



UCL

New Student Centre

Planning Statement

June 2015

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1 Introduction

1.1 This Planning Statement has been prepared by Deloitte LLP in support of a planning application, submitted on behalf of University College London (UCL) ("The Applicant"), for the erection of a part 4, part 5 storey new academic building at a vacant site between 26 Gordon Square, Camden, WC1H 0AQ and the Bloomsbury Theatre, 15 Gordon Street, Camden, WC1H 0AH ("The Site").

1.2 UCL is seeking full planning permission for:

"Demolition of staircase structure and plant rooms, erection of a part 4, part 5 storey (plus two below ground floors) academic building (Use Class D1); the re-landscaping of the existing Japanese Garden to the rear; the provision of cycle parking; new vehicular and pedestrian access and associated works."

1.3 This Planning Statement sets out the planning justification for the proposed development and assesses the proposed development against the Development Plan for the Site and other relevant material considerations.

Bloomsbury Masterplan

1.4 UCL is embarking on an ambitious programme of transformation, renovation and redevelopment of its Bloomsbury campus. The UCL Bloomsbury Masterplan was prepared by Lifschutz Davidson Sandilands in 2010 and adopted by the UCL Council in 2011, following consultation with a wide range of internal and external stakeholders, including the London Borough of Camden. It sets out a vision for the long term development and improvement of the campus over the next ten to fifteen years, with expected investment of over £500 million. It identifies a range of projects to implement this vision and create the best possible teaching and learning environment including the delivery of the New Student Centre.

1.5 The masterplan projects that are under construction include the Wilkins Terrace, Refectory and Bloomsbury Theatre projects in the core campus area. These projects include a range of aesthetic and functional change that will revolutionise the use of space in the centre of the campus: transforming wasted space and creating space where previously the potential had not been realised.

1.6 The delivery of the New Student Centre is central to delivering the Masterplan vision.

Application Documents

1.7 The application comprises and is supported by:

- Planning Application Form and Certificates;
- Site Location Plan prepared by Nicholas Hare Architects;
- Application Drawings prepared by Nicholas Hare Architects;
- Landscape Drawings prepared by Colour UDL;

- Design and Access Statement prepared by Nicholas Hare Architects;
- Planning Statement (including Statement of Consultation and Planning Obligations Heads of Terms) prepared by Deloitte LLP;
- Townscape, Conservation and Visual Impact Assessment prepared by Tavernor and Miller Hare;
- Sustainability Statement (including BREEAM Pre-Assessment and Ecology Report) prepared by Expedition and Thomson Ecology;
- Energy Strategy prepared by Expedition;
- Archaeological Desk Based Assessment prepared by CgMs;
- Air Quality Desk Based Assessment prepared by Air Quality Consultants;
- Basement Impact Assessment prepared by Curtins;
- Noise Assessment prepared by BDP; and,
- Transport Statement (including deliveries strategy and outline construction management strategy) prepared by Icen Projects.

Environmental Impact Assessment (EIA) Screening

- 1.8 The proposed development has been considered with regard to the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended) (“the EIA Regulations”). These regulations raise and amend the thresholds at which certain types of development project will need to be screened in order to determine whether or not an EIA is required.
- 1.9 In determining whether the proposed development constitutes EIA development, consideration should be had for whether it is listed in Schedule 1 of the EIA Regulations, whether it is listed in Schedule 2 and exceeds the relevant thresholds, or, whether it is of more than local significance, is located in an environmentally ‘sensitive area’ as defined by the EIA Regulations, or is likely to give rise to unusually complex and potentially hazardous effects:
- The Proposed Development is not of a type listed in Schedule 1, therefore mandatory EIA is not applicable.
 - The Proposed Development may be considered to be Schedule 2 development under Category 10, ‘Infrastructure Projects’, of the EIA Regulations. Sub-section 10 (b) relates to ‘Urban development projects’ and states that development should be screened for the need for EIA if it meets the following thresholds:
 - i. The development includes more than 1 hectare of urban development which is not dwellinghouse development; or
 - ii. the development includes more than 150 dwellings; or
 - iii. the overall area of the development exceeds 5 hectares.
 - The proposed development does not exceed the thresholds stated in Schedule 2 10 (b) and therefore does not need to be screened for the need for an EIA to be undertaken.
- 1.10 In addition, the likelihood of significant environmental effects arising as a result of the proposed development has been considered in relation to the following points:
- The development is considered to be of local significance only, an enhancement to the existing UCL Bloomsbury Campus.

- The nearest 'sensitive area,' as defined by the EIA Regulations, is a Scheduled Monument (the Benedictine nunnery of St Mary, Clerkenwell) located approximately 1.5km to the east of the site.
- There will be increases in scale and massing of development at the site, from 498.4m² up to 4,704m² in floorspace, plus the construction of new buildings to a height of 25m; however, it is considered that this is in keeping with the surrounding environment; and
- The proposed development will not give rise to unusually complex or potentially hazardous effects given its proposed use as an academic building.

1.11 In conclusion, the proposed development does not meet the tests of Schedules 1 or 2 of the EIA Regulations and does not raise concerns in relation to other considerations stipulated within the Regulations. For these reasons, it is considered that an EIA screening assessment is not required for the proposed development.

Structure of the Planning Statement

1.12 The remainder of this Statement is structured as follows:

- Section 2 describes the Site and surrounding area;
- Section 3 explains the proposed development;
- Section 4 describes the community and stakeholder engagement that has informed the proposed development;
- Section 5 assesses the proposed development against planning policy and relevant material considerations;
- Section 6 sets out the proposed planning obligations Heads of Terms; and
- Section 7 summarises the key planning considerations and explains why planning permission should be granted.

2 Site Context

Location

- 2.1 The Site is situated at the heart of UCL's core Bloomsbury Campus in the London Borough of Camden (LB Camden). It is bound by the Bloomsbury Theatre to the north; Gordon Street to the east; 26 Gordon Square to the south; and the Wilkins Building and Japanese Garden to the west.
- 2.2 Whilst land uses in the surrounding area are varied the area is characterised by education, health and institutional uses (Class D1) including numerous buildings occupied by UCL. Retail and commercial uses can be found to the north and west of the site on Euston Road and Tottenham Court Road. The area to the east of the site contains a mix of residential, institutional and hotel uses. The nearest public open space is at Gordon Square Gardens with Tavistock Square Gardens also within close proximity.
- 2.3 The Site is situated within Sub-Area 3 of the Bloomsbury Conservation Area and borders Sub-Area 2. The Wilkins Building and the terrace buildings at 16 – 26 Gordon Square are Grade I and Grade II Listed respectively.
- 2.4 The Site has a TfL Public Transport Accessibility Level (PTAL) rating of 6b, indicating excellent access to the location by public transport. Euston, Euston Square and Warren Street Stations are situated less than 650m from the Site and the Site is well served by a number of bus routes running along Upper Woburn Place, Gower Street and Euston Road. The site is well served by cycle routes. The nearest Cycle Hire Docking Station is located on Taverton Street.
- 2.5 A Site Location Plan is provided at Appendix 1.

Description

- 2.6 The freehold of the Site is owned by UCL. Excluding the Japanese Garden, the Site has been vacant for a prolonged period since being cleared following bomb damage sustained during the Second World War; however, of late this area has been accommodating UCL construction worker welfare facilities for a temporary period.
- 2.7 The site is the primary point of access to the university campus for many students, as well as for emergency and delivery vehicles.

Site Allocation and Designations

- 2.8 The adopted LB Camden Site Allocations Development Plan document identifies the front part of the Site (excluding the Japanese Garden) (Site 22: 27 Gordon Square and 15 Gordon Street) as being suitable for development for *“university, education, cultural and/or community and related ancillary uses”*. The allocation sets out detailed guidance for the development of this area, which is discussed in further detail in Section 5 of this Statement.
- 2.9 The Site is situated within the Borough's Central London Area and in the Bloomsbury Conservation Area. It is also located within the Background Assessment Area of the Greenwich

to St Pauls Strategic Viewing Corridor. The south eastern portion of the Site lies within the Cross Rail 2 (Chelsea-Hackney) safeguarding area.

- 2.10 The Site lies approximately 500m to the south of the area safeguarded for the delivery of the proposed High Speed 2 rail link from London to the Midlands, which includes the provision of a new London Underground station entrance at the north end of Gordon Street and underground link to Euston and Euston Square stations.

Planning History

- 2.11 The Site's relevant planning history is summarised in Table 1 below:

Reference	Proposal	Decision (Date)
2004/4090/P	The erection of a six storey infill building with three basement levels between 26 Gordon Square and 15 Gordon Street to provide a museum gallery, lecture theatres and associated facilities for the University College London. These proposals were never implemented.	Granted Subject to a Section 106 Legal Agreement (06/10/2004)
2004/4093/C	The removal of the plant room pavilion to the Bernard Katz Building and the electricity substation to the side of the Bloomsbury Theatre.	Granted (06/10/2004)
2006/2435/P	Revision of planning permission dated 16th December 2004 ref. 2004/4090/P (six storey infill building with three basement levels between 26 Gordon Square and 15 Gordon Street to provide a museum gallery, lecture theatres and associated facilities for the University College London) by way of design changes to the approved external envelope, additional bulk at roof level and the inclusion of a chimney.	Granted (02/06/2006)
2007/3990/P	Details of hard and soft landscaping and means of enclosure of all un-built, open areas pursuant to condition 4 of planning permission dated 16/12/2004 (ref. 2004/4090/P) for erection of a six storey infill building with three basement levels between 26 Gordon Square and 15 Gordon Street to provide a museum gallery, lecture theatres and associated facilities for the University College London.	Granted (24/08/2007)
2010/1168/P	Installation of cycle parking station on vacant site for up to 62 cycles (behind existing hoarding).	Withdrawn (11/03/2010)
2015/1262/P	Installation of new plant equipment and enclosure on the roof of the Bloomsbury Theatre.	Granted (23/03/2015)

Table 1: Planning History

3 Proposed Development

Description of Development

- 3.1 The proposed development comprises the erection of a part 4, part 5 storey academic building (Class D1) and the re-landscaping of the existing Japanese Garden. The new building will have two below ground floors and will in total provide 4,704m² of gross internal floorspace.
- 3.2 Drawings showing the Site in its existing condition and the proposed development have been prepared by Nicholas Hare Architects and are submitted with the application.

Vision for the New Student Centre

- 3.3 The key drivers behind the proposed development are the chronic need to improve the quality and increase the quantity of student learning environments and to provide a new Student Enquiries Centre. The Site, given its location, size, policy context and vacant nature provides a prime opportunity to deliver these functions.
- 3.4 The New Student Centre will provide outstanding facilities that enhance the student experience. The highly sustainable new building will be of exceptional design quality and will be accessible, inclusive and welcoming. The main purpose of the building is to provide student learning space: a variety of different study areas for individual learning and group work. The building will also house a Student Enquiries Centre, which will provide a comprehensive enquiry point for student. Ancillary requirements include a lightly serviced café, a space for exhibitions and displays, a quiet contemplation room, IT resources, and cycle storage and showers.

Proposed Uses

- 3.5 The proposed development comprises 6,794sqm Gross External Area, 5,838sqm Gross Internal Area and 4,704m² net internal area as identified at Table 2 below:

Floor	Study Space and Main Circulation Areas (m ²)	Core Areas, Plant, WCs, Lifts and Escape Stairs (m ²)	Staff Areas (m ²)	Other (m ²)	Total NIA (m ²)
Basement 02	68	409	-	134 (Quiet Contemplation Room)	611
Basement 01	290	317	26	-	633
Street Level	326	185	10	-	521
Garden Level	217	177	-	-	394
First Floor	210	195	17	294 (Student Enquiries Centre)	716
Second Floor	557	150	-	-	707
Third Floor	402	177	-	71 (Café)	650
Fourth Floor	316	156	-	-	472
Total	2,386	1,766	53	499	4,704

Table 2: Proposed Uses by Floor

Previous Schemes

- 3.6 Previous proposals for the Site were developed in 2012 and 2013 but were not pursued and a planning application was never submitted. This followed feedback received from LB Camden and Design Council CABE and reflected UCL's desire to deliver a development of the highest quality in this location.
- 3.7 In 2014, UCL decided to change architects and carried out a selection process which LBC was heavily involved in.

Design

- 3.8 The proposed development incorporates the following design principles:
- Create a transparent, legible and welcoming building at ground floor level;
 - Create an entrance to the Campus for thousands of students as well as emergency and delivery vehicles;
 - Mediate between the various level changes surrounding the Site;
 - Improve circulation and navigation in and around this part of UCL's Core Bloomsbury Campus;
 - Deliver useable and effective student learning spaces;
 - Respond to the unique character of the Sub-Area 2 of the Bloomsbury Conservation Area;
 - Engage Gordon Street by creating a contemporary masonry façade and active frontage;
 - Celebrate the identity of UCL.
- 3.9 For further information regarding detailed design please refer to the Design and Access Statement prepared by Nicholas Hare Architects and the Townscape, Conservation and Visual Impact Assessment prepared by Tavernor and Miller Hare, which accompany this application.

Public Realm and Landscape

- 3.10 The proposed development includes the transformation of the Japanese Garden, an area of publically accessible open space enclosed by the Wilkins Building and the Bernard Katz Building. The Wilkins Building is Grade I listed and the Japanese Garden forms part of its setting.
- 3.11 Known as the Japanese Garden because of a memorial donated by Japanese former UCL students, it currently accommodates a temporary events structure, a plant-room for laboratories beneath it, and the 'Node', the staircase and plant-room for the Bloomsbury Theatre. The proposed development will remove these structures and create a much-improved hard and soft landscaped courtyard that will retain access from the Wilkins building and from Gordon Street via the Site. These landscaping works will greatly enhance the setting of the Grade I listed Wilkins Building. The works do not affect the structure of the Wilkins Building and do not require listed building consent.
- 3.12 It is part of UCL's ambition to achieve the pedestrianisation of Gordon Street to create a safe, accessible, inclusive and attractive setting for the NSC and other UCL buildings on Gordon Street, and a coherent part of the wider pedestrian environment across the Bloomsbury Masterplan area.

- 3.13 In previous discussions with LBC the issue of whether pedestrianisation proposals could be brought forward in tandem with the NSC planning application was raised. However, it is not possible to achieve this due to the timing of the HS2 works on Gordon Street and in the surrounding area. In addition UCL is proposing to develop a Public Realm Framework for a much wider public realm scheme of which the Gordon Street works should form an integral part.
- 3.14 UCL is in discussion with LBC on the timing and preparation of the Public Realm Framework.

Energy and Sustainability

- 3.15 UCL has set out a clear vision and ambitious targets for delivering sustainability on the Bloomsbury Campus. The development of new buildings including the New Student Centre will play a key role in UCL's ability to meet those targets, particularly the reduction of carbon emissions.
- 3.16 The scheme will deliver a number of notable sustainability benefits and credentials, including:
- **Energy Efficiency:** A highly energy efficient building, connected to the UCL District Heat Network, cooled by a ground source system and with renewable energy generation from roof mounted photovoltaics.
 - **Water Efficiency:** Minimising water consumption through the specification of water efficient fittings.
 - **Sustainable Use of Materials:** Durable materials with a simple open structure, where finishes are minimised and hence whole life material impacts are reduced.
 - **Biodiversity:** A biodiverse roof will be provided and enhancement of the planting in the Japanese Garden will be undertaken. Bird and bat boxes are also to be provided.
 - **Flooding:** Peak runoff from the site will be managed through attenuation in the biodiverse roof and a basement level attenuation tank.
 - **Adaption to Climate Change:** Methods for dealing with overheating are incorporated within the design. Surface water drainage systems accommodate likely impacts of climate change.
 - **BREEAM:** BREEAM 'Excellent' and Camden's minimum standards for energy, water and materials are targeted.
- 3.17 This holistic approach goes beyond the requirements of BREEAM but also ensures that the scheme will achieve a BREEAM Excellent Rating.

Access

- 3.18 The building's primary point of access for pedestrians, and the sole point of vehicular access will be directly from Gordon Street; however, pedestrian access can also be achieved from the Wilkins Building via the Japanese Garden to the rear of the New Student Centre and from the south beside the Bernard Katz Building.
- 3.19 It is a UCL priority to create fully accessible teaching and working environments for staff and students. UCL is committed to monitoring and identifying the particular needs of current and future users with disabilities, and responding by making the necessary changes to the physical environment. As such, the New Student Centre will have full disabled access.
- 3.20 The New Student Centre will be serviced from the new pedestrian and vehicular gateway to the campus which will be situated within the New Student Centre site, immediately north of 26 Gordon Street.

- 3.21 To facilitate the relocation of the pedestrian and vehicular access point, it is necessary to relocate the existing pedestrian crossing outside the Site. Pre-application discussions with the Local Highways Authority have taken place and it has been agreed in principle to relocate this crossing further north on Gordon Street. It has been agreed that this relocation can be achieved through a Traffic Management Order that can run in parallel to the planning application process for the proposed development and will be the subject of public consultation.
- 3.22 Please refer to ground floor plan reference 689-NHA-PL-009 for the access points described above.

Sustainable Transport

- 3.23 UCL's core Bloomsbury Campus is well served by public transport with Euston, Euston Square and Warren Street Stations all within close proximity and numerous bus routes running along Upper Woburn Place, Gower Street and Euston Road. The proposed development will be entirely car free.
- 3.24 In accordance with LBC's adopted cycle parking standards as set out at Policy DP18 - *Parking Standards and Limiting the Availability of Car Parking*, UCL is required to provide 1 space per 250 m² floorspace for both staff and students. This equates to 47 spaces for the New Student Centre based on a proposed GIA of 5,838m².
- 3.25 UCL wishes to further encourage students and staff to use sustainable modes of transport such as cycling and will thus provide 54 spaces within the proposed Refectory Route. Showers and drying facilities will be provided at basement level 2. For full details please refer to the Transport Statement prepared by Icen Projects.
- 3.26 The use of sustainable modes of transport by UCL staff and students is already very high with the vast majority accessing the Bloomsbury Campus by walking, cycling or using public transport.
- 3.27 The UCL campus-wide Travel Plan is currently in draft and is being worked up in consultation with LB Camden. A site-specific addendum for the New Student Centre is currently being prepared and will be secured through the S106 legal agreement.

Demolition of Structures

- 3.28 To optimise the potential of the Site, UCL will demolish two non-listed structures: a one-storey plant room (the ACBE) which accommodates plant equipment serving laboratories below the Japanese Garden; and a stair tower known locally as 'the Node' which currently houses the mechanical plant that supplies the Bloomsbury Theatre.
- 3.29 The plant equipment from the ACBE plant room will be relocated in the basement of the proposed development.
- 3.30 The existing plant in the Node is at the end of its serviceable life and in chronic need of replacement. As such LB Camden has granted planning permission for the erection of a replacement plant machinery enclosure on a purpose built plant deck to the rear of the Bloomsbury Theatre (Ref: 2015/1262/P).

4 Statement of Consultation

- 4.1 This Section summarises the consultation that has been undertaken during the evolution of the proposals and how it has influenced the design of the scheme.

Consultation Overview

- 4.2 UCL has sought to engage with key stakeholders throughout the design development between December 2014 and May 2015, including consultation with statutory consultees from an early stage and on-going communication with other groups.
- 4.3 During the development of the design, the team developed a comprehensive stakeholder strategy. This included pre-application consultation meetings with the LBC planning and highways authorities, Historic England (formerly English Heritage), the Bloomsbury Conservation Area Advisory Committee (BCAAC) and the Commission for Architecture and the Built Environment Design Council (CABE). Extensive consultation was also carried out with students and staff at the university and the Metropolitan Police.
- 4.4 The feedback from key stakeholders is summarised below:

London Borough of Camden

- 4.5 LBC officers were consulted through a series of pre-application meetings held between December 2014 and May 2015. The focus of the discussions at each of these meetings is listed below.

Pre-application meeting 1 (17 December 2014)

- 4.6 This first meeting focused on meeting the project brief, the internal layouts, access, height and massing, impacts on the Conservation Area and neighbouring listed buildings and assessing the various preliminary development options.
- 4.7 The demolition of the Node and the erection of replacement plant on the gym roof of the Bloomsbury Theatre were also discussed and LBC set out some detailed advice on the principles which the replacement plant scheme should follow, largely to minimise the visual impact of the new plant.
- 4.8 In written meeting notes dated 14th January, officers concluded:

“Overall officers are impressed with the emerging plan forms: they are clear and legible and the links between Gordon Street and the courtyard and the rear of the Gordon Street properties are looking good.”

Pre-application meeting 2 (18 February 2015)

- 4.9 This meeting focussed on highways matters only and principally UCL's approach to Gordon Street works. UCL's approach to procuring the design of the pedestrianisation of Gordon Street as part of the wider core campus Public Real Framework was explained.

- 4.10 This meeting also discussed the need to relocate the existing pedestrian crossing on Gordon Street, in order to avoid any conflict with the proposed relocated pedestrian and vehicular portal through the application site. Officers accepted the rationale behind needing to advance the consultation for the relocation of the crossing so that these works could be completed prior to any New Student Centre construction works commencing.

Pre-application meeting 3 (17 March 2015)

- 4.11 This meeting concentrated on the proposed form and materials of the elevations. Officers were encouraged by the progress that had been made; however, there were some reservations about the proposed treatment of the Gordon Street elevation – primarily its relationship to 26 Gordon Street - and the definition of the entrances.

Pre-application meeting 4 (14 April 2015)

- 4.12 This meeting focussed on addressing comments from the CABE design review (see below), in particular the approach taken to the Gordon Street elevation. Officers were very encouraged by the design development and considered the approach taken to the set back of the bay adjacent to 26 Gordon Street a successful one.

Other LBC Meetings

- 4.13 LBC's Access and Sustainability officers have also been consulted and have had the opportunity to review and comment on the proposals. UCL has taken on board this feedback during the development of the design.

Historic England

- 4.14 Historic England (formerly English Heritage) was first consulted on the previous scheme for the Site in 2013.
- 4.15 A meeting was held on 27 January 2015 with Historic England to explain the current proposed development and how it differs to the proposals which were discussed in 2013. Historic England considered that the current proposed development shows a better understanding of the Site's historic context and considered that the proposed New Student Centre responded to the architecture and rhythm of the adjacent terraces in its 4 storey (plus basement) composition, its fenestration pattern and its materiality.
- 4.16 Detailed comments were made regarding the relationship between the northern end of the listed terrace and the south part of the New Student Centre, which the design team have sought to address. It is now considered that there is a more comfortable relationship between the New Student Centre and the listed terrace.
- 4.17 A second meeting was held on 29 April with additional information issued to Historic England by UCL on 7 May. Historic England has since confirmed that it is happy with how the proposals for the New Student Centre have progressed and it does not wish to make any further comments prior to submission of the planning application.

Bloomsbury Conservation Area Advisory Committee

- 4.18 A site visit took place with the Bloomsbury Conservation Area Advisory Committee (CAAC) on 11 February where Nicholas Hare Architects presented the emerging proposals for the New Student Centre. The proposals were well received notwithstanding some concerns regarding the double height entrance on Gordon Street and the vehicular route through the southern part of the building.

- 4.19 A second meeting was held on 7 May where support was offered for the Gordon Street setback, the consistent height around the Japanese Garden courtyard in line with the existing cornice level, the façade design and the proposed use of bricks.

CABE Design Review Panel

- 4.20 A presentation was made to the CABE Design Review Panel by Nicholas Hare Architects on 23 March following an initial briefing meeting on 24 February.
- 4.21 The advice and response from the CABE Panel was positive and focused on detailed elements of the design. LBC and Historic England were also in attendance.
- 4.22 The formal letter of feedback received from CABE on 13 April stated:

“There is much to applaud in the current proposal. The concept of a university building that is open to both students and the public is a highly commendable one, and the steps taken to achieve this – particularly removing the existing ‘node’ building and repositioning the plant rooms – are justified and worthwhile. The proposed mix of amenities is becoming of a new place well-vested in the welfare of its students and the public and the internal organisation works well with the outdoors. We are confident that once the Japanese Courtyard and Gordon Street elevations have been developed, and the currently less successful subterranean spaces have been addressed, the New Student Centre can build upon the strong legacy of the university and architectural diversity in the Bloomsbury Conservation Area.”

- 4.23 The key comments received following the CABE Design Review Panel have helped to shape the final proposals for which planning permission is sought.
- 4.24 UCL will continue to engage with and update key stakeholders throughout the statutory consultation period and determination process.

5 Policy Review and Scheme Justification

- 5.1 This section considers the proposed development against the Development Plan for the Site and relevant material considerations.

Planning Policy Framework

- 5.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the statutory Development Plan, unless material considerations indicate otherwise.
- 5.3 The Development Plan for the area comprises:
- Further Alterations to the London Plan (FALP) (2015);
 - Camden Core Strategy (2010);
 - Development Policies DPD (2010); and,
 - Camden Site Allocations Plan (2013).
- 5.4 The National Planning Policy Framework (NPPF, March 2012), the National Planning Policy Guidance (NPPG, March 2014) and Camden Planning Guidance (updated 2013) are all material considerations.
- 5.5 The FALP sets out the strategic development policies for London and as such we have concentrated on policies set out in it plus the Local Development Framework and Camden Planning Guidance to assess the detailed proposals.

Principle of Development

- 5.6 The principle of developing academic uses in this location is well established and, subject to other relevant Development Plan policies, is supported by policies in Camden's LDF and the London Plan, which seek to promote the existing Bloomsbury university cluster and the growth of the knowledge economy.
- 5.7 London Plan Policy 2.11(g) supports the development of clusters of strategically important CAZ uses, including academic uses. Policy 4.10(b) supports London's higher and further education institutions, recognising their needs for accommodation and the special status of the parts of London where they are located, including the Bloomsbury / university precinct.
- 5.8 Policy 2.11(g) states that the Mayor will, and boroughs and other relevant agencies should:
-
- “ensure development complements and supports the clusters of other strategically important, specialised CAZ uses including legal, health, academic, state and ‘special’ uses while also recognising the ‘mixed’ nature of much of the CAZ.”
- 5.9 Policy 4.10(b) states that the Mayor will, and boroughs and other relevant agencies should:

“give strong support for London’s higher and further education institutions and their development, recognising their needs for accommodation and the special status of the parts of London where they are located, particularly the Bloomsbury/ Euston and Strand university precincts.”

- 5.10 Core Strategy Policy CS9 – Achieving a Successful Central London, supports the concentration of educational and research institutions in Central London. Policy CS10 – Supporting Community Facilities and Services, also supports the higher education sector whilst seeking to balance its requirements with those of the local community (please refer to the section below on residential amenity).

- 5.11 Policy CS9 states:

“The Council will support and promote the Central London area of Camden as a successful and vibrant part of the capital to live in, work in and visit. We will:

- a) recognise its unique role, character and challenges;
- b) support Central London as a focus for Camden’s future growth in homes, offices, hotels, shops and other uses;
-
- h) support the concentration of medical, educational, cultural and research institutions within central London;

- 5.12 Policy CS10 states:

“The Council will work with its partners to ensure that community facilities and services are provided for Camden’s communities and people who work in and visit the borough.

This includes:

...

- b) supporting the higher education sector in Camden and balancing its requirements with those of other sectors and the local community. In assessing applications for higher education use, the Council will ensure that such developments are sensitive to their surroundings, take into account the cumulative impact on the balance and mix of uses in the area, protect residential uses, the local environment and the amenity of, and services for, the residential community and other users of the area and their future needs;

- 5.13 The proposed development will positively contribute to the aims of CS9 and CS10 by providing much needed learning space facilities for UCL as part of its wider strategic transformation of its core Bloomsbury campus. The proposed development will maintain UCL’s role as a key education and research institution in the borough.

Site Allocation

- 5.14 The site forms part of ‘Site 22: 27 Gordon Square and 15 Gordon Street’, which is identified in Camden’s adopted Site Allocations DPD for the provision of university, education, cultural and/or community and related ancillary uses. The supporting text goes on to state that development will be expected to:

- *Integrate development with associated development and improvements within and adjoining the UCL campus and assist providing a more legible entrance to UCL.*

The New Student Centre seeks to celebrate the identity of UCL and as such the building has been designed to be transparent, legible and welcoming particularly at ground floor level. The proposals will also help realise improvements to Gordon Street, the Japanese Garden

and the surrounding public realm whilst improving the setting of adjacent heritage assets, including the Grade I listed Wilkins Building.

- *Create an improved pedestrian entrance into the university campus.*

The New Student Centre will be an important gateway to UCL's Core Bloomsbury campus with thousands of students accessing the campus from the east each day. The proposals will improve circulation and navigation in and around this part of UCL's Core Bloomsbury Campus.

- *Support opportunities for activities and spaces encouraging public access.*

It is proposed that the New Student Centre will be publically accessible at ground floor levels with large spaces welcoming people and encouraging them to enter the building. The new building will provide a welcoming reception point for students, the public and visitors, combined with a security presence. Security access gates operated by swipe card proximity readers are situated in four locations to prevent unauthorized visitors from accessing other floors of the building. The Japanese Garden is also publically accessible.

- *Safeguard the setting of adjacent and nearby listed buildings and the character of the Bloomsbury Conservation Area*

The Site is situated within Sub-Area 3 of the Bloomsbury Conservation Area which is institutional in character and includes the Grade I listed Wilkins Building. The Site lies adjacent to Sub-Area 2 which is more residential in character and includes the Grade II listed terrace at 16 – 26 Gordon Square. The proposed design of the New Student Centre responds to the character of these Sub-Area's and the Conservation Area moreover whilst being sympathetic to the setting and significance of the Wilkins Building, The Gordon Square listed terrace and other statutory listed buildings within close proximity. In terms of 16-26, the use of brick as the main façade material, the step back of the upper floors and the alignment of the New Student Centre floors with those of 26 Gordon Square, all work to create an appropriate and harmonious relationship with the listed terrace.

- *Provide infrastructure for supporting local energy generation on site and/or connections to existing or future networks where feasible.*

The New Student Centre will be connected to UCL's existing District Heat network. This will provide space heating and domestic hot water to the building. An open loop ground source borehole will provide 'free' cooling to the building. Finally, roof mounted photovoltaics will provide local energy generation.

- *Safeguard the future construction of the Chelsea-Hackney line.*

The New Student Centre proposals will not prejudice the Chelsea-Hackney Cross Rail line coming forward.

Mixed Use Development

5.15 Core Strategy Policy DP1 – Mixed Use Development, states that the Council will require a mix of uses in development where appropriate in all parts of the borough. No non-residential uses are specifically excluded from this requirement; however, the policy does set out a number of factors to be taken into account when considering exceptions to this policy.

5.16 In particular, paragraph 1.23 of the supporting text states that secondary uses may not be sought would they would be precluded by *"the operational requirements of a specialised use, such as a hospital or healthcare facility, or an academic, research or educational institution."* This is reflected in the site allocation, which recognises that *"secondary uses might not be feasible, given the existing use and specific requirements of the university on this site."*

- 5.17 It is therefore considered that the basis for an exception to Policy DP1 has already been established in planning policy. In this case, given the needs of UCL and the constraints of the Site, it is not possible to incorporate a mix of uses in the development other than those serving the student population.

Design and Heritage

- 5.18 Core Strategy Policies CS14 – Promoting High Quality Places and Conserving our Heritage and DP25 – Conserving Camden’s Heritage, seek to ensure that development proposals meet the highest standards of design, respect local context and character, and resist development that would cause harm to the any listed building or Conservation Area. The impact of the proposals on nearby heritage assets has been tested extensively during the design process and this approach has informed the submitted design and choice of materials.
- 5.19 The design of the proposed development balances the need to be sensitive to the surrounding built environment, in particular the adjacent listed buildings and Bloomsbury Conservation Area, with the ambition of UCL to create a ‘landmark’ building that befits ‘London’s Global University’.
- 5.20 The submitted scheme seeks to maximise the potential of the Site, by creating a building which responds to its academic functional, as well the character and materiality of the Conservation Area and nearby listed buildings.
- 5.21 The building seeks to enhance the setting of the nearby listed buildings by delivering a high quality academic building on a Site which currently accommodates temporary construction welfare facilities and which was vacant for many years prior. It does not seek to replicate the form or architecture of the listed buildings, but uses them as reference points to mediate between the old and the new.
- 5.22 The proposed development has been informed by extensive consultation with the LBC, Historic England, the Bloomsbury CAAC, CABE and UCL staff and students.
- 5.23 The proposed development will fully comply with NPPF heritage and design policy and in particular with the requirement for new development to make a positive contribution to local character and distinctiveness (NPPF paragraph 131).
- 5.24 The proposed development will fully comply with heritage and townscape related policy set out in The London Plan. It will protect local character (Policy 7.4), be of a high architectural quality (Policy 7.6) and will relate well to the historic environment (Policies 7.8-10). No views set out in the London Views Management Framework SPG will be affected by the proposed development.
- 5.25 The proposed development will fully comply with Camden’s heritage and townscape related policy. In accordance with Camden’s Core Strategy, the proposed development will be of the highest standard of design which respects local context character (Policy CS14). No locally important views will be affected by the proposals (para 14.25). It will meet the necessary high quality standard in all aspects of design set out in Policy DP24 and, in accordance with Policy DP25, will not harm any conservation area or listed building.
- 5.26 For a more detailed assessment of the proposed development’s potential visual impacts on the character of the local and wider townscape and the setting of heritage assets, please refer to the accompanying Townscape, Conservation and Visual Impact Assessment.

Sustainability

- 5.27 The proposed development will deliver a highly sustainable building that is consistent with the clear vision and ambitious targets that UCL has set to improve sustainability across the entire Bloomsbury campus.
- 5.28 Policy DP22 – Promoting Sustainable Design and Construction expects non-domestic developments of 500 m² of floorspace or above to achieve a “very good” BREAAAM rating. The New Student Centre is currently expected to achieve BREEAM ‘Excellent’ as demonstrated in the accompanying BREEAM pre-assessment report.
- 5.29 The Sustainability Statement prepared by Expedition which accompanies this submission sets out UCL’s wider sustainability objectives for the New Student Centre.
- 5.30 The proposals will enable sustainability benefits to be realised with regards to:
- **Energy Efficiency:** A highly energy efficient building, connected to the UCL District Heat Network, cooled by a ground source system and with renewable energy generation from roof mounted photovoltaics.
 - **Water Efficiency:** Minimising water consumption through the specification of water efficient fittings.
 - **Sustainable Use of Materials:** Durable materials with a simple open structure, where finishes are minimised and hence whole life material impacts are reduced.
 - **Biodiversity:** A biodiverse roof will be provided and enhancement of the planting in the Japanese Garden will be undertaken. Bird and bat boxes are also to be provided.
 - **Flooding:** Peak runoff from the site will be managed through attenuation in the biodiverse roof and a basement level attenuation tank.
 - **Adaption to Climate Change:** Methods for dealing with overheating are incorporated within the design. Surface water drainage systems accommodate likely impacts of climate change.
 - **BREEAM:** BREEAM ‘Excellent’ and Camden’s minimum standards for energy, water and materials are targeted.
- 5.31 On the basis of the information provided in the Sustainability Strategy, the scheme fully complies with Policy CS13 – Tackling Climate Change Through Promoting Higher Environmental Standards.

Energy

- 5.32 The New Student Centre will meet the LB Camden (CPG 3 – Sustainability) and the London Plan requirement of achieving a 35% carbon dioxide reduction on Part L 2013 for new development. LB Camden’s renewable target is for a 20% reduction in regulated carbon dioxide emissions which will also be met from on-site renewable energy technologies; in this instance solar PV panels.
- 5.33 The results from the Part L calculation in relation to the energy hierarchy are summarised in the Energy Strategy in accordance with GLA guidance.
- 5.34 The New Student Centre has been designed in line with the following key principles:
- Minimise the demand for energy by enhancing fabric efficiency and promoting passive design.

- Utilise the thermal mass of the building to help control internal heat gains.
- Use of mechanical ventilation with heat recovery to recover ventilation heat loss during the winter.
- Provide heating through a connection to UCL's District Heat Network.
- Prevent spaces from overheating by using natural ventilation or mechanical ventilation (heat recovery element by-passed), with CO2/temperature sensing and optimiser to increase the fresh air rate for comfort purposes.
- Connect the building to a 'free' source of cooling via an open loop ground source borehole system which feeds cooling pipes embedded in the underside of the floor slabs.
- Maximise the use of photovoltaic panels to generate renewable energy.

Transport

- 5.35 Core Strategy Policy DP16 – The Transport Implications of Development states that the Council will seek to ensure that development is properly integrated with the transport network and is supported by adequate walking, cycling and public transport links. The Site has an excellent PTAL rating (6b) and benefits from easy access to Euston, Euston Square and Warren Street stations and a number of active bus routes, as well as cycling and walking routes, connecting it with the rest of the campus, nearby shops and public transport interchanges.
- 5.36 Policies CS11 – Promoting Sustainable and Efficient Travel and DP17 – Walking, Cycling and Public Transport, endorse walking, cycling and public transport, all of which are already heavily used by UCL staff and students (over 99% of students travel to campus by walking, cycling and public transport).
- 5.37 LBC Policy DP18 - Parking Standards and Limiting the Availability of Car Parking, requires new higher education / university development to provide 1 space per 250 m² floorspace for both staff and students. This equates to 47 spaces for the New Student Centre based on a proposed GIA of 5,838m².
- 5.38 54 cycle parking spaces will be provided on site, with provision of showers and changing areas in the building. This number of cycle parking spaces exceeds the minimum LBC policy requirement and demonstrates UCL's commitment to providing adequate and safe cycle parking across its core campus.
- 5.39 In accordance with DP17, the Council will resist development that would be dependent on travel by private motor vehicles. The proposed development will be entirely car free with no on-site parking spaces. As such, the proposals are also in full accordance with policies DP18 – Parking Standards and Limiting the Availability of Car Parking and DP19 – Managing the Impact of Parking which provide guidance on parking standards and managing the impact of vehicle parking respectively.
- 5.40 A limited number of car parking spaces are available on the UCL campus for disabled students who are blue badge holders.
- 5.41 For full details please refer to the Transport Statement prepared by Iceni Projects enclosed.

Servicing and Deliveries

- 5.42 The New Student Centre will be serviced from the north end of the Refectory Route, linking it with the main ground floor street level by means of a platform lift. This route into the building has security restricted access and is intended as the principal entry / exit point for goods, deliveries and refuse. The platform lift leads directly into the core where the main lifts are located resulting in easy access to the remainder of the New Student Centre.

Residential Amenity

- 5.43 The Site is located in an area dominated by institutional buildings many of which are occupied by UCL and fall within Use Class D1, including the neighbouring Wilkins Building and Bloomsbury Theatre. There are also some offices (Use Class B1) within close proximity of the site.
- 5.44 As per policies CS14, DP24 – Securing High quality Design and DP25, the proposals have been sensitively designed and are sympathetic to the Grade II listed terrace at 16 – 26 Gordon Square and the Grade I listed Wilkins Building.
- 5.45 The proposals will aesthetically improve Gordon Street considerably and will thus contribute towards improving the general quality of this part of Bloomsbury for the benefit of those working, studying and visiting the area.
- 5.46 There are no residential properties close to the Site whose daylight, sunlight or privacy rights would be affected by the proposed development.

Noise

- 5.47 In accordance with DP28 – Noise and Vibration, measures have been taken to mitigate plant noise as detailed in the Noise Impact Assessment which supports this application.
- 5.48 The Noise Impact Assessment enclosed measured the lowest background noise levels to be LA90 54 dB during the day and LA90 46 dB during the night at the position representative of the nearest noise sensitive premises.
- 5.49 To comply with DP28, any individual items of building services plant associated with the New Student Centre must be specified such that the cumulative noise ratings of all items of plant in simultaneous operation do not exceed the following at the nearest noise sensitive premises:
- Noise emissions level of LAeq,T 49 dB during the day time (0700 – 2300 hrs)
 - Noise emissions level of LAeq,T 41 dB during the night time (2300 – 0700 hrs)
- 5.50 A further 5 dB reduction will be applied to the above noise emissions limit if the proposed plant items display tonal characteristics (such as whines, hisses or hums).
- 5.51 The cumulative noise emissions from the proposed building services plant at the New Student Centre has been calculated to fall within the noise emissions limit and thus accords with the relevant Camden planning policies. Further details are provided in the Noise Impact Assessment.

Air Quality

5.52 Policy DP32 Air Quality states:

“The Council will require air quality assessments where development could potentially cause significant harm to air quality. Mitigation measures will be expected in developments that are located in areas of poor air quality.”

5.53 CPG 6 Amenity provides further guidance on Air Quality Assessments and Mitigation Measures and has been duly considered.

5.54 An Air Quality Statement has been produced and concludes that the overall operational air quality impacts of the development are judged not to be significant notwithstanding the need for mitigation measures to be implemented to minimise dust emissions during the construction period; therefore the proposed development accords with Policy DP32.

5.55 The development will result in a negligible change in local air quality, and is expected to be ‘Air Quality Neutral’ in its operation phase as set out in the Air Quality Statement enclosed.

Archaeology

5.56 An Archaeological Desk Based Assessment has been prepared by CgMs and in accordance with London Plan Policy 7.8 – Heritage Assets and Archaeology, and LBC Policy DP25, the archaeology section of which states:

“The Council will protect remains of archaeological importance by ensuring acceptable measures are taken to preserve them and their setting, including physical preservation, where appropriate.”

5.57 The enclosed Archaeological Desk Based Assessment concludes that the application Site has a modest archaeological potential for remains associated with the Palaeolithic period, and a limited potential for all other periods.

5.58 It is also considered that past medieval agricultural activity is likely to have already had a low, but widespread, negative impact on below ground archaeological deposits whilst the construction of buildings on the site during the 19th and 20th century will have had a severe widespread negative impact. As such, the proposals for the New Student Centre are considered to be acceptable with regards to archaeology and accord with the relevant development plan policies.

5.59 In accordance with DP25, the Archaeological Desk Based Assessment recommends that appropriate mitigation measures in the form of a targeted archaeological watching brief for the groundwork construction period, and specifically the construction of the new basement, is secured by condition.

Basement Impact

5.60 It is proposed that the New Student Centre will include two below ground floors and as such a Basement Impact Assessment has been prepared in accordance with Policy DP27 - Basements and Lightwells.

5.61 Policy DP27 states:

“In determining proposals for basement and other underground development, the Council will require an assessment of the scheme’s impact on drainage, flooding, groundwater conditions and structural stability, where appropriate. The Council will only permit basement and other

underground development that does not cause harm to the built and natural environment and local amenity, and does not result in flooding or ground instability.”

- 5.62 In accordance with DP27, the basement levels will not have an adverse impact on adjacent buildings and infrastructure (including public highways and services) and further assessments will be undertaken during detailed design to confirm that this remains the case.
- 5.63 The Basement Impact Assessment has concluded that during detailed design there is a need for an assessment of the potential impact of the new basement on groundwater levels in the shallow aquifer due to the proposed basement extending into ground which is currently permeable and saturated.
- 5.64 It is possible that the groundwater level will be raised up-gradient of the new basement and lowered down-gradient, compared with the present situation. This is considered to be the only potential impact of any significance and thus UCL will undertake a Hydrogeological Assessment subject to the granting of planning permission. The scope for this Assessment is set out in the Basement Impact Assessment.

6 Planning Obligations and Conditions

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

Section 106 Guidance

- 6.2 All development specific planning obligations are required to meet the legal tests, set out in the Community Infrastructure Levy (Amendment) Regulations 2010 (as amended by the Community Infrastructure Levy (Amendment) Regulations 2014) which require planning obligations to be:
- i. Necessary to make the development acceptable in planning terms;
 - ii. Directly related to the development; and
 - iii. Fairly and reasonably related in scale and kind to the development.
- 6.3 Camden Planning Guidance 8: Planning Obligations (CPG 8) was adopted in September 2011 and sets out the Council's priorities for planning obligations. It provides thresholds and formulae for the calculation of planning obligations, which have been used to inform the Draft S106 Heads of Terms set out below.
- 6.4 LB Camden adopted its CIL Charging Schedule on 1 April 2015.

Planning Obligations

- 6.5 UCL has considered appropriate planning obligations, and the proposed draft heads of terms are set out below:
- A site specific Construction Management Plan will be prepared and aligned with the campus-wide Construction Management Plan.
 - UCL will connect to the existing decentralised energy network, which is expected to be upgraded in the future, as detailed in the Energy Strategy.
 - UCL or the chosen contractor for the proposed development, will prepare a local employment and training strategy, in consultation with LBC, and will use its best endeavours to recruit construction apprentices (precise figure to be determined) working with the appointed contractor, in accordance with paragraph 8.17 of CPG 8. A support fee of £1,500 per apprentice will be payable. Where the recruitment of apprentices is not possible, a fee of £7,000 per apprentice will be payable to LBC to enable the creation of training opportunities elsewhere in the borough.
 - The Section 106 legal agreement will be used to secure a commitment to the Camden Local Procurement Code, to identify opportunities for local businesses during construction.
 - A site specific Travel Plan will be produced and will tie into the campus-wide Travel Plan. This will consider options to promote sustainable modes of transport including walking and cycling. A Travel Plan Review fee will be required.
 - A contribution to improvements to highways, public realm, footways, cycle routes and the surrounding environment.

- The pedestrian crossing outside the site on Gordon Street will be relocated in accordance with the results of the traffic regulation order consultation.
- The scheme will be car free.
- Improvements to public realm, the scope of which will be agreed between UCL and LBC. It should be noted that UCL is proposing to significantly improve the quality of the Japanese Garden - which is publically accessible - as part of this application.

Monitoring

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

Legal Costs

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

7 Conclusions

7.1 UCL is seeking planning permission for the:

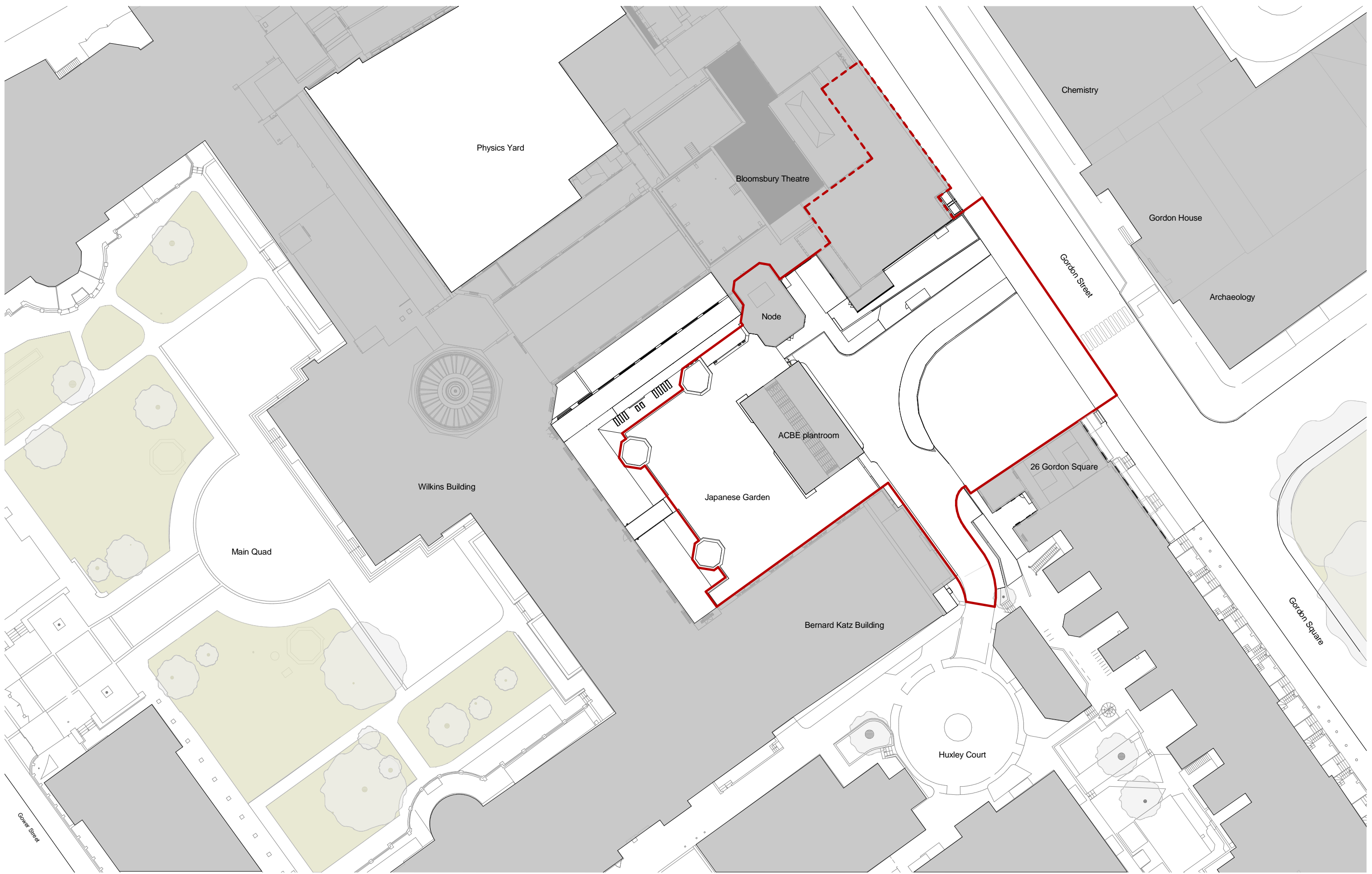
“Demolition of staircase structure and plant rooms, erection of a part 4, part 5 storey (plus two below ground floors) academic building (Use Class D1); the re-landscaping of the existing Japanese Garden to the rear; the provision of cycle parking; new vehicular and pedestrian access and associated works.”

7.2 The proposed development complies fully with the relevant policies contained within the Development Plan as set out in this report. It will deliver a number of significant planning benefits which are relevant to the determination of this planning application including:

- The proposed development is supported by, and is in accordance with, Camden’s Site Allocations Plan which seeks new academic floorspace on this site to facilitate the growth of the University and strategic Camden and London Plan policies which support the existing Bloomsbury University cluster.
- The proposed development will enhance the character and appearance of the Bloomsbury Conservation Area by introducing a high quality new building into a bomb damaged “gap” site. It will respect the setting of nearby listed buildings and has been sensitively designed.
- The proposed development is a key element of the Bloomsbury Masterplan and will be one of the first major projects identified in the Masterplan to be completed as part of UCL’s transformational agenda. There is also a chronic need to improve the quality and increase the quantity of student learning environments at UCL and to provide a new Student Enquiries Centre.
- The Japanese Garden, an area of publically accessible open space to the west of the proposed new building will be significantly upgraded in terms of quality of environment, creating an improved area of public realm.
- The new building will achieve BREEAM Excellent rating by connecting to UCL’s existing decentralised energy network and improved energy and sustainability performance including renewable energy provision and sustainable drainage system.
- The building is located in a highly sustainable location and will be entirely car free. 54 cycle parking spaces will be provided which exceeds Camden’s cycle parking standards for the development.
- To create and appropriate and harmonious relationship with 26 Gordon Square, while the removal of the Node and other structures and re-landscaping of the Japanese Garden will considerably improve the setting of the Grade I listed Wilkins Building.

7.3 For the reasons set out in this Planning Statement, we consider that planning permission should be granted.

Appendix 1: Site Plan



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