

Planning Statement
222 Euston Road

On behalf of: University College London
September 2023

PIR/AME/U0023423

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1 Introduction

- 1.1 The Planning Statement is submitted in support of a detailed application for planning permission made on behalf of our client University College London (UCL), for the temporary change of use of 222 Euston Road ('the Site'), to secure a flexible educational and office use for a period of 5 years.

Planning permission is therefore sought for:

"Temporary change of use for a period of up to 5 years for a flexible office (Class E(g)) and education (Class F1 (a))"

- 1.2 This is a continuation of a temporary, flexible permission for the same uses that was obtained in 2020 and which expires on 3 December 2023. Prior to this use commencing the property's lawful use was B1 (office).
- 1.3 UCL is a comprehensive, large and highly successful research university which is consistently ranked on average in the top ten universities globally. The University has approximately 14,587 staff members and 44,461 students as of 2023.
- 1.4 The student population has grown consistently over the past 10 years and projections indicate that demand for places will continue to grow on an annual basis. To accommodate this anticipated growth, it is necessary to maintain adequate teaching and learning space.
- 1.5 UCL is currently in the process of developing a new Estates Strategy in order to better accommodate the anticipated growth. At the same time, and in accordance with their Strategic Plan, it is also looking to rationalise its existing short-term leasehold stock and use its own freehold buildings more intensively. This can be evidenced by UCL's recent departure from Maple House, 149 Tottenham Court Road, London, W1T 7NF, a leasehold property, as an example.
- 1.6 Whilst UCL is seeking to rationalise its leasehold stock as far as possible it has become evident that, in order to accommodate the continued increase in student numbers, there is still some need for temporary teaching space in the short to medium term. It is expected that in the longer term, the developing Estates Strategy will adequately plan for UCL's growth, and this will reduce the University's reliance on temporary teaching space.

1.7 This Statement sets out the planning case in support of the planning application. It summarises the planning history of the Site and assesses the development in the context of relevant planning policies and planning guidance.

1.8 The structure of this Statement is as follows:

- Section 2 – Site and Surroundings
- Section 3 – Proposed Development
- Section 4 – Planning Policy Context
- Section 5 – Planning Policy Assessment
- Section 6 – Conclusions

2 Site and Surroundings

- 2.1 The Site is a four-storey building located on Euston Road close to the junction with North Gower Street. The building is located outside of the main Bloomsbury campus area but is approximately 200m from the Wilkins building. It is therefore an excellent location for students being close to the centre of the campus and near to the amenities of Euston Road.
- 2.2 Surrounding uses are mixed and comprise university and hospital buildings to the west and south. There are also a mix of commercial and retail premises to the west and east along Euston Road, with the nearest residential properties located to the north, on North Gower Street. Planning permission has also recently been granted for the re-development of the site immediately to the rear of the building, to provide student accommodation.
- 2.3 The Site is located close to, but falls outside of, the Bloomsbury Conservation Area. Although the site is not listed, it is located close to a number of listed buildings including 1-19 Melton Street, which is Grade II* listed and 168-170 and 185-189 North Gower Street which are Grade II listed terraces.
- 2.4 The Site benefits from a public transport accessibility level (PTAL) of 6b, which is the best rating. The high rating can be attributed to the Site's proximity to a number of underground stations, including Euston Square, Warren Street, Euston and Great Portland Street. There are also 18 bus routes serving the site.
- 2.5 The building provides 2,143 sqm. of office and educational space. The office space is used primarily for desk-based research by the Institute of Health Informatics. This department specialises in research using large scale data and advanced analytics to develop a better understanding of diseases on a national and international scale. At the same time, the building accommodates teaching space, which is 'central space' meaning it is not allocated to any particular department and can be used by any faculty as demand requires.
- 2.6 Planning permission which allowed for the flexible educational and office use was approved on the 3 December 2013. UCL has occupied the building since this time, and its lease is due to expire in 2028. Prior to UCL's occupation, the building had laid vacant for two years.

Distribution of Uses

- 2.7 The current distribution of uses within the building is set out in Table 1 below. The measurements are net useable areas.

Table 1: 222 Euston Road – Floorspace by use

Department	NUA (m2)	% of area
Teaching	240.9	13.9
Office	1081.91	62.7
Balance Space (Circulation, toilets, showers, plant rooms)	420	24.4
Total	1,724.51	100

Note: The percentages may not add up entirely to 100 due to rounding

- 2.8 The table indicates that at present, the majority of the building is used for desk-based research (62.7%) and a far smaller proportion used for teaching (13.9%) which is largely confined to the lower ground floor. It is not anticipated that the division of uses will change over the next 5 years, although should needs change, this is the benefit of the flexible permission.

Detailed Planning History

- 2.9 From a review of the Council's online records, we have provided a summary of the relevant applications relating to the Site.
- 2.10 **On the 18 October 2013, planning permission (ref. 2013/6539)** was granted for the Display of 1x non illuminated fascia sign.
- 2.11 **On the 19 November 2013, planning permission (ref. 2013/6029/P)** was granted for the Installation of ventilation duct and plant equipment in the rear yard of office building (Class B1).

- 2.12 **On the 3 December 2013, planning permission (ref. 2013/5523/P)** was granted for the Change of use of lower ground to fourth floor from offices (Class B1) to dual use education (Class D1) and office (Class B1) for a temporary period of 10 years.
- 2.13 Condition 2 of this permission, is a reversionary condition which states ‘The use hereby permitted shall be for a limited period of 10 years from the date of this letter. At the end of this period, the premises shall revert to their former lawful use which is as Class B1(a) offices.’
- 2.14 **On the 8 June 2023, planning permission (ref. 2023/1600/P)** was granted for the installation of 6 condenser units and associated works at roof level, following the removal of 1 condenser unit

3 The Proposed Development

- 3.1 The extant permission for flexible use is due to expire on the 3 December 2023 and there is a continued need for the Site to be used flexibly. The current application seeks to extend the flexible permission for a further 5 years, until 2028. This time period is sought in order to align with the expiry of UCL's lease on the building. In terms of the 2020 revisions to the Use Classes Order, the flexible use would be described as E (g)(offices to carry out any operational or administrative functions) and F1 (a)(provision of education).
- 3.2 The current application seeks planning permission for:

"Temporary change of use for a period of up to 5 years for flexible office E(g) and education F1(a)".
- 3.3 The continued need for flexibility between office and teaching uses at 222 Euston Road is driven by the pressure UCL is encountering in respect of teaching space. This is due to a growth in student numbers which has continued at UCL, as it has consolidated its position as one of the premier universities in the UK and globally and widened its range of academic subjects as illustrated in Figures 1 and 2 below.
- 3.4 UCL is now a comprehensive, world-renowned, and highly successful research-intensive university of global standing. With a strong culture of multi-disciplinary work and a prime location in one of world's greatest global cities with a vibrant and diverse population. As a result, student positions at UCL are in high demand from students around the world, as well as staff wanting to work at UCL, and philanthropists wanting to partner with the University. The University has confirmed that they currently have 44,461 students and this is expected to increase by a further 2% in 2024/5, 5% by 2025/26 and 6% by 26/27.
- 3.5 Significant expansion of the number of departments, faculties and other academic units has occurred with the accompanying growth in students and staff. Student numbers increased by 75% between 2009 and 2019, outpacing other Russell Group universities in London, which increased by 35%. This growth, as well as adding complexity, has also changed the balance of the University from undergraduate dominant to postgraduate dominant.

Figure 1 (source: UCL Now)

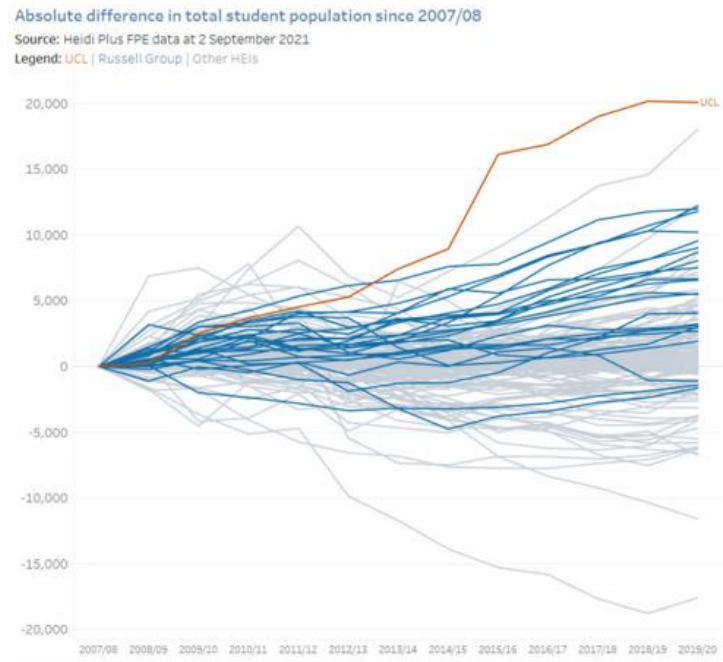


Figure 4. UCL has grown relative to its UK peers. The change in total student population (undergraduate and postgraduate) is plotted for UCL (red line), Russell Group universities (blue lines) and other UK HEIs (grey lines) relative to a 2007/2008 baseline. Data from HESA(<https://www.hesa.ac.uk/>)

Figure 2 (source: UCL Now)

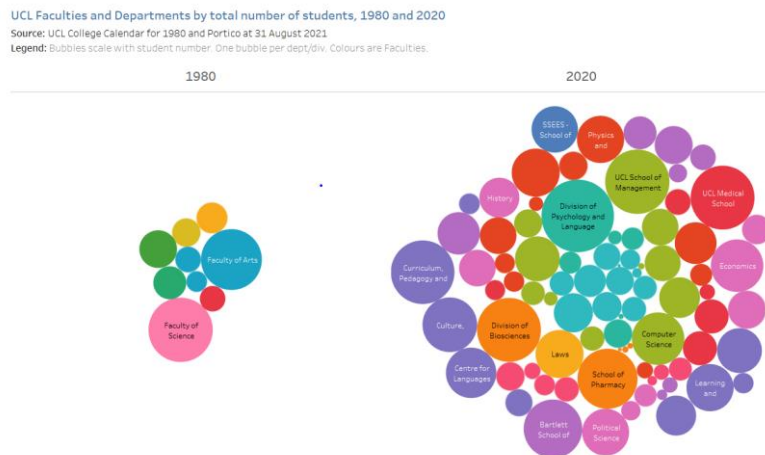


Figure 5. UCL has become very complex. UCL Faculties and Departments are shown in 1980 (left panel) and 2020 (right panel) where each colour indicates membership of a Faculty, and each circle represents a Department. The size of each circle represents the total number of students associated with that Department. The growth in size overall is accompanied by a growth in complexity with many more individual Departments.

3.6 Those students, admitted to the University during the years of the “student bulge” (this refers to the significant increase in student intake for academic years 20/21 and 21/22 that arose due to changes in the awarding of A level grades during the COVID pandemic, which increased undergraduate student numbers by 23%, creating a larger group of students in specific subject areas moving through the teaching programmes over the next few years), are now looking towards graduation. This means that the temporary space UCL acquired during this period, can start to be released and UCL can look to further implement its Strategic Plan and develop its Estates Strategy. However, whilst UCL is in a position to release a number of temporary spaces in the near future, given the continued increase in student numbers, it has become evident that there is still some requirement for temporary space, including 222 Euston Road.

UCL’s Strategic Plan 2022-2027

3.7 UCL 2034: A 20-year strategy for UCL, was published in 2014 and is an important statement of the vision and aspiration for UCL as a globally leading university.

“Vision: Our distinctive approach to research, education and innovation will further inspire our community of staff, students and partners to transform how the world is understood, how knowledge is created and shared and the way that global problems are solved.”

“Mission: London’s Global University: a diverse intellectual community, engaged with the wider world and committed to changing it for the better; recognised for our radical and critical thinking and its widespread influence; with an outstanding ability to integrate our education, research, innovation and enterprise for the long-term benefit of humanity.”

3.8 Building on this overarching Vision and Mission and the ethos that informs them, UCL has prepared a strategic plan for the next five years – Strategic Plan 2022-2027 (the “Strategic Plan”).

3.9 Whilst in the early stages of this, it is evident that the existing campus (including the planned growth at UCL East) will be unable to accommodate the anticipated growth in student numbers. There is therefore an ongoing need for teaching and learning space, particularly in the central campus area, if the University is to accommodate future demand.

- 3.10 The Strategic Plan is seeking to address this and in due course will inform a new estates strategy examining how best to utilise UCL's portfolio of buildings and, importantly, which existing UCL properties can be redeveloped to deliver increased teaching space.
- 3.11 Another aspect that is feeding into the Strategic Plan is the aim within UCL to give up externally rented spaces, and to focus on freeholds and long leaseholds as much as possible. UCL will seek to come out of leasehold properties where possible and consolidate activities in freehold and certain long leaseholds. This process in itself will release some office properties in the Bloomsbury area back to the general market.
- 3.12 UCL has started this process and has exited, or is in the process of exiting, a number of its leasehold properties, including Maple House on Tottenham Court Road. Whilst the use of UCL owned stock is being intensified as a result of this, it has become evident that there is still some need for temporary teaching space, whilst the Strategic Plan continues to be implemented, and the Estates strategy developed. It is therefore proposed to continue to utilise the teaching space at 222 Euston Road until 2028, when the lease on the building expires. After this date, a lease extension/extension to the temporary permission will not be pursued, as UCL intends to release the building in accordance with its Strategic Plan ambitions.
- 3.13 Formulating the Strategic Plan is a complex exercise which has involved extensive consultation with academics and departments on their future needs, as well as addressing a range of strategic issues, such as sustainability objectives and UCL's commitment for all buildings to be net zero carbon by 20230and for the whole institution to be net zero carbon by 2030. An important aspect of the process is the consideration of UCL's size and shape. This is considering the ideal size and shape of the student body, both academically, and in terms of the revenue that will be required to sustain the University into the future.
- 3.14 The application is therefore submitted for the temporary change of use from offices (Class E(g)) to dual flexible use as offices (Class E) and educational use (Class F1) for a further period of 5 years. As stated above this 5-year period is sought, having regard to the lease, and given the time period needed to allow for the further development and implementation of the Strategic Plan and associated estates strategy.

3.15 It is acknowledged that this is a departure from planning policy (see assessment section below), however, it is considered that this is justified on the basis of UCL's significant and ongoing contribution to the Borough, London and national economies and the substantial contribution to education, research and the skills set of the workforce. The history of the site and the quality of the office space being lost in this instance is also an important consideration. The following section discusses UCL's contribution to the local and national economy.

The Impact of UCL on the National, Local and London Economy

3.16 The clear success of UCL has undeniably had a positive impact on the world, and is clearly demonstrable through a wide variety of metrics. UCL has consistently ranked in the top 10 global universities on average, with parts of the institution, such as the UCL institute of Education consistently being ranked first globally.

3.17 From a social perspective, the University is home to a diverse community of 50,000 students from over 150 different nationalities, with over 18,000 students from outside of the UK. In line with other UK Universities, UCL students bring economic, cultural and intellectual value.

3.18 A recent study conducted by London Economics looked into the social and economic impact of UCL and found that the Institute generated £9.9 billion of economic impact across the UK in 2018/19 (which is comparable every year to the trade boost delivered by the 2012 London Olympics). This impact was noted to arise from diverse activity including research, entrepreneurship, teaching, and education exports, amongst others. The total figure meant that for every pound spent by UCL during the 2018/19 year, £5.90 was generated in economic benefit.

3.19 Specifically in relation to teaching, the report found that the economic impact generated by UCL's teaching and learning activities during 2018/2019 was £990 million. This figure included both the employment and earnings benefit to students of £454 million, and to the country in the form of higher tax revenues of £536 million.

Figure 3 (source: Economic and Social Impact of UCL)

Table 6 Aggregate impact of UCL’s teaching and learning activities associated with the 2018-19 cohort (£m), by type of impact, domicile, and level of study

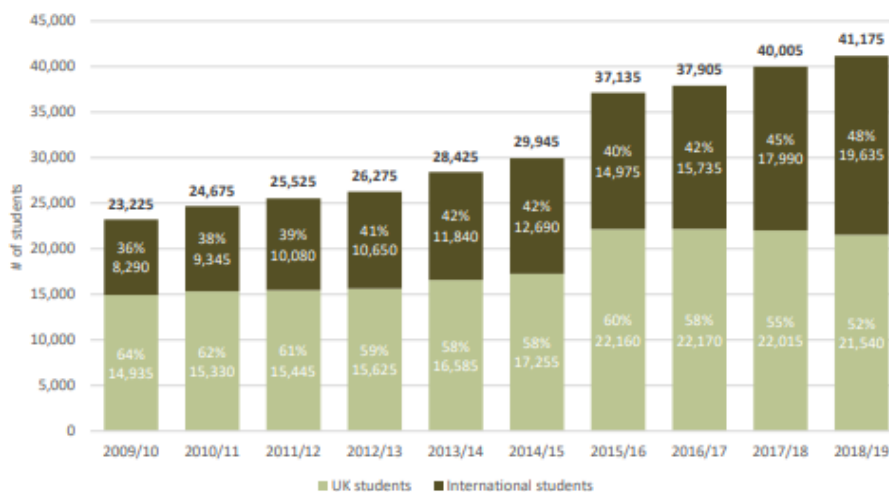
Beneficiary and study level	Domicile				Total
	England	Wales	Scotland	Northern Ireland	
Students	£441m	£7m	£3m	£2m	£454m
Undergraduate	£230m	£4m	£1m	£1m	£237m
Postgraduate	£212m	£3m	£2m	£1m	£218m
Exchequer	£521m	£8m	£4m	£3m	£536m
Undergraduate	£198m	£3m	£1m	£1m	£204m
Postgraduate	£323m	£5m	£3m	£1m	£332m
Total	£963m	£15m	£8m	£5m	£990m
Undergraduate	£428m	£7m	£3m	£3m	£441m
Postgraduate	£535m	£8m	£5m	£2m	£550m

Note: All estimates are presented in 2018-19 prices, discounted to reflect net present values, rounded to the nearest £1m, and may not add up precisely to the totals indicated.
 Source: London Economics’ analysis

3.20 It should be recognised that UCL is part of a higher education sector that is one of the UK’s largest and most successful export industries. Almost half a million international students are studying for qualifications at higher education institutions across the UK, with a net economic impact on the UK economy of £25.9bn annually. UCL is particularly attractive to international students, with the London Economics report stating that a total of 11,690 international students started higher education qualifications at UCL in 2018/19. Figures show a consistent and gradual increase in the number of international students over the past decade, indicating that the University continues to be an increasingly popular destination for those students from outside of the UK.

Figure 4 (Economic and Social Impact)

Figure 17 Total students at UCL, 2009-10 to 2018-19, by domicile



Source: London Economics’ analysis based on HESA (2011, 2012, 2013, 2014, 2015 and 2021)

- 3.21 The London Economics report found that the economic contribution of these international students was substantial and amounted to £1.7 billion in the 2018/19 academic year. Of the total figure, £1bn was associated with international students' net tuition fees, and £732 million was associated with these students' non tuition fee expenditure during their time at UCL. As international student numbers at UCL continue to grow, so will the economic impact they create and this will continue to promote a significant economic impact in the local, London and national context.
- 3.22 In terms of research and knowledge exchange, this provided UCL's largest boost to the economy in 2018/19 with £4.1bn contributed. This meant that for every £1m that was publicly invested in research, UCL produced a benefit of £11.5m. The University's works in collaboration with a number of research partners in science and technology (e.g., Cisco, Google, Turing), health and life sciences (e.g., Francis Crick Institute, six major NHS Trusts) and the arts and humanities/ social sciences (e.g. British Museum, British Library, National Trust, V&A).
- 3.23 One particular area where UCL have invested heavily is in research into brain diseases. UCL invested £120 million in a new landmark facility dedicated to this, which will support research into conditions, including dementia, Huntington's disease. Parkinson's and epilepsy. This speaks to the extent to which UCL is a university which continues to invest in crucial research which can have a profound impact for society.
- 3.24 It should also be noted that UCL's physical footprint also supports jobs and promotes economic growth throughout the UK. The £1.6bn total expenditure on UCL activities in 2018/19 had a direct positive impact on supply chains by generating economic benefit of over £3bn and supporting 19,075 full time jobs across the UK economy.
- 3.25 Other ways in which UCL was found to create (and continues to create) economic impact is through spin out companies and graduate start- ups. In 2018/19, 11 new spin outs and 39 graduate start-ups were created. During this time there were also 72 active spin outs and graduate start-up during this year. These organisations generated £110.8 million in turnover in 2018/19 and attracted £639 million in external investment.
- 3.26 The benefits of UCL's expenditure were found to be experienced in wide ranging sectors including distribution, transport, hospitality, and F&B as well as the production sector and the professional and

support activities sector (collective estimate £1,040 million). This is in addition to the £1,195 million contribution UCL made to the government, higher education, and health sectors.

- 3.27 UCL's contribution to the local, London and national economies is therefore extensive and is experienced and demonstrated through its extensive activities including its research, teaching and learning, start-ups and spin outs as well as its own expenditure and that of its staff and students.
- 3.28 Teaching space is critical to this performance. UCL is responding to continued high growth in student numbers as described above and this presents a constant challenge to its estate. The ability to use buildings such as 222 Euston Road flexibly is vital to UCL's current estates plan, and it is considered that this should be supported in the context of the economic impacts set out above.

The Socio-Economic Impact of UCL in Camden

- 3.29 The substantial benefits UCL generate as an institution are clearly outlined in the preceding sections, however, with their origins in Bloomsbury, the University has a particular focus on creating opportunities and benefits at a local level, for Camden and its residents. In a recent survey conducted by UCL, 10% of students were found to be Camden residents, which highlights the importance of the University in supporting local residents in their studies.
- 3.30 UCL was the first university in the country to be the sole sponsor of an academy school in order to bring about a fundamental improvement in the educational experience of students in the school and beyond. The school, UCL Academy, is located in Swiss Cottage and educates 1,150 students.
- 3.31 Furthermore, UCL holds a number of outreach programmes, for primary and secondary school students, in order to encourage future attendance at the University.
- 3.32 In terms of business, UCL, in connection with Camden Council, supports BaseKX which is a hub for early-stage startups and entrepreneurs located in the heart of Kings Cross. The space is for those with an interest in business to connect with like-minded peers and access the support a young company needs. Base KX provides co-working space, opportunities for networking and entrepreneurial advice from a team of experienced advisors.
- 3.33 Furthermore, UCL has recently developed a new Apprenticeship Strategy which sets out significant ambitions for growth. The ambition over time is to have 700 apprenticeships, including existing staff

opportunities. Of the apprenticeships on offer, 150 will be new opportunities and UCL anticipate that 30-40 of these will be in Bloomsbury. These will be procured through UCL's training providers. The training providers source the best people, and aim for local people where possible. UCL has already secured three apprenticeships for Camden residents in the forthcoming academic year. These include two roles in IT and one in Early Years. UCL are looking to fill the remaining two nursery apprenticeships with Camden residents and have an informal agreement with Camden that all early career apprenticeships for the Bloomsbury campus will be advertised and prioritised within Camden, before being advertised more widely. UCL have a further four vacancies in the pipeline and will offer these to Camden residents as a priority.

3.34 In addition, UCL can also divert up to 25% of its levy funds to organisations that are non-levy paying (i.e. organisations with a salary bill of less than £3m annually) and is committed to directing these funds to local organisations so that they can offer and fund the training for apprenticeships. UCL are currently working with the Camden Inclusive Economy Team to undertake a shared campaign to promote levy transfer opportunities to Camden based SMEs. UCL are finalising a pledge of up to £400,000 to transfer levy funds and have had discussions with training providers and the UCL Business and Careers team to explore opportunities to promote this more widely within the Borough. UCL have active plans to improve connectivity and place-making for the benefit of the local community and are supporting the Bloomsbury Green Corridor through their collaboration with the Calthorpe Community Garden. In terms of other contributions, the UCL Student Union recorded 40,250 hours of volunteering by 1,246 volunteers in 2020/2021 with 45% of these hours based within Camden. Furthermore, UCL have also established the Citizen Science Academy, which is an initiative which aims to deliver community-based, practice-led research training to empower communities to lead change through social action and shape policies that impact their livelihoods. The University is also host of the Bloomsbury Festival which is an annual celebration of the diverse communities that live and work in the Bloomsbury area. The festival provides an opportunity for students to engage with the local community in the Bloomsbury area.

3.35 In order for UCL to continue to provide opportunities that directly benefit the local community, it needs to maintain its status as a profitable and highly regarded higher education institution, and this will only be the case if it is able to offer the facilities commensurate with this.

The Knowledge Quarter

- 3.36 In May 2023 the London Borough of Camden, in conjunction with the London Borough of Islington, published 'KQ 2050: A Knowledge Quarter Unlocked' which confirmed the importance of UCL to the Knowledge Quarter.
- 3.37 Within this report UCL is recognised as a key anchor tenant, central to the future success and growth of the Knowledge Quarter. The report states that the Council's envision working closely with these anchor tenants *"leveraging their capacity, influence and commitment to the local area, to ensure the Knowledge Quarter continues to thrive as a world class innovation district."*
- 3.38 The importance of higher education institutions to the Knowledge Quarter is consistently referenced throughout the report, particularly through their ability to create new business. The report recognises that the Knowledge Quarter produces a talent pool of approximately 30,000 highly skilled graduates, postgraduates and postdoctoral researchers who spill outside the KQ and establish highly innovative businesses in other parts of London and the UK. In 2020/2021 higher education institutions within the Knowledge Quarter spun out 484 companies with a total of 1,182 companies spun out since 2014/2015 remaining active, employing 6,429 (FTE) with an aggregate turnover of around £171m.
- 3.39 To ensure that UCL continues to contribute to the Knowledge Quarter's reputation as an internationally recognised inclusive innovation district, which provides economic benefits at a local and national scale, it is important that the University is provided with the facilities that can attract and retain talent and provide the right environment for innovation and research.
- 3.40 At present, 222 Euston Road provides critical space and therefore its continued occupation for educational and administrative use is central to the University's ability to foster talent that can contribute to the success of the Knowledge Quarter and in turn, the economy.

4 Planning Policy Context

- 4.1 This section of the Statement seeks to outline the relevant national, regional, and local planning policy guidance documents against which the Proposed Development should be assessed, and the key to planning considerations.
- 4.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Statutory Development Plan unless material considerations indicate otherwise.
- 4.3 Planning policy operates at the national, regional, and local level.
- 4.4 The Statutory Development Plan for the purposes of this application consists of:
- a) The London Plan (2021); and
 - b) Camden Local Plan (2017)
- 4.5 In addition, the NPPF revised in July 2021, sets out the Government's economic, environment and social planning policies for England and supersedes the vast majority of Planning Policy Guidance Notes (PPGs) and Planning Policy Statements (PPSs). It summarises in a single document all the previous national planning policy advice. Taken together, these policies articulate the Government's vision of sustainable development, which should be interpreted and applied locally to meet local aspirations. Although not part of the Development Plan, it forms a material consideration when determining planning applications.
- 4.6 The NPPF sets out the Government's requirements for the planning system only to the extent that it is relevant, proportionate, and necessary to do so. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.
- 4.7 In March 2014, the Department for Communities and Local Government (DCLG) launched the web-based Planning Practice Guidance (PPG) resource. This aims to provide guidance which is useable in an up-to-date and accessible manner

- 4.8 With regard to decision taking, the PPG is a material consideration in the determination of planning applications.
- 4.9 The London Plan was formally adopted on 2 March 2021. This means that it is not an alteration or an update to previous versions of the London Plan. This London Plan is the third London Plan and replaces all previous versions.
- 4.10 This London Plan is different to those that have gone before it. It is more ambitious and focused than the previous London Plans. The concept of Good Growth – growth that is socially and economically inclusive and environmentally sustainable – underpins the London Plan and ensures that it is focused on sustainable development. The London Plan forms the London-wide policy context within which the Boroughs set their local planning agendas, and forms part of the Statutory Development Plan.
- 4.11 The Camden Plan was formally adopted on the 3 July 2017 and now forms part of the statutory development plan for the Borough. The Local Plan will lead decision making in the Borough up to 2031 and sets out to create the conditions to harness economic growth, reduce inequality and to secure sustainable neighbourhoods.
- 4.12 The following GLA Supplementary Planning Guidance (SPG) documents are also material considerations:
- Social infrastructure (May 2015)
 - Sustainable Transport, Walk and Cycling (September 2021)
 - Character and Context (June 2014)
- 4.13 The following Camden Planning Guidance (CPG) are also material considerations:
- Amenity (January 2021)
 - Community uses, leisure and pubs (January 2021)
 - Design (January 2021)
 - Employment sites and business premises (January 2021)

- Energy efficient and adaptation (January 2021)
- Transport (January 2021)

5 Planning Policy Assessment

Support for Educational Uses

- 5.1 Paragraph 96 of the NPPF which sets out that to ensure faster delivery of other public service infrastructure such as further education colleges, hospitals and criminal justice accommodation, local planning authorities should also work proactively and positively with promoters, delivery partners and statutory bodies to plan for required facilities and resolve key planning issues before applications are submitted
- 5.2 Policy S3 of the London Plan sets out that proposals should ensure there is a sufficient supply of good quality education facilities to meet demand and offer educational choice. The supporting text recognises that higher education is a significant employer and helps the capital to remain globally competitive
- 5.3 In addition, Policy E8 of the London Plan states that the development of higher and further education providers across all parts of London should be promoted. The supporting text states that the Mayor supports measures to secure and develop London's leading role as a centre of higher and further education
- 5.4 Local Plan Policy C2 (Community Facilities) states that the Council will work with its partners to ensure that the community facilities are developed and modernised to meet the changing needs of the community. In particular, it states that the Council will support the investment of educational and research bodies to expand and improve their operations having regard to how they benefit the economy on a local, London and national level.
- 5.5 UCL continues to be a world-leading university and an attractive destination for both domestic and international students who wish to benefit from its world class teaching and learning facilities. Figures provided by UCL indicate that at the time the last planning permission was granted in 2013, full time student numbers stood at 25,209. The figures for the current academic year show that full time student numbers have almost doubled to 44,461. Moreover, projections indicate that full-time student numbers will continue to grow.
- 5.6 For UCL to be able to accommodate the forecast demand over the next few years, retain and strengthen its position as a leading higher education facility and continue to make a significant

contribution to the local, London and national economic, it needs to be supported by high-quality teaching spaces.

- 5.7 The extension of the temporary change of use would allow UCL to utilise the space for teaching and help to support the expansion of a world class educational institution which would help to consolidate London's leading role as a hub for higher and further education. The proposal therefore complies with the requirements of Local Plan Policy C2 and London Plan Policy C3 and C8.

Loss of office

- 5.8 Policy E2 (Providing suitable business space) of the London Plan states that borough policies should support the provision, and where appropriate, protection of a range of B Use Class business space.
- 5.9 Policy E1 (Economic Development) of the Local Plan seeks to ensure a successful and inclusive economy. In order to achieve this overriding aim, the Council will, amongst other things, support the development of Camden's health and education sectors and promote the development of the Knowledge Quarter. The policy also states that the Council will recognise the importance of other employment generating uses including education.
- 5.10 Policy E2 (Employment premises and sites) of the Local Plan states that the Council will encourage the provision of employment premises and will protect premises and sites that are suitable for continued business use. In particular, it states that premises capable of accommodating smaller businesses and those businesses that support the functioning of the Central Activities Zone (CAZ) or the local economy will be protected.
- 5.11 As previously detailed in the introductory sections of this statement, the Site has benefitted from a flexible use since 2013. It should be noted that prior to the temporary use being granted, the building had been vacant for over 2 years and had been marketed for office use for 17-months prior to the submission of the temporary flexible use application. Despite the marketing exercise being undertaken, there was no interest from office tenants (including SMEs) primarily due to the compromised layout and restricted ceiling heights. In the officers committee report, it was acknowledged that the building did not provide "*flexible employment space nor grade A offices and would require substantial investment to bring it up to standard.*"

- 5.12 Whilst UCL has made aesthetic improvements to the building during its occupation, there has been no substantial refurbishment since this time. Of note, the recent William Road appeal decision (APP/X5210/W/21/3284957 which allowed the demolition of an office building to provide student accommodation) recognised that *“there is plenty of high-quality office floorspace available within this vicinity, including around Euston Road.”* Given the existing supply of modern, fit for purpose office space in the immediate vicinity, it is considered that the office space at 222 Euston Road would likely still fail to attract interest from office tenants without substantial refurbishment. The continued flexible use by UCL will therefore secure the occupation of an office building, which may otherwise be left vacant.
- 5.13 Furthermore, it is important to note that the site would continue to be used flexibly and it would not result in total loss of the office space. Since UCL have occupied 222 Euston Road, there has always been the need to have office space within the building for desk-based research purposes and this is expected to continue. Whilst a proportion of floorspace is used for teaching and learning activities, this is 13.9% of the total floorspace, and the majority is retained in office use. Whilst a flexible use is sought, it is not expected that the proportion of uses will vary considerably over the next five years and therefore the limited loss of office floorspace to educational should not be viewed negatively, especially when considering the employment generation of UCL as an occupier and its wider economic impacts referenced above.
- 5.14 As highlighted above, Policy E1 seeks to ensure a ‘successful and inclusive economy’ and specifically recognises the importance of the education sector in achieving this. As stated in previous sections of this statement, UCL makes a contribution to the local, London and national economies, and this is in part, generated through its teaching and learning activities. If UCL is to continue to make an economic impact in the future, it needs to be able to accommodate potential growth, with teaching and learning spaces being crucial.
- 5.15 It is also highlighted that UCL have no intention to pursue further extensions to the temporary education use, as the building is held on a short lease which is due to expire in 2028. Therefore, at the point UCL exits the building, the building will revert back to office use meaning any impact arising from the reduction in office floorspace will be experienced for limited 5-year period only.

Transport

- 5.16 Policy T5 (Cycling) Of the London Plan seeks to ensure that development proposals should remove barriers to cycling and create a healthy environment in which people opt to cycle. In order to ensure this is achieved development proposals should secure the provision of appropriate level of cycle parking (as set out in Table 10.2) which should be fit for purpose, secure and well located.
- 5.17 Local Plan Policy T1 (Prioritising walking, cycling and public transport) seeks to promote sustainable transport modes in the borough. In particular, in relation to cycling the policy seeks to ensure that development provides for accessible, secure cycle parking facilities. As a minimum the Council will expect developments to provide, the number of spaces set out in the London Plan.
- 5.18 The Site currently benefits from 26 cycle parking spaces located within the lower ground floor, taking access from Stephenson Way. At the time of previous permission was granted, UCL committed to providing a minimum of 16 spaces which was in line with the Local Plan standards at the time.
- 5.19 Since this time, the cycle parking standards in the London Plan have been adopted which require increased cycle parking provision. However, it is highlighted that the use of the space since the previous permission is not changing and therefore the existing on-site provision, together with the wider provision across the UCL campus, should be adequate for the continued educational use of the premises.

Servicing and Waste

- 5.20 London Plan Policy T7 (Deliveries, servicing, and construction) states that development proposals should facilitate safe, clean, and efficient deliveries and servicing with adequate space on site for off-street servicing, storage and deliveries. Local Plan Policy T4 (Sustainable movement of goods and materials) states that where developments are likely to generate significant movement of goods or materials, they should provide a Delivery and Servicing Management Plan.
- 5.21 In terms of servicing and waste arrangements, these will remain as existing. Condition 4 of planning permission ref. 2013/5523/P required the submission of details of all servicing arrangements, which were subsequently discharged under application ref. 2014/0852/P. The site will continue to operate under the existing, agreed measures.

Amenity

- 5.22 Policy A4 (Noise and Vibration) of the Local Plan seeks to ensure that noise is properly controlled and managed. In addition, Policy C2 (Community Facilities) states that the Council recognises that the scale and intensity of community uses can lead to adverse impacts on amenity due to the movement of large numbers of people, noise, and pressure on the transport system. The Council will therefore seek to ensure that schemes address any adverse impacts associated with the expansion of community facilities.
- 5.23 The site has operated in a mixed educational and office use since 2013 and immediately surrounding uses are all commercial. The nearest residential properties are located on North Gower Street. Some distance from the site. Under this application, the building is proposed to be operated in the same way as it currently is, and there are no immediate plans to change the existing mix of office and education floorspace.
- 5.24 UCL are not aware of any noise complaints since their occupation of the building.

Design

- 5.25 Policy D1 (Design) of the Local Plan states that the Council will resist development of poor design that fails to take the opportunities available for improving the character of the area and the way it functions. In addition, Policy D2 (Heritage Assets) states that the Council will require that development within conservation areas preserves or enhances the character and appearance of the area.
- 5.26 No external changes are being made to the building to facilitate the temporary change of use and thus the development would not have an adverse impact on the appearance and character of the local area, nor harm nearby heritage assets.

Sustainability

- 5.27 London Plan Policy SI2 (Minimising greenhouse gas emissions) states that major development proposals should be net zero carbon. Furthermore, Local Plan Policy CC1 (Climate Change Mitigation) states that the Council will require all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards.

- 5.28 At the time of the previous application, the freeholder was in the process of implementing a number of M&E measures in order to improve the buildings environmental performance and reduce carbon emissions. The full implementation of these measures was secured by Condition 3 of the permission.
- 5.29 Given the recent implementation of energy efficient measures, it is considered that the building already operates in accordance with Policy C1. Furthermore, given the nature of the proposal, which relates to a temporary change of use with no internal or external alterations, it is not considered practical to implement further major interventions, particularly as these works would likely disrupt the occupation of a building.

6 Conclusions

- 6.1 222 Euston Road is a key building in UCL's Bloomsbury Estate. Providing some 2143.2 sq.m (GIA) of accommodation for educational/office purposes, the building is held on a short lease which is due to expire in 2028. This flexibility the building offers has been extremely valuable, allowing for the provision of 'central teaching space' which has enabled UCL to respond to new pressures and growth trends.
- 6.2 Although the temporary permission was applied for in 2013, the continued strong growth in staff and student numbers has necessitated the need for additional teaching space in Bloomsbury at a pace that the permanent estate has not been able to keep up with. Whilst UCL is currently seeking to address this issue through the implementation of measures outlined in the Strategic Plan, including ensuring better space efficiency through the intensified use of UCL freehold buildings, this is an ongoing process, and it is evident that at present, there is still some need for temporary space.
- 6.3 Furthermore, there is strong planning policy support for the expansion of educational uses at national and development plan level. Although office uses are protected by Camden policy, it is considered that the ongoing loss of part of the building to education use for a further temporary period of 5 years should be supported in the context of the challenges that UCL is experiencing and as well as the positive impact that UCL has locally from an economic perspective. The quality of the existing office space and its likely lack of appeal to office tenants in its current state, is also something that should be taken into account when considering the temporary loss.
- 6.4 UCL plays a crucial role in contributing to local and national economies through teaching and learning, research and start-ups as well as its own level of expenditure. Teaching space continues to be vital to UCL's performance, and it is requested that this application is supported.