
University of London
Dilke House, Malet Street

Planning Statement

Doc No: P2008508

Issue: Planning

Rev:

Date: 13th December 2021

BDP.

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1. Introduction

- 1.1. This Planning Statement relates to a planning application for the use of Dilke House, 1 Malet Street as a dual/alternative use as office (Use Class E) and/or learning and non-residential institutions (Use Class F.1). The Planning Statement has been prepared by BDP, on behalf of the University of London. The purpose of this accompanying statement is to provide details of the proposed development and an appraisal against the relevant planning policy context, which form material considerations in determining the planning application.
- 1.2. A dual use planning permission, or flexible use planning permission as it is also referred, allows the applicant to apply for permission for two separate uses which can be interchangeable over a 10 year period without the need for further planning permission. At the end of the 10 year period, whichever use is functioning at the time becomes the permanent lawful use of the property.

The application site

- 1.3. The application site comprises Dilke House, 1 Malet Street. It is currently vacant and is six storeys, plus basement, and is accessed directly from Malet Street. The building dates from 1915, and forms a prominent frontage on the western side of Malet Street.
- 1.4. Dilke House is located within the Bloomsbury Campus Area which extends over 22 hectares between Euston Station and the British Museum, and contains a concentration of University-related buildings and activities. The area is at the heart of higher education in Camden, providing the main base for the University of London and several member institutions including UCL (University College London), SOAS (the School of African and Oriental Studies), London School of Hygiene and Tropical Medicine and Birkbeck.
- 1.5. The building was originally constructed as an office building. However, over the years, and as demonstrated by the building's planning history it has been used by a variety of tenants both as offices and for university and education purposes as a result of its location within the Bloomsbury Campus area. The proposed dual/alternative use for either office or educational purposes would therefore reflect the historical use of the property, whilst ensuring that the applicant, the University of London, has the best opportunity of securing future tenants for the building.
- 1.6. The building is not listed, but is located within the Bloomsbury Conservation Area. The neighbouring terraced buildings, No's 74-80 Gower Street to the north, and the Former Dillon's Bookshop building on Torrington Place to the north are Grade II Listed.
- 1.7. The site falls within the Bloomsbury Conservation Area, for which a Conservation Area Appraisal and Management Strategy has been prepared (2011). This sets out the background and historical development of the area and its significance. The site falls within sub area 3: University of London/British Museum. This sub-area is dominated by large-scale University-related buildings.
- 1.8. The site benefits from a PTAL level of 6B, indicating the best possible access to public transport.

The applicant – University of London

- 1.9. The University of London is unique; it consists of 17 self-governing Colleges of outstanding global reputation, ranging from larger universities such as UCL or King's College London to smaller specialised institutions such as the Royal Academy of Music or the Courtauld Institute of Art, and 10 specialist research institutes. Eight of these institutes are based in the London Borough of Camden (LBC). The University of London comprises approximately 29% of the London Higher Education Institution (HEI) total and is therefore of strategic importance at the London level.

Summary of the proposed scheme

- 1.10. This application is for planning permission for the use of the existing floorspace across all floors of the building (basement, ground, and first-fifth) as a dual/alternative use as office (Use Class E) and/or learning and non-residential institutions (Use Class F.1). There are no external or internal alterations required to facilitate the proposed flexible use of the building. For further details, please refer to the submitted drawings from Pick Everard.

- 1.11. The proposed flexible use is carried out under the Town and Country (General Permitted Development) Order 2015 Schedule 2 Part 3 Class V which allows development consisting of a change of use of a building or other land from a use permitted by planning permission granted on an application to another use which that permission would have specifically authorised when it was granted.
- 1.12. The proposed flexible use allows the applicant a degree of flexibility with regards to the future use of the building, ensuring that it will be attractive to a wider range of potential occupiers. This is deemed to be sensible owing to the current COVID-19 pandemic and the likely reduced need for office space post 2021.
- 1.13. The description of development is as follows:
“Dual/alternative use of Dilke House as office (Use Class E) and/or learning and non-residential institutions (Use Class F.1.”
- 1.14. The structure of this Planning Statement is as follows:
- Section 3: Planning Assessment outlines the relevant planning policy framework and, in light of this, provides an analysis of the proposed development.
 - Section 4: Conclusion provides a concluding summary.
- 1.15. This Planning Statement should be read in conjunction with the following supporting documents:
- Planning application forms and certificate of ownership
 - CIL form
 - Site location plan
 - Existing and proposed elevations
 - Existing and proposed floorplans
- 1.16. The following section provides a brief overview of the planning history associated with and considered to be of relevance to the application site. The planning history demonstrates that the building has been used for a mixture of educational and office uses other the last fifty years.

Planning Application	Decision Date	Status	Note
2003/0438/P	13/08/2003	Granted	The installation of a ramp to one side of the premises for the purpose of disabled access and alterations to the railings to the front of the building
9000124	27/02/1990	Withdrawn	Use of part of the ground and part of the first floor of Dilke House as a dispatch riders office
M13/21/1/23048	16/07/1976	Granted	The continued use of the third floor for university purposes
M13/21/1/19355	22/08/1974	Granted	Continued use of the fourth floor for university purposes
7022	31/03/1969	Granted	The change of use for a limited period of the 3rd floor for Dilke House from offices to university purposes.
M13/21/1/4110	15/08/1967	Granted	Use of the fourth and fifth floors of Dilke House for University purposes for a limited period of 7 years.

2. Planning Assessment

- 2.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that the determination of planning applications should be in accordance with the development plan, unless material considerations indicate otherwise.
- 2.2. This section of the Planning Statement provides an overview of the adopted planning policy framework that applies to the site, before assessing the proposed development within the context of the relevant planning policy considerations.

Relevant policy and guidance

Planning policy

- 2.3. The planning considerations for this application relate to the following policies, spanning national, regional and local tiers:

National Planning Policy Framework (NPPF; 2021)

- 2.4. In 2021, the National Planning Policy Framework (NPPF) was published by the Ministry of Housing, Communities and Local Government. The NPPF sets out the Government's economic, environmental, and social planning policies for England; it states that the purpose of the planning system is to contribute to the achievement of sustainable development. In terms of development management, the NPPF advises that the primary objective of development management is to foster the delivery of sustainable development, not to hinder or prevent development.
- 2.5. The overarching national planning policy theme evident from the NPPF is a presumption in favour of sustainable development, which the Government have advised should be at the heart of the planning system running through both plan making and decision taking.
- 2.6. Section 8 of the NPPF relates specifically to promoting healthy communities. It recognises the importance of planning in facilitating social interaction and creating healthy, inclusive communities. Paragraph 95 states that local planning authorities should take a proactive, positive and collaborative approach to development that will widen choice in education.

London Plan policies (2021)

- 2.7. The London Plan provides the strategic policy context for all of London and seeks to provide an integrated framework for its development. Amongst other key strategic aims, the Mayor's policies support the provision of further and higher education facilities to meet the demands of a growing and changing population and to enable greater educational choice.
- 2.8. The relevant policies contained within the London Plan are considered to include:
- Policy S3 – Education and childcare facilities
 - Policy E8 – Sector growth opportunities and clusters
 - Policy E1 – Offices
 - Policy T2 – Parking and car-free developments

Camden Local Plan policies (2017)

- 2.9. The Local development plan policies for the site are contained within the Camden Local Plan. The Development Management policies within the Local Plan help to deliver the Council's overarching approach to assessing planning applications. The relevant policies contained within the Local Plan are considered to include:
- Policy G1 – Delivery and location of growth
 - Policy C2 – Community facilities
 - Policy E1 – Economic development
 - Policy E2 – Employment premises and sites
 - Policy A1 – Managing the impact of development
 - Policy T1 – Prioritising walking, cycling and car-free development

Policy D1 – Design

Planning guidance

2.10. A number of guidance documents are also relevant to the site:

- National Planning Practice Guidance (NPPG;2021)
- Bloomsbury Conservation Area Appraisal and Management Strategy (2011).
- Camden Planning Guidance: Employment Sites and Business Premises (2021)
- Camden Planning Guidance: Transport (2021)

Planning policy assessment

2.11. The following section reviews the key planning considerations relevant to the proposed development, and seeks to provide justifications for the proposals in the context of the planning policy framework.

Principle of development

2.12. As the proposal will result in the flexible use of the building for office or educational purposes. Accordingly, Camden Local Plan Policy E2 (Employment premises and sites) is a key policy. However, it must be noted that the policy focusses on the loss of employment space. In this instance there is no loss of employment space proposed, as a dual use is being sought which will secure flexibility for either employment or educational uses for the next ten years. Notwithstanding this, the Statement considers the proposal against the aims of policy E2. As is explained in the following paragraphs, educational floorspace in this location is also strongly supported by local planning policies.

2.13. Policy E2 has regard to proposals (paragraph 5.37) involving the loss of business premiss and states that when assessing proposals that involve the loss of a business use to a non-business use, the Council will consider whether there is potential for that use to continue. Various factors will be taken into account including:

- The suitability of the location for any business use
- Whether the premises are in reasonable condition to allow the use to continue
- The range of unit sizes it provides, particularly suitability for small businesses
- And whether the business is well related to nearby land uses.

2.14. In this instance, a flexible dual/alternative use is proposed and it is not intended that the office use on site will be extinguished. Instead, the flexible use will allow the building to be occupied by either an education use or retained as office floor space. This would allow the applicant a greater degree of flexibility with regards to the future use/tenants of the building to ensure floor space is not left vacant which in turn would benefit the surrounding economy. The flexibility of the change of use would allow for the building to adapt to the needs of any future tenants, such as small business, different businesses over multiple floors or a new educational use occupying all six floors. The site is located within the Bloomsbury Campus Area which is internationally renowned as a prestigious area of higher education. Clearly, the flexible education use would be well related to nearby land uses; almost all neighbouring buildings are used for higher education purposes, or linked to higher education institutions.

2.15. The principle of an education use in this location is strongly supported by local and London-wide policy. London Plan policy S3 (Education and childcare facilities) states at paragraph 5.3.8 that higher education in London provides an unparalleled choice of undergraduate and postgraduate degrees, continuing professional development, advanced research, and infrastructure to support business growth, such as incubation space and business support services. It is also a significant employer and attracts major international companies able to benefit from universities' research reputations, such as in pharmaceuticals and life sciences. Universities also play a vital part in ensuring Londoners have the higher order skills necessary to succeed in a changing economy, and for the capital to remain globally competitive.

2.16. London Plan policy E8 (sector growth opportunities and clusters) states that innovation including London's role as a location for research and development should be supported, and collaboration between businesses, higher education providers and relevant research and innovation organisations should be encouraged.

2.17. Education facilities are defined by Camden Local Plan policy C2 as community facilities. Policy C2 states that the Council will work with its partners to ensure that community facilities and services are developed and modernised to

meet the changing needs of the community and reflect new approaches to the delivery of services. This includes providing support for *“the investment plans of educational, health, scientific and research bodies to expand and enhance their operations, taking into account the social and economic benefits they generate for Camden, London and the UK. In assessing proposals, the Council will also balance the impact proposals may have on residential amenity and transport infrastructure”*.

- 2.18. Higher education is a major contributor to the economy in Camden and London, both directly and through its influence on other activities (e.g. attracting international businesses and generating new startup firms). Camden's universities are a key component of the Camden's Knowledge Quarter, and are a major factor in the growth of the science and creative sectors.
- 2.19. The University of London in particular contributes hugely to the higher education offer in this area. The University of London comprises approximately 29% of the London Higher Education Institution (HEI) total and is therefore of strategic importance at the London level. In turn, the University is also a major employer and attracts major international companies able to benefit from the university's research reputation, such as in pharmaceuticals and life sciences. In this context, it is of strategic importance that the facilities and services provided by the University of London continue to reflect the status of the University and indeed the reputation of this part of Central London as a nationally and indeed internationally important cluster of higher education institutions.
- 2.20. Whilst no end tenant has been secured for this site, flexibility is sought to attract the widest level of interest in occupation of the building from both the business and education sectors, these uses are both encouraged as well as co-working environments for businesses and SMEs in the Central London area. The applicant considers that the need for this flexible approach has if anything increased due to the COVID-19 pandemic and the uncertainties around the future demand for office space post 2021 versus the concept of employees working from home. Conversely this location and its proximity to other educational establishments in the area is well suited to educational use.
- 2.21. The site is in a highly accessible location with established public transport, pedestrian and cycle networks which allow future users of the site the opportunity to adopt the most sustainable form of travel. It is therefore an appropriate location for either an office of educational use. The principle of protection and enhancement of educational facilities as part of the proposed development is therefore strongly supported by policy at a London and local level

Design

- 2.22. Camden Local Plan policy D1 seeks to secure high quality design in all development by requiring development to respond to local character and context, integrate well to the surrounding streets and townscape, comprise high quality architecture, and be accessible for all.
- 2.23. The proposals do not involve and internal or external alterations to the building. Consequently, there will be no impact on the external appearance of the building or the Bloomsbury Conservation Area. Given that there are no external alterations included in the proposal, the proposed will have no design impacts, nor issues relating to privacy/overlooking, outlook or sunlight/daylight matters.

Amenity

- 2.24. The site is located within a dense central location. The majority of neighbouring buildings are in educational use, and do not contain noise sensitive uses. The proposed educational use would be similar in nature to the an office use in terms of numbers of visitors and potential disturbance. Opening hours are likely to be similar to standard office hours. As such, it is not considered that there would be any harm to neighbouring amenity by way of loss of privacy or disturbance.

Transport

- 2.25. Camden Local Plan policy C2 specifically states that “*facilities should provide access to a service on foot and by sustainable modes of transport*”. The PTAL rating of the site is 6b which is considered the best rating on the PTAL scale and therefore a highly sustainable location. The site is located within the central London area of Bloomsbury and is served well by a range of transport modes. This is mainly due to the site’s close proximity to the Euston Rail and Underground station and Goodge Street underground station. The site is also served by a number of bus routes to the north on the A501 Euston Road.
- 2.26. The proposed flexible use of the property will not alter or extend the existing footprint of the building and the existing and permitted pedestrian access into the building are to remain unaffected by the proposals. The subject site is to remain car free. Servicing, delivery and refuse activity will be conducted in line with the existing delivery and servicing strategy of the site, and the proposed change of use is unlikely to have any significant impact on the delivery and servicing requirements.
- 2.27. Given that the number of trips associated with the proposed development is likely to be similar to that of the existing office use, the proposals are not considered to result in any significant change in the number of trips in peak periods to and from the site. The development is therefore not considered to have a detrimental impact on the local transport networks.
- 2.28. The application does not include cycle parking as there is not a feasible location within the building for storage to be located. There are a large number of cycle racks opposite the site, located outside the University of London Union. The transport accessibility of this site is considered appropriate to the proposed uses and therefore compliant with Policy C2 and T1 which encourage sustainable transport.

3. Conclusion

- 3.1. The proposal would bring a currently vacant commercial site back into use in a central London location, introducing end-users of education or business into an area that has a long established educational use nature of buildings. The flexibility allowed by the permission will provide the applicant with the greatest opportunity of securing a tenant for the building and ensuring that the floorspace does not remain vacant, benefitting the economy. The flexibility will allow the building to adapt to the needs of any future occupiers, be that small business or otherwise, ensuring the proposal accords with Local Plan policy E2.
- 3.2. The application does not propose internal or external alterations to the building. The Planning Statement has demonstrated that the proposals will have no demonstrable design or amenity impacts on the character of the area or neighbouring occupiers.
- 3.3. Equally, given that the number of trips associated with the proposed development is likely to be similar to that of the current building use, the proposals are not considered to result in a significant change in the number of trips in peak periods to and from the site. The development is therefore not considered to have a detrimental impact on the local transport networks.
- 3.4. Following the reasons set out above, it is considered that the proposed scheme constitutes sustainable development consistent with the NPPF, London Plan, and the Camden Local Plan. As such, the proposal benefits from a presumption in favour of sustainable development as set out in the NPPF, and planning permission should be granted subject to appropriate conditions.