



COTUIT HALL, OXFORD

PLANNING STATEMENT (INCLUDING AFFORDABLE HOUSING AND PLANNING OBLIGATIONS STATEMENT)

MARCH 2017

DP9 Ltd
100 Pall Mall
London
SW1Y 5NQ

Tel: 020 7004 1700
Fax: 020 7004 1790

CONTENTS

1.0	Introduction	1
2.0	Site Description	3
3.0	Proposed Development	5
4.0	Planning Policy Assessment	11
5.0	Affordable Housing and Planning Obligations Statement	33
6.0	Conclusions	35

APPENDIX 1: Planning History

SCHEDULE 1: Documents Submitted for Approval

1.0 INTRODUCTION

1.1 This Planning Statement has been prepared by DP9 Ltd. on behalf of EF International Academy UK Ltd. (“the Applicant”) and is submitted in support of a planning application for full planning permission for the redevelopment of the Cotuit Hall site located on Pullens Lane (“the site”) for the change of use of the site from sui generis student accommodation to C2 (residential institution), as well as the erection of a one-storey building for student accommodation to allow the site to function as a self-contained boarding school.

1.2 The development description for the planning application is as follows;

“Demolition of single storey lecture hall and refectory buildings, change of use from sui generis student accommodation to C2 (residential institution), erection of single storey connecting buildings, along with internal reconfiguration of the retained buildings, and provision of associated car parking and cycle parking spaces, landscaping, plant, and associated works.”

1.3 The proposal, as defined in paragraph 1.2, is referred to in this Planning Statement as “the proposed development”.

1.4 This Planning Statement assesses the planning considerations associated with the proposed development in the context of national, regional and local planning policy and guidance. Section 4.0 of this Statement provides an overview of the main planning policy and guidance documents relevant to an assessment of the proposed development.

1.5 In addition to this Statement, the application is accompanied by the following documents for approval as *part* of the main submission (please refer to Schedule 1):

- **Planning Application Form and Certificate** (March 2017), prepared by DP9;
- **CIL Form** (March 2017), prepared by DP9;
- **Proposed planning drawings** (August 2016), prepared by Tony Fretton Architects (as set out in Schedule 1 attached to this statement);
- **Demolition drawings** (August 2016), prepared by Tony Fretton Architects (as set out in Schedule 1 attached to this statement); and
- **Site location plan** (August 2016), scaled at 1:1250, prepared by Tony Fretton Architects.

The following documents are submitted in support of the Application:

- **Existing planning drawings** (August 2016), prepared by Tony Fretton Architects;
- **Design and Access Statement** (August 2016), prepared by Tony Fretton Architects;
- **Area schedule and calculations** (January 2017), prepared by Tony Fretton Architects;

- **Heritage Impact Assessment** (January 2017), prepared by Professor Robert Tavernor Consultancy;
- **Acoustic Report** (August 2016), prepared by Max Fordham Associates;
- **Extended Phase 1 Habitat Survey** (August 2016), prepared by EcoConsult;
- **Flood Risk Assessment** (July 2016). prepared by Peter Brett Associates;
- **Foul Water Drainage Assessment** (July 2016), prepared by Peter Brett Associates;
- **Mechanical and Electrical Feasibility Report (including Natural Resource Impact Assessment and Energy Strategy)** (January 2017), prepared by Max Fordham Associates;
- **Statement of Community Consultation** (July 2016), prepared by Quatro;
- **Bat Survey Report** (August 2016), prepared by EcoConsult;
- **Operational Statement** (February 2017), prepared by EF Academy;
- **Arboricultural Impact Assessment** (November 2016), prepared by Landmark Trees;
- **Outline Arboricultural Method Statement** (November 2016), prepared by Landmark Trees;
- **Transport Statement (including draft Travel Plan)** (February 2017), prepared by Peter Brett Associates;
- **Construction Traffic Management Plan** (February 2017), prepared by Peter Brett Associates;
- **Landscape Statement and accompanying drawings** (July 2016), prepared by Todd Longstaffe-Gowan; and
- **Structural Survey** (July 2016), prepared by engineersHRW.

1.6 The remainder of this Planning Statement is structured as follows:

- **Section 2:** Description of the Site and Surrounding Area
- **Section 3:** The Development Proposal
- **Section 4:** Planning Policy Assessment
- **Section 5:** Affordable Housing and Planning Obligations Statement
- **Section 6:** Conclusions

2.0 SITE DESCRIPTION

The application site and surrounding area

- 2.1 The site is located to west of Pullens Lane in the Headington Hill area of Oxford. The site falls within the Headington Hill Conservation Area which is a largely rural setting that has its origins as a Victorian suburb to the city of Oxford. The area is home to various institutional uses including boarding schools and other residential facilities located throughout the conservation area and along Pullens Lane.
- 2.2 Pullens Lane itself is narrow and serves largely as a local thoroughfare for both pedestrian and vehicular traffic connecting London Road to the south with Jack Straw's Lane to the north, leading ultimately to Headley Way. The majority of residential properties along the lane are setback from the street and well shielded by the mature landscaping which lines the lane. During term time the lane is busy with students walking between the Cotuit Hall site and EF language school campus.
- 2.3 The site is accessed from Pullens Lane and occupies a rectangular plot of approximately one hectare aligned east to west, sloping gradually downhill towards the western end. Cotuit Hall itself occupies the north-eastern corner of the site and a large grassed area covers the majority of the eastern end of the site divided only by the Brewer and Marcus Lower buildings. The western-most portion of the site is largely unused and covered by uncultivated vegetation. Mature trees line the perimeter of site, and the eastern perimeters are largely shielded by robust hedges.
- 2.4 There are five buildings existing on site: Cotuit Hall, a Victorian building constructed in the 1890s currently used for residential accommodation and library/study space; Upper Block, a single storey building providing ancillary services to the accommodation on site including kitchen, storage, dining, lounge, and office space; Middle Block, a single storey lecture hall used for teaching and tutoring; and the Brewer and Marcus Lower buildings, both of which are three storey residential blocks providing a combined 80 rooms of student accommodation and eight "house parent" flats. It is understood that all of the buildings apart from Cotuit Hall itself were added to the site in the 1960s.
- 2.5 The site is used primarily for residential accommodation and houses both EF Academy and EF International Language School students who are taught at the Plater Campus, which is approximately 100 metres to the south of Cotuit Hall to the east of Pullens Lane. Depending on the time of year, between 220 and 308 students are housed on site in a combination of double and triple occupancy rooms. Over the years some ad hoc study space has been created to accommodate small tutoring sessions and study groups. The kitchen/dining facilities have never been used by EF and Upper Block is used instead as student lounge space.

Planning history

- 2.6 There have been a variety of planning applications for works to and development of the Cotuit Hall site dating back to 1958 when permission was granted for the temporary conversion of Cotuit Hall into a “hostel for technical college” (see Appendix 1 for a complete planning history). Since then the site has received permission for a “students hostel” (1960), erection of the Marcus Lower building and Middle Block (1966), extension to Cotuit House to provide self-contained flats and form Upper Block (1966), use of the site outside of term time for boarding/guest house/hotel accommodation and conference use (1985), and various other minor alterations and additions.
- 2.7 In 1997 Oxford Brookes University submitted two planning applications for the construction of buildings on site to provide additional student residential accommodation, both of which were withdrawn. In 2012 the Applicant submitted an application which included proposals for the demolition of the Upper and Middle blocks and erection of three new buildings to provide teaching, residential and ancillary accommodation together with an underground common room for students. This scheme sought an increase of the student activity to provide 130 residential rooms to house 260 students on site with teaching accommodation for approximately 400 students. This application (referred to here at the “2012 application”) was withdrawn in 2013.

3.0 PROPOSED DEVELOPMENT

3.1 The application seeks full planning permission for:

3.2 *“Demolition of single storey lecture hall and refectory buildings, change of use from sui generis student accommodation to C2 (residential institution), erection of single storey connecting buildings, along with internal reconfiguration of the retained buildings, and provision of associated car parking and cycle parking spaces, landscaping, plant, and associated works.”*

3.3 The proposed development has been designed to take account of the feedback received in relation to EF’s previously submitted and subsequently withdrawn application for proposals to redevelop the Cotuit Hall site. The new design team has undertaken a comprehensive review of the site, and carefully considered feedback from previous proposals and acknowledged the proximity of the neighbours, the needs of the conservation area, and a reduction in proposed student accommodation on site, which form the key drivers of the new design. The design process in turn fed back into the formulation of EF’s brief and the operational plans for the school. The key drivers that informed the design were:

- Consolidate operations and form a self-contained school with a reduced quantity of proposed accommodation that is suited to the site
- Reduce potential noise nuisance to neighbours and provide more control over access
- Minimise the height of proposed buildings to:
 - Prevent overlooking of neighbouring properties and preserve their amenity
 - Protect lateral views across the site.
 - Protect the character of the conservation area.

3.4 The design responses which have been incorporated into the proposed development to achieve these ambitions include reduced building heights in comparison to the previous proposals. The new buildings are sunken into the landscape and make use of the slope of the site. This includes the New Accommodation Block to the west end of the site, which was modified with a more generous courtyard following Design Review Panel feedback. All rooms in this block look inwards to the central court that is embedded into the landscape. The proposals follow the profile of the existing buildings being replaced and are generally little more than a single storey above current ground level.

3.5 Further, the new entrance into the school is placed on the north of Cotuit Hall and the main circulation route through the site is reconfigured to pass entirely through internal spaces to mitigate noise impact on neighbours. The buildings are kept to the north side of the site, away from the closest neighbours on the southern site boundary and an access road is retained at the northern edge of the site. A new accommodation block to the western end of the site is set away from the site boundary with a continuous border of approximately 14-15 metres, which ensures the privacy of the

surrounding properties and maintains the existing woodland character of the area and in turn defines the footprint of the building.

- 3.6 Comprehensive details of the proposed development are set out in the Design and Access Statement prepared by Tony Fretton Architects. The main elements of the proposals are discussed below.

Land use

- 3.7 The proposed development comprises sleeping and teaching accommodation to enable the formation of a self-contained sixth form school campus, along with ancillary uses, such as gym and dining facilities. A comprehensive breakdown of the existing and proposed areas for each of the school's uses is provided in the accompanying area calculations document prepared by Tony Fretton Architects.

- 3.8 A key consideration during the determination of the 2012 application prior to its withdrawal centred on the existing use of the site, and whether it could be considered to be in C2 use as a residential institution. It was the Council's opinion that the site was, and remains, in sui generis use as student accommodation. The Applicant accepts that the site is in sui generis use and as part of this application is seeking a change of use of the premises to a C2 residential institution to be used as a sixth form boarding school.

- 3.9 The proposed school will provide 113 student bedrooms to accommodate a maximum of 244 students on-site during the academic year. Teaching accommodation is proposed to be introduced and the proposals include 20 new classrooms, as well as ancillary facilities including a gym, refectory, prayer and study room, and other communal space. Although up to 244 students will be able to be housed on site, teaching accommodation is sought for 300 students. The 56 students who are not housed on site will be housed with host families in the local area and will have classes at Cotuit Hall during the days, and return to their houses in the evenings.

- 3.10 The proposals also include accommodation for nine "host parents", which are members of the EF staff who reside on site in the student accommodation blocks and act as a resource for the students throughout the year.

Car and cycle parking

- 3.11 The site currently provides 10 car parking spaces for staff members. The proposed development will provide six car parking spaces, which will be available for staff members only, and one disabled bay (totaling seven car parking spaces). Students will not be permitted to own cars nor park on the site.

- 3.12 A total of 182 cycle parking spaces will be provided at ground level for student and staff use.

Servicing and refuse

- 3.13 Servicing will remain broadly in line with the existing arrangement. As per the existing arrangement, delivery vehicles would service the site on-site with access from Pullens Lane to a service road that runs along the length of the site's northern border. The existing road will be improved with turning facilities located near the Marcus Lower building which will allow service vehicles to more easily exit the site. All service vehicles will be instructed pull into the site to collect or drop off deliveries to ensure that vehicles do not stop on Pullens Lane.
- 3.14 The site's refuse will be stored in a dedicated refuse store near the Pullens Lane entrance. The store is located at street level and will house eight 1,100 litre bins, including capacity for recyclables, and two 120 litre segregated food waste bins and two 240 litre glass bins. Refuse will be collected twice weekly.
- 3.15 The refuse store has been designed to accommodate the required number of waste and recycle bins in accordance with Oxford Direct Services and OCC's Planning Technical Advice Note: Waste bin storage and access requirements for new and change of use developments (November 2014). Full details of the refuse management and collection strategy, as well as internal circulation and access to the refuse stores, are set out within the Transport Statement and Design and Access Statement.

Design, layout and materials

- 3.16 A key feature of the proposed development is the provision of an internal circulation route which will be the primary circulation route on the site and a single point of entry will be provided to the west of Cotuit Hall. This route ensures that there will be no noise nuisance from student movement within the site. In addition, the new buildings will be a similar height to the buildings they replace to ensure that there are no negative impacts on neighbouring amenity.

Existing buildings

- 3.17 The proposed development includes the retention of the Cotuit Hall, Brewer and Marcus Lower buildings, as well as the demolition of the existing single storey refectory and lecture hall buildings.
- 3.18 The Cotuit Hall building will undergo significant enhancements to restore its original character and improve its functionality within the proposed development. The existing ramped access to the south façade will be removed along with the external fire escape located on the building's eastern elevation and a new entrance sequence will be provided. The new approach from the car park to the east of the site is gently stepped and will be covered with a glazed pergola structure, which will provide an enclosed route to access the building for students, staff, and visitors. The pergola structure will be clad in light bronze anodised aluminium and introduce the rhythm of the trabeated architecture of the new buildings to improve the appearance of the house and its connection with the rest of the site.

- 3.19 Other exterior alterations to the Cotuit Hall building include the removal of the 1930s garage structure, removal of 2013 entrance doors and replacement with a door matching the existing house, removal of unnecessary pipework and restoration of affected brickwork, removal of existing porch on northern façade, removal of CCTV and wiring, and connection to proposed new teaching block. Interior alterations are also proposed, including the removal of some interior walls and extension of staircases, and other reconfigurations to support the proposed uses for the house, including offices and bedrooms.
- 3.20 The Marcus Lower and Brewer buildings will be retained and will continue to function as student accommodation. Proposals for these blocks are largely confined to the external facades and ground level where the site's new central internal circulation route will pass through these buildings. New vertical planted screening will be installed on the east and west facades. The screening will be in the form of a lightweight cable and wire support system that will support climbing plants, which will help integrate the buildings into the landscape of the site. The south facing elevations will have pergolas to reduce any potential overlooking to neighbouring properties as well as improve the appearance of the buildings. Minor interior alternations will also be undertaken to these blocks.

New buildings

- 3.21 Three new buildings (a new refectory, teaching block, and student accommodation block) are proposed in the locations of the existing refectory, lecture hall, and in the western portion of the site. The new buildings have been designed to fit in with and complement the site's existing buildings and have been sensitively designed to not result in negative impacts on neighbouring amenity. The height of the proposed new buildings will be approximately the same height as the structures they replace, and in the case of the new accommodation block in the west of the site, will be only one storey above ground. The new buildings will have a simple palette of materials of anodised aluminium with green roofs to produce a garden architecture that complements Cotuit Hall and its grounds.
- 3.22 The new teaching block sits to the west of Cotuit Hall, and will be connected to the house to allow the internal circulation route to pass through. The new block will be a single storey above ground and will be clad with light bronze anodised aluminium cladding with solar control glazing. It will house teaching spaces including classrooms, a library, and laboratories, as well as the headmaster's office.
- 3.23 The new refectory block will be located between the two existing student accommodation blocks and shares the same simple material palette with the teaching block. Variations within the fenestration will reflect the internal uses, including a gym and common room, and will help to distinguish the building. It will connect to the internal corridor at its upper level, and will contain classrooms, a refectory, common room, gym, and prayer room, as well as ancillary plant facilities and service spaces on the north side for deliveries to the kitchen.

3.24 A new student accommodation block is also proposed in the western portion of the site, and will primarily provide additional student accommodation. This block has been designed to have minimal impact on neighbouring properties, and will be sunken into the ground and will raise to only one storey above ground level. The student rooms will be situated around an internal courtyard with house parent flats located at the western end. The block will be accessed via the internal corridor at its eastern point. The design of the new accommodation block shares the trabeated language and material palette of the other new buildings.

3.25 The proposed detailing and materials of the proposals represent high quality additions to the existing site, and will significantly improve the existing 1960s student accommodation blocks, which are outdated and unsympathetic to the character of the conservation area. The addition of the sensitively designed new buildings and restoration of Cotuit Hall Further details of the design, layout and materials of the proposed development are included in the accompanying Design and Access Statement.

Amenity space

3.26 Indoor and outdoor amenity spaces will be provided throughout the development. A double height gym will be provided in the refectory building, along with a common room, and prayer room. In terms of outdoor amenity, a new courtyard will be provided in the western portion of the site and surrounded by the new accommodation block, which will contain any noise generated from the use of this space. New seating areas will be created to the south of the refectory building which will allow the common spaces within this building to have an indoor and outdoor presence. A comprehensive landscape strategy has been prepared to ensure that the site's green spaces are tranquil areas which will be enjoyed quietly.

Sustainability

3.27 The proposed development has been designed to achieve the energy standards as set out within the Building Regulations and achieves a 25.3% reduction of CO² emissions over the Part L baseline, with 20.5% of the carbon emissions being offset by LZC technologies through the inclusion of PV panels.

3.28 All of the accommodation units have been designed to comply with Building Regulations Part M to meet the needs of and provide the highest quality living environment for future occupiers. The building services strategy has been carefully considered in order to balance the need for energy-smart, low carbon technologies with the need for adequate and controllable ventilation, heating and cooling.

Consultation

3.29 A public exhibition was held at the site on 25 May 2016 and members of the public as well as local stakeholders and ward councillors were invited to view details of the proposed development and

discuss any comments or queries with the project team. An additional meeting was held with the Oxford Preservation Trust who expressed general support of the proposals. Further information is provided within the supporting Statement of Community Involvement prepared by Quatro.

3.30 The proposed development has also been informed by three pre-application discussions held with OCC planning and design officers, as well as a meeting with Oxford's Design Review Panel and the Oxford Preservation Trust. All matters associated with the proposals were discussed at length at the pre-application stage and have been taken into consideration during the development of the final proposals.

3.31 A meeting and site visit with Oxford's Design Review Panel was held on 11 February 2016. Members of the panel were generally supportive of the proposed development, and noted that the proposals had taken significant steps to address previous feedback. Specifically, the Panel considered that the proposed internal circulation route successfully connects the new and existing blocks and relates well to the new building entrance. The Panel made a number of specific suggestions on how to improve the proposals, including:

- Seeking input from a landscape designer;
- Developing a stronger relationship between the refectory and the central courtyard;
- Improving the design of the entrance pergola and a few internal spaces; and
- Developing the environmental strategy for the building.

3.32 These comments have been fully considered and incorporated into the final scheme proposals. A full scheme assessment and consideration of the DRP response is provided within the accompanying Design and Access Statement.

4.0 PLANNING POLICY ASSESSMENT

Planning policy framework

- 4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 (the Act) states that when making any determination under the Act it should be made in accordance with the development plan unless material considerations indicate otherwise.
- 4.2 This section identifies the statutory development plan that is relevant to the application site. The planning policy context comprises three levels of adopted and emerging policy – national, regional and local. Within each level there is both planning policy and guidance which together provide the framework for consideration of proposed development.
- 4.3 In this instance the Development Plan for the site comprises the Core Strategy (2011), Sites and Housing Plan (2013), and the Local Plan saved policies (2005).

National planning policy

- 4.4 The National Planning Policy Framework (NPPF) was published on 27 March 2012 and sets out the Government’s planning policies for England and how these are expected to be applied by local planning authorities and decision-takers, both in making policy and taking decisions about planning applications. The NPPF must be taken into account in the preparation of local and neighbourhood plans, and is a material consideration in planning decisions.
- 4.5 At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both the plan-making and decision-taking process. In particular, the core planning principles include, amongst others, to “drive and support development” and to “encourage” the reuse of existing resources. This means approving development proposals that accord with the development plan without delay unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits of development, or specific policies in the NPPF indicate otherwise.
- 4.6 Policies in the NPPF can be used directly to determine planning applications as a material consideration. Local authorities and other decision makers may also give weight to relevant policies in emerging plans, according to:
- the stage of preparation of the emerging plan (the more advanced the preparation, the greater the weight that may be given);
 - the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
 - the degree of consistency of the relevant policies in the emerging plan to the policies in the NPPF (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

Oxford's Development Plan

- 4.7 Locally, Oxford's planning policy is comprised of a suite of documents which form the council's development plan. The following documents from Oxford's Local Plan contain policies which relate to development for student and teaching accommodation at the Cotuit Hall site:
- Core Strategy (2011);
 - Sites and Housing Plan (2013); and
 - Local Plan saved policies (2005).
- 4.8 Since the 2012 application was withdrawn the Sites and Housing Plan, which was in draft at the time it was submitted, has been formally adopted by the council. Oxford's development plan is therefore up to date in line with the NPPF and carries significant weight in the decision making process for future planning applications.
- 4.9 The site is designated as being within the Headington Hill Conservation Area. An Article 4 direction covers the site which prevents permitted development changes of residential buildings to HMO. The site is not in a flood risk zone and is not allocated for development in the Sites and Housing Plan.
- 4.10 OCC's Core Strategy was adopted in March 2011 and sets out the policy framework for determining planning applications in Oxford. The policies contained within this document and the Sites and Housing Plan are the most up-to-date local policies and as such take priority of the OCC's saved Local Plan 2001-2016 policies.
- 4.11 The Oxford Local Plan 2001-2016 was produced and adopted in 2001. Many Local Plan policies have been superseded by subsequent policy documents, however, a number of the policies saved by the Secretary of State in 2005 remain in force.
- 4.12 In 2013 OCC adopted its Sites and Housing Plan, which sets out detailed policies that planning applications for residential development are considered against, and which also allocates large sites that are considered to be suitable development that will deliver the aims of the development plan.
- 4.13 OCC have also prepared a number of Supplementary Planning Guidance Documents which expand on relevant planning policies. Where relevant these documents have also been considered.

Planning assessment

- 4.14 This section provides an overview of specific considerations in respect of the Proposed Development, which is assessed against the following issues:
- Land use
 - Amenity
 - Transport and parking
 - Servicing and refuse

- Sustainability and energy
- Environmental impacts
- Design and heritage

Land use

Principle of establishing an academic site at Cotuit Hall

- 4.15 Core Strategy policy CS16 sets out OCC's approach to improving access to education. It states that new educational facilities must be located in locations accessible by walking, cycling and public transport. Additionally, provision for community as well as educational use will be sought.
- 4.16 OCC's Core Strategy policy regarding student accommodation applies specifically to the University of Oxford and Oxford Brookes University. It does not contain policy specific to private colleges. However, the glossary to the policy contains the following relevant definitions:
- Private colleges: Private colleges may include language schools, secretarial colleges and tutorial colleges. Oxford Brookes University and the colleges of the University of Oxford do not fall within this definition.
 - Student accommodation: Non-self-contained accommodation for students.
- 4.17 Core Strategy policy CS25 limits the occupation of student accommodation to students in full-time education on courses of an academic year or more. This restriction does not apply outside term-time provided that during term-time the accommodation houses only university students.
- 4.18 The Sites and Housing Plan sets out criteria for determining which locations are suitable for student accommodation and other considerations for its development. Policy HP5 states that for student accommodation to be acceptable it must be located:
- on or adjacent to an existing university or college academic site, or
 - in the City centre or a District centre, or
 - located adjacent to a main thoroughfare, or
 - on a site allocated in the development plan for student accommodation.
- 4.19 University or college academic sites in this context are defined as "a site where the principal use is either for the teaching of students over the age of 16 years, or for academic research by students over the age of 16 years, or a combination of the two".
- 4.20 Additionally, the policy states that proposals for student accommodation must include provision for indoor and outdoor communal space, a management regime agreed with the City Council, and an undertaking to prevent residents from parking cars on the site and anywhere within Oxford.

- 4.21 Policy HP6 of the Sites and Housing Plan specifies that applications for new student accommodation will be subject to a financial contribution towards affordable housing. There are certain exceptions to the liability for this payment, including (at part c) where “the proposal is for the redevelopment and/or intensification of a site, including proposals for the extension of a site on contiguous adjoining land, where the main existing use is student accommodation.”
- 4.22 Student accommodation in the Sites and Housing Plan is defined as "accommodation whose main purpose is to house students of 16 years or above, registered on full-time courses of an academic year or more in Oxford, and is not self-contained for each tenant.”
- 4.23 Although most of OCC’s Local Plan policies ceased to have effect following the adoption of the Core Strategy, a handful of policies relating to education have been retained, including policies specific to private colleges. The Local Plan considers that the upper floors of non-residential premises in the City and District centres and other areas of secondary shopping centres are the most suitable locations for private colleges. Further, the policy seeks to ensure that new teaching premises would not result in environmental or nuisance problems to the amenity of the area.
- 4.24 Local Plan policy ED.10 pertains specifically to student accommodation for private colleges and states that “planning permission will only be granted for the creation of new educational establishments or the expansion of existing premises where the applicant agrees to:
- a limit on the overall number of students; and
 - to accommodate the students in other educational premises, purpose built accommodation or family lodgings.”
- 4.25 It is acknowledged that the existing Cotuit Hall site is not principally in use for either the teaching of or research by students of 16 years of age. However, the predominant use of the site is for the accommodation of students who are taught off site (at the nearby Plater Campus), and historically by Oxford Brookes University at their campuses. The principle of student accommodation at this site is therefore already established by its current use.
- 4.26 An increase in the number of students accommodated at this site is sought in conjunction with proposals for a change of use from predominately student accommodation (sui generis) to a self-contained boarding school (C2). These proposals will effectively turn the site into a college academic site. The relevant question in terms of the principle of development, therefore, is whether the introduction of new educational facilities in the form of teaching accommodation at the site is acceptable.
- 4.27 OCC’s Development Plan contains two policies relevant to the creation of new educational facilities:
- Core Strategy policy CS16 requires education facilities to be located in areas accessible by walking, cycling and public transport, and states that provision for the community and education use will be sought.

4.28 The site is located in an area well served by public buses (with an approximately 8 minutes' walk to the nearest stops on Headington Road and Headley Way), and is approximately a 30-minute walk and 10-minute cycle from central Oxford. Additionally, the majority (81%) of students will live and be taught on site, which removes any barriers to access to the educational facilities for the students. A small number of students will be housed in home-stays with local host families and will commute to the site each day for classes. These family homes are located in close proximity to the site, making the teaching facilities highly accessible to these students.

- Policy ED.10 states that planning permission will only be granted for the creation of new educational establishments, or the expansion of existing ones, where the applicant agrees to both a limit on the overall number of students and to accommodate the students in other locations off-site.

4.29 The proposed development seeks on-site student accommodation for 244 students, and teaching accommodation for 300 students. The applicant is prepared to consider a formal limit on the number of students to reflect these numbers, in line with policy ED.10. Also in line with this policy, 56 students at EF Academy will be housed off-site with host-families. In accordance with the Core Strategy, students will not be allowed to own cars and will be restricted from arriving at the site in vehicles, including taxis.

4.30 An Operational Statement has been prepared by EF and submitted alongside this application to provide details on the proposed management of the school and detailed operations, including the movement of students, restrictions on car ownership, and disciplinary procedures. This statement provides clarity on how the site will function as a self-contained campus to ensure compliance with the relevant planning policies as well as to ensure that the school remains a good neighbour and the development does not result in negative impact to neighbouring residents.

Cumulative impact of development – Cotuit Hall and Plater Campus

4.31 As existing, Cotuit Hall is used to accommodate 210 students of EF Academy during the school year. During the summer period when the Academy students are not present the site is let out in full to EF's International Language School, which is also located on Pullens Lane, and houses up to 308 students at Cotuit Hall over July and August. 308 students is the maximum level ever present at Cotuit Hall.

4.32 The proposed development will result in a maximum of only 300 students at Cotuit Hall, which represents a net reduction in student activity at the site. The number of students now proposed results from a rethinking of the proposed design which has sought to primarily address the main concerns raised from the previously withdrawn application. The proposed student numbers have been informed by the design and the capacity of buildings within the revised scheme.

4.33 The design response and plans that are now being put forward have prioritised the adequate mitigation of these concerns, which has dictated the proposed scale and massing. The resultant form

of the new buildings adheres to the key principles set out at paragraph 3.2, and through the efficient planning of classrooms and optimising operational programming, it was determined that the site was able to adequately house 244 students on-site and teaching accommodation for 300 students, along with the school's supporting functions.

- 4.34 The Plater Campus, which is home to EF International Language School (ILS) in Oxford, is also located on Pullens Lane a short walk from Cotuit Hall. Plater Campus received planning permission in 2007 (ref. 07/02499/FUL) for an additional 16 student bedrooms above the 120 rooms already permitted through previous applications. This 2007 application also introduced a new entrance hall, lecture theatre, and offices on the ground floor, and four classrooms on the first floor. This permission did not impose any condition or obligation in the legal agreement limiting the number of students allowed to be taught or housed on site.
- 4.35 The number of students enrolled at Plater Campus varies from term to term. The peak period is over the summer where enrolment can reach 1,550, and the minimum is approximately 250 with a yearly average of approximately 540 students. The Plater campus has a teaching capacity of 798 students in 48no. classrooms. Timetabling allows the enrolled numbers to peak at around 1,550 although not all students will be on site at the same time. The Plater Campus has 132no. bedrooms with a capacity for 323no. beds.
- 4.36 Students enrolled at the language school are housed either on-site, off-site with host families, or at times at Cotuit Hall alongside Academy students. The proposed development seeks to regularise EF Academy's operations at Cotuit Hall so that during term time Cotuit Hall will accommodate only Academy students. Outside of term time (i.e. during the summer months) EF intend to continue to let bedrooms to ILS but the maximum number of students accommodated at the site will never exceed the new 300 student limit.
- 4.37 The tables below set out a comprehensive overview of the pre-existing, existing, and proposed scenarios relating to the use of the Cotuit Hall site, as well as an overview of the existing teaching and sleeping accommodation at the Plater Campus in both the existing and proposed scenarios.

Table 1

COTUIT HALL	SLEEPING ACCOMMODATION			TEACHING ACCOMMODATION		MAXIMUM NUMBER OF STUDENTS ON SITE AT ANY ONE TIME
	Number of bedrooms	Students during term time	Maximum occupancy (outside term time)	Number of classrooms	Maximum enrolment	
Pre-existing (Oxford Brookes)	110	110	110	0	0	110
Existing (2012 to present)	92	210	308	0	0	308
Proposed	113	244	244	20	300	300
Change (existing to proposed)	+21	+34	-64	+20	300 (210 + number of students commuting from host families)	-8

Table 2

PLATER CAMPUS	SLEEPING ACCOMMODATION			TEACHING ACCOMMODATION	
	Number of bedrooms	Students during term time	Maximum occupancy	Number of classrooms	On-site student capacity
Existing	132	323	323	48 (12 currently in use for EF Academy students)	798
Proposed	132	323	323	48	798

- 4.38 Enrolment figures notwithstanding, the number of seats at the Plater Campus is limited by its physical teaching space. If all the seats in all 48 classrooms, including all three iLabs (larger computer rooms) are occupied, the maximum occupancy of the Plater Campus is, at any one time, 798 seats, based on an average capacity of 17 students per classroom. Although the number of students enrolled varies throughout the year, and at some peak times may be higher than 798, not all students are present on site at the same time as timetabling allows for enrolled numbers to be greater than the maximum number of seats.
- 4.39 In terms of sleeping accommodation, the Plater Campus has maximised its sleeping accommodation allowed by the 2007 planning permission. The language school is therefore not able to increase the number of students who are housed at the site. In terms of teaching capacity, the average enrolment at ILS as set out above is 540 students, and there is no planning condition or obligation which restricts its enrolment. Even with 210 classroom spaces currently being let out to IA students for the majority of the year the teaching space at the Plater Campus is typically operating under capacity with 720 spaces filled (210 by IA and 540 by ILS), compared to a maximum capacity of 798 spaces.
- 4.40 The Applicant recognises that concern may arise regarding the potential for capacity at the Plater Campus to be freed up following the vacation of the Academy students once they are able to be taught at the Cotuit Hall site. Despite there being no plans to increase enrolment at the language school beyond the existing operation, the Applicant is prepared to formally agree to limit on the overall number students which can be enrolled for classes at the language school. Based on enrolment figures from previous years, the peak enrolment for the language school is for a short period in the summer months and over winter holidays where enrolment can reach up to 1,550 students. On this basis, the Application is prepared to limit enrolment of language school students to 1,550 students at any one time. The cap on enrolment will ensure that the impact on Pullens Lane from language school students will not be worsened as a result of the redevelopment of the Cotuit Hall site.
- 4.41 The proposed development will rationalise and regularise the impact that the Academy students who currently take classes at the Plater Campus have on the local area, and any impact from the language school students will be no different than in the existing scenario. Further, the enrolment at the language school is currently not restricted by any planning conditions or legal obligations, so the prospect of potential intensification of the Plater Campus is entirely unchanged as a result of the proposed development.
- 4.42 The summer peak period at the Plater campus has historically coincided with Academy's summer holidays, so the language school's peak enrolment has never been impacted by Academy's use of its classrooms. The Applicant is prepared to now impose a limit on language school student enrolment to mitigate potential impact from the vacation of the Academy students at the Plater Campus. The number of language school students being taught at the Plater Campus will not be higher than in the existing situation, and therefore the impact of removing Academy students during term time will not impact intensity of the Plater Campus classroom use.

Trip generation

- 4.43 In the proposed development, the cumulative impact of consolidating the activities to Cotuit Hall arises from the removal of Academy students from the Plater Campus and their potential replacement with additional ILS students who would commute from host families. In terms of day-time pedestrian movements along Pullens Lane, although there would be a net increase in students at the Cotuit Hall site, the pedestrian movements would decrease significantly as Academy students would not be commuting between the two sites multiple times each day, and the students coming from host families would typically generate only two movements each day. With the operations at the language school remaining as existing and with a cap on enrolment in place, the number of movements generated by language school students would remain the same as in the existing scenario.
- 4.44 The accompanying Transport Statement, prepared by Peter Brett Associates, estimates that the 210 existing Academy students housed at Cotuit Hall during term time travel between the two sites 3-4 times per day, which results in up to 840 daily movements as a result of commuting to the Plater Campus. In addition, an average of 65 students are housed with host families, and typically generate two movements per day by commuting to and from the site, resulting in 130 additional movements. The current daily total of movements generated by the Academy students, therefore, is 970.
- 4.45 The proposed development will result in the removal of the 210 term-time students from the Plater Campus site owing to the new teaching accommodation at the Cotuit Hall site, with no intention to increase in the maximum number of students present at the Plater Campus. These proposals would return Plater Campus to the normal operating conditions for which buildings were originally designed. The transfer of those 210 Academy students to Cotuit Hall would result in a net reduction in pedestrian movements caused by EF Academy from the 970 currently generated to 112 generated by the 56 students who will be housed with host families.
- 4.46 In terms of the language school, the Plater Campus has sleeping accommodation for 323 students. As set out above, the average enrolment throughout the year is 540 students, which would mean that, on average, 217 language school students are housed with host families and commute to and from Plater Campus. The ILS students housed with host families typically only travel once per day for their classes and leave when they are finished, generating two trips each per day. Due to the nature of their instruction, there is no need for them to make multiple trips to and from the site each day.
- 4.47 The pedestrian movements generated by the language school students who are already enrolled are expected to stay the same as with the existing situation. As the ILS enrolment figures will not change as a result of the proposed development, there is not expected to be any increase in the number of private car trips or deliveries/servicing trips as a result of the proposed development.
- 4.48 In terms of servicing and catering at Cotuit Hall, it is estimated that the proposed development is not expected to generate a significant increase in vehicle trips to the Cotuit Hall site. Servicing trips are

expected to remain the same as at present and catering may see a very minor increase of up to two additional vehicles per week. Further details regarding servicing and deliveries are set out within the accompanying Transport Statement.

4.49 On the basis that the proposed development complies with the planning policies relevant to the creation of new educational establishments, the introduction of teaching accommodation at the site is acceptable. It follows that, should the introduction of teaching be acceptable on the site, the site would therefore fit the definition of a college academic site where student accommodation is acceptable. In addition, the consolidation of EF Academy’s sleeping and teaching functions at the Cotuit Hall site would have a positive impact on the local area by reducing the number of daily student movements along Pullens Lane, and EF’s International Language School operating at the nearby Plater Campus will also regulate operations and agree a cap on enrolment. The consolidation of operations at both schools results in a significantly reduced amount of the number of students that would be both present at the sites during the day and traveling along Pullens Lane. Therefore, in principle, the introduction of teaching at the Cotuit Hall site along with a moderate increase in student sleeping accommodation would not give rise to negative cumulative impacts and is acceptable in planning policy terms.

Amenity

Outdoor space

4.50 Sites and Housing Plan policy HP5 relating to student accommodation requires developments of 20 or more bedrooms to include some indoor and outdoor communal space.

4.51 The Cotuit Hall site has a significant amount of existing outdoor communal space which will be enhanced through the proposed development and the implementation of a comprehensive landscaping strategy which will improve the appearance and functionality of the outdoor space for the students. Additionally, new communal outdoor spaces will be created, including the enclosed courtyard within the new accommodation block in the west of the site, and the outdoor seating area accessed via the new refectory building.

4.52 The proposed development will also provide high quality communal indoor spaces including a double height gym, prayer room, and common room.

4.53 These provisions will ensure that the site is able to function to meet the needs of its student residents in accordance with policy HP5.

Daylight/sunlight

4.54 Policy HP14 of the Sites and Housing Plan states that planning permission will only be granted for new residential development that provides reasonable privacy and daylight for the occupants of both existing and new homes. In determining proposed applications, the local authority will consider

whether the degree of overlooking to or from neighbouring gardens will significantly compromise privacy of occupiers, the orientation of windows in respect of access to daylight, sunlight and solar gain, and existing walls and hedges that influence a sense of privacy.

4.55 The proposed development will retain the 1960s residential blocks and the main Cotuit Hall house, therefore, the daylight, sunlight and overshadowing impacts from these buildings will be unaltered. Similarly, the access to daylight and sunlight within the Marcus and Brewer buildings will remain as in the existing situation, and will not be negatively impacted by the proposed planting structure.

4.56 As the proposed new refectory and teaching block will be a single storey above ground level and will be a similar height to the existing buildings in those locations, the daylight, sunlight and overshadowing impacts will not be materially different to the existing situation. Similarly, the new accommodation block proposed to the western end of the site will be only one storey above ground level and will not negatively impact the daylight and sunlight access of neighbouring properties.

Noise

4.57 Saved Local Plan policy CP.19 states that planning permission will be refused for proposals that result in unacceptable nuisance. Policy CP.21 states that development proposals will be refused where they result in unacceptable levels of noise, and particular attention will be given to noise levels close to noise sensitive developments and in indoor and outdoor private and public amenity space.

4.58 An Acoustic Report has been prepared by Max Fordham LLP, which outlines the results of an environmental noise survey that has been undertaken in order to measure the prevailing noise climate at the site, as well as assess any potential noise impact on neighbouring occupiers. The study considers potential noise levels generated by students both internally and in the external amenity areas.

4.59 The study concludes that the predicted levels of outdoor student activity would result in noise levels well within the BS8233 55dB LAeq limit. Additionally, the study considers the impact of plant equipment and concludes that noise levels generated by plant equipment will not exceed existing background noise levels and will therefore have a negligible impact on existing external noise conditions at the nearest residential buildings.

4.60 The new buildings will include acoustic absorption treatment which will mitigate any noise leakage from the use of these buildings. The existing residential rooms will be retained as existing so it is not expected that the noise egress from the residential rooms would be any more than the existing scenario, which is minor.

4.61 The suitability of the site for an academic campus has been assessed in accordance with OCC's Local Plan policy requirements, and suitable mitigation measures (including acoustic absorption, mechanical ventilation and a perimeter barrier on the southern boundary) have been proposed which

will comply with internal noise limits and noise emission limits. The study concludes that suitable internal noise levels can be achieved within the proposed development through the implementation of these measures and, consequently, the site is considered to be suitable for its proposed use.

Transport and parking

Car parking

- 4.62 Sites and Housing policy states that residential development should comply with the council’s maximum car parking standards set out in Appendix 8, which states that proposals for student accommodation should provide operational and disabled car parking only. In discussing parking for student accommodation, paragraph A2.38 of the Sites and Housing Plan states that operational parking should be available for students and their families, for a limited period, arriving and starting at the end of semesters and terms.
- 4.63 Core Strategy policy CS13 supports low-parking development in locations accessible by walking, cycling and public transport. Further, Core Strategy policy CP25 seeks to prevent students from bringing cars to Oxford.
- 4.64 Six car parking spaces, including one designated disabled bay, will be provided for the site. Five of the car parking spaces will be located at the eastern end of the site, and the disabled bay will be located directly adjacent to the main entrance with level access into the building.
- 4.65 In consideration of OCC’s transport and car parking policies, the students will not be permitted to own or park vehicles and the car parking spaces will be available only to staff members. Such an approach is fully consistent with the objectives of OCC’s low-parking strategy and sustainable development as outlined in the Local Plan and NPPF.

Cycle parking

- 4.66 Core Strategy policy CS13 states that planning permission will only be granted for development which prioritises access by walking, cycling, and public transport. The Sites and Housing Plan further states that sufficient, high quality cycle parking is especially important for student accommodation as it is car free development. Policy HP15 requires one cycle parking space for every two study bedrooms of student accommodation that is located in close proximity to where the students take classes.
- 4.67 In terms of cycle provision, accommodation for 182 cycles for the students and staff will be provided at ground level in a dedicated Sheffield style cycle racks along the site’s northern boundary. In addition, students, staff and visitors will be provided with details of cycle routes and public transportation to encourage sustainable transport methods in compliance with OCC transport policy. Given the site’s proximity to Oxford’s city centre, and accessibility via bicycle (approximately 10

minutes), the high provision of cycle parking and reduction in car parking spaces is acceptable in terms of access.

Servicing and refuse

- 4.68 Policy HP13 of the Sites and Housing Plan states that adequate provision should be made for safe, discreet, and accessible storage of refuse and recycling. Core Strategy policy CS10 requires all new developments to have regard to the waste management hierarchy, and that developments must make provision for waste and recycling in accordance with the Oxfordshire Joint Municipal Waste Strategy and local waste management strategies. In addition, saved Local Plan policy TR.14 states that for commercial development planning permission will only be granted where adequate provision is made for essential servicing activities that do not compromise other developments.
- 4.69 As required under these policies, servicing within the scheme will be tightly controlled to ensure there are no adverse impacts on the amenity of the students nor the surrounding residential properties.
- 4.70 The proposed development is expected to generate broadly the same amount of deliveries as the existing building, and as per the existing arrangement, delivery vehicles would service the site via designated bay on the site's northern border. Deliveries will be carefully managed by EF Academy, and full operational details are set out within the accompanying Transport Statement.
- 4.71 The waste store will be located at ground level at the eastern end of the site with easy access to Pullens Lane. The refuse collection arrangements are expected to remain as existing.
- 4.72 The refuse stores have been designed to accommodate the required number of waste and recycle bins in accordance with Oxford City Council recycling and waste storage requirements. Full details of the refuse management and collection strategy are set out within the Transport Statement and Design and Access Statement.
- 4.73 Overall, it is considered that the proposed development will have a negligible effect on the local highway and public transport networks, and that the servicing strategy which retains the current arrangement is suitable for this site's location and needs.

Sustainability and energy

- 4.74 Paragraph 96 of the NPPF states that local authorities should expect new development to comply with adopted Local Plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable. The NPPF also outlines that new development should take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.

- 4.75 Core Strategy policy CS9 states that all developments should seek to minimise their carbon emissions and optimise energy efficiency through quality design and the use of renewable technologies. Policy HP11 of the Sites and Housing Plan requires student accommodation to include an element on-site renewable or low carbon technologies where practicable, and 20% of the development's energy needs must be met from zero or low-carbon technologies.
- 4.76 A Natural Resource Impact Analysis and Energy Assessment, prepared by Max Fordham LLP, has been submitted in support of the proposed development and sets out how it accords with the planning policy provisions set out above.
- 4.77 The energy strategy for the proposed development has been developed in line with NRIA checklist, and carbon dioxide emissions have been achieved through the process. As set out in the accompanying Energy Assessment, the proposed development achieves a Building Emissions Rating that is 6.1% better than the target emissions rating, with 20.5% of the carbon emissions being offset by LZC technologies through the use of PV panels.
- 4.78 The proposed development will incorporate key sustainability features, including reduction in water consumption, protection and enhancement of on-site ecology, inclusion of a green roof, and reductions in CO² emissions.
- 4.79 Through implementing the strategies set out above the proposed development fully complies with policies CS9 of the Core Strategy and HP11 of the Sites and Housing Plan achieving the required reduction in CO² emissions and also includes a range of sustainability initiatives.

Environmental impacts

Flood risk

- 4.80 The NPPF follows a sequential risk-based approach in determining the suitability of land for development in flood risk areas, with the intention of steering all new development to the lowest flood risk areas.
- 4.81 NPPF Technical Guidance Table 2 confirms the flood risk vulnerability classification of a site, depending upon the proposed usage. This classification is subsequently applied to Table 3 to determine whether:
- The proposed development is suitable for the flood zone in which it is located, and;
 - Whether an Exception Test is required for the proposed development.
- 4.82 The proposed residential use is classed as 'more vulnerable' development, which is considered acceptable in Flood Zones 1, 2 and in Flood Zone 3a subject to the Exception Test.
- 4.83 Core Strategy policy CS11 requires that all development proposals on sites over one hectare must demonstrate that the proposed development would not increase flood risk and that necessary

mitigation measures must be implemented. It also requires that developments should incorporate sustainable urban drainage systems to limit and reduce the rate of run-off.

4.84 The site is located in a Flood Risk Zone 1 as designated by the Environment Agency, meaning that it has less than 1 in 1,000 annual probability of river or sea flooding. Residential and academic development is therefore considered to be acceptable at the site in terms of flood risk.

4.85 A Flood Risk Assessment, prepared by Peter Brett Associated, has been submitted in support of the proposed development to assess its potential impact on surface water drainage and to consider appropriate mitigation measures OCC policy. The implementation of a green roof together with attenuation are considered acceptable mitigation measures within the proposed development. The use of these measures will decrease the volume run-off as a result of the new development.

4.86 By incorporating the above measures, the proposed development complies with the requirements of National Planning Policy Framework by protecting the users of the proposed development and reducing the flood risk to third parties beyond the site. In accordance with the requirements of the NPPF and OCC policy, the future occupants and users of the proposed development will be safe from flooding and there will be no increase in flood risk elsewhere.

Construction management

4.87 Core Strategy policy CS9 requires developments to demonstrate how sustainable design and construction methods will be incorporated into the new development and saved Local Plan policy CP.17 states that the design of development proposals should include the use of recycled or reclaimed materials.

4.88 Best practice guidance documents will be followed in the construction of the proposed development to ensure that the environmental impacts of construction are minimised. These include:

- Considerate Constructors Scheme;
- Section 60/61, Control of Pollution Act 1974;
- BS 5--8: -005 Noise and Vibration Control on Construction Sites;
- BS 6187: -000 Code of Practice for Demolition; and
- Control of Asbestos Regulations (CAR) 2012;

4.89 A Construction Traffic Management Plan (CTMP), which sets out the framework for how construction traffic will be managed has been provided in support of this application. The CTMP describes that the main construction vehicle access for the site would be via Pullens Lane, and all deliveries to the site would be carried out within restricted hours to avoid peak travel times, where possible. Active measures will be implemented to ensure safety and reduce disturbance from construction traffic, including warning signs, agreed access and egress routes for all construction traffic, consultation with local residents, and restricted delivery hours.

4.90 The NRIA submitted in support of this application confirms that the proposals retain and refurbish a significant portion of existing structures on the site, and existing utilities are generally retained. Where demolition is necessary and site clearance required, material from these works will be recovered, sorted and stored on-site and used as aggregates for the construction of new elements.

4.91 The above demonstrates that the environmental impacts of construction works have been considered and sustainable measures to address these have been proposed where possible. The impacts of traffic, dust and noise have been taken into consideration in addition to proposing methods for robust stakeholder and neighbour liaison.

Biodiversity

4.92 The NPPF stipulates at paragraph 118 that the planning system should contribute to and enhance the natural and local environment. When determining planning applications LPAs should aim to conserve and enhance biodiversity by encouraging opportunities to incorporate biodiversity in and around developments and resisting the loss of or harm to protected habitats.

4.93 Core Strategy policy CS12 states that development should enhance Oxford's biodiversity and should include features of benefit to biodiversity. It also states that species and habitats of importance for biodiversity will be expected to be appropriately protected from harm. Saved Local Plan policy NE.21 states that permission will not be granted for developments that would harm plant and animal species specially protected by law unless the harm can be overcome by appropriate mitigation.

4.94 An Extended Phase 1 Habitat Survey report has been submitted in support of the proposed development. In terms of habitats, it concludes that the woodlands and dense scrub found at the site are of neighbourhood ecological value. In terms of species, the survey uncovered evidence of badger setts on and near the site which could be disturbed as a result of the proposed development. Common bird species were also recorded to be using the site and the woodland is considered to be a suitable habitat for nesting birds. Disturbance to these birds will be avoided by carrying out works and/or by excluding birds from suitable nest sites outside the main nesting season.

4.95 A Bat Survey Report has also been submitted which concludes that small numbers of soprano pipistrelle bats are roosting under hanging tiles on the existing Brewer and Marcus Lower buildings. No known bat roosts will be directly affected by the proposed façade alterations to these buildings, however, the new treatment will likely be less suitable for bats. Appropriate mitigation strategies are set out in the report, and it concludes that the impact from the proposed development will be low.

4.96 The Habitat Survey and Bat Survey reports conclude that, provided that the proposed development follows recommended guidance, the proposed development is likely to have low ecological impacts. Therefore, in terms of biodiversity, the proposed development accords with policy CS12.

Trees

- 4.97 Saved Local Plan policy NE.15 states that planning permission will not be granted for development proposals which include the removal of trees, hedgerows and other valuable landscape features that form part of a development site where the removal would have a significant adverse impact upon public amenity or ecological interest. It further states that landscaping schemes should take account of local landscape character and should include the planting of indigenous species where appropriate. Policy NE.16 further states that planning permission will not be granted for proposals that destroy or involve major surgery to protected trees if it will have a significant adverse effect upon public amenity, unless such action can be shown to be good arboricultural practice.

- 4.98 An Arboricultural Impact Assessment, prepared by Landmark Trees, has been submitted in support of this application and assesses the potential impact of the proposed development and accompanying recommended tree works on the existing trees. It concludes that the proposed development will not have any significant impact on either the site’s retained trees or the wider landscape. An Arboricultural Method Statement has also been submitted in support of this application to set out a methodology for proposed works which may impact the site’s existing trees to ensure that the proposed development does not harm the trees of value on the site.

Daylight and Sunlight

- 4.99 That tallest buildings at the site, namely the Brewer and Marcus Lower buildings, will be retained at the same height, and the proposed new buildings will be of a similar height to the buildings they replace, and the western accommodation block will raise to only one storey above ground. Given these heights, and the distance to the site boundary, it is not considered that the proposed development will negatively impact on daylight and sunlight amenity of neighbouring properties.

Design and heritage

Heritage and conservation

- 4.100 A significant amount of policy at national level and within OCC’s Development Plan is relevant to determining the design of a proposal and its contribution to the wider conservation area and Oxford itself.

- 4.101 The TCPA (1990 as amended) requires decision makers give “considerable importance and weight” to the desirability of preserving listed buildings and their settings, and similar provisions are set out for conservation areas where the decision maker is required to give special attention to ensure that development proposals preserve or enhance the character and appearance of that area.

- 4.102 Paragraph 133 of the NPPF introduces the concept of substantial harm to or total loss of a designated heritage asset. To find substantial harm, decision makers must look at the asset as a whole and ask whether its significance as a heritage asset “is very much, if not all, drained away”.

- 4.103 Paragraph 134 of the NPPF provides for the concept of “less than substantial harm” to the significance of the heritage asset. In such cases the harm should be weighed against the public benefits of the proposal including securing its optimum viable use. This provision requires the decision maker to assess the impact of the development as a whole on the designated heritage asset in its entirety. The decision maker must weigh up the various components of the scheme and decides whether, as a whole, the proposals enhance or cause net harm. It may be possible for a scheme to have some negative impact on a particular asset but for that to be outweighed by the positive impacts.
- 4.104 Paragraph 144 states that where proposals will lead to less than substantial harm, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.
- 4.105 Core Strategy policy CS18 requires development proposals to respect and draw inspiration from the historic environment and respond positively to the character of the locality. Developments must not result in the loss or damage to important historic features or their settings and where possible should enhance the historic environment.
- 4.106 Saved Local Plan policy HE.7 states that planning permission will only be granted for development that preserves or enhances the special character and appearance of the conservation areas or their setting. Planning permission will not be granted for proposals involving the substantial demolition of a building or structure that contributes to the special interest of the conservation areas.
- 4.107 The site is situated within the Headington Hill Conservation Area. Oxford City Council’s Conservation Area Appraisal for Headington Hill (2012) sets out the history, context and character of the area.
- 4.108 The Headington Hill Conservation Area was first designated in 1977 and is located to the east of the Cherwell Valley, and the hill itself provides many vantage points from which to view Oxford’s city skyline. The Appraisal considers the retention of trees and characteristic buildings, the provision of footpaths and protection of viewpoints looking down onto Oxford as important elements which contribute to the public enjoyment of the conservation area.
- 4.109 Pullens Lane is a significant feature of the Headington Hill Conservation Area and is mentioned numerous time throughout the Appraisal. Pullens Lane is noted as a narrow lane which provides access to residential properties, and which has seen an increase in vehicle loads and “rat running” to avoid busier roads and junctions. Located in the south of the Conservation Area, Pullens Lane is described as having a more mixed pattern of use including private residential properties within Victorian houses, as well as green open space and educational institutions.
- 4.110 The Appraisal also sets out the history of Cotuit Hall (formerly Napier House), noting that it was purchased in 1917 by Headington School and used until 1930 when it was reverted to a house. The house eventually became a hostel for Oxford College of Technology and considerable expanded to

provide 102 study bedrooms and ancillary student facilities. The site was sold by Oxford Brookes University to EF Academy in 2011.

- 4.111 Cotuit Hall is notable along Pullens Lane as an example of the work of Henry Wilkinson Moore, a local Oxford architect who had considerable influence on the architecture of the city. The house has a plain elevation facing the road, which suggests that its main frontage is that which faces south overlooking its gardens. The Appraisal recognises that the mid-20th century redevelopment of the site which saw the addition of a bulky, rectilinear building used to support the site's institutional character introduced a character which does not harmonise with the domestic character of the area's original buildings. It is also noted that the infilling development for both residential and institutional use in increasing proximity to the road frontage has denuded the spacious character of the area.
- 4.112 A full assessment of the site's heritage value and the impacts of the proposed development is provided in the accompanying Heritage Statement prepared by Professor Robert Tavernor Consultancy. The Statement notes that the heritage value of Cotuit Hall lies predominately in its original built fabric and design, but that the house itself has no known special architectural or historic interest. The Statement considers that the proposals, including the minor alterations to Cotuit Hall itself and improvements to its immediate setting, represent an enhancement to Cotuit Hall.
- 4.113 In terms of impact on the Headington Hill Conservation Area, the Heritage Statement concludes that the overall character of the Conservation Area and the specific contribution made to it by Cotuit Hall would not be altered by the proposed development, and that the retention of Cotuit Hall and the significant improvement to its close setting through the high-quality design of the new structures and landscaping will enhance its significance.
- 4.114 In summary, the proposed development will result in the enhancement of Cotuit Hall and its immediate setting, which will have a positive impact on the wider Headington Hill Conservation Area, and is therefore acceptable in heritage terms and in line with the NPPF and local policy.

Architectural assessment

- 4.115 The NPPF states that good design is a key aspect of sustainable development indivisible from good planning, and should contribute positively to making places better for people. Planning policies and decisions should not attempt to impose architectural styles of particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. However, it is proper to seek to promote or reinforce local distinctiveness.
- 4.116 Paragraph 63 states that in determining applications, great weight should be given to outstanding or innovative designs which help raise the standard of design generally in the area.

- 4.117 Core Strategy policy CS18 sets out criteria for high quality design which new developments are expected to meet, including:
 - responding appropriately to the site and its surroundings;
 - creating a strong sense of place;
 - being easy to understand and to move through;
 - being adaptable, in terms of providing buildings and spaces that could have alternative uses in future;
 - contributing to an attractive public realm;
 - high quality architecture.

- 4.118 Saved Local Plan policy CP.8 sets out further criteria to ensure that new developments relate to their immediate context:
 - new development is well connected to, and integrated with, the wider area;
 - the siting, massing and design of proposed development creates an appropriate visual relationship with the form, grain, scale, materials and details of the surrounding area;
 - building design is specific to the site and its context and should respect, without necessarily replicating, local characteristics, and should not rule out innovative design; and
 - proposed development on sites with a high public visibility enhances the style and perception of the area, particularly by retaining features which are important to, and remove features which detract from, the character of the local area. In addition, in and adjacent to conservation areas, new development needs to have special regard for the character and appearance of the area.

- 4.119 Policy CP.8 also states that developments within conservation areas should have special regard to the character and appearance of the area.

- 4.120 Policy CP.11 relates specifically to landscape design, and requires landscape proposals to relate to the character and function of spaces, incorporate existing and new trees and seek to protect them, incorporate boundary edges into the development and surrounding area, and enhance ecological value.

- 4.121 The supporting Design and Access Statement prepared by Tony Fretton Architects provides an analysis of the constraints and opportunities presented by the proposed development. The site occupies a plot with existing student accommodation blocks and a sizeable area of garden space. It is located off of a small, private lane which serves a number of residential houses as well as other institutions.

- 4.122 A principal consideration for the design of the proposed development has been to take into account the feedback received in relation to EF’s previously withdrawn application and seek to mitigate as far as possible any negative impacts on local amenity, and in particular the site’s nearest neighbours.

In order to reduce any impact from student movement across the site the proposed design incorporates an internal corridor which connects all of the site's buildings and allows passage from Cotuit Hall in the east to the new accommodation block in the west entirely within the site's buildings.

- 4.123 The design proposals also include a number of enhancements to Cotuit Hall and the Marcus Lower and Brewer buildings, which will enhance both their external appearance and functionality within the new scheme. The new proposed buildings will fit into the new design between the existing structures and are designed to link seamlessly to their adjacent structures and surrounding landscape.
- 4.124 The site's design capitalises on the significant level change to ensure that the scale and massing of the buildings across the site fit within the context of the immediate and wider surroundings. The massing of the new buildings has been carefully designed to minimise their scale and appearance within any views to the site, and will be approximately the same height as the single storey structures which they replace. The new accommodation block will also be a single storey above ground, and has been designed around an external courtyard which is enclosed on three sides by the building. This courtyard will provide high quality amenity space for the students, any potential noise impacts will be mitigated by its enclosure.
- 4.125 The external appearance of the new buildings and the façade enhancements to the Marcus Lower and Brewer buildings has been designed to respond to the character of the surrounding area whilst also providing a distinctive architecture befitting the school. The design seeks to produce a "garden architecture" which complements the defining characteristics of the Headington Hill Conservation Area, as well as the prominent Cotuit Hall building and its grounds. The material palette centres on anodised aluminium expressed over trabeated elevations which give the buildings a more layered appearance with subtle variations owing to the daylighting changes throughout the day.
- 4.126 The existing Marcus Lower and Brewer buildings will be enhanced by a screening system added to the east and west facades which will support climbing plants to better integrate the blocks into the surrounding landscape.
- 4.127 The scheme design and architecture were the subject of a review by Oxford's Design Review Panel who were broadly supportive of the scheme. The panel made several suggestions for revisions which have been incorporated into the final scheme design, including an enhanced relationship between the refectory and the external courtyard and incorporating sustainability measures.
- 4.128 A Landscape Strategy for the proposed development has been prepared by Todd Longstaffe-Gowan Design Ltd in direct response to the DRP suggestions. The strategy seeks to create a sense of address for the main site and enhance the quality of the private landscape as well as the ecological diversity. Full details of the strategy are set out in the accompanying Landscape Statement.
- 4.129 It is considered that the proposed development is of the highest architectural quality, in terms of appearance, layout and massing and will contribute positively to its immediate and wider setting.

The new buildings have been carefully designed to complement the site and local area taking account of the particular features detailed with the Headington Hill Conservation Area Appraisal, and thereby accords with policies contained within the NPPF, Core Strategy, and saved Local Plan.

5.0 AFFORDABLE HOUSING AND PLANNING OBLIGATIONS STATEMENT*Oxford's Local CIL*

5.1 OCC began implementing its CIL charge on 30 September 2013. CIL is charged on developments that create new-build floorspace with a gross internal floorspace (GIA) of 100 square metres or one residential dwelling. If it can be demonstrated that the property was in lawful use for a period of six months within three years of the date when planning permission is given and CIL payment becomes liable, then CIL is charged only on the uplift of GIA floorspace.

5.2 The building is currently occupied; on this basis, the proposed development will only to pay CIL on the uplift in floorspace which is 2,317 square metres (GIA). The CIL rate for C2 development as set out in the adopted charging schedule is £20 per square metre.

5.3 A CIL Additional Information form forms part of this submission.

S.106 Obligations

5.4 The NPPF states that local authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations (paragraph 203). In doing so, the NPPF sets out the statutory tests which require obligations to be:

- Necessary to make the development acceptable in planning terms;
- Directly related to the development; and
- Fairly and reasonably related in scale and kind to the development.

5.5 At local level, Core Strategy policy CS17 identifies that planning permission for new development will only be granted if it is supported by appropriate infrastructure at a timely stage and developer contributions will be sought where needs arise as a result of new development.

5.6 OCC's Affordable Housing and Planning Obligations Supplementary Planning Document was adopted in September 2013. The document sets out the priorities for planning obligations and identifies the ways in which these can be applied in the case of individual development proposals.

5.7 In accordance with the CIL Regulations, local authorities are now limited in relation to what financial contributions can be included through a S106 Agreement. CIL contributions should be used to fund infrastructure to support developments generally (across OCC), and S106 contributions can now only be sought on a site-specific basis to ensure that developments are acceptable in planning terms.

5.8 For the proposed development, heads of terms are anticipated to cover the following:

- SuDS provision and maintenance
- Travel Plan

- Operational provisions
- Limits on student numbers and monitoring
- Car parking restrictions
- Monitoring contributions

5.9 These Draft Heads of Terms are provided without prejudice.

Affordable Housing

5.10 Policy HP6 of the Sites and Housing Plan sets out the requirements for providing affordable housing alongside student accommodation. It states that planning permission will only be granted for new student accommodation that includes 20 or more bedrooms if a financial contribution is secured towards delivering affordable housing elsewhere in Oxford. However, part c of this policy sets out that there will be an exception to this policy where “the proposal is for the redevelopment and/or intensification of a site, including proposals for the extension of a site on contiguous adjoining land, where the main existing use is student accommodation.”

5.11 It has been established that main existing use of the Cotuit Hall site is for student accommodation, in particular the EF Academy students who are housed at the site and attend classes at the nearby Plater Campus on Pullens Lane. The proposed development seeks to redevelop part of the site to allow it to function as a self-contained campus, which will also moderately intensify its use by providing sleeping accommodation for up to 244 students and teaching accommodation for up to 300 students. On this basis, the proposed development qualifies for the exception under part c of policy HP6 and should not be required to provide an affordable housing contribution.

6.0 CONCLUSIONS

6.1 This Planning Statement has been prepared to accompany a full planning application for the redevelopment of the Cotuit Hall site on Pullens Lane to provide a self-contained academic campus for a sixth form boarding school.

6.2 The Planning Statement has assessed the proposals against the provisions of OCC’s Development Plan, supplementary planning guidance and national planning policy. It is considered that overall, the proposed development accords in all material respects with the relevant policies and delivers significant benefits through:

- Consolidating EF Academy’s operations onto one, self-contained campus which has been specifically designed to suit the needs of a boarding school as well as mitigate the impact on surrounding residential occupiers;
- An enhancement of the Headington Hill Conservation Area’s significance through improvements made to site including Cotuit Hall and its grounds;
- An improved landscape for the school which has been designed to encourage calm and quiet activities, improve the appearance of and through the site, and improve pedestrian links;
- The proposed development will have no material detrimental impact on existing residential amenity in terms of noise, vibration, daylight/sunlight and overlooking, and adequate amenity space is provided for the students;
- The proposed development will result in the regularisation of the operations of both EF Academy and the international language school across Pullens Lane, and will introduce enrolment caps to mitigate any potential cumulative impact arising from the redeveloped Cotuit Hall site;
- Sufficient parking and cycle parking will be provided on-site in accordance with OCC standards. The proposed development has been demonstrated to have no adverse impact on the local highway network and a servicing and waste strategy has been provided;
- A sustainable development which ensures that the site will benefit from low carbon technologies and improve the site’s energy performance;
- A design of high architectural quality, built on strong urban design principles and comments received at the pre-application stage that will contribute positively to the surrounding townscape; and
- A scheme that respects the local character of the area and relates to its existing context.

6.3 Overall, the proposed development not only accords with relevant national, regional and local planning policy, but represents an appropriate development that enhances its conservation area setting and contributes to the economic function of the city and quality of the student accommodation.

APPENDIX 1

COTUIT HALL PLANNING HISTORY

Details submitted in compliance with condition 3 of planning permission 12/00397/FUL

Cotuit Hall Pullens Lane Headington Oxford OX3 0DA

Ref. No: 12/00397/CND | Received: Mon 25 Jun 2012 | Validated: Tue 26 Jun 2012 | Status: Approved

Erection of 3 new buildings on 3 floors plus basement to provide teaching, residential and ancillary accommodation, together with underground common room to frontage. Refurbishment of existing Marcus and Brewer buildings, including alteration to existing elevations. Provision of new pedestrian footpath from Pullens Lane. (Amended Plans)

Cotuit Hall Pullens Lane Oxford Oxfordshire OX3 0DA

Ref. No: 12/01106/FUL | Received: Thu 03 May 2012 | Validated: Tue 08 May 2012 | Status: Withdrawn

Demolition of existing upper and middle blocks of accommodation.

Cotuit Hall Pullens Lane Oxford Oxfordshire OX3 0DA

Ref. No: 12/01107/CAC | Received: Thu 03 May 2012 | Validated: Tue 08 May 2012 | Status: Withdrawn

Demolition of existing external store. Conversion of garage to new store, insertion of new window and glazed screen, formation of new entrance door and construction of new access ramp and landing.

Cotuit Hall Pullens Lane Oxford Oxfordshire OX3 0DA

Ref. No: 12/00397/FUL | Received: Fri 17 Feb 2012 | Validated: Fri 17 Feb 2012 | Status: Approved

Construction of buildings to provide additional student residential accommodation and ancillary facilities (in the form of 4x2 storey houses each containing 6 student bedrooms) plus pedestrian footpath access.

Cotuit Hall Pullens Lane Headington Oxford OX3 0DA

Ref. No: 97/01713/NFH | Received: Tue 21 Oct 1997 | Validated: Tue 21 Oct 1997 | Status: Withdrawn

3 storey building to provide 72 student bedrooms with ancillary kitchen and laundries.

Cotuit Hall Pullens Lane Headington Oxford OX3 0DA

Ref. No: 97/00402/NFH | Received: Wed 12 Mar 1997 | Validated: Wed 12 Mar 1997 | Status: Withdrawn

Use outside term time as boarding/guest house/ hotel accommodation (80 beds) (Class XI) including conference use

Cotuit Hall Pullens Lane Headington Oxford OX3 0DA

Ref. No: 85/01084/DFH | Received: Tue 03 Dec 1985 | Validated: Tue 03 Dec 1985 | Status: Approved

Alterations and conversion of top floor into self-contained flat.

Cotuit Hall Pullens Lane Headington Oxford OX3 0DA

Ref. No: 67/18466/A_H | Received: Tue 20 Dec 1966 | Validated: Tue 20 Dec 1966 | Status: Permitted
Development

Alterations and conversion of top floor into self-contained flats and extension to existing dining room.

Cotuit Hall Pullens Lane Headington Oxford OX3 0DA

Ref. No: 66/18232/A_H | Received: Tue 27 Sep 1966 | Validated: Tue 27 Sep 1966 | Status: Approved

Erection of three-storey building to provide residential accommodation for students and single-storey building for games/lecture room and ancillary accommodation.

Cotuit Hall Pullens Lane Headington Oxford OX3 0DA

Ref. No: 66/17963/A_H | Received: Tue 19 Jul 1966 | Validated: Tue 19 Jul 1966 | Status: Approved

Provision of car park.

Cotuit Hall Pullens Lane Headington Oxford OX3 0DA

Ref. No: 64/15063/A_H | Received: Tue 28 Apr 1964 | Validated: Tue 28 Apr 1964 | Status: Approved

Students Hostel.

Cotuit Hall Pullens Lane Headington Oxford OX3 0DA

Ref. No: 60/09868/A_H | Received: Tue 02 Aug 1960 | Validated: Tue 02 Aug 1960 | Status: Approved

Alterations.

Cotuit Hall Pullens Lane Headington Oxford OX3 0DA

Ref. No: 59/08006/A_H | Received: Tue 10 Mar 1959 | Validated: Tue 10 Mar 1959 | Status: Approved

Conversion into hostel for Technical College.

Cotuit Hall Pullens Lane Headington Oxford OX3 0DA

Ref. No: 58/00728/D_H | Received: Tue 01 Apr 1958 | Validated: Tue 01 Apr 1958 | Status: Approved
Temporarily

SCHEDULE 1**DOCUMENTS SUBMITTED FOR APPROVAL**

The following documents are submitted for approval as *part* of the main submission:

- **Planning Application Form and Certificate**, prepared by DP9;
- **CIL Form**, prepared by DP9;
- **Proposed planning drawings**, prepared by Tony Fretton Architects, including:

Document title	Drawing number
Proposed Site Plan	275_PL_200
Proposed Lower Ground Floor 4 Plan	275_PL_207A
Proposed Lower Ground Floor 3 Plan	275_PL_206A
Proposed Lower Ground Floor 2 Plan	275_PL_205
Proposed Lower Ground Floor 1 Plan	275_PL_204
Proposed Ground Floor Plan	275_PL_203
Proposed First Floor Plan	275_PL_202
Proposed Second Floor Plan	275_PL_201
Proposed Roof Plan (1/2)	275_PL_210
Proposed Roof Plan (2/2)	275_PL_211
Proposed South Elevation (1/2)	275_PL_300
Proposed South Elevation (2/2)	275_PL_301
Proposed North Elevation (1/2)	275_PL_302
Proposed North Elevation (2/2)	275_PL_303
Proposed South Elevation – New Teaching Block	275_PL_304
Proposed North Elevation – New Teaching Block	275_PL_305
Proposed Section EE	275_PL_306
Proposed West Elevation – New Teaching Block	275_PL_307
Proposed South Elevation – New Refectory Block	275_PL_308
Proposed North Elevation – New Refectory Block	275_PL_309A
Proposed East Elevation – New Refectory Block	275_PL_310
Proposed West Elevation – Refectory Block	275_PL_311A
Proposed South Elevation – Accommodation Block	275_PL_312
Proposed North Elevation – Accommodation Block	275_PL_313
Proposed East Elevation – Accommodation Block	275_PL_314
Proposed West Elevation – Accommodation Block	275_PL_315

Proposed Section AA (1/2)	275/PL/350
Proposed Section AA (2/2)	275_PL_351
Proposed Section BB	275_PL_352
Proposed Section CC	275_PL_353
Proposed Section DD	275_PL_354
Proposed Section EE	275_PL_355
Proposed Section FF	275_PL_356A
Proposed Section GG	275_PL_357
Proposed Section HH	275_PL_358
Proposed Section AA – Proposed Teaching Block	275_PL_359
Proposed Section AA – Proposed Refectory Block	275_PL_360
Proposed Section AA – Proposed Accommodation Block	275_PL_361
Proposed Section II – Proposed Teaching Block	275_PL_362
Proposed Section II – Proposed Refectory Block	275_PL_363A
Proposed Section II – Proposed Accommodation Block	275_PL_364
Proposed Section JJ – Proposed Accommodation Block	275_PL_365
Proposed Section KK – Proposed Refectory Block	275_PL_366
Proposed Plans	275_PL_9002
Proposed Elevations	275_PL_9005
Proposed Plans – Brewer Building	275_PL_9012
Proposed Elevations – Brewer Building	275_PL_9015
Proposed Plans – Marcus Lower Building	275_PL_9022
Proposed Elevations – Marcus Lower Building	275_PL_9025
Typical Façade Section Elevation	275_PL_9050
Refuse Store Elevations	275_PL_9051

- **Demolition drawings**, prepared by Tony Fretton Architects, including:

Document title	Drawing number
Demolition Roof Plan	275_PL_150
Demolition Second Floor Plan	275_PL_151
Demolition First Floor Plan	275_PL_152
Demolition Ground Floor Plan	275_PL_153
Demolition Lower Ground Floor -1 Plan	275_PL_154
Demolition Lower Ground Floor -2 Plan	275_PL_155
Demolition Lower Ground Floor -3 Plan	275_PL_156
Demolition South Elevation	275_PL_160

Demolition North Elevation	275_PL_161
Demolition Plans	275_PL_9001
Demolition Elevations	275_PL_9004
Demolition Plan – Brewer Building	275_PL_9011
Demolition Elevations – Brewer Building	275_PL_9014
Demolition Plans – Marcus Lower Building	275_PL_159
Demolition Elevations – Marcus Lower Building	275_PL_9024

Site Location Plan (275_PL_001), scaled at 1:1250, prepared by Tony Fretton Architects.