed to be fully wheelchair accessible. The wheelchair accessible units will be provided on the upper and lower ground floors with fully accessible kitchen facilities.

Car and Cycle Parking

- 4.27 The Site currently has 5 car parking spaces that will be removed as part of the redevelopment proposals.
- 4.28 44 cycle parking spaces are proposed, which is a reduction from the 90 existing (please see Section 7 for further details).

5 Design Response to Consultation

Pre-application Advice

- 5.1 The evolution of the proposals has been supported by a series of pre-application advice meetings which have ensured that the design and purpose of the proposal is in line with LB Camden's planning policy guidance.
- 5.2 In October 2010 pre-application advice was sought for a scheme on the Site that involved full demolition of the existing buildings and a new part 8, part 6 storey building plus basement level to accommodate 298 student spaces; however that scheme was never progressed.
- 5.3 A design workshop with LPA officers was held in July 2014 as well as a two further meetings to discuss the scheme in more detail. The scheme was amended and now comprises a refurbishment and modest extensions.

Pre-application Meeting 1 - August 2014

- In August 2014, UCL met with LBC planning officers to discuss the revised scheme. The following key 5.4 aspects of the scheme were presented to officers:
 - the rationalisation and simplification of the front elevation;
 - the inclusion of an A3 unit;
 - a review of the potential of the Bedford Passage; and,
 - a review of the plinth to investigate increasing the prominence of the front entrance.

Pre-application Meeting 2 and 3 – October 2014 and November 2014

- 5.5 A second pre-application meeting was held in October 2014, with a subsequent design workshop in November 2014.
- 5.6 Officer comments related to:
 - The comfortable seating of the brickwork banding with changes to the primary framework: This will now consist of high quality Portland stone coloured pre-cast facing concrete panels and fins, rather than brick.
 - The building line: this has since been stepped back to align with the Sainsburys Wellcome Centre to
 - Increased fenestration heights on the gable end and elevation of the rear extension: these have been decreased on the upper storeys to help emphasise the building's façade hierarchy.
 - Opaque glazing added to the gable and elevation of the rear extension: a slot of opaque glazed windows have been added to the corner of the flank wall of the rear extension to aid the composition and increase the perceived activity of the elevation.

6 Planning Policy Context

Development Plan

- 6.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise.
- 6.2 In this instance, the development plan comprises the London Plan (2011) and alterations, the LB Camden Core Strategy (2010) and the LB Camden Development Management Policies (2010). The following documents are relevant 'material considerations'.
 - The National Planning Policy Framework;
 - CPG 1: Design;
 - CPG 3: Sustainability;
 - Draft Further Alterations to the London Plan (FALP) (January 2014); and
 - Charlotte Street Conservation Area Appraisal and Management Plan.

Site Allocations and Designations

6.3 The site specific planning policy designations set out within the Development Plan and other policy documents are listed below:

London Plan

 Central Activities Zone (Policy 2.10 Central Activities Zone – strategic priorities & Policy 2.11 Central Activities Zone – strategic functions).

Camden Core Strategy

- Central Activities Zone.
- Designated View 2A.2 Parliament Hill summit to the Palace of Westminster.
- Public Open Space Deficiency (greater than 280m from Public Open Space).

Fitzrovia Area Action Plan (FAAP)

- Astor College is an allocated opportunity site within the 'Bedford Passage Group', alongside the Middlesex Hospital Annex, Arthur Stanley House and Tottenham Mews Day Hospital. It is identified as Opportunity Site 1.
- 6.4 These designations and the wider policies of relevance to the proposals are discussed in the following section.

7 Key Planning Considerations

Principle of Development

The NPPF states that: 7.1

"at the heart of the National Planning Policy Framework is a presumption in favour of sustainable development which should be seen as a golden thread running through both plan-making and decisiontaking."

- 7.2 For decision-taking this means that planning officers should approve development proposals that accord with the development plan without delay.
- 7.3 The NPPF continues to state that:

"pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life, including (but not limited to):

making it easier for jobs to be created in cities, towns and villages;

moving from a net loss of bio-diversity to achieving net gains for nature;

replacing poor design with better design;

improving the conditions in which people live, work, travel and take leisure; and widening the choice of high quality homes."

- 7.4 Fundamentally, the proposals seek to replace poor design with better design, therefore improving the conditions within which students live, work and take leisure.
- 7.5 Specifically, the principle of development is to improve provision of UCL's accommodation facilities.
- 7.6 UCL is identified within the Camden Core Strategy as a renowned institution within the Borough. Moreover, the Core Strategy Vision statement states that the Council will reinforce Camden's valuable contribution to London, in terms of business, employment, research, retail, culture, entertainment, tourism, education and medicine.
- 7.7 Therefore, the provision of improved facilities for Higher Education Institutions is accordingly supported by Policy CS10 'Supporting community facilities and services'.
- 7.8 The Greater London Authority Housing SPG also emphasises that academic estates should be enabled so as to manage their estates more effectively in order to "enhance their offer, reduce costs, and contribute to wider strategic objectives for London." This would, "enable academia to contribute further to promotion of London as a world city as well as a centre of academic excellence".
- 7.9 The remainder of this section details how the proposals accord with the development plan and thus the overarching principle of sustainable development as outlined in the NPPF.

Student Accommodation

7.10 The GLA's 'Adopted Housing Supplementary Planning Guidance (November 2012)' states in Paragraph 3.1.50 "in considering LDF policy approaches to, and proposals for new student accommodation, boroughs should not constrain provision which meets strategic as well as local needs." Section 2 of this Statement outlines the evidence for this need in LB Camden.

- 7.11 In the 2013 London Strategic Housing Market Assessment, the GLA outlines three scenarios for potential student population growth (high, medium and low), with medium considered the most likely scenario. Having worked through this scenario in detail, the GLA concludes with figures that lay out a demand for an increase of between 2,500 and 3,100 student bed spaces a year.
- 7.12 LB Camden has shown a clear commitment to this with the Core Strategy stating that over the period 2010-25, LB Camden's 15-year target is for 1,500 non self-contained homes of which student housing will make up the majority.
- 7.13 Principally, the proposals seek to increase the level of student accommodation provision at the existing Astor College Halls of Residence. There are a number of policies that support this proposed use which the proposal will be objectively assessed against. Firstly, the FAAP, in which the site is allocated, states the preferred use for the site is to remain as student accommodation.
- 7.14 Policy DP9 'Student housing, bedsits and other housing with shared facilities' of the Camden Development Policies recognises that students and young people make up a significant proportion of households in Camden. The policy directly relates to 'any form of accommodation that has been designated as student housing' and is thus applicable to Astor College.

7.15 Policy DP9 states:

"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;
- 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;
- 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;
- complies with any relevant standards for houses in multiple occupation (HMOs);
- e) will be accessible to public transport, workplaces, shops, services, and community facilities;
- f) 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.

Student housing development should:

- h) serve higher education institutions based in Camden or adjoining boroughs;
- be located where it is accessible to the institutions it will serve; and
- include a range of flat layouts including flats with shared facilities.

The Council will resist development that involves the net loss of student housing unless either:

- k) adequate replacement accommodation is provided in a location accessible to the higher education institutions that it serves; or
- I) 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".
- 7.16 The proposals at Astor College are in accordance with Policy DP9 for the reasons listed below:
 - The proposals do not result in a net loss of student accommodation or self-contained homes.

- The proposals involve the refurbishment of and extension to an existing Halls of Residence, therefore the supply of land for self-contained homes will not be impaired nor will there be a loss of sites considered suitable for affordable housing for older or vulnerable people.
- The proposals include layout changes to allow for new bedroom clusters which will incorporate dedicated kitchens shared between 6 and 10 bedrooms.
- The proposed development is located 0.2 miles from Goodge Street Underground Station representing a 4 minute walk, and approximately 0.4 miles from Euston Square Underground Station representing a 9 minute walk. These stations give access to the Hammersmith & City, Metropolitan, Circle and Northern lines and therefore access to the wider national rail network is very good with both Euston and Waterloo within a 10 minute journey time via underground. Its proximity to Tottenham Court Road also provides very good access to public bus routes as well as a number of shops, services, workplaces and community amenities.
- The proposals include the provision of a ground floor A3 unit that will ensure the street level frontage remains active and positively contributes to Charlotte Street and the wider community.
- The proposed development intensifies the existing use on site by increasing student accommodation provision by 20% (based on increase in student accommodation rooms). It is felt that this extra provision will not result in undue over-concentration in the local area. This view was reiterated in Camden planning guidance following pre-application feedback, where it "identifies 100 additional students as the threshold point beyond which the mix and balance of local communities may be harmed" (2014/5673/NEW).
- The development will provide student accommodation that will continue to serve UCL. It is within 5 minutes' walk of the UCL Campus.
- The proposals include a range of flat layouts including those with shared facilities.
- 7.17 Policy CS6 of the Camden Core Strategy 'Providing quality homes' states that Camden Council will:

"support the supply of additional student housing providing this does not prejudice the Council's ability to meet the target for the 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."

7.18 It further adds that:

"the range of housing sought will include homes for young adults and students in higher education and acknowledges the potential for purpose built student housing to mitigate pressure on the stock of private rented homes in Camden."

- 7.19 The proposals will not prejudice the Council's ability to meet the target for the supply of additional homes due the intensification of the existing use on site. Nor will the scheme disrupt the existing balance of uses in the area. The proposals seek to improve the overall design and aesthetics of the existing Astor College (this will be discussed in detail below) and therefore improve the quality of residential amenity and character of the surrounding area.
- 7.20 Policy CS10 'Supporting community facilities and services' of the Camden Core Strategy places emphasis on the aim to support the higher education sector in Camden and balance its requirements with those of other sectors and the local community. Part B of CS10 states:

[&]quot;The Council will ensure that such developments are sensitive to their surroundings, take into account the cumulative impact on the balance and mix of uses in the area, protect residential uses, the local

- environment and the amenity of, and services for, the residential community and other users of the area and their future needs".
- 7.21 It is considered that moderately intensifying the existing student use on site will not disturb the balance of the area's current mixed and inclusive community character. Moreover, the arrangement of cluster flats is a positive factor in ensuring that local residential uses remain protected as the cluster flats will provide accommodation that may otherwise be sought through the private rented sector.

Design

7.22 The NPPF sets out 12 core planning principles, the fourth of which states that planning should:

"always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings".

7.23 Paragraph 56, Part 7 'Requiring Good Design' of the Delivering Sustainable Development guidelines in the NPPF states that:

"good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people."

7.24 Paragraph 58 states:

"Planning policies and decisions should aim to ensure that developments:

- 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 (including incorporation of green and other public space as part of developments) and support local facilities and transport networks:
- respond to local character and history, and reflect the identity 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".
- 7.25 Camden Core Strategy Policy CS14, 'Promoting high quality places and conserving our heritage' states

"the Council will ensure that Camden's places and buildings are attractive, safe and easy to use".

- 7.26 CS14 outlines that this will be achieved through a number of means and to which this proposal conforms as explained below.
- 7.27 Firstly, by "requiring development of the highest standard of design that respects local context and character". The existing building is poorly designed, of a 1970's utilitarian build and unsympathetic to its heritage-rich surroundings. The proposals incorporate more modern design with high quality features and materials. The design proposed is modern but also subtly reflects the character of the surrounding area, for example in the choice of materials that borrows from the area's vernacular and includes more detailing than the existing building.
- 7.28 Secondly, by "preserving and enhancing Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens". The design is respectful of the heritage of the surrounding area,

specifically with regard to the character of the Charlotte Street Conservation Area which it borders. With regards to the MHA, the proposals are considered be an improvement to the existing relationship between the two buildings. Where the existing dark grey composite brick work is aesthetically poor, the proposed lighter façade to the rear will brighten the outlook for the MHA and any future residents. This design feature is also consistent with part B 'overshadowing and outlook' of DP26 'Managing the impact of development on occupiers and neighbours'. Changes in the building mass will not impinge on the Terrace to the South, which is listed as a positive contributor to the area.

- 7.29 Thirdly, by "promoting high quality landscaping and works to streets and public spaces". The proposals offer vast improvements to the existing frontage onto Charlotte Street. The existing building's ground floor lies at a half a storey above street level. A new 1.5 storey extension to the front will rationalise this currently mis-matched space and create an active and more legible frontage onto Charlotte Street. The active frontage will also front onto Bedford Passage to increase natural surveillance, access and vitality down the formerly closed passage.
- 7.30 Fourthly, by "seeking the highest standards of access in all buildings and places and requiring schemes to be designed to be inclusive and accessible". The proposals include features to ensure maximisation of accessibility for all users. The design includes a ramp to the front to mitigate the raised ground floor and 5 units will be or will be adaptable for wheelchair access. A new and more welcoming entrance (approximately 15 metres to the south of the current entrance) and reception area will also improve access and inclusivity of access in the building. This ensures that the proposals are in line with Camden's Policy DP6 'inclusive design' and DP29 'Improving Access' and Policy 7.2 'An Inclusive Environment' of the London Plan.
- 7.31 Lastly, by "protecting important views of St Paul's Cathedral and the Palace of Westminster from sites inside and outside the borough and protecting important local views." The Site sits within designated viewing corridor 2A.2. It is considered that the proposals will not have a negative impact on this viewing corridor because there are no extra floors and no change in height. The extension to the rear is enclosed by surrounding buildings and therefore not visible in the context of the protected view. This acknowledges the FAAP that states that development: "should be of a height which does not harm the strategic viewing corridor from Parliament Hill to the Palace of Westminster" as well as the Charlotte Street Conservation area Appraisal and Management Plan which states that new development must consider its impact on this viewing corridor.
- 7.32 The proposals are also considered to be in line with Camden's Policy DP24 'Securing High Quality Design', which provides a number of quidelines against which to assess the quality of design. Specifically the proposal is considered to promote good design and respect the local character of the area with a vastly improved, high-quality façade and rationalisation of the building mass to create a more respectful relationship with the street and surrounding buildings.

Conservation and Heritage

- 7.33 The Site sits adjacent to the Charlotte Street Conservation Area and the Grade II Listed Middlesex Hospital Annex. It is necessary to consider the proposals against the character and the setting of the Conservation Areas.
- 7.34 Part D of DP25 'Conserving Camden's Heritage' states that, "development shall not be permitted outside a conservation area that will cause harm to the character and appearance of that conservation area" whilst, part G states that LBC will "not permit development that it considers would cause harm to the setting of a listed building."
- 7.35 The Charlotte Street Conservation Area and Management Plan reiterate this and states that developments must not affect setting or views into or out of the Charlotte Street Conservation Area.

- 7.36 Part B of CS14 'Promoting high quality places and conserving our heritage' emphasises that the Council will ensure that Camden's places and buildings are attractive, safe and easy to use by: "preserving and enhancing Camden's rich and diverse heritage assets and their settings, including conservation areas [and] listed buildings."
- 7.37 The site is adjacent to the Charlotte Street Conservation Area and therefore considered to be within its setting. The proposals provide an opportunity to enhance the setting of the Conservation Area through the redevelopment of a building which is currently is considered not to positively contribute to the street or townscape.
- 7.38 The character and setting of the Conservation Area has been carefully considered at an early design stage of the proposals and the impact of the on the setting of the Conservation Area has been tested extensively during the design process. As set out in Section 5 of this Statement, there has also been close engagement with LB Camden planning, design and conservation officers.
- 7.39 It is considered the proposals provide a sensitive and considered approach that positively responds to the character, materiality and setting of the Conservation Area whilst creating sufficient additional student accommodation floorspace to meet UCL's needs and student demands.
- 7.40 The design seeks to create variety and interest through elevational treatment, where the existing building monotonously impacts on the setting of the Conservation Area. A range of high quality and modern materials will be arranged so as to carefully respect the vernacular of the area, whilst also ensuring that the proposals reflect their own modern background.
- 7.41 The front extension will be a 1.5 storeys, which will rationalise the existing plinth whilst also ensuring that the bulk and massing will not dominate the townscape of Charlotte Street.
- 7.42 The scale of the proposals is generally in keeping with the existing building. The mid-building location of the extension, the height and overall refurbishment of the building mean that the rear extension is considered an appropriate addition. The proposals are therefore not considered to harm the setting of the Grade II Listed MHA.
- 7.43 The proposals seek to improve the building fabric and rear landscaping to the extent that outlook from MHA will be improved. The façade treatment to the rear was also carefully considered, with a lighter natural brick treatment decided upon to be more proportionate to the building materials around it including those of the MHA.
- 7.44 Similarly to the south, the relationship between the existing building and the Terraces which are listed as positive contributors to the area has been addressed and improved. The proposed A3 unit will act as a transitional point that will, unlike the rest of the front elevation, align with the Terraces to the South. This means that a stepped back effect is created ensuring that the proposals respect the setting of these Terraces and do not engulf, or ignore their contribution to the streetscape.
- 7.45 Part E of Core Strategy Policy CS14 reiterates that important local views must be protected, particularly those of St Paul's Cathedral and the Palace of Westminster from Sites inside and outside the Borough. The Site lies within designated Viewing corridor 2A.2 'Parliament Hill summit to the Palace of Westminster'. This designated view will not be impinged by the proposals for the following reasons:
 - The extensions will not result in a change of height to the existing building.
 - The rear extension is protected from the viewing corridor by the existing surrounding buildings.
 - The extension to the front of the building is a maximum of 2 storeys tall, and does not exceed the existing building alignment of the terraces to the South, and the Windeyer Building to the North.
- 7.46 Overall, it is considered that the proposals do not adversely impact the setting of the Charlotte Street Conservation Area, the setting of the Grade II Listed MHA or affect Designated View 2A.2. It is

considered that the proposals will improve upon Astor College's current relationship with the important heritage assets which neighbour it. The Charlotte Street Conservation Area Appraisal and Management Plan states that: "proposals which seek to redevelop those buildings that are considered to have a negative impact on the special character or the appearance of the conservation area with appropriate new development will be encouraged". In Appendix 1 'Site Assessment Proformas' of the FAAP, it states that "the current building detracts rather than contributes to the streetscape, so redevelopment should provide an enhancement to the street scene". Given this, it should be recognised that the proposals will fulfil this aspiration.

Massing

- 7.47 Part B of Policy DP24 'Securing High Quality Design' states that developments must carefully consider "the character and proportions of the existing building, where alterations and extensions are proposed".
- 7.48 An extension will be created to the rear, perpendicular to the existing building. Its design will maximise distances between the extension and the existing sports hall to the south and the Sainsburys Wellcome Centre podium to the north. The design will also maximise the efficiency of the rear extension with a double-loaded corridor. It will allow 3.5m between the new extension and the Astor College site boundary with the MHA site and be one storey lower than the existing building to create a natural transition between Astor College and the adjacent properties.
- 7.49 The existing building is tall, long and has little articulation. By extending the front façade out in areas, and recladding the building with a new layered and highly modelled façade treatment, a strong architectural language can be used to reduce the perceived mass of the existing building.
- 7.50 The interface with the MHA has been developed with UCLH. It is understood that UCLH has discussed the principle of a 7m zone between the two developments with LB Camden and that this is acceptable in principle subject to detailed design. UCL have agreed with UCLH that the end façade facing that site will be treated such that overlooking is minimised.
- 7.51 The front extension will be of a generous volume at 1.5 to 2 storeys tall and address the existing issues of the elevation at street level.
- 7.52 Given the careful consideration in the proposals regarding the scale and massing of both the existing building and the extensions, it is considered that the proposals scale and massing are acceptable for the Site.

Appearance

- 7.53 The changes to the front façade will improve the perception of bulk and massing and will involve new architectural compositions. These will borrow from the area's vernacular including a primary framework formed of high quality Portland stone coloured pre-cast facing concrete panels and fins and high quality handmade brick panel infills. The rear elevation will feature a high quality brick façade in a natural tone. The podium wing onto Charlotte Street will be clad in high quality large format glazed ceramic cladding. The South and West elevational treatment will be clad in a restrained light render treatment. Coloured fins will be added to prevent overlooking and provide shading.
- 7.54 The new extension and the rear of the existing building will be re-clad with a more restrained approach than the front treatment; helping to create a better outlook from Bedford Passage and MHA as well as improving the fabric of the building. In response to pre-application feedback from Camden Officers, the gable of the extension will present an attractive elevation to the neighbouring the MHA site, with opaque glazed windows on this elevation to ensure maximum privacy for future occupants of both Astor College and the MHA.

- 7.55 The proposals have carefully considered the elevational treatments and therefore meet requirements of Part C of Policy DP24.
- 7.56 The window proportions will be improved to tackle overheating in bedrooms and insulation will be improved and installed to improve energy performance.

Public Realm and Open Space

7.57 The London Plan states in Part D of Policy 7.1 that:

"the design of new buildings and the spaces they create should help reinforce or enhance the character, legibility, permeability and accessibility of the neighbourhood".

- 7.58 The proposals include the enhancement of the street frontage which addresses existing issues of legibility, including:
 - activating the street and reinforcing the entrance;
 - the creation of a new façade onto the Bedford Passage;
 - the redevelopment of the front of the Site with a new façade and active frontage; and
 - the provision of a ramp at the building's entrance to negotiate the change in levels and improve accessibility to all.

7.59 The FAAP states that:

"any development should improve the frontage to Charlotte Street which at present is a brick wall. A frontage with windows and, potentially, active uses is preferred. Depending on the extent of redevelopment, the built form could be brought forward fronting Charlotte Street to define the block, and set back on the southern edge, widening the space for a new east-west pedestrian link."

- 7.60 The proposals will rationalise the entrance of the building with the street where currently the ground floors sit a half storey above street level and a plinth fronts the street, through a front extension and an increase in glazing. This extension will include an active frontage with an A3 unit and a clear, legible and inviting entrance. Moreover, the A3 unit, located on the corner of Charlotte Street and the Bedford Passage would also offer a good level of natural surveillance over the Bedford Passage.
- 7.61 The unit would not reduce the current width of the Bedford Passage and therefore not compromise the effectiveness of the route, and as such is considered to be in line with LPA Officer pre-application feedback.
- 7.62 The urban grain has also been carefully considered during the design process in order to meet expectations of the FAAP where it states: "depending on the extent of redevelopment, the built form could be brought forward fronting Charlotte Street to define the block". The adjustments to the street level elevation through the front extension ensure that this wish is met, allowing for the legitimisation of the original block form, reflecting the character of the local area.

Bedford Passage

- 7.63 An inviting through-route along the Bedford passage will be created in accordance with the Fitzrovia Area Action Plan, increasing permeability through the Site.
- 7.64 The FAAP argues that the block form can be reiterated through the re-provision of the Bedford Passage for public access and that 'routes across and between sites should reflect the grid pattern of streets in Fitzrovia'. The route will cater primarily for pedestrians and cyclists in line with DP17 'Walking, Cycling and Public Transport' and CS11 'Promoting Sustainable and Efficient Travel', particularly Part F. These aspects of the proposals are also in line with CS9 'Achieving a successful Central London' and

- throughout the design process have actively sought to improve the quality of the area's streets and places, the connections between them and the ease of movement into, and through, the area.
- 7.65 The re-opening of the Bedford Passage as will positively contribute to significant improvements in the public realm, townscape and permeability.
- 7.66 Policy CS17 'Making Camden a safer place', seeks to ensure 'Camden's businesses and organisations take responsibility for reducing the opportunities for crime through effective management and design' particularly through promoting safer streets and public areas. With CS17 in mind, and with consideration of development timings, it is proposed that prior to the redevelopment of the MHA site, Bedford Passage remains private until such time as that development comes forward. This solution respects the FAAP's desire to re-open the passage, whilst also respecting the need to ensure future student residents' safety demonstrating that all impacts of the proposal on crime and safety have been considered as recommended by CPG1 'Design'.
- 7.67 Furthermore, this approach will allow a joined-up approach to be taken when the MHA development progresses as advocated by Camden Planning Officers in pre-application feedback and the FAAP which states: "development should allow for public access through Bedford Passage, to the south of the site, in order to provide a link to Tottenham Mews, and through to Cleveland Street,"

Open Space

- 7.68 Camden Development Policies 2010 indicates that, "student housing schemes creating 10 or more units/ rooms or occupiers are considered to increase the demand for public open space. The Council will seek contributions to public open space from such developments in Fitzrovia, taking into account local public open space deficiencies, the pressure on existing spaces and any alternative facilities available to students."
- 7.69 The FAAP further states, "development that increases the use of open space should provide new on-site public open space. Where on-site provision is not practical, public open space should be provided in association with the Middlesex Hospital Annex/ Bedford Passage or on an identified site in the vicinity."
- 7.70 With the proposals including the re-opening of the Bedford Passage, it is considered that the need to provide further public open space on site is mitigated. However, the inclusion of high quality seating and planting on the Site as an extension to the future provision of the proposed pocket park on the MHA Site was welcomed at pre-application meetings.
- 7.71 A private area of open space in the rear courtyard will be landscaped to provide an improved outdoor amenity space for student residents. This will also improve the outlook of the overlooking accommodation.

Sustainability and Energy

- 7.72 The proposals are inherently sustainable as they intensify use on an existing brownfield site.
- 7.73 Policy DP22 expects non-domestic developments of 500 m² of floorspace or above to achieve a "very good" BREAAM rating. The proposals currently aim to achieve BREEAM 'very good'. This is in line with the Camden sustainability guidance that sets this target for all developments Post-2013. The preassessment score of 77.24 has already been achieved due to UCL's sustainability aspirations and the focus of the design team.
- 7.74 Camden Planning Guidance CPG3 'Sustainability' provides an Energy Hierarchy against which the energy saving features of the proposal can be assessed: 'be lean', 'be clean' and 'be green'.

- 7.75 Firstly, there are measures in place which will ensure the building will use less energy (be lean). Passive and natural systems have been employed including: natural ventilation where possible; designs to improve daylighting; limiting of solar heat gain; high levels of thermal insulation; and reduction of air leakage. Moreover, the existing single glazing will be replaced by new double glazing.
- 7.76 Secondly, measures have been implemented to supply energy efficiently (be clean). It is proposed that the existing (recently installed) condensing natural gas boilers on the roof be utilised for heating and hot water for the newly refurbished and extended areas of the building. Additionally, there is a Low Temperature Hot Water pipework connection from the neighbouring Sainsbury Welcome CHP which will provide a proportion of the building's base-load heating and hot water with the boilers used to top-up.
- 7.77 Heat recovery ventilation systems are proposed to ensure energy is not wasted in the winter months and can be used to pre-heat supply air streams in active ventilation systems. Hours of operation of active ventilation systems shall be reduced through demand based controls. The fitting of efficient T5 and LED lighting will reduce demand for artificial lighting energy. Demand based controls, sensing occupancy or daylight will reduce hours of operation also.
- 7.78 Thirdly, the proposals intend to use renewable energy (be green) and opportunities to utilise renewable energy systems are currently under investigation. Design has focused on reducing building demands to reduce total CO2 emissions prior to the specification of renewable energy plant.
- 7.79 It is considered that the proposals conform to DP22 'Promoting sustainable design and construction' and CS13 'Tackling climate change through promoting higher environmental standards'.
- 7.80 For more detailed information regarding the sustainability of the development, please see the accompanying Energy and Sustainability Statement prepared by Parsons Brinckerhoff.

Noise

- 7.81 Planning Policy Guidance Note 24 requires planning decision-takers to take into account the acoustic environment via assessing schemes on whether a significantly adverse or adverse effect is likely to occur and whether a good standard of amenity can be achieved. Camden DP28 'Noise and Vibration' reiterates this advice, stating that development that exceeds Camden's Noise and Vibration thresholds will not be permitted.
- 7.82 The proposals involve the addition of some plant, specifically the installation of two extract fans on the 7th floor roof of the rear extension and plant associated with the A3 unit (café). It is planned that an acoustic screen will surround the extract fans and plant associated with the A3 unit (café).
- 7.83 The nearest noise sensitive window would therefore be located at the rear of the block at 7th floor level within Astor College, approximately 12m from the proposed plant location. Two further receptors locations were identified, the first to the North of the site at a distance of approximately 30m from the proposed plant location, and Cleveland Street Workhouse at approximately 15m.
- 7.84 An ambient noise survey was completed with noise limits for the proposed new plant set using Camden's criteria and guidance given in relevant British Standards. The Plant Noise Report set maximum sound power limits for the proposed extract fans in order to meet Camden's noise criteria at the nearest identified residential receptor.
- 7.85 Assuming the proposed limit, the predicted noise level from the extract fans does not exceed 5dB below minimum external background noise at the noise sensitive receptor. Therefore, subject to the satisfactory installation of the fans and according to BS4142, noise levels at the receptor show a positive indication that complaints are unlikely. Therefore noise from the plant conforms to DP28 'Noise and Vibration' of the Camden Development Policy Document. The extra care taken to ensure an acoustic

surround also ensures that the proposals meet expectations of policy CS5 'Managing the impact of growth and development' where managing noise ensures the protection of amenity.

Daylight/Sunlight

- 7.86 The Fitzrovia Area Action Plan, in which the site is identified as an opportunity site, also recognises that 'Astor College is likely to be upgraded and extended in the near future and a coordinated approach is encouraged'. It is in recognition of this acknowledgement that daylight and sunlight amenity has been considered, especially with regard to the Grade II Listed MHA to the rear. Adopting a coordinated approach, there is an agreement between UCLH (MHA) and UCL (Astor College) in which the two Sites respect a 7m divide between the proposed developments. This is considered by the two parties to be a considerable enough distance to limit any impact on daylight or sunlight amenity to future residents of either scheme. The windows of the rear extension overlooking the MHA site are to provide light into corridor and stairwell space, therefore direct impacts on future residential amenity is minimized.
- 7.87 Camden Policy DP26 'Managing the impact of development on occupiers and neighbours' states that "the Council will protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity". Specifically Part C states that the 'sunlight, daylight and artificial light levels' are factors that will be considered.
- 7.88 The proposals will cause negligible reductions of daylight and sunlight in accordance with BRE guidelines. Taking into account the urban location of the site, the redevelopment of Astor College will have a negligible impact on the proposed Middlesex Hospital Annex residential scheme. There are no other residential uses in the vicinity of the proposal that would be impacted by it. Therefore the proposal complies with planning policy.
- 7.89 For further detail, please refer to the Daylight and Sunlight Assessment accompanying this application.

Transport and Servicing

- 7.90 The site has an existing PTAL rating of 6b, which is equivalent to excellent accessibility. With good footway and cycle links and proximity to frequent bus, underground and rail services, the Site is ideally located to take advantage of sustainable travel opportunities.
- 7.91 The NPPF, in Paragraph 32 states that:

"all developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Plans and decisions should take account of whether:

- the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;
- safe and suitable access to the site can be achieved for all people; and
- improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe."

7.92 The NPPF continues:

"plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore, developments should be located and designed where practical to:

accommodate the efficient delivery of goods and supplies;

- give priority to pedestrian and cycle movements, and have access to high quality public transport facilities;
- create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones;
- incorporate facilities for charging plug-in and other ultra-low emission vehicles; and
- consider the needs of people with disabilities by all modes of transport".
- 7.93 Camden Core Strategy Policy DP16 'The Transport Implications of Development' states that the Council will seek development that is properly integrated with the transport network and is supported by adequate walking, cycling and public transport links. Policy DP17 'Walking, Cycling and Public Transport' states that the Council will promote walking, cycling and public transport use and developments should make suitable provision for pedestrians, cyclists and public transport.
- 7.94 The proposed development conforms with the NPPF and Camden Core Strategy due to its excellent location for access to sustainable modes of transport.
- 7.95 It further conforms to Policy DP18 'Parking Standards and Limiting the Availability of Car Parking' as it proposes a car free development.

Cycle Parking

Adopted London Plan

7.96 The adopted London Plan (2011) states in Policy 6.9 'Cycling' that developments should:

"A) provide secure, integrated and accessible cycle parking facilities in line with the minimum standards set out in Table 6.3"

7.97 However, Student accommodation does not fall into a use class categorised by Table 6.3.

Camden Policies

7.98 Camden Development Policy DP17 'Walking, cycling and public transport' states that:

"Development should make suitable provision for pedestrians, cyclists and public transport"

7.99 Part B of DP17 continues to state that provisions may include:

"Other features associated with pedestrian and cycling access to the development, where needed, for example seating for pedestrians, signage, high quality cycle parking, workplace showers and lockers"

- 7.100 Policy DP17 dictates that cycle parking should be of a high quality. The current bicycle parking arrangement along with the existing plinth, provide an extremely poor elevation to the pavement and are of considerably poor design quality. The reduction and relocation of the bicycle storage will allow for the front redevelopment of the Site to create a new façade with an active frontage.
- 7.101 The proposals for the new and relocated bicycle parking are for high quality, secure and covered parking. Showers and lockers will also be provided for staff and students.
- 7.102 Camden Development Policy DP18 'Parking standards and limiting the availability of car parking' sets out further parking standards, to which the development conforms as it is car-free. DP18 also states that

[&]quot;developments will also be expected to meet the Council's minimum standards for cycle parking set out in Appendix 2".

- 7.103 For the purpose of calculating cycle parking requirements, and despite the defined use class of 'sui generis' for the purpose of this application, Appendix 2 of the Camden Development Policies classifies student accommodation as use class C2 'residential institutions'. Cycle parking standards for residential institutions states that the number of spaces for staff from a threshold of 500 sqm is 1 space per 250 sqm or part thereof. The same calculations apply for visitor cycle parking. However, it continues to say that a "lower figure may be accepted where visitors are unlikely to use cycles due to age, disability or infirmity". For residents (education only), cycle parking spaces are calculated from a threshold of 500 sgm, with 1 space required per 250 sgm, or part thereof.
- 7.104 The development will provide 8185 sqm of student accommodation. Therefore Camden Policy DP18 requires the proposals to provide a total of 33 cycle spaces for staff, 33 for visitors and 33 for students giving an overall total requirement of 99 spaces.

Proposed FALP

- 7.105 The proposed FALP will provide standards for student accommodation (as with Camden Policy, taking student accommodation as use class C2). It states that 1 long stay space should be provided per 2 beds, and 1 short stay space per 40 beds.
- 7.106 This would give a cycle parking provision of 152 spaces.

Current Bicycle Parking Provision and Usage

- 7.107 The proposals include a total of 44 cycle parking spaces. This is less than that recommended in the policy, however it is considered that this is an appropriate quantity given the circumstances and evidence of current use outlined below.
- 7.108 A study of parking usage figures at a number of other UCL's halls of residence demonstrated that cycle parking provision is under-used, especially at those Halls within easy walking distance of the Bloomsbury Campus. The results followed: of the 175 spaces provided at the 350 bed New Hall facility only 18 were used, a usage figure of only 10%; at John Dodgson House which has 209 beds, only 8 of the 50 cycle spaces were in use giving a usage figure of 16%; at Pancras Way, a 500 bed facility, 13 of the 50 cycle spaces provided were used, 26% of the total capacity; and, of the 32 spaces provided at Ramsay Hall, which provides 502 beds, only 17 of the spaces provided were in use, giving a cycle parking stress level of only 53%.
- 7.109 There are currently 90 spaces provided at Astor College. The table below comprises a survey of bicycle rack usage during term time of the current academic year at Astor College specifically.

	Date	27- 10-14	28- 10-14	29- 10-14	30- 10-14	31- 10-14	03- 11-14	04- 11-14	05- 11-14	06- 11-14	07- 11-14
No of Bicycles	AM	9	8	8	8	7	8	8	9	7	8
%		10%	9%	9%	9%	8%	9%	9%	10%	8%	9%
No. of Bicycles			7	5	5	8	8	6	7	5	5
%		7%	8%	6%	6%	9%	9%	7%	8%	6%	6%

Table 5: Bicycle Rack Usage

- 7.110 The survey demonstrates that demand for cycle parking usage at Astor College is considerably less than provision with a maximum capacity of 10% and a 10 day average capacity of 9% in the morning and 7% in the evening.
- 7.111 Therefore the 90 cycle parking spaces exceed the demand significantly. Of the Halls analysed, this gap between demand and need is most significant at Astor College.

7.112 The proposals will reduce cycle parking provision to 44 spaces, which is considered more appropriate given this clear underuse of current provision.

LBC Feedback

7.113 Minutes from the workshop held on 23rd July 2014 supplied by LBC state that the proposals should 'strike a balance between the policy requirements and the need/availability of space'. As such, it is deemed that 44 cycle spaces is acceptable for this development and would more than accommodate the existing and any future cycle parking requirements.

Justifications for reduced provision

- 7.114 The site is located approximately 500m, a short six minute walk from the main UCL campus. Therefore given its central location and distance from other UCL buildings; the need for a bike is severely negated.
- 7.115 The existing provision of 90 cycle spaces is less than that required of new developments of Astor College's size, type and scale by Camden Development Policy DP18 which states that a minimum of 99 spaces would be required. This figure is even less than the 152 that would be required once the FALP is adopted.
- 7.116 However, the current provision of 90 cycle spaces is extremely underused, as demonstrated by the cycle parking usage survey carried out at Astor College during the current academic year where actual demand is less than 1/10th of provision. Thus in this circumstance, the figures demanded by policy could be considered excessive where need has been evidenced to be low.
- 7.117 Furthermore, to provide a more realistic idea of existing demand and provision, a ratio has been calculated between used cycle parking spaces to existing beds at Astor College. This ratio gives a requirement of 0.04 cycle spaces per student bed. Based on this, 12 spaces would be a realistic level of provision at Astor College.
- 7.118 Transport for London (TfL), in its draft 'London Cycling Design Standards' document takes a more pragmatic approach where:

"the right amount of cycle parking for a site or area would be at a level that:

- Meets existing baseline demand
- Meets the potential demand generated by the existing and proposed land uses in the area
- Ensures there is allowance for spare capacity (ideally at least 20%)".
- 7.119 The proposals adopt this pragmatic approach and will re-provide a standard of cycle parking that not only meets, but exceeds existing baseline demand, meets and exceeds the potential demand generated by the development taking into account the current ratio of use, and ensures there is significant spare capacity of more than 20%.
- 7.120 Therefore the reprovision of 44 cycle parking spaces to the rear of the site, which will be accessible from both Astor College and Bedford Passage, is considered to acceptable in the specific circumstance of Astor College and its refurbishment and extension.

Servicing

7.121 All servicing, including refuse collection, will be undertaken from Charlotte Street in line with existing practice. It is not anticipated that the number of deliveries will change due to the proposals. Further information can be found in the Transport Statement.

8 Planning Obligations

8.1 UCL proposes to enter into a Section 106 legal agreement with LB Camden.

Section 106 Guidance

- 8.2 All development specific planning obligations are required to meet the legal tests, set out in the Community Infrastructure Levy (Amendment) Regulations 2010 (as amended by the Community Infrastructure Levy (Amendment) Regulations 2014) which require planning obligations to be:
 - Necessary to make the development acceptable in planning terms;
 - Directly related to the development; and
 - Fairly and reasonably related in scale and kind to the development.
- 8.3 Camden Planning Guidance 8: Planning Obligations (CPG 8) was adopted in September 2011 and sets out the Council's priorities for planning obligations. It provides guidance for planning obligations, which have been used to inform the Draft S106 Heads of Terms set out below.
- 8.4 LB Camden submitted its Community Infrastructure Levy (CIL) for examination on 28 August 2014, with the public hearing taking place on the 11th November 2014 and the examination concluding on the 16th December 2014. The examiner recommended that the proposed charging schedule be adopted in its published form without changes. It is planned for adoption in March 2015.

Planning Obligations

- 8.5 The following planning obligations are anticipated to be included in the Section 106 Agreement:
 - Student management plan;
 - Student housing tied to UCL;
 - Local procurement plan for Camden businesses to tender for supply of goods and services during the construction phase;
 - Local employment plan for construction phase;
 - Sustainability Plan;
 - Energy efficiency plan;
 - Car-free (student) housing;
 - Travel Plan;
 - Servicing Management Plan;
 - Construction and/or Demolition Management Plan;
 - Highways and Street-works financial contribution;
 - Public Realm Improvements financial contribution;
 - Parks and Open Space Contribution this will be offset by the provision of Bedford Passage; and,
 - Community Facilities Contribution.

Monitoring

8.6 UCL understands that a charge will be made for monitoring the completed legal agreement. This charge will depend on the number of clauses included in the legal agreement.

Legal costs

8.7 UCL will meet the Council's reasonable legal costs incurred preparing and completing the legal agreement.

Mayoral Community Infrastructure Levy

The proposed development will deliver an uplift in floorspace of 1,853 sq m which will be liable for Mayoral CIL but subject to relief where applicable. UCL will deliver the scheme and obtain relief as a charitable institution.

9 Conclusions

9.1 UCL is seeking planning permission for the:

"Refurbishment of Astor College comprising front and rear extensions for student accommodation (Sui Generis), elevational alterations, relocation of main access, provision of ground floor café (Class A3) and associated works."

- 9.2 The proposals will deliver a number of significant benefits which are relevant to the determination of this planning application including:
 - The proposals represent the continuing investment by UCL into its Bloomsbury Campus and wider estate, ensuring that it meets its targets to provide flexible and adaptable accommodation, provide an enhanced user experience for students, staff and public, and respond to future changes in the student demographic. Continuing this investment will ensure that UCL maintains its competitive edge as a world-class university and remains a key socio-economic contributor to the London Borough of Camden.
 - A further 60 rooms will be provided, representing a 25% increase of provision currently offered. This will help meet the anticipated increase in demand resulting from the changing student demographics.
 - Furthermore, 8.3% of the total bedrooms will also be made suitable for or adaptable to suit, wheelchair users.
 - To adapt to the changing demands of the student demographic, where possible en-suites are to be introduced to existing bedrooms.
 - The traditional block layout in the local area will be reinforced by creating a single storey extension to the front of the building.
 - There will be significant improvement of the current buildings relationship with the public realm through the provision of an A3 unit (café) accessed from Charlotte Street and increased permeability of the area through the reintroduction of the Bedford Passage adjacent to the site.
 - The building will be aesthetically enhanced through over-cladding, updating the design of the building to an aesthetic more modern and respectful of its location at the heart of Fitzrovia.
 - Energy performance will be improved with the provision of a number of energy efficiency and reduction measures. Moreover, following UCL aspirations and Sustainability Strategy, BREEAM 'very good' rating to be targeted.
 - A new entrance will be created that will be highly legible and welcoming.
 - The courtyard to the rear will be greatly improved to provide a more suitable external amenity space and improve the outlook of overlooking accommodation.
- 9.3 For the reasons set out in this planning statement, we consider that planning permission should be granted.

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