

Town Planning Statement

1-19 Torrington Place, London, WC1E 7HB

On behalf of: University College London

Date: 11/08/2022

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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 1-19 Torrington Place ('the Site'), to secure flexible educational and office use for a period of 10 years.

Full Planning Permission is therefore sought for:

“Temporary change of use for a period of up to 10 years for flexible office E(g)(i) and education F1(a) (excluding the retail and other commercial units on the Tottenham Court Road frontage, the data centre at basement and part ground floor levels and the UKPN substation).”

1.2 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 47,884 students as of 2021.

1.3 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. In order to accommodate this anticipated growth, it is necessary to maintain existing teaching and learning space.

1.4 Whilst UCL are in the process of developing a new Strategic Plan, there is a need to maintain existing teaching space in the shorter term. UCL have occupied the Site with a flexible use since 1992, and have recently invested heavily in the property to ensure that it meets the needs of its students. The Site is therefore considered to be ideal to assist in accommodating the increased student numbers in the short to medium term while the Strategic Plan is finalised and implemented.

1.5 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.

1.6 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 part 2, part 6 and part 11 storey building located at the corner of Torrington Place and Tottenham Court Road. The building is currently occupied by various UCL academic departments, professional services and teaching and learning spaces, as well as a data centre at sub-basement level. The location is exceptional for students, being close to the centre of campus and near the amenities of Tottenham Court Road.
- 2.2 The Site is located within the Bloomsbury Conservation Area but is not a listed building. It does, however, sit within the vicinity of a number of listed buildings, including 18-26 Torrington Place which is Grade II* listed.
- 2.3 Surrounding uses are mixed and comprise university and hospital buildings to the north and east. There are a mix of commercial and retail premises to the west of the Site and along Tottenham Court Road. The nearest residential properties are Gordon Mansions located at the corner of Torrington Place and Huntley Street.
- 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 Goodge Street, Tottenham Court Road, Euston Square, Russell Square and Warren Street. There are also 17 bus routes serving the Site.
- 2.5 1-19 Torrington Place is a key building in UCL's Bloomsbury Estate. Providing some 17,000 sq. m of accommodation, the building is held on a long lease from the Bedford Estates with 85 years unexpired, and as such will continue to play an important long-term role in UCL's estates strategy.
- 2.6 UCL has occupied 1-19 Torrington Place since 1992. Since this time there has always been an element of flexibility between office use and teaching space. A planning permission obtained in 1992 (ref. 9200984) allowed an educational use on the second to fifth floors for a temporary period of 5 years. Owing to continued need and increased demand, a subsequent application was submitted in 1994, which allowed the university to occupy the basement, ground floor and second to fifth floor as educational floorspace. This consent expired as of the 1 October 2013.
- 2.7 In 2012, prior to the expiration of the temporary permission an application was submitted and granted for the temporary change of use for a period of 10 years for the entire building to office and

educational use. This change of use was necessary at that time, as UCL were in the process of finalising the Bloomsbury Masterplan, and Torrington Place was viewed as an ideal building to function as ‘swing space’ and accommodate the academic and administrative moves associated with the implementation of the masterplan.

2.8 As set out above, the building is occupied by various UCL academic departments, professional services, and teaching and learning spaces. These include:

- The Bartlett School and Construction and Project Management
- Brain Sciences
- Faculty of Population Health Sciences
- Department of Statistical Science
- Estates Department
- Information Services Division
- Library Services

2.9 Originally built as an office property in c. 1960, the accommodation that the building provides is ideally suited to UCL’s needs for a wide range of office-based activities, desk-based research, student study spaces and teaching.

2.10 UCL has made considerable investment in the building. In recent years, parts of the basement and ground floors, as well as part of first floor, have been refurbished and fitted out as teaching and learning space. This work was completed as part of the Transforming UCL programme and completed in 2018 delivering 10 new teaching rooms of capacities ranging from 18-120 seats, supporting different pedagogies, together with informal learning spaces. Outside of the formal teaching rooms there are plenty of areas for students and staff to rest, study and collaborate between classes, with ample power sockets and accessible laptop tables. The project included reconfigured reception areas with improved circulation space. Accessibility, inclusion and sustainability were key drivers throughout this project which also includes improved access to the building, the installation of gender-neutral toilets, re-provision of the multi-use room and water fountains on each floor reflecting wider inclusion and sustainability priorities.

2.11 These premises are supported by a refurbished ground floor entrance hall which again was completed in 2018/19. In addition, there are some seminar areas which have been fitted out on the top level (10th floor). On the other upper floors (5th – 9th) the accommodation is wholly laid out as offices and used for desk-based activities by UCL service departments or by academics and researchers requiring office space.

- 2.12 As an example of a flexible way in which UCL use the space, in 2020/2021 due to 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), floors 7,8 and 9 were given over to Library Services to be run as bookable learning spaces. This was very popular and well utilised by students. However, with social distancing no longer required these learning spaces have now been switched back to office use for academic desk-based research.

Data Centre

- 2.13 The building also includes UCL’s data centre at sub-basement level which supports various UCL departments in the vicinity. This was relocated to the building from the Wolfson Centre in 2018 after an extensive site search. The relocation was caused by the potential impact of the HS2 works on the operation of the existing data centre in the Wolfson Centre. 1-19 Torrington Place was the only site found that met UCL’s stringent criteria in terms of location, size of space, power supply and length of tenure. The data centre use is considered to be ancillary to the B1/D1 (now E(g)/F1(a) use of 1-19 Torrington Place
- 2.14 The relocation of the Data centre to 1-19 Torrington place incurred a cost of c. £50 million. UCL’s long-term plan is for the data centre to remain in this location, and it is likely that other local data servers will relocate into this area. As London’s leading multi-disciplinary university, a large amount of infrastructure is required to facilitate the success and growth of the university and its world class teaching and research programmes. The provision of sufficient data storage is an essential requirement of the University. UCL required additional data storage to secure sufficient long-term capacity for the University. Any disruption caused to this critical infrastructure could cause immeasurable harm to the operation and day to day running of the University.

Other uses

- 2.15 The building also contains a UKPN substation in the basement.
- 2.16 On the Tottenham Court Road frontage there are a number of commercial units. These are not occupied by UCL.

2.17 Although the data centre, substation and the commercial units are within the redline area of the planning application, they are not covered by the current planning application for a temporary flexible office/educational use.

Distribution of uses

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

Table 1: 1-19 Torrington Place – Floorspace by Use

Floor	Office m2	%	Teaching m2	%	Data Centre m2	%	UKPN m2	%	Total m2
-2	0	0%	0	0%	2560	100%	0	0%	2560
-1	645	26%	1264	52%	469	19%	63	3%	2441
0	591	33%	1114	61%	106	6%	0	0%	1811
1	1358	74%	480	26%	0	0%	0	0%	1837
2	1047	87%	162	13%	0	0%	0	0%	1210
3	1181	100%	0	0%	0	0%	0	0%	1181
4	1021	87%	156	13%	0	0%	0	0%	1177
5	1178	100%	0	0%	0	0%	0	0%	1178
6	920	100%	0	0%	0	0%	0	0%	920
7	593	100%	0	0%	0	0%	0	0%	593
8	590	100%	0	0%	0	0%	0	0%	590
9	573	100%	0	0%	0	0%	0	0%	573
10	240	59%	168	41%	0	0%	0	0%	408
11	254	61%	163	39%	0	0%	0	0%	417 (Plant only)
Total	10189	60%	3507	21%	3135	19%	63	0%	

2.19 This table indicates that at present, the majority of the building (60%) is used for office purposes. 21% of the building is used for teaching and 19% for the ancillary data centre. However, the exact distribution of teaching and office uses changes over time as described above, which is the benefit of the flexible permission.

Detailed Planning History

2.20 From a review of the Council's online planning register, we have provided a summary of the relevant applications relating to the Site.

2.21 **On the 12 November 1992, planning permission (ref. 9200983) was granted for the 'Change of use of second to fifth floors inclusive of west wing facing Tottenham Court Road from Class B1 (office) use**

to Class D1 (educational) within the meaning of the Town and Country Planning (Use Classes) Order 1987.’

This permission expired on the 1 October 2003.

- 2.22 **On the 25 May 1994, a planning application (ref. 9400749) was granted for** ‘Change of use for a limited period of part of basement, ground floor and second to fifth floors including east wing from office use with Class B1 to education use within Class D1 as shown on drawing 900/01/18, B1906-01, 02 04 05 06 & 07.’

This temporary permission expired on 1 October 2013.

- 2.23 **On the 3 December 2012, a planning application (ref. 2012/4608/P) was granted for the** ‘Change of use from offices (Class B1a) to dual use as offices (Class B1a) and educational use (Class D1) for a temporary period of 10 years (excluding retail and other commercial units on Tottenham Court Road).’

This temporary permission is due to expire on the 3 December 2022.

- 2.24 **On the 24 December 2013, a planning application (ref. 2013/6364/P) was approved for the** ‘Installation of enclosed plant/equipment in rear basement car park (Class D1).’

- 2.25 **On the 2 February 2015, a planning application (ref. 2014/7526/P) was granted for the** ‘Installation of plant, in association with the ancillary data storage at sub- basement level, comprising enclosure for the 6 chiller units, transformers, emergency generators (with brown roof), acoustic screening and cycle parking all in the rear yard, following demolition of existing plant enclosure and sub-basement wall.’

- 2.26 **On the 8 May 2017, a planning application (ref. 2017/1326/P) was granted for** ‘Various internal and external alterations to university building (Use Class B1/D1) including the installation of accessible platform lift/alterations to front entrances and the replacement of a number of ground and lower ground floor windows to rear and side elevations with louvered panels, metal doors and opaque materials.’

- 2.27 **On the 5 March 2021, a planning application (ref. 2020/4786/P) was granted for** ‘Creation of secure pedestrian access with reconfiguration of vehicular access and associated works’

3 The Proposed Development

3.1 The extant permission for flexible use is due to expire on the 2 December 2022 and there is a continued need for the Site to be used flexibly. As a long leasehold asset in Bloomsbury, the Site needs to be used as intensively as possible by UCL. Therefore, the current application seeks to extend the flexible permission for a further 10 years until 2 December 2032. In terms of the 2020 revisions to the Use Classes Order, the flexible use would be described as a E(g)(i) (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 10 years for flexible office E(g)(i) and education F1(a) (excluding the retail and other commercial units on Tottenham Court Road frontage, the data centre at basement and part ground floor levels and the UKPN substation).”

3.3 The continued need for flexibility between office and teaching uses is driven by the pressure UCL is facing in respect of teaching space. This is as a result of growth in student numbers which has continued over many years as UCL has consolidated its reputation as one of the leading 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, large and highly successful research-intensive university of global standing. With a strong culture of cross disciplinary work and a location in one of the world’s greatest global cities with a diverse and vibrant population. As such, it sees high demand from around the world from students wanting to study at UCL, staff wanting to work at UCL and philanthropists wanting to partner with the University.

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 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)

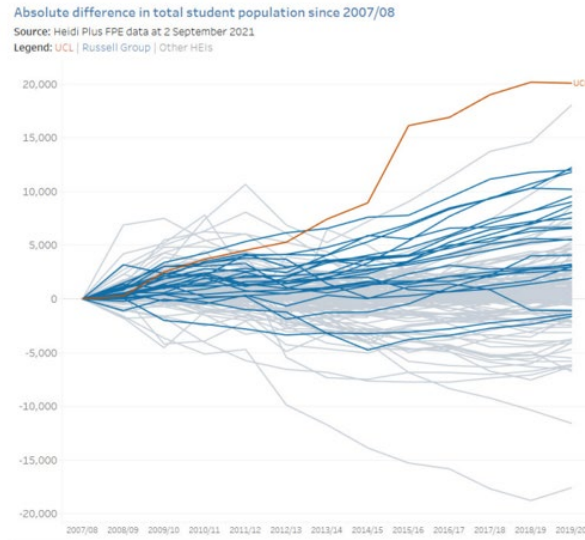


Figure 4. UCL has grown relative to its UK peers. The change in total student population (undergraduate and postgraduate) is plotted for UCL (red line), Russell Group universities (blue lines) and other UK HEIs (grey lines) relative to a 2007/2008 baseline. Data from HESA(<https://www.hesa.ac.uk/>)

Figure 2 (source: UCL Now)

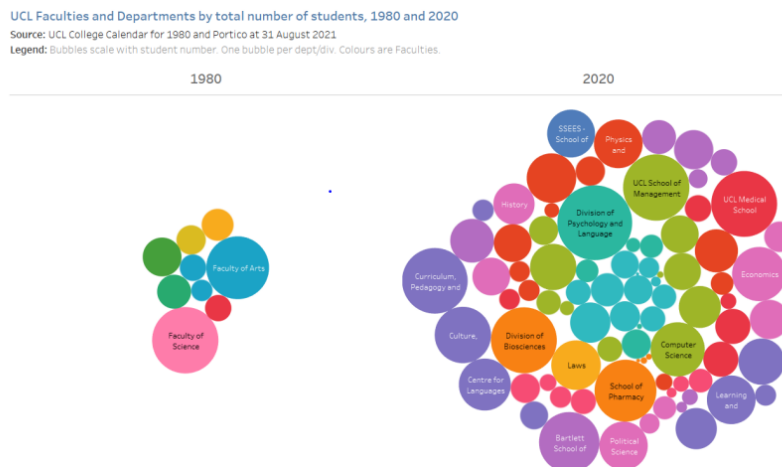


Figure 5. UCL has become very complex. UCL Faculties and Departments are shown in 1980 (left panel) and 2020 (right panel) where each colour indicates membership of a Faculty, and each circle represents a Department. The size of each circle represents the total number of students associated with that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

3.6 In the last few years, the growth in student numbers has been fuelled even further by the “student bulge” (referred to above). UCL has had to react quickly to this sudden upswing in numbers and has taken temporary space at 77 Wicklow Street and 40 Bernard Street to meet demand for teaching

space, as well as prolonging the life of the temporary building on the Main Quad which will be used for a further temporary period to provide lab space to meet the needs created by the bulge.

- 3.7 UCL’s medium and long-term academic plan, and how this translates to the estate’s strategy, is currently under review as part of a new strategic plan. UCL’s proposals for the Site must be considered in the context of the work being undertaken on the Strategic Plan 2022-2027, which is discussed below.

UCL’s Strategic Plan 2022-2027

- 3.8 UCL 2034: A 20 year strategy for UCL, was published in 2014 and is an important statement of 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.”

- 3.9 Building on this overarching Vision and Mission and the ethos that informs them, UCL is now preparing a strategic plan for the next five years – Strategic Plan 2022-2027 (the “Strategic Plan”).
- 3.10 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.
- 3.11 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.
- 3.12 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.

- 3.13 Formulating the Strategic Plan is a complex exercise involving extensive consultation with academics and departments on their future plans and needs, as well as addressing a wide range of strategic issues, such as sustainability objectives and UCL's commitment for all buildings to be net zero carbon by 2024 and 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 However, in the short/medium term pending the completion of the Strategic Plan and implementation of an associated Estates Strategy, 1-19 Torrington Place remains central to UCL's teaching needs and it is essential that flexibility is maintained to use part of the building for teaching activities.
- 3.15 In particular, the refitted teaching areas in the basement, ground and first floors were part of the UCL strategy to create a 23% increase in centrally bookable teaching space in the 2017-2018 academic year. There is no other space to relocate this teaching space to within UCL's current footprint and its loss would have a major impact on UCL's operation.
- 3.16 The application is therefore submitted for the change of use from offices (Class E) to dual flexible use as offices (Class E) and educational use (Class F1) for a further period of 10 years. This 10-year period is considered necessary given that the time period needs to allow for the development and implementation of the Strategic Plan and associated estates strategy.
- 3.17 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 following section discusses UCL's contribution to the local and national economy.

UCL's Impact on the National, Local and London Economy

- 3.18 The success of UCL, as an academic community with an overwhelmingly positive impact on the world, is evident from a wide variety of metrics. For example, UCL is consistently ranked on average in the

top ten universities globally with parts of the institution such as the UCL Institute of Education being repeatedly ranked first globally.

- 3.19 The university benefits from a diverse community of more than 48,000 committed, engaged and intellectually curious students representing over 150 different nationalities, with almost a third studying abroad for part of their time at UCL. Like other UK universities, UCL students bring economic as well as cultural and intellectual value.
- 3.20 A recent study by London Economics looked into the economic and social 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.
- 3.21 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

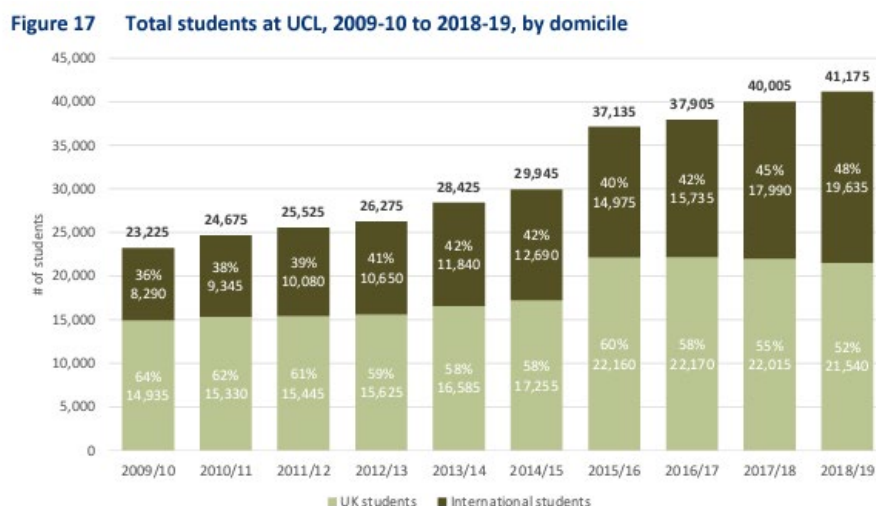
Note: All estimates are presented in 2018-19 prices, discounted to reflect net present values, rounded to the nearest £1m, and may not add up precisely to the totals indicated.

Source: London Economics' analysis

- 3.22 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 noting that a total of 11,690 international students started higher education qualifications at UCL in 2018/19. Figures show a consistent increase in the number of international students over the past decade, indicating that UCL continues to be an increasingly popular destination for those students from outside of the UK.

Figure 4 (source: Economic and Social Impact of UCL)



- 3.23 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.
- 3.24 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).
- 3.25 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.
- 3.26 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.

- 3.27 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.
- 3.28 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 £1040 million). This is in addition to the £1195 million contribution UCL made to the government, higher education, and health sectors.
- 3.29 UCL's contribution to the local, London and national economies is therefore extensive and is experienced 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.
- 3.30 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 1-19 Torrington Place 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.

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. At the national level, the Central Government revised the National Planning Policy Framework ('NPPF') in July 2021.
- 4.4 The Statutory Development Plan for the purposes of this application consists of:
- a) The London Plan (2021)
 - b) Camden Local Plan (2017).
- 4.5 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.
- 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 (also known as a Replacement Plan) was formally adopted on 2 March 2021. This means that it is not an alteration or an update to previous London Plans. 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, local planning authorities should 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 As discussed in preceding sections, UCL continues to be a very attractive choice for both home 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 2012, full time student numbers stood at 21,586. The figures for the current academic year show that full time student numbers have almost doubled to 40,996. Furthermore, projections indicate that full time student numbers are expected to continue to increase on an annual basis.
- 5.6 In order to ensure that UCL is able to accommodate the forecast demand, retain its position as a leading higher education facility and continue to make a substantial contribution to the local, London and national economies, it needs to be supported by increased and high-quality teaching space. Given the size and location of Torrington Place, together with the recent investment into the building, which ensures it is fit for purpose, it represents a key asset in supporting the future growth of the university.

- 5.7 The proposed temporary change of use would allow for increased teaching space to support the expansion of a world class educational institution which in turn would help to further secure London's leading role as a centre of higher and further education. Furthermore, the development would allow for UCL to expand its teaching operations which would directly benefit the local, London and national economies. The proposal therefore complies with the requirements of Local Plan Policy C2 and London Plan Policy S3 and E8.

Temporary loss of office use

- 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 outlined in the introductory sections of this statement the Site has benefited from a flexible use, in some form, since 1992. Figures provided by UCL show that there has been a consistent growth in student numbers since the previous temporary permission was granted in 2012 and this growth is expected to continue for the foreseeable future.
- 5.12 Whilst the proposal would allow the Site to be used flexibly, it would not result in the total loss of the office use. Since UCL have occupied the building, there has always been a need for a certain amount of office floorspace, and this need is expected to continue. Whilst a proportion of floorspace would be given over to teaching and learning activities (the amount of which could alter over the period of the proposed temporary permission), the change of use to education should not be viewed negatively, particularly when considering the success of UCL as a business, and as an employment generating use. At present approximately 60% of the building is used for offices, 21% for teaching and 19% for the data centre. On this basis the temporary loss of office space amounts to some 3,500 sq m.

- 5.13 As stated above, Policy E1 seeks to ensure a *'successful and inclusive economy'* and specifically recognises the importance of the education sector in achieving this. As detailed in Section 3 of this statement the contribution UCL makes to the local, London and national economies is substantial and this is, in part, generated through its teaching and learning activities. If UCL is to continue to make significant, and increased, economic impact in the future, it needs to be able to accommodate growth and, for this to be achievable, the teaching and learning arm needs to be supported by adequate and appropriate facilities.
- 5.14 In relation to Policy E2, this seeks to protect existing business spaces. It is accepted that the proposed development does represent a departure from this policy as the change of use would allow the building to be occupied by a non-business use. However, it should be noted that the change of use is sought on a temporary basis only, and as is the case currently, an element of traditional business use would be retained on site. Therefore, whilst there would be a reduction in office floorspace in the short term, the proposed development does not seek to remove the office use altogether. Furthermore, in the future the entire site would revert back to office use, and therefore would once again form part of the Borough's diverse range of business premises.
- 5.15 Furthermore, the introductory text to Policy E2 at paragraph 5.34 specifically states that the reason for strict policy in relation to the protection of business premises is in order to *'to support Camden's economy and provide employment opportunities.'* Whilst the proposed change of use would result in the business premises being used for non-business purposes, UCL can be seen to perform in the same way as any traditional business use, in that it makes substantial contributions to the local economy and provides significant employment opportunities. Whilst the text emphasises Camden's economy, the economic impact of UCL's educational and research activities extends far beyond the Borough and is experienced at a more wide-reaching London and national level.
- 5.16 Notwithstanding the above, in order to demonstrate their commitment to ensuring the premises for business purposes in the future, UCL would be happy to accept a reversionary personable condition to be included in a decision notice to cover this requirement. This would ensure that the premises revert back to an office use upon the expiration of the planning permission, or upon the time at which UCL vacate the premises, whichever is sooner. The following wording is proposed:
- "The use hereby permitted is for a temporary period only and shall cease on 2 December 2032, or upon the time at which UCL vacate the premises, whichever is sooner. At which time the premises shall revert to their former lawful use which is offices"*
- 5.17 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 1-19 Torrington Place flexibly is vital to UCL's current estates plan, and it is considered that the temporary reduction in office accommodation should

be supported in the context of the above factors and the economic impacts set out section 3 which clearly illustrate UCL's contribution to the local, London and national economies.

Transport

Cycling

- 5.18 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.
- 5.19 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.
- 5.20 The Site currently benefits from 90 on site cycle parking spaces. The current cycle parking provision was established when the planning permission for the data centre works was granted in 2015. Condition 7 of this planning permission requires details of secure and covered cycle storage for 90 cycles to be submitted to and approved by the local planning authority. Prior to the data centre works taking place there were 72 cycle parking spaces on site, so this development secured an uplift of 18 spaces which at the time exceeded the Council's cycle parking requirement of 1 space per 250sqm, as is noted in the Planning Officer's Report on the application.
- 5.21 Since this time, the cycle parking standards in the London Plan have been adopted and the requirement based on current office/education use of the building (indicated in section 2) is set out in Table 2 below:

Table 2: Policy compliant cycle parking provision

	Area (sqm)	London Plan long stay cycle parking standards	Long stay requirement	London Plan short stay parking standards	Short stay requirement
Office	10,189	1 space/75sqm GEA	136 spaces	1 st 5,000sqm = 1 space/500sqm Thereafter 1 space/5,000sqm	10 spaces 1 space
Education	3,507	1 space per 4 FTE staff + 1 space per 20 FTE student	22 staff 6 spaces 729 students 36 spaces	N/A 1 space per 7 FTE students	104 spaces
Total	13,696		178 spaces		115 spaces

- 5.22 This indicates that the full cycle parking for the Site, based on the current split of office and educational uses, would be 293 spaces (178 long stay and 115 short stay). The data centre has only a few staff members (4 or 5 staff) and has not been calculated as a separate category.
- 5.23 If the whole building (13,696 sqm) was in office use, the requirement would be 185 spaces (183 long stay spaces and 12 short stay spaces).
- 5.24 There is not scope to provide any further cycle parking spaces on site as all of the basement and ground floor areas are in use for the data centre, teaching or reception areas. UCL has used the building for office and teaching purposes since 1995 and during this time the on-site spaces, plus those provided on the central campus have been used by occupants of the building. No change to the occupancy of the building is proposed and it is therefore considered appropriate that the existing 90 spaces, supplemented by parking on the wider campus, remains appropriate. Table 3 provides details on other UCL cycle parking within approximately 300m and 500m distance from the Site:

Table 3: UCL Cycle Parking Provision

UCL Cycle Parking within approximately 300m	
Location	Number of Spaces
Rayne Institute	30
Gower Street	26
Chenies Mews	12
Darwin Building	10
Roberts Building	14
Byng Place	26
Malet Street	40
Medawar Building	18
Foster Quad	60
South Junction	24
Andrew Huxley Building	6
Medical Sciences Building	40
Total	306
Additional UCL Cycle Parking within approximately 500m	
UCL Main Quad	94
Student Centre Cycle Parking	54
Rear of Gordon Square Houses	Parking in basement vault
Main Quad South Wing	24
Cumulative Total	478

Parking

5.25 Policy T6 (Car Parking) of the London Plan seeks to restrict car parking in line with public transport accessibility and connectivity. Policy T2 of the Local Plan states that the Council will limit the availability of parking and require all new developments in the borough to be car free. Where acceptable, on-site parking will be restricted to spaces designated for disabled people or that required for operational or servicing needs.

- 5.26 The site benefits from 6 car parking spaces located in the rear yard. The proposed temporary change of use would not result in an increase in parking provision and existing on-site car parking arrangements would not be affected.
- 5.27 As no changes are proposed to the existing arrangements, the development is not conflict with Policy T6 of the London Plan and T2 of the Local Plan.

Servicing and Waste

- 5.28 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.
- 5.29 In terms of servicing and waste arrangements, these will remain as existing. Conditions 6 and 7 of planning permission ref.2012/4608/P required the submission of comprehensive details in relation both servicing and waste and these were subsequently discharged under application ref. 2015/4769/P. The Site will continue to operate under the existing, agreed measures.

Amenity

- 5.30 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.
- 5.31 The Site has operated in a mixed office and educational use since 1992. During this period the applicant has received one complaint which related to noise during the construction of the data centre. The applicant is aware of no noise complaints being received whilst the building has been operational in mixed office and educational use.
- 5.32 Under this application, the building is proposed to be operated in the same way as it currently is, and there are no changes proposed to the proportion of office floorspace and educational floorspace. Whilst it is acknowledged that the permission seeks flexibility across the entire building and therefore this could change

in future, given the lack of complaints to date, it is considered that the development would not give rise to any undue noise disturbance.

Design

- 5.33 Policy D1 (Design) of the Local Plan states that the Council will resist development of poor design that fails to take the opportunities for 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.
- 5.34 No external changes are being made to the building to facilitate the temporary change of use and therefore the development would not have an adverse impact on the character and appearance of the locality.

Sustainability

- 5.35 London Plan Policy SI 2 (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.
- 5.36 Condition 5 of planning permission ref. 2012/4608/P required the implementation of a number of energy efficient measures prior to the occupation of the building. These measures included the replacement of gas boilers with more energy efficient ones, the installation of energy metres to monitor energy use, systems to control ventilation, energy efficient lighting, insulation to plant rooms and upgrade of the cooling plant. This condition was formally discharged in 2015 (ref. 2015/4769/P) with the supporting energy report demonstrating that the measures implemented resulted in a 30% reduction in CO2 emissions.
- 5.37 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 1-19 Torrington Place is a key building in UCL's Bloomsbury Estate. Providing some 17,000 sq. m of accommodation for educational/research purposes, the building is held on a long lease from the Bedford Estates with 85 years unexpired, and as such will continue to play an important long-term role in UCL's estates strategy. A variety of planning permissions granted consecutively since 1992 have permitted UCL to occupy the building flexibly for both office uses (including administrative facilities and desk-based research) and teaching.
- 6.2 This flexibility has been extremely valuable, enabling UCL to quickly respond to new pressures and growth trends, and is an important factor supporting the success of its Bloomsbury campus. UCL has invested heavily in the building in order to optimise its contribution to the campus, not least with the £50m investment in the data centre, where there were no alternative sites for this crucial piece of infrastructure.
- 6.3 Although at each time a temporary permission has been applied for, it has been anticipated that it would be for a limited period, the reality is that the continual strong growth in student and staff numbers has continued to fuel the need for teaching space in Bloomsbury at a pace that the permanent estate has not been able to keep up with, despite the implementation of the Transforming UCL masterplan and new development at UCL East. This has been exacerbated recently with the student bulge that has necessitated a number of temporary planning permissions in buildings taking on short term leases.
- 6.4 1-19 Torrington Place is a long-term asset for UCL, and it is crucial that it can continue to meet UCL's needs at a time of extreme growth pressure and when the new Strategic Plan is being formulated. The Strategic Plan covers the period 2022-2027 but is part of UCL's strategy to 2034. It is considering UCL's shape and size and will set a framework for the next stage in the estate's strategy which will look at which buildings on the estate can be redeveloped to provide significant quantities of new teaching space. However, this will take time and in the short to medium term, the ability to use 1-19 Torrington Place flexibly is vital to UCL's current estates strategy.
- 6.5 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 from pure office use for a further temporary period of 10 years should be supported in the context of the growth challenges that UCL is experiencing and the very significant economic benefits it delivers - both of which have been detailed in this planning statement.
- 6.6 UCL's contribution to the local and national economies is extensive and is experienced through its activities including its research, teaching and learning, start-ups and spin outs as well as its own expenditure. Teaching space is critical to this performance, and it is requested that this application is supported.