Pembroke College, Oxford Old Quad Decarbonisation, Maintenance and Refurbishment Works 21 March 2024



PEMBROKE COLLEGE, OXFORD OLD QUAD DECARBONISATION, MAINTENANCE AND REFURBISHMENT WORKS PLANNING STATEMENT

Table of Contents

1.0	Introduction	1
2.0	Site Context	1
3.0	Proposed Development	4
4.0	Planning Policy	10
5.0	Planning Assessment	11
6.0	Public Benefits	15
7.0	Conclusion	16

1.0 Introduction

- 1.1 This Planning Statement is prepared by Bidwells on behalf of Pembroke College (the College) to accompany a full planning application and Listed Building Consent for proposed decarbonisation, maintenance and refurbishment works at Pembroke College, St. Aldates, OX1 1DW.
- 1.2 Some of the proposed works require planning permission, whilst others require Listed Building Consent (LBC). Two descriptions of development are therefore provided to clearly describe the works that fall under each application type.

Full planning description of development:

Installation of air source heat pumps and associated screening at the McGowin Library roof; installation of air source heat pumps, associated screening and creation of external terrace following the demolition of existing gardener's store in the North Quad; associated external service works; addition of external doors to Old Quad staircase entryways; replacement of dormers and selected windows in the Old Quad; and associated works.

Listed Building Consent description:

Works to the Old Quad comprising the addition of external doors to staircase entryways; replacement of dormers and windows; repair and secondary glazing of windows; structural repairs; reconfiguration, refurbishment and reallocation of internal rooms; upgrades to internal doors; external service works to support air source heat pumps; upgrades to internal electrical and piped services including radiators; addition of loft insultation; upgrades to ventilation; and internal redecoration.

1.3 This Statement provides supporting information in respect of the proposed development. The planning policy review section highlights the key issues and considerations against which the application should be determined. It aims to assist the Local Planning Authority in reaching a considered determination of the application.

2.0 Site Context

2.1 The application site is within Pembroke College, a constituent college of the University of Oxford. The College has approximately 400 undergraduate students and 250 graduate students. The College is celebrating its 400th anniversary in 2024.



Figure 1.1 Pembroke College location

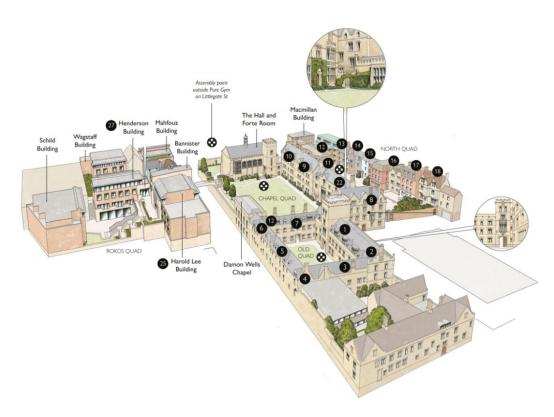


Figure 1.2 Pembroke College map

The application site encompasses the Old Quad, the McGowin Library and external areas within the North Quad and Chapel Quad.



Figure 1.3 Extract of site location plan.

- 2.3 The site is within the Central (City and University) Conservation Area. The Old Quad is a grade I listed building and there are a number of listed buildings adjacent to the application site.
- 2.4 The table below sets out the relevant planning history of the site.

REFERENCE	DESCRIPTION	STATUS
07/01330/LBC	Listed Building consent for alterations to main entrance gates and formation of ramp within the Porter's Lodge to provide access under the Disability Discrimination Act 1995.	Approved
08/01034/FUL	North Quadrangle - Installation of cycle facilities.	Withdrawn
09/02142/FUL	Extend existing garden wall and erection of gardener's store.	Approved
14/00921/FUL	External alterations involving formation of 2 x doorways. Erection of low metal gates in covered passage way and regrading the North West corner of 'old quad'	Approved
14/00870/LBC	External alteration involving formation of 2 x doorways and erection of low metal gates in covered passageway, regrading the North West corner of 'old quad'. Internal alteration to events room to form new porter lodge involving reducing floor levels to form level access, remove and insert new partitions. new electrical and data services.	Approved
15/01025/LBC	Removal of C17floor structure below C19 main floor structure, to allow for lowering of floor in events room to be formed as new Porters Lodge, in line with approved proposal of 14/00870/LBC.	Approved
16/00496/LBC	Replacement of 10no. timber windows to South Range at Pembroke College.	Approved

17/01577/LBC	Replacement of rainwater goods to Brewer Street elevation at South Range, Old Quad.	Approved
19/00611/FUL and 19/00465/LBC	Upgrade of the existing LV distribution cabling running from the St. Ebbes Street switch room, through Chapel Quad, Old Quad and on to the Almshouse & Master's Lodgings at Pembroke College.	Approved
19/01292/FUL and 19/01293/LBC	Alteration and refurbishment of the McGowin Library, including a small extension to the front and an additional storey. New openings formed to create a connection into the adjacent East Range of Old Quad (paving, landscaping and lighting) to provide a new entrance to the Almshouse and Master's Lodgings.	Approved
22/02901/LBC	Replacement of existing dormer windows facing into the Old Quadrangle at Pembroke College.	Withdrawn

2.5 **Pre-Application Engagement**

- 2.5.1 Pre-application engagement has been undertaken with Oxford City Council (OCC) Planning (23/02632/PAC) and Conservation (23/02630/LBPAC), as well as Historic England (HE).
- 2.5.2 A pack of information was submitted and a meeting held on site with OCC and HE on 10 January 2024.
- 2.5.3 The feedback from this meeting included detailed advice on the level of information required to assess the proposals, including options appraisals for fabric interventions, full window and internal door schedules, and visualisations of ASHP enclosures. It was advised that any heritage harm will need to be clearly identified and weighted against clear sustainability benefits set out in an Energy Statement. The requested details are submitted with this application.
- 2.5.4 Specific advice on the proposals included:
 - The design of ASHP enclosures should be deliberate and contextual in each location.
 - Window replacement is reasonable where windows modern, including replacement of the Old Quad dormer windows.
 - The removal of the tree stump is not considered controversial.
 - The relocation of radiators within rooms to more sensitive locations could constitute a heritage gain.

3.0 Proposed Development

3.1 The proposed development incorporates a number of elements spanning decarbonisation works, planned preventative maintenance and internal refurbishment. The proposed works are summarised below; the Design and Access Statement accompanying this application provides full details.

Decarbonisation

3.2 Interdependencies



3.2.1 It is important to note the interlinked nature of the proposed decarbonisation works; fabric improvements which reduce peak and annual space heating demands allow for reduced ASHP and radiator sizes. The individual decarbonisation proposals must therefore be viewed and understood holistically, as they have been designed as a package. The proposed works should be delivered together to achieve the intended sustainability benefits.

3.3 Air Source Heat Pumps

- 3.3.1 It is proposed to replace existing gas boilers (in Staircases 1, 2, 7 and 8, Tower Staircase and Broadgates Hall) and direct electric heating (in Staircases 3-6) with air source heat pumps (ASHPs).
- 3.3.2 To serve the Old Quad Staircases 1-6 and the Tower Staircase, it is proposed to install 10 no. ASHP units on the roof of the McGowin Library. These ASHPs would be surrounded by a bronze-coloured acoustic screen which matches the colour of the building's windows and doors.

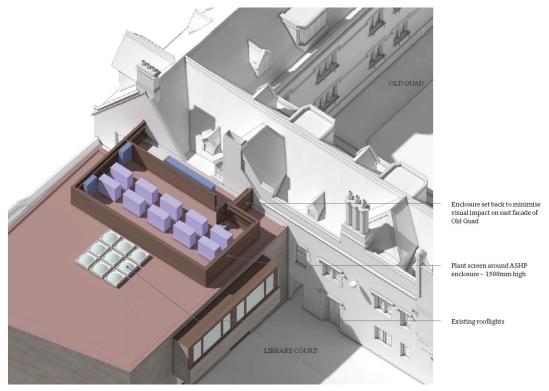


Figure 3.1 McGowin Library roof ASHP visualisation (from DAS).

- 3.3.3 To serve Staircase 7, Staircase 8 and Broadgates Hall, it is proposed to install 8 no. ASHPs in the North Quad, outside Staircase 17. These ASHPs will be screened by existing walls to the south and east, which will be built up so that the ASHPs are fully concealed. To the west, the enclosure will be hit-and-miss brickwork, which allows for adequate air flow and matches the brickwork of Staircase 17 and the adjacent wall.
- 3.3.4 It is also proposed to create an adjacent outdoor seating terrace as part of the development of this area, to increase the provision of external amenity space for students. The proposed works in the North Quad will require the demolition of the existing gardeners' store and the removal of one tree stump.



Figure 3.2 North Quad ASHP and terrace visualisation (from DAS).

- 3.3.5 The ASHPs will require new cabling to be installed both within buildings and externally. This will involve excavation in the external areas of the Chapel Quad, with cables feeding under the western boundary wall and into the substation adjacent to St Ebbe's street.
- 3.3.6 Two cable routes have been identified within this area adjacent to St Ebbe's street; one follows the route of existing ducts which may have capacity to take the new cabling, the other is a new route which will be used if it is discovered that the existing ducts do not have capacity. The routes have been selected to avoid arboricultural impact.

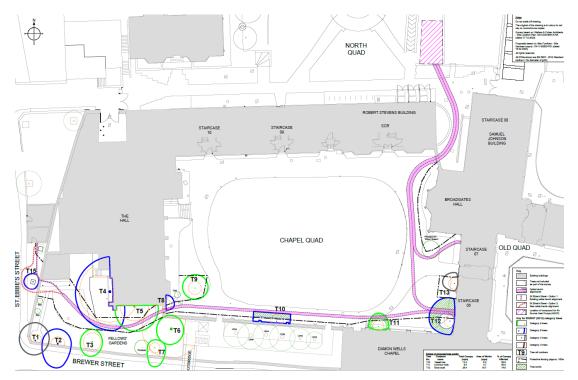


Figure 3.3 External cable route.

3.4 Radiators

3.4.1 The proposed ASHPs will be supported by new radiators in internal rooms. The addition of larger radiators allows for reduced electrical consumption of the ASHPs whilst achieving equivalent performance in terms of space heating. The new, larger radiators will make the ASHPs operate more effectively and therefore allow smaller heat pumps to be installed, reducing the size of enclosures needed.

3.5 External Doors

- 3.5.1 Following an options appraisal, as set out in the Design and Access Statement and Energy Statement, it is proposed to add external doors to the staircases within the Old Quad where feasible. Most staircases are currently completely open, creating a complex thermal envelope and leading to significant heat loss through 'internal' walls.
- 3.5.2 The proposed doors are automatic, frameless glass doors.

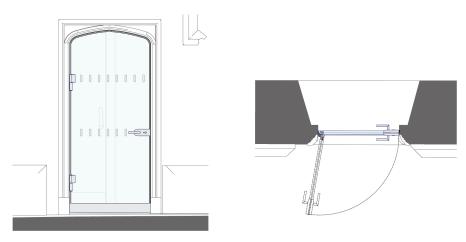


Figure 3.4 Proposed frameless glass door elevation and plan.

LOCATION	PROPOSAL
Tower Staircase	Frameless glass door proposed to be added
Staircase 1	Remain open - no practical location for installing door
Staircase 2	Frameless glass door proposed to replace modern oak door
Staircase 3	Frameless glass doors proposed to be added on either side of the staircase
Staircase 4	Frameless glass door proposed to be added
Staircase 5	Frameless glass door proposed to be added
Staff room	Frameless glass door proposed to be added
Staircase 6	Remain open - no practical location for installing door
Staircase 7	Remain open - no practical location for installing door

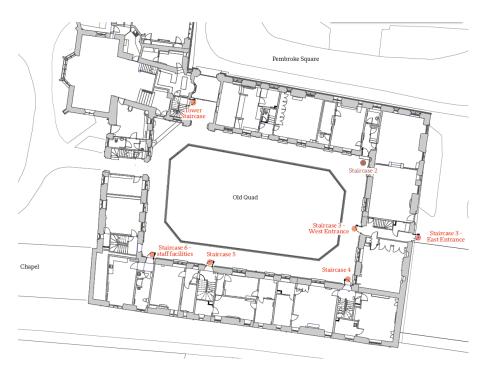


Figure 3.5 Locations of external doors to be added.

3.6 Windows

- 3.6.1 Secondary glazing is proposed via a range of means suitable for specific window types. All of the windows within Old Quad have been analysed and sorted into 48 different types. Each of the 48 types will require a different secondary glazing configuration as set out in the Window Schedule.
- 3.6.2 Some windows, where modern, are proposed to be replaced by new timber windows with incorporated slimline double glazing. This includes the dormers facing the Old Quad, which were constructed in the late 20th century and are currently in particularly poor condition and generating issues with water ingress to the historic building.

3.7 Loft insulation

3.7.1 It is proposed to add insultation to the loft spaces within the Old Quad. This includes the addition of insultation both where it is currently present and where it is not. In conjunction with additional insultation, it is proposed to install lead roof vents to ventilate the space.

Maintenance and Refurbishment

3.8 Fire Safety

- 3.8.1 Following fire risk assessments, a number of internal works are required within the Old Quad. The full works are set out within the Design and Access Statement and Schedule of Works to Internal Doors. In summary, this includes upgrades to internal doors and partitions, and the reallocation of space.
- 3.8.2 The uses of some rooms within the Old Quad are proposed to be rearranged, due to the risks associated with sleeping accommodation in historic rooms that cannot be upgraded to meet current fire safety recommendations. Overall, the internal rearrangement will result in the loss of 4 no. student bedrooms, which will be replaced by tutor rooms.

	NET CHANGE		
	First floor	Second Floor	Net change
Student Bedrooms	-2	-2	-4
Tutor rooms	+2	+2	+4
Guest Bedrooms	+1	-1	0
Fellow's Office	-1	+1	0

3.9 Repairs and Upgrades

- 3.9.1 A number of structural repairs, sometimes following further investigative opening up works, are proposed. These are explained in the Structural Report by Price & Myers. The works include items such as remedial ties between walls where cracked, repointing of stone, and the repair to rafters.
- 3.9.2 The electrical wiring of Old Quad is in poor condition and is not installed to current standards. It is proposed that the entire building is rewired in accordance with the current Wiring Regulations. The fire alarm system is also proposed to be replaced.
- 3.9.3 The existing cold water distribution uses a series of cold water storage tanks in the Old Quad loft, which are a challenge to maintain. The tanks are proposed to be removed, with the capacity of the cold water booster in Staircase 8 increased to cover the whole of Old Quad.
- 3.9.4 Improvements to mechanical extract ventilation are proposed, as a number of areas which generate moisture are not adequately ventilated. This creates a risk of internal condensation and potential damage to the historic fabric. The new ventilation system requires distribution routes and extract fans, which will utilise new risers, bulkheads and suspended ceilings. These will connect to new terminals in the tiled roof.

3.10 Refurbishment Internal spaces

- 3.10.1 A range of internal refurbishment works are proposed to the internal spaces of the Old Quad.
- 3.10.2 The scope of works to internal rooms includes upgrades to Fellow's sets with some changes to room layout and the installation of new bathrooms. Refurbishment is also required where rooms

are changing use for fire safety purposes, as described in Section 4.8. Student bedrooms in Staircase 8 will also be refurbished.

3.10.3 In communal circulation spaces, refurbishment is proposed. The approach to this is dependent on the existing condition of the space, with some areas requiring more input than others.

4.0 Planning Policy

4.1 Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004 state that to the extent that development plan policies are material to an application for planning permission, the decision must be taken in accordance with the development plan unless there are material considerations that indicate otherwise.

Development Plan

- 4.2 The development plan relevant to the proposed development is the Oxford Local Plan 2036, which was adopted on 8th June 2020. The most pertinent policies from this plan are:
 - Policy RE1: Sustainable Design and Construction
 - Policy RE4: Sustainable and foul drainage, surface and groundwater flow
 - Policy RE8: Noise and Vibration
 - Policy G2: Protection of biodiversity and geo-diversity
 - Policy G7: Protection of existing Green Infrastructure features
 - Policy H8: Provision of new student accommodation
 - Policy DH1: High quality design and placemaking
 - Policy DH3: Designated heritage assets
 - Policy DH4: Archaeological remains

National Planning Policy Framework (NPPF)

- 4.3 The NPPF (2023) represents up-to-date government planning policy and is a material consideration that must be taken into account where it is relevant to a planning application or appeal. This includes the presumption in favour of development found at paragraph 11 of the NPPF.
- 4.4 The sections of the NPPF relevant to this application include:
 - Chapter 2: Achieving sustainable development (Paragraphs 7-14)

This chapter sets out that the purpose of the planning system is to contribute to sustainable development, in line with economic, social and environmental objectives. The presumption of sustainable development means that proposals that accord with an up-to-date development plan should be approved without delay.

Chapter 4: Decision making (Paragraphs 38 – 59)

Local planning authorities should approach decisions on proposed development in a positive and creative way. Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate

otherwise. Decisions on applications should be made as quickly as possible, and within statutory timescales unless a longer period has been agreed by the applicant in writing.

Chapter 16: Conserving and enhancing the historic environment (Paragraphs 195-214)

Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

Planning (Listed Buildings and Conservation Areas) Act 1990

- 4.5 This application affects both listed buildings and a conservation area, and therefore must comply with the Planning (Listed Buildings and Conservation Areas) Act 1990. The Act requires that no works shall be undertaken for the demolition of a listed building or for its alteration or extension in any manner which would affect its character as a building of special architectural or historic interest, unless the works are authorised by the Local Planning Authority.
- The information accompanying the Listed Building Consent element of this application provides the requisite details for the LPA to consider the proposed alterations to the listed buildings.

Emerging Local Plan

- 4.7 Oxford City Council has published the proposed submission draft of the emerging Oxford Local Plan 2040. Consultation on the draft Local Plan (regulation 19) concluded on 5 January 2024.
- 4.8 Whilst the emerging Plan will carry limited weight in the consideration of the present application, the draft provides a useful insight into the policy trajectory of Oxford City Council, including the vision for Oxford to become a net zero carbon city by 2040.

5.0 Planning Assessment

5.1 Sustainability

- 5.1.1 As outlined above, the emerging Oxford Local Plan 2040 sets out a policy intention for Oxford to become a net zero city by 2040. Pembroke College has made an ambitious commitment to achieving Net Zero operational carbon by 2030. These commitments to environmental sustainability are supported by adopted Policy RE1, which states that development should incorporate sustainable design principles including the use of low carbon energy.
- 5.1.2 The main rationale for the proposed development is the decarbonisation of the College's historic buildings, which are currently extremely inefficient.
- 5.1.3 The Energy Statement provided by Max Fordham demonstrates that the proposed fabric improvements (addition of external doors, secondary glazing and loft insultation) would result in a 15% reduction in annual carbon emissions. The rationalisation of domestic hot water (directly heating domestic hot water via ASHPs) would reduce annual carbon emissions by a further 14%, and the electrification of heat (replacing gas-fired boilers with ASHPs) would create an additional 51% reduction in annual carbon emissions.

- 5.1.4 It is important to note the interlinked nature of the proposed decarbonisation works; fabric improvements which reduce peak and annual space heating demands allow have been used to calculate the ASHP requirements and decide on the most efficient radiator sizes. The decarbonisation proposals must therefore be understood holistically. The proposed works need to be delivered together to achieve the calculated sustainability benefits.
- 5.1.5 Overall, a 65% reduction in annual carbon emissions would result from the proposed works. Furthermore, the installation of ASHPs removes the direct use of fossil fuels from the site which makes the full decarbonisation of the building possible as the national grid decarbonises over time.
- 5.1.6 The proposed interventions therefore align with Oxford City Council's trajectory towards a net zero city and are compliant with the principles of Local Plan Policy RE1.

5.2 Heritage

- 5.2.1 The proposed interventions, both for decarbonisation and maintenance/refurbishment, have been carefully selected based on the anticipated level of impact on heritage assets, including the Grade I listed Old Quad and the Central Conservation Area.
- 5.2.2 Local Plan Policy DH3 requires that for all planning decisions for planning permission or listed building consent, great weight will be given to the conservation of the significance of designated heritage assets.
- 5.2.3 In line with Policy DH3, a heritage assessment has been undertaken by Oliver Architecture. This assessment concludes that the majority of the proposed works would have a negligible heritage impact, and upgrades to internal doors would be a positive intervention.
- The impact of the two proposed ASHP enclosures on the setting of surrounded listed buildings and the Conservation Area would not amount to less than substantial harm.
 - The ASHP enclosure proposed on the McGowin Library roof would impact on the setting of the listed Master's Lodge, the east range of the Old Quad, and the gate opposite St. Aldate's church. However, the installation is a minor intervention on the roof of an uninspiring and unattractive modern block, which itself detracts from the general ensemble. Additionally, the Design and Access Statement shows that the ASHP enclosure would be largely invisible from Brewer Street, with only a small glimpse possible from a limited number of angles. It is therefore considered that the proposed ASHPs would not cause less than substantial harm.
 - In the North Quad, the ASHP enclosure and terrace would be visible from adjacent buildings, including the Grade II listed Staircase 17. However, the existing structures and screening in this area in the form of the gardener's store and brick wall mean that the proposed enclosure would not have a substantial impact on the setting of the heritage asset. The ASHPs are recessed into the ground to reduce the height of the enclosure. An options appraisal is included in the Design and Access Statement.
- 5.2.5 The only element of the proposals that are considered to generate heritage harm is the installation of glass doors to the open staircase entrances. This proposal would cause less than substantial harm to the Old Quad. The modest impact of this intervention, which is reversible, is considered to be outweighed by the public benefits of the scheme.
- As set out within the Heritage Statement the overall scheme generates less than substantial harm at the lower end of the scale. Accordingly, and as required by the NPPF, this harm should be weighed against the public benefits of the proposal. The public benefits, and weighting of harm against these benefits, are included in Section 6.0 of this Statement.

S.No	Proposal	Significance	Impact Assessment	Mitigation
1.	Repairs: To replace modern dormer window with like-for-like basis with insulation, secondary glazing added behind faceted leaded windows and to replace unsafe stones.	Low – modern windows	Negligible	Not required
2.	Fire safety improvements: To upgrade fire doors with perimeter seals and introducing closing device to resist fire and smoke.	Low	Beneficial. Modern flush doors replaced with panelled doors.	Not required
3.	Internal reorganisation: To provide some alterations to shower rooms.	Low	Negligible	Not required
4.	Staircase: To redecorate dated colour schemes, replace crudely installed handrails. To remove carpet on historic stairs.	High	Negligible	Careful joinery repairs to historic stair treads.
5.	Secondary glazing and improvements to windows: To refurbish and ensure all opening windows have draught strippers, replace broken panes, rebalance sashes (especially in dormers), and renew external decoration.	Refer to Appendix 4	Negligible	Energy saving. Repairs to maintain historic fabric.
6.	Staircase doors: To infill the door openings to the Quad (except staircase 2) with new doors.	High	Less than substantial harm	Energy saving. Precedent to 12 years ago.
7.	Insulation: To prevent moisture buildup by installing vents and to increase the amount of loft insulation.	Medium	Negligible	Not required
8.	Air Source Heat Pumps: To propose two locations for ASHP enclosure- McGowin Library roof top and back garden North Quad.	Medium	Negligible	Screening. Decarbonisation
9.	Service runs: To propose a below ground insulated duct from the pumps. Existing routes are used wherever possible and primary distribution within loft void.	High	Negligible	Archaeological watching brief.

Figure 5.1 Summary of heritage impact extracted from Heritage Statement.

5.2.7 Additionally, consideration has been given to below-ground heritage. The proposed external service works and excavation for the installation of sunken ASHPs in the North Quad have the potential to impact on archaeological remains. In accordance with Local Plan Policy DH4, Oxford Archaeology have undertaken a desk-based assessment of the application site to provide information on the character, significance, and extent of suspected archaeological deposits. Given the limited nature of the works that could affect archaeological deposits, it is anticipated that a watching brief would be sufficient for the proposed excavations.

5.3 Arboriculture

- 5.3.1 Policy G7 states that planning permission will not be granted for development resulting in the loss of trees, except in the following circumstances:
 - a) it can be demonstrated that retention of the trees is not feasible; and
 - where tree retention is not feasible, any loss of tree canopy cover should be mitigated by the planting of new trees or introduction of additional tree cover (with consideration to the predicted future tree canopy on the site following development); and

- c) where loss of trees cannot be mitigated by tree planting onsite then it should be demonstrated that alternative proposals for new Green Infrastructure will mitigate the loss of trees, such as green roofs or walls.
- 5.3.2 Lear Associates have undertaken an arboricultural impact assessment which concludes that the proposed works will require the removal of one tree (stump and regrowth) in the North Quad (T13, strawberry tree). This tree has already been substantively removed, and the remains of the stump and element of regrowth need to be removed to facilitate the development of this area with the ASHP enclosure and terrace.
- 5.3.3 The cable routing has been carefully designed to avoid root protection areas, ensuring that no trees of value are lost to the development. As shown in Figure 5.2 the two routing options have been designed to bypass the RPA of T15.

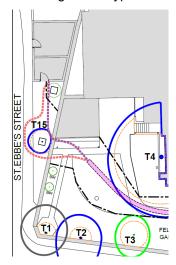


Figure 5.2 Extract of tree protection plan.

5.4 **Drainage**

5.4.1 The ASHP enclosure in the North Quad will require drainage for captured rainwater and condensation. The method for managing these small quantities of surface water has been considered in line with hierarchy set out in Policy RE4. The Price & Myers Drainage Statement concludes that where practicable, infiltration techniques will be adopted. If made ground is found to be deep enough, then a rain garden or attenuation tank will be used.

5.5 Amenity

- 5.5.1 Local Plan Policy RE8 requires that development proposals manage noise to safeguard or improve amenity, health, and quality of life. Planning permission will not be granted for development that will generate unacceptable noise and vibration impacts. Given that air source heat pumps generate noise, a Noise Impact Assessment has been undertaken to assess the likely impact on surrounding noise sensitive receptors.
- 5.5.2 The noise report identifies the relevant noise sensitive receptors and noise targets are informed by a long-term noise survey on the roof of the Henderson Building in the Rokos Quad. This location is considered to have low environmental noise levels and therefore represent a conservative approach. The conclusions demonstrate that at all noise sensitive receptors, appropriate noise levels will be achieved, safeguarding amenity in accordance with Policy RE8.

5.6 Ecology

5.6.1 The proposed decarbonisation and refurbishment works at the Old Quad of Pembroke College include limited works within loft spaces, and therefore have the potential to affect any bats roosting here. Works within loft spaces are limited to internal insulation within the Old Quad building and Staircase 8. Some loft insulation is already present in these locations.

Assessments of bat roosts and emergence have been undertaken within the relevant loft spaces. The submitted Bat Assessment includes the findings of the relevant investigations, concluding that the proposed works are unlikely to impact on bats accordance with Local Plan Policy G2.

5.7 **Space Reallocation**

- 5.7.1 Reallocation of uses within the Old Quad to comply with fire safety guidelines is not considered to constitute a change of use in Planning terms. The proposed changes are to the uses of individual rooms within the Old Quad, which as a building falls under Use Class C2 (Residential Institution).
- 5.7.2 The reallocation of space resulting from the fire risk assessment means that there is a net reduction of 4 student bedrooms. Policy H8 states that planning permission will not be granted for developments that would lead to the loss of student accommodation, unless new student accommodation is available for occupancy, within a reasonable and acceptable timeframe, by students of the same university or institution.
- 5.7.3 The negligible reduction of 4 no. student bedrooms within the Old Quad building will easily be absorbed by the overall Pembroke College accommodation provision. The College has very recently added 77 bedrooms to its stock of student accommodation with the completion of the Geoffrey Arthur site. The Geoffrey Arthur development represents a net gain in student accommodation provided by the College, and prior to this development the College was already able to provide accommodation to 100% of its undergraduate students and circa 25% of its graduate students, meeting demand.

6.0 Public Benefits

6.1 Introduction

- 6.1.1 This section has been prepared to explain the Public Benefits that are considered to derive from the proposed development to the Old Quad, with specific regard to the requirements of Paragraph 208 of the National Planning Policy Framework (NPPF) (December 2023).
- As set out within the Heritage Statement the proposed development is considered to cause 'less than substantial harm' to the heritage assets affected by the proposal. In this instance, the overall impact is at the lower end of less than substantial harm. Accordingly, and as required by the NPPF, "this harm should be weighed against the public benefits of the proposal".
- 6.1.3 This section provides an account of the public benefits which can be weighed against the low level of less than substantial harm associated with the proposals. These benefits can be summarised as follows:
 - Environmental benefits by reducing the carbon and energy consumption of the College;
 - Wider educational benefits arising from upgraded facilities; and
 - Heritage benefits via interventions to safeguard historic fabric and the sensitive redecoration (constituting improvements) of heritage assets.

6.2 Environmental Sustainability

The proposed works include fabric upgrades that would significantly enhance the energy efficiency of the College's buildings, as well as decarbonisation interventions that remove the direct use of fossil fuels from the site. As set out in the Energy Statement, the works will collectively reduce annual carbon emissions by 65%, with the potential for further decarbonisation as the national grid decarbonises. This represents an important public benefit by improving the sustainability of significant buildings within the city of Oxford as well as contributing to the City Council's goal of becoming a net zero carbon city by 2040.

The sensitive inclusion of fabric upgrades to enhance the sustainability of a Grade I listed building also offer a public benefit by acting as a precedent example that could provide learning opportunities for enhancing the sustainability of heritage assets.

6.3 Educational Benefits

The works will significantly improve the learning and working environments for the students and academic staff of Pembroke College. The College's charitable objects are "to advance education, scholarship and research through the provision of a college in the University of Oxford". By making significant improvements to the useability and comfort of some of the College's poorest performing spaces, including Fellow's sets and tutorial rooms, the proposed works will support the College in its charitable objectives and bolster the wider benefits to society that come along with advancements in education, scholarship and research.

6.4 Heritage Benefits

As set out in the Heritage Statement, some of the proposed works will have a beneficial heritage impact on the Old Quad, which is a building of high importance in the history of the wider City. The package of interventions will safeguard the longevity of significant historic fabric, which is currently deteriorating and at risk from water ingress and structural issues. Additionally, sensitive improvements to internal finishes will reverse previous insensitive interventions and enhance the enjoyment and preservation of the heritage assets. Safeguarding the future of College buildings is an important public benefit and the proposed works will support the continued use and public appreciation of Pembroke College's important heritage assets into the future.

7.0 Conclusion

- 7.1 The proposed development at Pembroke College is a positive step towards decarbonisation of the College's energy supply, reducing total energy demand, and improving the living and working environments for members of the College.
- 7.2 A holistic approach to decarbonisation has been taken, with the proposed fabric improvements, hot water rationalisation, and heat electrification collectively reducing the annual carbon footprint by 65%. This is an important step towards Oxford's ambitions to become a net zero city.
- 7.3 The proposed works are sensitively located within listed buildings and the Central Conservation Area. The proposals presented in this application have been carefully selected and refined to minimise impact on these designated heritage assets. The proposed works will largely have a negligible heritage impact, whilst some of the works will enhance the Grade I listed Old Quad. The proposed frameless glass doors to staircase entrances will generate less than substantial harm at the lower end of the scale. This low level of harm is outweighed by the public benefits of the scheme, most notably the improved environmental sustainability of the College.

