

paultcarter planning

Planning Statement

**Demolition of existing building and
redevelopment of the site with 15
residential apartments**

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

Opticrealm Limited

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Introduction

1. Planning permission is sought for the redevelopment of the site with the demolition of the existing building and redevelopment of the site with a new building housing a total of fifteen residential apartments, together with garden buildings and structures to the rear.
2. A schedule of the application drawings and documents is set out in Appendix 1.
3. This statement is arranged in the following sections: A description of the site and surroundings; an outline of the proposed development; a record of the planning history of the site; the National Planning Policy Framework; identification of the relevant development plan components and other material considerations; an account of pre-application advice received from the local planning authority; the identification and assessment of key determining issues; a note of matters that may be covered in a Planning Obligation; and conclusions.

The Site and Location

4. 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.
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 external appearance of the building has been much altered in accordance with planning permission (reference No. 6916) granted in September 1956. This provided for the extensive remodelling of the external appearance of the building; including the removal of bay features and raised entrances on the front elevation; the removal of architectural decorative features; the replacement windows throughout with the installation of metal casement windows; and the construction of dormer features in the roof.
8. 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.
9. The site is located within a predominantly residential area within the Belsize Park Conservation Area.

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 (see Design and Access Statement).
11. To the east 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 and they retain most of their original architectural features and ornamentation, including; three storey canted bays; entrance porticos and steps; sash windows; bracketed eaves cornice; decorative window surrounds; and rusticated quoins. External materials include brick, render, stucco in walls and slate on roofs.
12. Like 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 east 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 with: Gabrielle Court (Nos.1-3 Lancaster Grove) adjoining the site to the west 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. Although the height and building line of the property generally respect those of the neighbouring buildings, the bland front façade is at odds with the appearance of both Nos. 9 - 35 and Nos. 2-10 on the opposite side of the road.
16. 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 (this is acknowledged in the Belsize Conservation Area Appraisal – see Heritage Statement – by the inclusion of this street in an area of separate character to Lancaster Grove).
17. To the rear the site shares a boundary with the gardens of residential dwellings in Nos. 4, 5 and 6 Belsize Park.
18. 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”.

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. On street trees contribute to the character of the area.
21. 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

22. A schedule of the application documentation – drawings and statements/reports is set out at Appendix 1.
23. The comprehensive redevelopment of the site is proposed with a new high quality building providing for the continued residential use of the site in an architect designed modern high spec building, incorporating sustainable design, and preserving the character and appearance of the Belsize Conservation Area.
24. Planning permission is sought for the demolition of the exiting building and the redevelopment of the site with the erection of a building in a building with accommodation on six floors – basement, lower ground, upper ground, first and second floors together with the roof space – providing a total of fifteen residential dwellings.
25. 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; one unit complies with the Council's wheelchair housing specification – further details are set out below under the discussion of residential planning policy.
26. The design philosophy and parameters of the scheme are set out in the Design and Access Statement, and the Heritage Statement and discussed below in the assessment of urban design. In short the scheme provides for a contemporary interpretation of the characteristic building form and design in the vicinity of the site.
27. The development respects the established building line to Lancaster Grove; the scale, height, form and massing of the building respect the cues presented by neighbouring development; the footprint is similar to the existing but utilises the opportunities provided by redevelopment to incorporate partial projections at the rear at basement level and then again at ground level to align with the rear wall of the adjoining Gabrielle Court.
28. The scheme is car-free. Secure covered storage space for bicycles is provided for

24 bicycles.

29. The development incorporates high quality landscaping of the site; the details are set out in the Landscape Statement.

Planning History

30. The council's planning records reveal there have been 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 Grove by the erection of a four storey block of flats and four garages and the formation of a new | Granted | 01/11/1954 |

| | | | | |
|-------------|------------|---|--|------------|
| | | 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 |
| 2014/7416/P | Nos. 5 & 7 | Change of use and conversion from student accommodation to provide 8 flats (Class C3), including replacement windows, installation of doors on front and side elevations, and installation of photovoltaic panels at roof level | Council resolved to grant planning permission subject to Section 106 Agreement | 12/03/2015 |

National Planning Policy Framework

31. 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.
32. 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.
33. Both the Camden Core Strategy Development Plan Document and the Camden Development Policies Development Plan Document were adopted in November 2010, well before the publication of the National Planning Policy Framework in March 2012.

Principle of Sustainable Development

34. The NPPF refers to sustainable development as the golden thread running through both plan making and decision taking.
35. 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)
36. 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, minimise waste and mitigate and adapt to climate change.
37. 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: replacing poor quality design with better design; and widening the choice of high quality homes. (NPPF, paragraph 9)

38. The Framework identifies 12 core-planning principles that should underpin plan making and decision taking (NPPF, paragraph 17). These include: being creative in finding ways to enhance and improve the places in which people live; 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 high quality design and 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

39. The law - Section 70(2) of the Town and Country Planning Act 1971 and Section 36(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

40. The relevant components of the adopted development plan in this case are:
- The London Plan, March 2015
 - 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

41. The site is located in the Belsize Conservation Area. The site is shown without notation on the Camden Policies Map 2014.
42. The site is not located in any approved or proposed Neighbourhood Area (Neighbourhood Planning (General) Regulations 2012).
43. The buildings are not listed as buildings of special architectural or historic interest,

nor are they locally listed or otherwise identified as a heritage asset.

Other material considerations

44. 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
 - CPG4 Basements and lightwells, September 2013
 - CPG6 Amenity, September 2011
 - CPG7 Transport, September 2011
 - CPG8 Planning Obligations, September 2011
45. 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), The Control of Dust and Emissions During Construction and Demolition (July 2014), Shaping Neighbourhoods: Character and Context (June 2014) and Wheelchair Accessible Housing (September 2007)

Emerging planning policy

46. Camden Council is consulting on a Draft Local Plan. The consultation period runs to 17th April 2015. The Council will consider the responses and plans to consult again on an updated draft Local Plan late in April 2015 before proceeding with the submission of a Draft Local Plan to the Secretary of State. At this early stage in the preparation of this Local Plan little or no weight can be afforded to its' policies as a material consideration in the determination of this planning application.
47. Reference to development plan policies and other material considerations are set out under the topics examined in the Assessment section below.

Pre-application advice

48. There have been three rounds of pre-application meetings: 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. Copies of the advice issued by the Council following each of these meetings are provided at Appendices 2, 3 and 4 to this

statement. The key points made by Officers were:

- 1) Having first stated that the property does not make a positive contribution to character or appearance of the Belsize Conservation Area, Officers subsequently expressed the view that some aspects of the building contribute positively to the Conservation Area, but unsympathetic post-war alterations have a neutral affect on the Conservation Area;
- 2) Officers agreed that the demolition of the existing building would not be so significant as to cause substantial harm to the character and appearance of the Conservation Areas as set out in NPPF paragraphs 133 and 134;
- 3) Any development to replace the existing building should be designed to enhance the conservation area;
- 4) A very high quality of design will be required;
- 5) There is no objection in principle to contemporary design;
- 6) A replacement building needs to be sensitive to and respond well to the prevalent form of townscape and strictly adhere to the existing building line facing the street. The ridge height of the roof could mediate between the existing properties but not exceed the height of No 9 Lancaster Grove;
- 7) The general bulk and massing proposals are acceptable;
- 8) Officers would like the design to include a raised parapet/chimney feature to complement the local characteristic roof feature;
- 9) High level windows in the side elevations are acceptable in principle;
- 10) There is no objection to the incorporation of basements subject to compliance with Camden Planning Guidance 4;
- 11) Subject to justification for the loss of student accommodation development for permanent Class C3 housing is preferred;
- 12) A good mix of dwelling sizes should be provided;
- 13) All dwellings units and room sizes should meet development plan standards;
- 14) All dwellings should comply with the Lifetime Homes standards and 10% of the total should be wheelchair accessible;
- 15) The development should be designed to achieve Code for Sustainable Homes level 4 with the inclusion of 20% renewable energy on site;
- 16) Redevelopment of the site with 10 or more dwellings will trigger the need for

some affordable housing provision;

- 17) The development should be car-free;
- 18) Secure, covered cycle parking is required;
- 19) A Section 106 obligation will be required to cover the following issues: affordable housing, construction management plan; car-free; highway reinstatement and removal of crossover; sustainability and energy plans; education contribution and open space contribution;
- 20) The development will be liable for the Mayoral CIL¹;
- 21) The front boundary treatment should look to the prevalent local approach: low walls with hedge/greenery behind;
- 22) The Council encourages developers to engage with local residents, groups and conservation interests before making a planning application.

Community Engagement

49. The Localism Act 2011 proposes the introduction of a new requirement that developers should consult with local communities before submitting planning applications for certain developments.
50. The National Planning Policy Framework encourages developers to engage with the local community and others (NPPF, paras. 189 & 190).
51. The Camden Statement of Community Involvement (July 2011) also encourages pre application consultation with the local community.
52. The Report on Community Engagement (GKA Planning Communications) records:
 - 1) The activities that have been undertaken in seeking to engage with local ward councillors, neighbouring residents, the Belsize Residents Association, the Belsize and Conservation Area Advisory Committee;
 - 2) The feedback that has been received; and
 - 3) The responses that have been made to the issues that have been raised
53. Other issues may be raised as a result of the advertising and consultation the local planning authority will undertake on the planning application, and where appropriate the applicant will comment on these matters.

¹ The applicant notes that the introduction of the Camden CIL from 1st April 2015

Assessment

54. 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

Is the demolition of the existing building acceptable?

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

Urban Design

Is the character of the development and the scale and design of the building acceptable?

Daylight/Sunlight/Shadowing

Does the development provide for the maintenance of satisfactory natural light provision to neighbouring residential dwellings, and the provision of satisfactory natural light to the proposed dwellings?

Residential Policy

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

Landscape

Does the scheme make suitable provision for landscaping?

Biodiversity

Does the scheme incorporate adequate measures to enhance local biodiversity?

Basement and lightwells

Do the proposals comply with policy DP25 and CPG 4?

Sustainability

Does the scheme satisfy sustainability requirements - the Code for Sustainable Homes, energy and water 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?

Privacy

Does the scheme provide for adequate spatial separation to ensure residential privacy is satisfactory?

Land Use

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

55. In resolving, subject to a Section 106 Agreement, to grant planning permission to application 2014/7416/P (Change of use and conversion from student accommodation to provide 8 flats (Class C3 ...)) the Council has acknowledged that the case has been made for the loss of the student accommodation and its replacement with permanent housing in Use Class C3. That decision was made on the 12th March 2015 and the Council and the applicant are now working on the completion of the Section 106 Agreement. However, pending the completion of that Agreement the case for the loss of the student accommodation and replacement with permanent housing in Use Class C3 is restated below.
56. 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
- Adequate replacement accommodation is provided in a location accessible to the higher education institutions that it serves; or
 - 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.

57. The terms of Policy H9 – Student Housing – of the Draft Local Plan 2015, in so far as it refers to the loss of student accommodation, are not materially different to Policy DP9
58. The site is shown without notation on the Development Plan Proposals Map.
59. 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.

60. 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.
61. 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).
62. 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.
63. 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.
64. The Camden Core Strategy was drawn up under the London Plan 2008. Subsequent versions of the London Plan have noted the need for additional housing throughout London and have increased the housing requirements and targets. The London Plan 2015 calls 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. Policy H1- Maximising housing supply, of the draft Camden Local Plan 2015, commits the Council to seek to exceed the target for additional homes and to regard self-contained housing as the priority land-use of the Local Plan.
65. 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.

66. The Council's pre application advice explains that where a development involving the loss of student housing is justified under the tests set out at sub-paragraphs k) and l) of Policy DP9 the Council will expect the development to provide for permanent housing in Use Class C3 – Policy DP9 refer to an expectation that the development will provide an equivalent amount of Class C3 residential floorspace.
67. In this case 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 doubles providing post-graduate accommodation.
68. 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.
69. UCL identified the site as being surplus to its student housing requirements and ceased its use as student accommodation in January 2014.
70. The UCL Note: Student Accommodation Strategy, set out at Appendix 5, explains the background to the UCL decision 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; and
- 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).
71. 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 |

72. 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.
73. 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; and
 - 6) The development makes efficient full use of previously developed land.

Heritage

Is the demolition of the existing building acceptable?

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

74. 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.
75. 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. (NPPF, para. 128)

76. 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 assets conservation and any aspect of the proposal. (NPPF, para. 129)
77. 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)
78. 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)
79. Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of a number of specified criteria are satisfied. (NPPF, para. 133)
80. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. (NPPF, para. 134)
81. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset. (NPPF, para. 135)
82. Local planning authorities should not permit loss of the whole or part of a heritage asset without taking reasonable steps to ensure the new development will proceed after the loss has occurred. (NPPF, para. 136)

83. Local planning authorities should look for opportunities for new development within conservation Areas to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably. (NPPF, para. 137)
84. Not all of the elements of a Conservation Area will necessarily contribute to its significance. Loss of a building which makes a positive contribution to significance should be treated as either substantial harm or less than substantial harm, as appropriate, taking into account the relative significance of the element affected and its contribution to the Conservation Area. (NPPF, para. 138)
85. Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact. (NPPF, para. 142)
86. 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.
87. Policy CS14 provides that the Council will preserve and enhance Camden’s rich and divers heritage assets and their settings, including conservation areas.
88. Policy DP25 provides that in order to maintain the character of Camden’s conservation areas, the Council will:
 - a. Take account of conservation area statement, 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;
 - c. Prevent the total or substantial demolition of an unlisted building that makes a positive contribution to the character of appearance of the conservation area where this harms the character or appearance of the conservation area, unless exceptional circumstances are shown that outweigh the case for retention;
 - d. Not permit development outside of a conservation area that causes harm to the character and appearance of that conservation area; and
 - e. preserve trees and garden spaces which contribute to the character of a conservation area and which provide a setting for Camden’s architectural heritage.

89. Policy D2 of the Draft Local Plan 2015 covers heritage matters. It requires development within conservation areas to preserve or enhance the character or appearance of the area and resists the demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area, unless circumstances are shown that outweigh the case for retention.
90. Section 3 of Camden Planning Guidance 1 - Design sets out how the Council will apply policies CS14 and DP25. It will only permit development within conservation areas that preserve and enhance the character or appearance of the area. The Council will take into account conservation area statements, appraisal and management plans when assessing planning applications.
91. 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.
92. The Belsize Conservation Area Statement includes the following information:
- A description and assessment of the area's special character;
 - A comprehensive study of street furniture, paving materials and fixtures;
 - 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 list of listed buildings; and
 - A management strategy providing a clear and structured approach to development and alterations which impact on the Belsize conservation area
93. 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.
94. The Council's initial pre-application advice (issued following meeting 13th August 2013) records that the property does not make a positive contribution to the Conservation Area and there is no objection in principle to its removal, subject to an adequate replacement.
95. The Heritage Statement (Turley Heritage) makes the following points:
- 1) The designated heritage asset to be assessed in this case is the Belsize Conservation Area.
 - 2) The application site lies within Sub-Area One; Belsize Park, as identified in

the local planning authority's Conservation Area Statement, published in 2003

- 3) 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.
- 4) 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".
- 5) 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.
- 6) 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.
- 7) Such contribution is derived from external appearance and use (character) rather than any interior/internal characteristics
- 8) A series of planning applications were approved in the late 1940s/early 1950s for the demolition of No. 5 where it was variously stated as a "derelict dwelling house" that was "subject to a demolition order". Drawings from the period indicate that the building retained the original front window bays, decorative finishes and details, entrance porticos and steps.
- 9) The significance of the designated heritage asset that comprises the Belsize Park Conservation Area relates to its character and appearance deriving from mid to late C19th development of the area with classically inspired villas of Italianate design.
- 10) Nos.5-7 Lancaster Grove, whilst originally part of the later C19th development of paired villas, has been significantly altered externally, stripping the building of its original Italianate architectural character. Today it is of simple utilitarian appearance at odds with the prevailing architectural character and appearance of the conservation area.
- 11) When assessed against English Heritage's checklist (Understanding Place: Conservation Area Designation, Appraisal and Management, English Heritage 2011, Table 2 Checklist), the building does not make a positive

contribution to the significance of the conservation area. This fact is endorsed by the local planning authority's Conservation Area Statement.

- 12) This document dates from April 2003 and was prepared in the context of PPG15 Planning and the historic environment and guidance regarding the identification of buildings that may contribute to a conservation area. Review of the relative contribution of nos.5-7 Lancaster Grove in light of the more recent English Heritage guidance and present policy context does not suggest that the CAS was deficient in its approach or conclusions.
- 13) In light of heritage legislation and national policy and guidance, demolition of the building will not harm the significance of the designated heritage asset.
- 14) The tests set out in the National Planning Policy framework are satisfied. Paragraph 138 notes, as in this case, not all elements of a conservation area will contribute to its significance. The building is not important or integral to the character or appearance of the area and as such its demotion will not cause harm to that significance. Demolition of the building, subject to a suitable replacement, will preserve the character and appearance of the conservation area and meet the objective of the duty in the 1990 Act.
- 15) The opportunity exists for a replacement building which can preserve or enhance the character or appearance of the conservation area, or in Framework terms potentially to enhance or better reveal significance.
- 16) The design of the new building takes account of the contextual characteristics of the layout and appearance of built form in the conservation area whilst allowing for a contemporary interpretation of the traditional paired-villa typology.
- 17) The proposal 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.

Urban Design

Is the character of the development and the scale and design of the building acceptable?

96. Scale is considered here in townscape terms. Other possible impacts of scale in terms of amenity e.g. daylight and sunlight are considered under other topic headings below.
97. Seeking to ensure high quality design is one of 12 core planning principles identified in the NPPF. It advises that good design is a key aspect of sustainable development and indivisible from good planning and that planning decisions

should aim to ensure that development responds to local character while not preventing or discouraging appropriate innovation and is visually attractive as a result of good architecture (NPPF, paragraphs 17 and 58).

98. London Plan Policies 3.5 (Quality and design of housing developments); 7.1 (Lifetime neighbourhoods); 7.4 (Local character); and 7.6 (Architecture) express the same objectives in requiring high quality design, responding to local character and delivering high quality architecture.
99. Camden Plan Policies CS1 (Distribution of growth); CS14 (Promoting high quality places and conserving our heritage); and DP24 (Securing high quality design) require development of the highest standard of design that respects local context and character. Detailed guidance on the delivery of good design is set out in CPG1 – Design.
100. Policy D1 Design, of the Draft Local Plan 2015 contains no material alteration to these design policies of the adopted development plan.
101. The Council’s pre-application advice indicates that the overall scale and design of development are considered acceptable.
102. Policy DP24 (Securing high quality design) sets out matters to be considered in the delivery of good design. Comments on how the proposals respond to a number of these matters are set out below:

- 1) **Character, setting, context and the form and scale of neighbouring buildings:**

The existing building does not make a positive contribution to the character or appearance of the Belsize Conservation Area;

The development respects the predominantly residential character of the area;

The design rationale for the development is set out in the Design and Access Statement – “to create a new villa block that while true to its time, echoes and complements the adjoining mid-19th century villa blocks”;

The high quality contemporary design respects the important contextual characteristics that contribute to the character and appearance of the Belsize Conservation Area;

The pre-application advice confirms that the siting together with the overall scale and form of the building is acceptable; and;

The development will enhance the character and appearance of the Belsize Conservation Area.

2) **Quality of the materials to be used:**

The selection of materials is discussed in the Design and Access Statement. High quality materials will be used throughout.

3) **Visually interesting frontages at street level:**

The proposal incorporates entrance steps to a framed porch echoing a characteristic feature of original buildings in the local area.

4) **The appropriate location for building services equipment:**

Renewable energy will be provided through photovoltaic panels and an air source heat-pump. The PV panels are mounted flat on the dormer windows so they will not be visible from the street or other ground level - see jpa drawing Nos. 1409_1500 and 2002.

5) **Existing natural features such as trees:**

A survey of trees on the site has been undertaken by CBA Trees in accordance with BS5837:2012 – “Trees in relations to design, demolition and construction – Recommendations”. Most of the existing trees are self-seeded sycamores. The Tree Survey Report (CBA Trees) records no tree within the site higher than Category C (Trees of low quality with an estimated remaining life expectancy of at least 10 years, or young trees with a stem diameter below 150mm). The landscaping proposals provide for comprehensive planting of the site including many new trees and the retention of some existing trees on the boundary of the site.

6) **The provision of appropriate hard and soft landscaping including boundary treatments:**

The development includes a comprehensive high quality landscaping scheme – planting and paving and boundary treatment – see landscaping and ecology statement and Studio Engleback drawings Nos. 358/P/1000 Rev A; 1001, 1002 Rev A and 1003 Rev A

7) **The provision of appropriate amenity space:**

All of the residents of the development will benefit from excellent amenity space provision (further details are provided below under the heading “open space”. Nine of the units are provided with private amenity space in the form of terraces/balconies or sunken gardens. All of the units will enjoy access to the communal garden.

8) **Accessibility:**

The property is situated in a very accessible location with a PTAL of 6. Level access is provided to the full wheelchair accessible residential unit at ground floor level within the scheme together with a ramped access to the rear garden.

Daylight/Sunlight/Shadowing

Does the development provide for the maintenance of satisfactory natural light provision to neighbouring residential dwellings, and the provision of satisfactory natural light to the proposed dwellings?

103. Camden Plan Policy DP26 (Managing the impact of development on occupiers and neighbours) includes four light factors – daylight, sunlight, overshadowing and artificial light – among the criteria to be examined in protecting the quality of life of occupiers and neighbours.
104. No material change is proposed in the manner in which Policy A1 – Mitigating the impact of development – of the draft Camden Local Plan 2015, refers to the same light issues.
105. Camden CPG1 (Design) advises that consideration should be given to avoiding significant overshadowing of open space and amenity areas.
106. Camden CPG2 (Housing) advises that design should maximise sunlight and daylight both within the new development and to neighbouring properties. Developments should meet site layout requirements set out in the Building Research Establishment (BRE) Site Layout for Daylight and Sunlight – A Guide to Good Practice (1991). Minimum requirements are prescribed for natural lighting these include each dwelling in a development being required to have at least one habitable room with a window facing within 30° of south, but clearly this is not practicable in a scheme such as this where the aspect is largely dictated by the existing townscape. This fact is acknowledged by the Council as another section on sunlight and design in CPG6 (Amenity) requires new development to provide at least one window to habitable space facing with 90° south, where practicable. This CPG requires a daylight and sunlight report to accompany a planning application where development has the potential to reduce daylight and sunlight on existing and future occupiers, near to and within the site.
107. The Daylight, Sunlight and Shadowing Report prepared by Syntegra Consulting in accordance with Building Research Establishment (BRE) Guide to Good Practice – Site Layout Planning for Daylight and Sunlight 2011 – demonstrates:
 - 1) Daylight: The BRE Criteria are met. None of the adjoining buildings (at 1-3 Gabrielle Court and 9-11 Lancaster Grove will be adversely affected by the proposed development;
 - 2) Sunlight: The BRE Criteria are met. None of the adjoining buildings (at 1-3

Gabrielle Court and 9-11 Lancaster Grove will be adversely affected by the proposed development; and

- 3) Overshadowing: The BRE Criteria are met. None of the existing amenity areas/gardens/open spaces at the rear of 1-3 Gabrielle Court and 9-11 Lancaster Grove will be adversely affected by the proposed development.

Residential Policy

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

- 108. 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 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.
- 109. The housing policies of the Draft Camden Local Plan 2015 do not present any material change in the consideration of residential planning policy in the consideration of this proposal.

Dwelling mix

- 110. The scheme provides for a mix of dwelling sizes in accordance with Camden Plan policy DP5. Following the pre-application advice received from the Council the dwelling size mix has been amended. The mix and design occupancy of the scheme are:

| | |
|------------------------------------|------------------------|
| 1 No. one-bed wheelchair apartment | 2 persons per dwelling |
| 6 No. one-bed apartments | 2 persons per dwelling |
| 1 No. two-bed apartment | 3 persons per dwelling |
| 4 No. two-bed apartments | 4 persons per dwelling |
| 3 No. three-bed apartments | 5 persons per dwelling |

Dwelling sizes

- 111. 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 in Camden CPG2 Housing.

| Apartment size | Maximum design occupancy | Minimum floorspace requirement m ² | Minimum design floorspace m ² |
|----------------|--------------------------|---|--|
| | | | |

| | | | |
|---------------|---|----|------|
| One Bedroom | 2 | 48 | 50 |
| Two Bedroom | 3 | 61 | 62.5 |
| Two Bedroom | 4 | 75 | 70 |
| Three Bedroom | 5 | 84 | 103 |

Lifetime Homes

112. In accordance with Policy DP6 all of the dwellings meet the Lifetime Homes standards, and one unit meets the wheelchair housing standards.

Affordable Housing

113. The NPPF explains that pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. To ensure viability, the costs of any requirements to be applied to a development such as requirements for affordable housing should when taking account of the normal costs of development and mitigation, provide competitive returns to a willing land owner and a willing developer to enable the development to be delivered. (NPPF, paragraph 173).
114. The importance of ensuring development is viable is set out in the online National Planning Policy Guidance: "... Where an applicant is able to demonstrate to the satisfaction of the local planning authority that the planning obligation would cause the development to be unviable, the local planning authority should be flexible in seeking planning obligations. This is particularly relevant for affordable housing contributions, which are often the largest single item sought on housing developments. These contributions should not be sought without regard to individual scheme viability".
115. National Planning Policy Guidance also refers to the "Vacant Building Credit". Where a vacant building is brought back into lawful use, or is demolished to be replaced by a new building, the developer should be offered a financial credit equivalent to the existing gross floorspace of relevant vacant buildings when the local planning authority calculates any affordable housing contribution that will be sought.
116. The importance of development viability in the delivery of affordable housing is recognised in development plan policies: London Plan policy 3.12; Camden policies CS6 and DP3 and Camden CPG2.

117. The Viability Assessment undertaken by Douglas Birt Consulting shows that a contribution of circa £100,000 can be made towards the provision of affordable housing elsewhere in the Borough. This can be achieved through a Planning Obligation.

Landscape

Does the scheme make suitable provision for landscaping?

118. Under Section 197 of the Town and Country Planning Act 1990, local planning authorities have a statutory duty to consider the protection and planting of trees when granting planning permission for development.
119. The National Planning Policy Framework makes it clear that to achieve good design planning policies and decisions should aim to ensure that developments are visually attractive as a result of good architecture and appropriate landscaping (NPPF, para.56)
120. The role of landscaping in tackling climate change through urban greening is acknowledged in London Plan Policy 5.10: Urban Greening that requires development proposals to integrate green infrastructure – including green walls and soft landscaping – from the beginning of the development process.
121. The importance of landscaping, including green walls, in maintaining the local climate, reducing storm water run-off, increasing biodiversity and providing enjoyment is identified in the requirements set out in Camden Local Plan policies DP22: Promoting sustainable design and construction and DP24: Securing high quality design and referred to in CPG1: Design and CPG3: Sustainability
122. The Draft Camden Local Plan 2015 does not include any material change in the application of these matters in the consideration of this proposal.
123. The landscape scheme (Studio Engleback) provides for a high quality comprehensive approach to the landscaping (soft and hard landscaping and boundary treatment) of both the private and communal spaces with planting on balconies terraces, and sunken gardens, green walls and landscaping and planting to the front and rear of the site, together with the provision of garden structures/buildings – pergolas, veranda and stores –incorporating some green roofs at the rear.

Biodiversity

Does the scheme incorporate adequate measures to enhance local biodiversity?

124. The NPPF advises local planning authorities that they should encourage opportunities to incorporate biodiversity in development (NPPF, paragraph 118).
125. London Plan Policies 5.10 (Urban greening); 5.11 (Green roofs and development

site environs); and 7.19 (Biodiversity and access to nature); and Camden Plan Policies CS15 (Protecting and improving our parks and open spaces and encouraging biodiversity), include an expectation that development will incorporate new or enhanced habitat where possible; including through bio diverse green or brown roofs and new street trees. Further reference to green and brown roofs is set out in Camden Policy DP22 (Promoting sustainable design and construction) and CPG3 (Sustainability).

126. The Draft Camden Local Plan 2015 does not include any material change in the application of these matters in the consideration of this proposal.
127. The ecology section of the Landscape and Ecology statement incorporates a Phase 1 habitat survey. Much of the site is covered by the existing building and surfaced areas. No evidence of any protected fauna or flora was recorded on the site. No evidence was found that bats use the existing building. Given the presence of the rear garden that may support nesting birds, the vegetated sections of the site are considered to be of "low local" value for nature conservation.
128. The high quality landscaping proposal, with extensive varied new planting, together with the provision of bird boxes, artificial roost box for bats, lacewing and ladybird box, "bug hotel", log piles, green roofs and walls, will enhance biodiversity on the site.

Basements and Lightwells

129. Development Policies DPD Policy DP27 – Basements and Lightwells - requires an assessment of the scheme's impact on drainage, flooding, groundwater conditions and structural stability where appropriate. The Council will consider whether the proposal will harm the amenity of neighbours, lead to the loss of open space or trees of townscape or amenity value, provide satisfactory landscaping, harm the appearance or setting of the property or the established character of the surrounding area, and protect important archaeological remains.
130. The draft Camden Local Plan 2015 includes Policy A5 - Basements and Lightwells. In the consideration of this development proposal the requirements of this policy are not materially different to those in the adopted development plan.
131. Guidance on the application of this policy is set out in Camden Planning Guidance 4 Basements and Lightwells (2013).
132. The proposed habitable residential accommodation at basement level is part of two duplex apartments. The Basement Impact Assessment (Lyons O'Neil) undertaken in accordance with the requirements and methodology set out in CPG4 concludes that slope stability is not an issue and there will be no detrimental impact on existing buildings, geological or hydrological conditions. The Flood Risk Assessment (Three Counties Flood Risk Assessment) demonstrates that the site is located in Flood Zone 1 and there is a very low risk of surface water

flooding.

Sustainability

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

133. 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).
134. Planning policy requirements energy, water, Code for Sustainable Homes, drainage and waste management are found in London Plan Policies 5.1 (Climate change mitigation); 5.2 (Minimising carbon dioxide emissions); 5.3 (Sustainable design and construction); 5.6 (decentralised energy in development proposals); 5.7 (Renewable energy); 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).
135. In the consideration of this development proposal the sustainability policies of the draft Camden Local Plan 2015 are not materially different to those in the adopted development plan
136. All new development is expected:
- To reduce carbon emissions in accordance with the energy hierarchy – Be Lean, Be Clean, Be Green
 - To achieve a 40% improvement on the 2010 Building Regulations
 - To achieve Code Level 4 of the Code for Sustainable Homes
 - Following the application of stages 1 and 2 of the energy hierarchy to target a 20% reduction in CO₂ emissions from renewable technologies unless it can be demonstrated that this is not technically feasible or viable.
137. The Energy Strategy Report (incorporating a Code for Sustainable Homes Pre-Assessment) 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 strategy, including air source heat-pump, will provide an average 48.1% CO2 reduction saving (DER/TER) against current Building Regulations for the development, thereby exceeding the target of 35% CO2 reduction saving (Der/TER) against 2013 Building Regulations;
 - 4) The strategy will provide an average 20.7% reduction of CO2 emissions through the provision of photovoltaic panels providing renewable energy, hence the required target of 20% reduction in CO2 emissions through on-site renewable energy is achieved;
 - 5) The strategy will provide an 18% reduction of CO2 emissions over the standard case SAP assessments;
 - 6) The strategy will provide an average Fabric Energy Efficiency of 35.07; and
 - 7) Each of the dwellings in the scheme will achieve Level 4 Code for Sustainable Homes
138. The Phase 1 Desk Study (Hydrock) concludes that the potential for contamination on the site is low to moderate, and it is unlikely that the site would be classified as Contaminated Land under Part 2A of the EPA 1990.
139. The Flood Risk Assessment (Three Counties Flood Risk Assessment) confirms that 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%)]; having examined the data advises that there is no record of the site having flooded; and concludes that the site has a very low risk of flooding from surface water.
140. As per the Code for Sustainable Homes Pre-Assessment the design provides for internal water use not to exceed 105 litres per person per day, and surface water drainage will be in accordance with Sustainable Urban Drainage System principles.
141. Details for waste management in the scheme are discussed in the Design and Access Statement and illustrated on drawing 1409_1999. Based on recommendations made by Camden Council, the scheme incorporates a secure bin store at ground floor within the building with provision made for 1,100 litre Eurobin for general refuse, a 660 litre Eurobin for mixed recycling and a 240 litre wheelie bin for food waste.

Open Space

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

142. 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).

143. The policies of the draft Camden Local Plan 2015 do not materially affect the open space considerations in this case.
144. Where practicable new dwellings should provide access to some form of outdoor amenity space e.g. balconies or communal gardens.
145. The development makes good provision for open space on site. Nine of the fifteen units will benefit from the provision of private open space in the form of terraces/balconies or sunken gardens (see table below) and all benefit from the 300m² communal open space that is to be landscaped to a very high standard.

| Unit No. | Private amenity area m ² |
|----------|-------------------------------------|
| 1 | 30 |
| 2 | 30 |
| 3 | 17 |
| 5 | 14 |
| 6 | 14 |
| 12 | 16 |
| 13 | 16 |
| 14 | 7 |
| 15 | 7 |

146. The development will give rise to a liability for a payment in respect of the Camden Community Infrastructure Liability. Items covered by the Camden CIL include the provision/enhancement of public open space

Transport

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

147. 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)
148. 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; and
- Be car-free in areas within Controlled Parking Zones that are easily accessible by public transport

149. The policies of the draft Camden Local Plan 2015 do not materially affect the transport considerations in this case.
150. 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.
151. 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
152. 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).
153. As required by Policy DP19 the development is car free. The redevelopment of the site will result in the removal of the one existing on site car parking space and the removal of the vehicular access and dropped kerb, possibly allowing for the provision of one additional on-street parking space that will be subject to the controlled parking zone restrictions.
154. Provision is made for a total of 24 bicycles i.e. one secure bicycle parking space per each one bedroom dwelling units and two secure bicycle parking spaces per each dwelling unit of two bedrooms or more, as per the requirements of Policy 6.13 of the London Plan.

Privacy

Does the scheme provide for adequate spatial separation to ensure residential privacy is satisfactory?

155. Camden Plan Policy DP26 (Managing the impact of development on occupiers and neighbours) refers to the protection of neighbour's amenity – including visual privacy and overlooking - in the control of development. Further guidance on this issue is given in CP6 (Amenity).

156. The policies of the draft Camden Local Plan 2015 do not materially affect the privacy considerations in this case
157. The Council's pre-application advice refers to a general requirement for separation distance of 18 metres between the windows of habitable rooms of different units that directly face each other. This is achieved.
158. The terraces/balconies to the rear overlook communal garden areas and incorporate screening to prevent direct overlooking/loss of privacy of one unit to another.

Planning Obligation

159. The Council's pre application advice explains that a Section 106 Agreement covering the following matters will be required:
 - Public open space contribution (as per CPG8)
 - Education contribution (as per CPG8)
 - Affordable housing
 - Car-free housing
 - Construction management plan
 - Highway reinstatement
 - Sustainability plan (including code for sustainable homes design stage and post construction review)
 - Energy plan
 - Payment of the Council's fees in preparation and monitoring the Agreement
160. Since this advice was given work has progressed on a Camden Infrastructure Levy. This Levy will come into force on the 1st April 2015. As a result it will not be appropriate to include public open space and education contributions in any Section 106 Agreement.
161. The applicant further notes financial contributions may be required where a development does include a combined heat and power, and a connection to a decentralised energy network is not possible within 3 years (paragraph 5.28 and the following table in CPG3, and paragraph 7.10 of CPG 8 refer). The applicant would expect to see further information to set out the reasons such a payment but at this point the applicant is not persuaded that such requirement would be justified.
162. The affordable housing viability statement (Douglas Birt Consulting) demonstrates

that a contribution of circa £100,000 can be made towards the provision of affordable housing offsite elsewhere in the Borough (see paragraph 117 above). This issue can be covered as an element of the Planning Obligation.

163. 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

164. The site is located in a predominantly residential area.
165. There is a need to increase housing supply throughout London.
166. The replacement of student accommodation with Class C3 housing complies with policy.
167. The accommodation is surplus to the requirements of the University College London, and adequate replacement student accommodation in better locations has been provided and is planned.
168. Housing is the priority land use in Camden.
169. The development makes best use of this previously developed site.
170. The existing building is not identified as a building that makes a positive contribution to the character or appearance of the conservation area. It has been much altered externally. The design of the new building takes account of contextual characteristics in the appearance of built form in the conservation area. The development will preserve the character and enhance the appearance of the conservation area.
171. The scale and design of the development are suitable for the area.
172. Daylight and sunlight to neighbouring dwellings and within the scheme comply with BRE guidelines.
173. The mix and size of the accommodation complies with the Councils requirements.
174. The development satisfies the Lifetime Homes Standards.
175. The viability assessment shows that a financial contribution of circa £100,000 can be made towards the provision of affordable housing offsite elsewhere in the Borough.
176. The development includes a high quality comprehensive landscape scheme that will enhance the character and appearance of the conservation area.

177. The development will enhance biodiversity.
178. The design of the basement satisfies the requirements in CPG 4 Basements and Lightwells.
179. The development meets the Council's energy requirement, with predicted emissions 48.1% lower than baseline emissions.
180. The housing will achieve Code Level 4 of the Code for Sustainable Homes.
181. There is lo to medium risk of contamination. It is unlikely that the site would be classified as Contaminated Land
182. The site is located in Flood Zone 1.
183. Nine of the fifteen residential units will benefit from private open space. All of the proposed dwellings will enjoy the use of the proposed communal landscaped gardens.
184. The site is situated in a highly accessible location with a PTAL rating of 6a.
185. The development is car free.
186. The development provides for the protection of privacy, within the scheme and to neighbouring dwellings.
187. The development will be liable for CIL. Other site-specific impacts can be mitigated through a section 106 Agreement that accords with the Community Infrastructure Regulations 2010.
188. The development complies with the development plan.
189. Planning permission should be granted in accordance with the presumption in support of sustainable development.

Paul T Carter BSc.(Hons) Dip TP MRTI MRICS
April 2015

APPENDIX 1

Planning Application Drawings and Documents

Drawings

John Pardey Architects

| | |
|-----------|--|
| 1409/1000 | Location Plan and Topographical Survey |
| 1409/1001 | Existing Plans |
| 1409/1002 | Existing Elevations |
| 1409/1500 | Proposed Demolitions + Block Plan |
| 1409/1999 | Proposed Basement + Lower Ground Floor Plan |
| 1409/2000 | Proposed Upper Ground Floor + First Floor Plan |
| 1409/2001 | Proposed Second Floor + Attic Plan |
| 1409/2002 | Proposed Roof Plan |
| 1409/3500 | Proposed Site Sections |
| 1409/4500 | Proposed Elevations (Sheet 01) |
| 1409/4501 | Proposed Elevations (Sheet 02) |
| 1409/8000 | Detail Bay Elevations |

CBA Trees

| | |
|------------------|----------------------|
| CBA 10274.02 TPP | Tree Protection Plan |
| CBA10274.01A TSP | Tree Survey Plan |

Studio Engleback Landscape Architects

| | |
|--------------|---|
| 358/P/1000/B | Garden Layout Plan |
| 358/P/1001/A | Rear Garden Planting Plan |
| 358/P/1002/A | Front Garden Planting Plan and Schedule |
| 358/P/1003/B | Garden Structures and Paving Layout |

Reports

| | |
|--|---------------------------------------|
| Design and Access Statement | John Pardey Architects |
| Landscape and Ecology Design + Access Statement | Studio Engleback Landscape Architects |
| Arboricultural Development Statement | CBA Trees |
| Viability Statement | Douglas Birt consulting |
| Report on Community Engagement | GKA |
| Ground Conditions Desk Study Report | Hydrock |
| Basement Impact Assessment | Lyons O'Neill Structural Engineers |
| Planning Statement | paultcarter planning |
| Flood Risk Assessment | Three Counties Flood Risk Assessment |
| Syntegra Consulting Report | Daylight, Sunlight and Overshadowing |
| Syntegra Consulting | Sustainability and Energy Report |
| Heritage Statement | Turley Associates |

APPENDIX 2
Notes of pre-application meeting 13th August 2013

Michael Meadows
Drivers Jonas Deloitte
Athene Place,
66 Shoe Lane,
London
EC4A 3BQ

Application Ref: 2013/5244/PRE

Please ask for: **Gavin Sexton**
Telephone: 020 7974 **3231**

23rd August 2013

Meeting Notes: Clifford Pugh House (5-7 Lancaster Grove)

Meeting held Tuesday 13th August 2013.

No site visit was held

Present:

John Inglis (MAA Architects)
Michael Meadows (MM: Deloitte)
Don Messenger (DM: Deloitte)
Martin Mohamad (MMO: Deloitte)

LB Camden:

Gavin Sexton (GS: Planning)
Antonia Powell (AP: Conservation & Design)

Material presented:

Booklet 'Clifford Pugh house pre-application submission by MAA Revision 24th July 2013'
Cover letter by Michael Meadows dated 12th August 2013

Key issues discussed:

- Land use principles (redevelopment and change of use) and housing mix
- Affordable housing
- Design
- Transport
- Basement
- Sustainability
- S106 contributions



Overview

MM gave an overview of the proposals. UCL propose to dispose of the site and are seeking advice which would clarify the potential site value.

The existing property houses dedicated UCL student accommodation, mainly in use by post-graduates. MM identified that the internal conditions are cramped and substandard and all rooms are very small. Students share kitchen and other facilities.

The property is in the Belsize Park conservation area, and is neither listed nor identified as a positive contributor.

Three housing options were presented:

1. 10 large apartments
2. 18 smaller apartments
3. 2 town houses

Form of application

Any acceptable proposals involving Conservation Area Consent would require Development Control Committee approval. Any application proposing >1000sqm of replacement floorspace would be characterised as a Major development, requiring final decision (including completion of any s106 legal agreement) within 13 weeks, with derogation from the deadline only considered in exceptional circumstances where the application does not have an accompanying planning performance agreement.

Land use: Redevelopment & change of use

The property is not a positive contributor to the CA and therefore there is no objection to the principle of its removal, subject to an acceptable replacement.

Policy DP9 relates to the existing student use. DP9 expects existing student accommodation to be retained unless (K) adequate replacement is provided in a location accessible to the institution or (L) it is demonstrated that the accommodation is no longer required to serve another institution in LB Camden.

It is acknowledged that Clifford Pugh house is a considerable distance from the UCL campus. MM stated that the provision of additional units at John Dodgson house, in close proximity to the campus, would offset the loss at Clifford Pugh and therefore the proposals would fall under part (K) of DP9.

Officers advise that a clear argument setting out UCL's overall plan for student housing setting out details of re-provided units closer to the campus would be required as part of any application which evoked an argument in terms of part K. This would need to take the form of clear evidence, such as a copy of UCL's estate strategy or similar document, which sets out UCL's specific intentions and proposals for investing in student accommodation closer to the core campus. Information on the poor quality of the accommodation and costs of bringing it up to standard would also assist, although would not be pivotal in any decision, as background information.

DP9 sets out a clear preference for permanent C3 housing to replace existing student accommodation and therefore the proposals to redevelop the site as residential are acceptable in principle.

Housing mix and amenity

The two flatted schemes propose two approaches to unit sizes. Option 1 is overly homogenous in its emphasis on 3-bed units and should provide a wider range of unit sizes, including 40% 2-bed units and at least one smaller unit. Option 2 should also expand the range of sizes to include at least one or two 3- or 4- bed units.

All unit and room sizes should meet London Plan standards. 10% of units should be wheelchair accessible and all units should be designed to meet Lifetime homes criteria, to meet policy DP6. A Lifetime Homes statement must accompany any planning application.

Option 2 presents a number of single aspect north-facing flats. This should be avoided. It is likely that a reconfiguration of unit mix would present an opportunity to include greater numbers of dual aspect flats.

External balconies on the front elevation are likely to be acceptable, given the precedent on the neighbouring property. Overlooking of neighbouring habitable rooms at distances of less than 18m from external terraces or balconies should be avoided. High level windows on the side elevations to provide additional amenity while avoiding overlooking would be acceptable.

Affordable housing

Redevelopment of the site with 1000sqm GEA of residential floorspace (or development of 10 or more units) would trigger the need for a contribution to affordable housing (AH) in line with the sliding scale set out in DP3 and supporting guidance. The policy expects on-site provision, with off-site provision only acceptable where it cannot practically be achieved on site.

GS advised that the practical aspects of on-site delivery will depend on the nature of the proposals. A key concern is the nature of the shared communal areas and the impact on service charges for affordable units. MM stated that they could submit letters from Registered Providers (RPs) clarifying their difficulties with taking responsibility for individual or small numbers of affordable units. Officers accept that this would contribute to any argument which supports off-site provision, but the other aspects which contribute to the acceptance of off-site provision (see paragraph 3.14 supporting policy DP3) would also need to be addressed by clear and robust arguments.

The first two cases utilise a single access point (to the front and side respectively). However it seems likely to officers that it would be possible to reconfigure the ground floor to provide separate access to affordable units. In the third case it is accepted that provision of affordable housing on-site would be difficult to achieve. Overall officers would expect the options for on-site AH to be fully explored, ideally as part of a detailed pre-application discussion. A robust justification for the appropriateness of any off-site provision would be required as part of any application. GS made it clear that the Council's strong preference is for on-site provision and any derogation from this would need to be considered on a case-by-case basis.

MM stated that the client's preference would be for the affordable housing contribution to take the form of a financial payment. GS stated that the policy aim is delivery of affordable housing and the final stage of the cascade (financial contribution) is not a favoured approach and is only accepted in exceptional circumstances (see paragraph supporting policy DP3). We will therefore not accept the principle of a financial contribution at this early stage and the starting point for any application to redevelop the site will need to robustly demonstrate that neither on-site nor off-site provision would be possible.

Design

The local area provides a strong and consistent design and townscape context. Any replacement building on the site would need to be sensitive to and respond well to the prevalent form of townscape and strictly adhere to the existing building line facing the street. The ridge height of the roof could mediate between the adjacent properties but in any event not exceed the height of number 9 Lancaster Grove. The general bulk and massing proposals are acceptable.

The rear the Grove is bookended by larger, slightly deeper buildings but otherwise the rear building line along Lancaster Grove is very defined and consistent. This would need to be adhered to. There is very little planning history of rear extensions or accretions along the street. A rear projection may

be possible as part of any proposals, but it should be subordinate in bulk and massing to the host building and limited to single storey above ground. Deep plan projections extending into the garden would not be characteristic of the area and would not be acceptable.

Local boundary treatment along this side of the street is relatively consistent, being low boundaries backed by planting and limited areas of hard standing or vehicular crossovers. The existing crossover provides a precedent for the site, although the preference would be for this to be removed. A contextual approach to boundary treatment would be required.

Two approaches propose a front door with option 2 proposing a side entrance. The strongly preferred approach would be to provide walk-up front doors facing the street directly, suitably scaled and detailed to provide consistency with the prominence of entranceways along the street. In this respect the entrance proposals for options 1 and would require revision.

Two of the options presented take a contemporary approach, with balconies on the front elevation, projecting bay features to one level below the eaves and simple unadorned detailing. The choice of render would be consistent with the adjacent villas and would be acceptable, although the render would need to be of a very high quality. The rear elevation should be finished in brick, to match the local context.

Overall a very high quality of design would be required, with fine attention to detailing and materials and generosity in the depth of reveals and the visual interest of the primary elevation. Care should be taken about the proportion of solid: void on the front elevation which should take cues from the local context.

Option 3 proposed a more traditional approach. Officers advise that any replication of the prevalent villa-style would need to be scholarly in detailing, with proportions and dimensions rigorously and accurately reproduced.

Transport

The site is very well connected with a ptal rating of 5 or 6. The existing occupants are unlikely to have on-street permits and MM advised that the crossover and hard standing is not currently used for parking.

Transport policies strongly favour sustainable means of transport and a focus on provision of the minimum necessary parking. Developments in well connected areas, such as this, are expected to be car-free, irrespective of the size or mix of units and tenures. Officers advise that overcoming the policy DP18 presumption for car-free development on this site by provision of on-site parking is very unlikely to be acceptable. CPG on transport makes it clear that where existing occupiers are not returning to redeveloped sites then the precedent of street parking permits and on-site spaces does not hold.

In the unlikely event that the principle of providing some parking on-site (in accordance with the relevant limits set out in the LDF parking standards for a site of this PTAL level) is acceptable, option 3 proposes to add a second crossover to provide access to off-street parking. Policy DP19 advises that off-street parking which compromises existing on-street spaces would not be acceptable which means that addition of a second crossover would not be supported, unless spaces lost on-street could be recovered through local reconfiguration of spaces, paid for by the developer.

Secure and covered cycle parking would be required to be integrated into the development proposals, to meet London Plan standards, which includes the need for 2 bike spaces for larger flats.

Sustainability

Policy CS13 and supporting guidance CPG3 (sustainability) expects level 4 as a minimum target for Code for Sustainable Homes and for major developments (10 units+ or >1000sqm) the inclusion of 20% renewable energy generation, subject to an assessment of the most appropriate and feasible means of delivering renewable energy on site. We expect *all* development to follow the Mayors hierarchy for energy reduction – be lean, clean and green and also to consider renewable provision on site.

Basement

Any proposals which include a basement would require an appropriately detailed basement impact assessment, prepared in accordance with the screening and scoping flows and supporting methodology set out in planning guidance 4 (basements and lightwells). The inclusion of modest lightwells to the front elevation is likely to be acceptable, due to the context of half-basements along the street. The inclusion of large rear lightwells, excavated from the garden in order to accommodate habitable amenity at basement level, would not be acceptable.

S106 Heads of Terms

CPG8 (Planning obligations) provides full details of planning obligations which would be likely as a result of development, to mitigate its impact. My initial view is that there is likely to be a number of obligations sought including:

- Affordable housing
- Construction management plan
- Car-free
- Need to add Highway reinstatement for repairs and remove crossover.
- Sustainability and energy plans (at least Level 4 of the Code for Sustainable Homes and provision of on-site renewables to match London Plan requirements)

For schemes of > 5 units

- Education contribution – by formula
- Open space – by formula

CIL

Given that the proposal would result in the creation of new residential dwelling and new residential floorspace the development would be liable towards the Mayoral CIL, although this provides exemptions for affordable housing and will depend on the final mix of tenures.

Summary

Loss of student housing would need to be accompanied by robust justification but officers consider that this can be achieved. Replacement residential units would trigger the need for affordable housing, with a requirement for any development proposals to address each stage of the on-site, off-site, financial contribution cascade. At this stage the expectation would be for on-site provision. The mix of units in the flatted schemes would need to be modified to provide a wider spread of choice to include smaller and larger units as well as at least 40% 2-bed in market tenure.

Contemporary or traditional approaches to design would be acceptable, each requiring a very high quality of design and detailing.

Redevelopment would be expected to be car-free, secured by s106 legal agreement.

The comments above are based on the information which has been submitted, which is accepted to be a result of the early stage of the proposal. Therefore, the advice is as specific and detailed as possible but does not represent the considered view of a fully detailed scheme.

23rd August 2013

Please note that if you (the applicant or their representative) have drafted any notes of the pre-application meeting(s) held with the council you cannot assume that these are agreed unless you have received written confirmation of this from the case officer.

As the planning service is moving to a fully paperless system you are advised to check the details required for submission in advance. We strongly urge you to make all planning applications via the planning portal. Arrangements can be made with the case officer to simplify the transfer of electronic submissions to the Council (by CD, USB key etc) at the point of application.

If you have any queries about the above letter or the attached document please do not hesitate to contact me at the number given above.

Yours sincerely,

Gavin Sexton
Principal Planning Officer
On behalf of the Director of the Culture & Environment Department

APPENDIX 3
Notes of pre-application meeting 13th June 2014

Tobias Weaver
John Pardey Architects
Beck Farm Studio
St Leonards Road
Lymington
Hampshire
SO41 5SR

Application Ref: **2014/3641/PRE**

Please ask for: **Gavin Sexton**
Telephone: 020 7974 **3231**

30th June 2014

Meeting Notes: 5-7 Lancaster Grove

Meeting held on site Monday 16th June 2014

Present:

John Pardey – JPA
Tim Coburn – Optic Realm Ltd
Nick Coburn – Optic Realm Ltd

LB Camden:

Gavin Sexton (GS: Planning)
Catherine Bond (CB: Conservation & Design)

Material presented:

In advance:

Clifford Pugh House, Lancaster Grove, NW3 pre-application statement May 2014 by jpa.

Tabled at meeting:

Clifford Pugh House, Lancaster Grove, NW3 pre-application statement 16 June 2014 by jpa.

Key issues:

- Demolition and design
- Land use principles (redevelopment and change of use) and housing mix
- Affordable housing
- Transport

Overview

The building was viewed from the rear and from a number of rooms within.

The current proposals for a contemporary approach to the site were discussed in summary.



Demolition

The pre-application site comprises Clifford Pugh House, a former UCL student residence, which was originally developed as a pair of three-storey 19th century Italianate villas as part of a wider group on the north side of Lancaster Grove. The site is situated in the Belsize Conservation Area, and occupies a prominent site facing the junction with Crossfield Road.

CB expressed the view that having visited the site, the existing building has more original fabric and structure than was apparent at the time of the last pre-application (which formed part of a wider package of inquiries from UCL, at which time it was not possible to make a full inspection of the building) and therefore the principle of demolition would need to be addressed again.

It is apparent from an inspection of the building that much of the rear elevation, side elevations, central party wall and chimney breasts and stacks remain. The front elevation has been much altered, having lost its original modelling and projections, including bay windows and entrance porches. However, the front elevation may retain more original fabric than initially understood: although the steel windows are obviously postwar, the general positioning and proportions of the openings reflect the location of the former architectural features, as can be seen on the two neighbouring semi-detached villas at No 9-11 and 13-15 Lancaster Grove. It is also evident from the proportions and internal floor-to-ceiling heights at each level that the original floor levels survive; it may also be the case that much of the original floor structure remains. It is also considered that the roof form adheres to the original and could retain original fabric. The dormer windows at No 7 appear to be historic and reflect the design of dormers to be found on similar semi-detached pairs in the neighbourhood.

It should be noted that the northern section of Lancaster Grove falls within Sub Area 1 of the Belsize Conservation Area, as outlined in the statement which was adopted in 2002. This sub-area defines the historic core of the conservation area, which is characterised by substantial mid-19th century villas in an Italianate style, often employing large areas of stucco. The statement does not include Nos 5-7 Lancaster Grove as negative features detracting from the character and appearance of the conservation area. Whilst this conservation area statement is now some 12 years old, the NPPF makes provision for the assessment of the contribution buildings make to conservation areas through the planning process. Whilst the building in question may not obviously make a positive contribution to the character and appearance of the conservation area through its decorative features (which have been lost), the overall form, scale and proportions of the building, its footprint and location on the site including building lines, use of materials (including loadbearing brickwork, stucco finish and slate roofing), and resultant strong relationship with neighbouring properties make a valued contribution to the streetscape and Sub Area 1 of the Belsize Conservation Area. If officers are correct in their assessment that large areas of the building date from the mid 19th century, a case could be made that this building does make a notable contribution to the conservation area as part of the original swathe of development and contributing to group value.

Officers have discussed the principle of demolition in more detail and conclude that there are options to consider. One option is that demolition is not pursued and that the building is retained *in situ* with the potential for some extension and remodelling including the reinstatement of Italianate architectural features on the front elevation, thereby knitting the

building into its historic context. As such, this would be a conservation-led project benefitting from an upgrade and providing contemporary residential accommodation within its envelope. This approach is likely to be supported by officers and gain the approval of local groups and conservation bodies.

The second option, as submitted in your pre-application inquiry, is for total demolition of the property and its replacement with a new-build scheme (either a contemporary scheme or a scholarly replica - see comments on Proposed Design below). For this option to be deemed acceptable it will be necessary to fully justify the demolition of the building in accordance with the requirements of the NPPF. It will also be necessary to determine whether the loss of the building will cause substantial or less than substantial harm to the conservation area as set out in paragraphs 133 and 134, and a justification for the building's demolition will be required accordingly. Consideration needs to be made to such issues as the structural condition of the building and the wider benefit of the proposals, as well as whether a replacement scheme will preserve and appreciably enhance the character and appearance of the Belsize Conservation Area (as set out in policy DP25 of the Council's Local Development Framework document).

Design context

The local townscape, within sub-area one of the conservation area, is strongly defined and displays many consistent features, as described in the Conservation Area Statement:

“Belsize Park, Belsize Park Gardens, Buckland Crescent and Belsize Square represent the core area of the Belsize Park development undertaken by developer Daniel Tidey on the site of Belsize House in the mid-1850's. The streets are predominantly residential, characterised by the repeated forms of the stucco villas, whose design gives a strong identity and unity of appearance to the area.”

These characteristic features include:

- symmetric pairs of villas grouped with stucco or brick frontages
- defined hierarchy in the front elevation with prominent piano nobile and recessed sash windows diminishing in size on successive upper floors with classically detailed surrounds
- steps up to porticoes
- canted three-light bays on the ground floor
- hipped, slate roofs with overhanging eaves
- the elevations have large rusticated quoins
- closely spaced villas maintain a continuous building line and their repeated forms with narrow gaps between give a uniform rhythm to the streets and provide important, glimpsed views

The application site terminates the views along Crossfield Road and sits among a group of stucco/white painted buildings. The neighbouring plot 1-3 Lancaster Grove (although a non-original addition it is symmetrical with a hipped roof and is sympathetic to the local townscape). Despite dating from an earlier policy regime, the rebuilt property at 1-3 can be viewed as succeeding in its modern interpretation of the semi-detached villa. A feature which differentiates the neighbouring building is its additional depth at the rear which bookends the otherwise very consistent rear building line along the remainder of the street.

Proposed design

The design takes an asymmetrical, orthogonal, zinc flat roofed contemporary approach finished in brick and precast stone. The rear building line has been extruded across its full width and height to match the neighbouring plot at 1-3.

It is considered that the proposed depth of the building is excessive and the primary rear elevation should be consistent with the established mid-street building line. It may be possible to add some rear massing, which should be set in at both sides from the primary rear building line and must be subordinate in height to the main building.

The current approach to the roof storey is not acceptable: the flat roofed orthogonal form appears harsh, the choice of materials and minimal setback from the street elevation would mean the structure would be highly visible in local views and is not considered to be sympathetic to the local character, townscape context or an acceptable termination to the end of Crossfield Road. Since this sub area of the conservation area is dominated by shallow hipped roofs, strong consideration should be given to a non-flat roofed structure.

The front elevation reproduces the raised entrance portico feature and provides two prominent bays featuring architectural frames and terminated with terraces. The prominent asymmetry of the bay termination is entirely uncharacteristic of the area and is not an acceptable response. The suitability of the stone and brick is questioned – again in the well-defined context, with this section of Lancaster Grove characterised by stucco and light painted finishes. Consideration should also be given to the impact of facing materials in views down Crossfield Road, from which the group value of stucco in this section of Lancaster Grove is apparent. Overall the front elevation maintains a rather clinical orthogonality from street to roof, which lacks the warmth of the approach taken on the local villas.

Design conclusions

In order to justify the demolition of the existing building the replacement buildings needs to be a high quality architectural response. A contemporary response in an area characterised by such strongly defined Victorian features presents a significant design challenge. The current approach is not considered to respond appropriately to the predominant character. Roof form, elevation, rear massing and building line all need significant amendments to produce an acceptable design.

Officers are happy to work with the applicant towards an acceptable design with an open and constructive dialogue. The scale of changes required is considered too significant to resolve by way of an exchange of drawings and email commentary and instead further pre-application discussion is recommended.

The alternative approach, which may be more straightforward to resolve, is to take a more traditional approach with either the remodelling of the existing building or its replacement with a new-build scholarly replica.

The dialogue on design should be mirrored by open dialogue affordable housing and transport policy matters if agreement is to be reached on the proposed development.

Land use principles (redevelopment and change of use) and housing mix

The previously issued pre-application notes advised on the information required to justify the change in use from student accommodation to permanent housing and are not revisited here.

However the quantum of housing currently proposed would trigger the need for provision of affordable housing on site. Under the sliding scale detailed in CPG2 the proposals for 18 units would trigger the need for **18% of total GEA** of floorspace to be provided as affordable housing on site.

No information has been forthcoming about the proposed affordable housing (AH) provision.

You are strongly discouraged from making a planning application until such time as the AH issue has been discussed and the approach agreed. Where AH is proposed on site it should be discussed with the Council's Housing Initiative team, via the case officer. Any AH strategy which involves submission of viability details must be agreed in advance of an application if it is to proceed in a timely and efficient manner.

The current mix of units (10 x 1-bed, 7 x 2-bed, 1 x 3-bed) does not adequately address the market housing priorities for larger (2 bed+) requirements of policy DP5. The current mix is not supported and should be amended to re-balance the unit sizes more favourably towards 3+ bedrooms.

Transport

As set out in the previous pre-application response, the policy presumption is for car-free development on this site. Officers consider the outcome of the 14 Netherhall Gardens Inquiry to be specific to that site and context with very limited material impact on the policy requirement for this well connected site.

The change of use from student housing where no parking permits have been issued to permanent housing would lead to an increase in potential demand for non-sustainable transport modes. Policy DP18 is clear that this means that the development should be car-free, an approach which is supported by the NPPF. Basement parking will not be acceptable on this site.

Form of application

Any acceptable proposals involving Conservation Area Consent would require Development Control Committee approval. Any application proposing >1000sqm of replacement floorspace would be characterised as a Major development, requiring final decision (including completion of any s106 legal agreement) within 13 weeks, with derogation from the deadline only considered in exceptional circumstances where the application does not have an accompanying planning performance agreement.

Yours sincerely,

Gavin Sexton

Principal Planning Officer

On behalf of the Director of the Culture & Environment Department

30th June 2014

The comments above are based on the information which has been submitted, which is accepted to be a result of the early stage of the proposal. Therefore, the advice is as specific and detailed as possible but does not represent the considered view of a fully detailed scheme.

Please note that if you (the applicant or their representative) have drafted any notes of the pre-application meeting(s) held with the council you cannot assume that these are agreed unless you have received written confirmation of this from the case officer.

As the planning service is moving to a fully paperless system you are advised to check the details required for submission in advance. We strongly urge you to make all planning applications via the planning portal. Arrangements can be made with the case officer to simplify the transfer of electronic submissions to the Council (by CD, USB key etc) at the point of application.

If you have any queries about the above letter or the attached document please do not hesitate to contact me at the number given above.

APPENDIX 4
Notes of pre-application meeting 28th July 2014

Tobias Weaver
John Pardey Architects
Beck Farm Studio
St Leonards Road
Lymington
Hampshire
SO41 5SR

Application Ref: **2014/4612/PRE**

Please ask for: **Gavin Sexton**
Telephone: 020 7974 **3231**

29th July 2014

Meeting Notes: 5-7 Lancaster Grove

Meeting held in Camden offices on Monday 28th July 2014

Present:

John Pardey – (JP: JPA)
Paul T Carter – (RC: Planning consultant)
Roger Mascall – (RM: Turley heritage)

LB Camden:

Gavin Sexton (GS: Planning)
Catherine Bond (CB: Conservation & Design)

Material presented:

In advance:

Clifford Pugh House, Lancaster Grove, NW3 pre-application statement May 2014 by jpa.
Initial Heritage Appraisal by Turley Heritage 3 July 2014;

Key matters discussed:

- Demolition and design
- Design

1. Demolition

RM gave an overview of the Heritage appraisal
Bulk and scale are resonant with neighbours but lots of design changes
View is that the building is neutral at best -

Officer comments:

Original pre-app comments from 2013 were without benefit of site visit and inspection.



Much of original building remains in form of flank walls, much of rear elevation, possibly the roof structure, internal party wall and raised parapet at roof level. The smaller dormers may be 'historic'.

The Belsize Conservation Area Statement is elderly and doesn't provide a full or up-to-date audit of positive/negative contributors to the CA.

Officers consider that although the existing building dates from the mid-19th century, unsympathetic alterations to the front façade have a neutral value in the conservation area context.

Officers provide the following comments on section 4 of the initial heritage statement

- Qst 3 (reflect other elements in the CA)
 - Officers are of the view that the building has lost the majority of its architectural decoration but the overall built form, the roof and materials remain as clear indicators of the building's history.
- Qst 4 (relate to neighbouring designated assets)
 - Officers are of the view the neighbouring buildings to the south make a positive contribution to the CA (as non-designated heritage assets).
- Qst 5 (does it contribute positively)
 - Officers are of the view that it makes a partial contribution due to the retained elements of the building envelope which reinforce its footprint, overall height and form and the general use of materials.
- Qst 8 (illustrate development)
 - Officers consider that despite some alterations the building retains significant historic associations as part of the original mid-19th century development on the east side of Lancaster Grove.

To conclude, officers are of the view that some aspects of the building contribute positively to the CA, but unsympathetic post-war alterations have a neutral effect on the CA.

PM discussed NPPF para 137 and the extent of harm. It was agreed that the demolition of the existing building would not be so significant as to cause substantial harm to the character and appearance of the CA as set out in NPPF paras 133 and 134.

CB advised that text supporting policy DP25 (Conserving Camden's heritage) (para 25.8) makes it clear that *"...before conservation area consent for demolition is granted, the Council must be satisfied that there are acceptable detailed plans for the redevelopment. Any replacement building should enhance the conservation area to an appreciably greater extent than the existing building. When a building makes little or no contribution to the character and appearance of a conservation area, any replacement building should enhance the conservation area to an appreciably greater extent than the existing building."*

Notwithstanding, officers would be supportive of a refurbishment scheme with scholarly replication of the elevations which would clearly give rise to such enhancement, however officers accept that this is currently not on offer.

2. Design details

Roof

JP clarified that a projecting cornice band would add interest at eaves level which would complement, in a contemporary manner, the overhanging eaves which are characteristic of the street/area. This was welcomed, subject to detailing.

Officers are generally happy with the roof form although we would like to see the addition of a raised parapet/chimney explored in order to complement the locally characteristic roofscape feature, as the roof is visible in long views to the west along Crossfield Road. JP advised that he would explore this in a contemporary idiom.

The roof materials were not discussed; however officers would expect to see a high quality approach used, with a preference for natural materials sympathetic to neighbouring roof finishes. Standing seam zinc should be avoided in any event.

Front elevation

Officers accept the approach of the scheme to inverted partial symmetry (with particular relation to the front elevation treatment including the projecting bays).

The off-centre door location is acceptable however the door itself appears to set deeply into the front elevation which gives it a cavernous appearance. The platform provided at the mid-point also results in the front steps having a more bulky appearance than is necessary.

JP will examine pulling the door forward and amending the steps to reduce their projection.

Officers consider that the materials on the front elevation are very important. Our strong preference is for the use of a single material to echo the stucco finish of this section of the east side of Lancaster Grove. The local groupings of brick/stucco elevations was discussed and it is evident that the local approach is not homogenous within any one street. Building 1-3 (Gabrielle Court) is finished in painted brick and is not very satisfactory. The semi-detached villa pairs of 9/11, 13/15 and 17/19 are all stucco finished and distinct from the detached brick mansions at 21-35. JP is keen to identify the 9-19 as a grouping from which the new building at 5-7 can be differentiated the materials on the front elevation. Furthermore JP advised that the maintenance of render can be problematic and would be avoided by use of brick.

Officers acknowledge this desire for distinction, but consider that 5-7 is part of a stucco finished grouping which runs from 1-19 and express a strong preference for a non-brick finish on the front elevation. Whether the use of stone across the whole front elevation would be satisfactory remains to be seen and officers cannot give a view on this without seeing further details and the final choice of materials should be something historically contextual.

The window frames would be matt powdered coated finish within punched hole openings. The detailing includes a matt finished panel above the glazing. Officers reserve taking a view on this feature in the absence of detailed design proposals.

In general the buildings in this part of the CA do not provide balconies/terraces on the front elevation, although the late 20th-century neighbour at 1-3 is an obvious exception. It is accepted that advice issued previously noted "*External balconies on the front elevation are likely to be acceptable, given the precedent on the neighbouring property*". This advice was issued on the basis of drawings showing balconies within front bays and not at roof level.

The CAS (page 36) specifically identifies a key development concern within the CA as the "*addition of roof terraces or balconies. The key issue being roof terraces with inappropriate railings that are prominent in the street scene*". Any roof level inset balconies should be minimal in size with no projecting or visible balustrades. Across the front elevation the balconies should not draw attention to themselves. You are advised to consult the CA Statement for further advice. JP confirmed that the roof over the front entrance would not be provided as a terrace/balcony and that other balconies would be of a modest size not encouraging high levels of activity or the accumulation of paraphernalia including parasols. This is welcomed.

The front projecting bays are very large – being of the order of 5m in width. Officers consider that these are overly dominant on the front elevation and appear as part of the primary building structure rather than as discrete projecting additions. We would like to see them reduced in width, preferably set in from the side elevations in the same manner as the porches on the neighbouring mid-19th century Italianate villas.

The forward facing side windows in the rear setback will need to be slim, refined and recessive in appearance, in order to minimise their visual impact on the streetscene.

Rear

Officers would prefer to see the rear projections provided as two elements. If necessary a further stepping into the garden at low level could be supported, although they should not be more than 3-4m deeper than the proposed 3.3m elements on the upper floors, and must retain subordination to the host building. A garden level projection would provide an opportunity for terraces at that level – appropriately screened to avoid overlooking of neighbouring habitable rooms. This would also assist in providing additional 3-bed units in order to improve the mix of units. It was agreed that it would be desirable to provide some form of separation between the two halves of the bay so that it broke down the scale and echoed the typical rear bay window arrangement found on semi-detached villas in the neighbourhood.

The planning application should provide as much detail as is available on the choice of materials and design detailing. Bay studies including 1:10 sections/elevations/plans are strongly recommended and mean that pre-commencement conditions can be minimised. We would condition sample panels of all facing materials on site as part of any permission however the application should seek to provide as much detail as possible about choice of materials, manufacturers details etc.

Boundary Treatment

The front boundary treatment should look to the prevalent local approach: low walls with hedges/greenery behind. The elevated wall at 1-3 Lancaster Grove is not an appropriate reference point. The east side of Lancaster Grove is characterised by green front gardens, which should be picked up in new landscaping.

Design summary and conclusions:

Officers are supportive of the direction of travel of the design. The alterations to the roof, rear and front elevations are an improvement on the first iteration.

Further work is required to the detailing, in particular in respect of :

- front elevation materials
- reducing the scale of the front bays
- redesigning the front entrance and steps
- introduction of a vertical feature at roof level echoing a central party wall and chimney
- separation of the rear bays
- boundary treatment

The design will need to be to a very high quality with the resultant building appreciably enhancing the CA. The choice of materials is a key component in delivering a quality building.

Other matters

- The removal of the basement parking is welcomed.
- The proposed accommodation as basement level is unclear. If it is to be habitable rooms they should be part of a duplex arrangement with the floor above in order to ensure a high quality of occupant amenity.
- As noted above the current mix is still not policy compliant. There should be increased provision of 3-bed or larger units.
- Affordable housing was not discussed however officers re-iterate the following: the quantum of housing currently proposed would trigger the need for provision of affordable housing on site. You are strongly discouraged from making a planning application until such time as the AH issue has been discussed and the approach agreed. Where AH is proposed on site it should be discussed with the Council's Housing Initiative team, via the case officer. Any AH strategy which involves submission of viability details must be agreed in advance of an application if it is to proceed in a timely and efficient manner.

NPPF compliance

Camden has carried out an NPPF compliance study of the LDF but has not published the results. The council's position (as reflected in appeal statements) is *"The Councils policies are recent and up to date and should be accorded full weight in accordance with paragraphs Nos.214-216 of the NPPF."*

Local consultation

We strongly encourage all developers to engage with local residents, groups and conservation interests before making a planning application. Particular groups of interest in the Belsize area are:

- Belsize Conservation Area Advisory Committee

- Belsize Residents Association

Their contact details can be found under 'Cindex' on the Camden [website](#).

Form of application

Any acceptable proposals involving Conservation Area Consent would require Development Control Committee approval. Any application proposing >1000sqm of replacement floorspace would be characterised as a Major development, requiring final decision (including completion of any s106 legal agreement) within 13 weeks, with derogation from the deadline only considered in exceptional circumstances where the application does not have an accompanying planning performance agreement.

The planning application should be made electronically: via the planning portal. We are happy to receive larger files via USB/CD in order to simplify the submission. The only paper details to be submitted should be one A3-sized paper copy of the Design & Access statement and Drawings. Please see the attached guidelines on preparing electronic documents which allow for ease/efficiency of public consultation.

Yours sincerely,

Gavin Sexton

Principal Planning Officer

On behalf of the Director of the Culture & Environment Department

The comments above are based on the information which has been submitted, which is accepted to be a result of the early stage of the proposal. Therefore, the advice is as specific and detailed as possible but does not represent the considered view of a fully detailed scheme.

Please note that if you (the applicant or their representative) have drafted any notes of the pre-application meeting(s) held with the council you cannot assume that these are agreed unless you have received written confirmation of this from the case officer.

As the planning service is moving to a fully paperless system you are advised to check the details required for submission in advance. We strongly urge you to make all planning applications via the planning portal. Arrangements can be made with the case officer to simplify the transfer of electronic submissions to the Council (by CD, USB key etc) at the point of application.

If you have any queries about the above letter or the attached document please do not hesitate to contact me at the number given above.

APPENDIX 5

UCL Note – Student Accommodation Strategy

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.