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WRITTEN STATEMENT ON BEHALF OF THE UNIVERSITY OF LONDON (REPRESENTOR REF 404) IN RELATION TO CAMDEN LOCAL PLAN EXAMINATION MATTERS, ISSUES AND QUESTION - MATTER 10, ISSUE 2 AND MATTER 3, ISSUE 2.

This representation is made on behalf of our client, the University of London (UoL) (representor ref. 404), and is submitted in response to Matter 10, Issues 2 (Policy S4) and Matter 3, Issue 2 (Policy H9) of the Inspector's Matters, Issues and Questions (MIQs).

By way of background, the University of London's core purpose is to increase access to education, champion research excellence and deliver social good, by working in partnership with the University of London federation members. They also support several of the federation members who are located in the Bloomsbury / Camden area through their ownership and active management of the local estate.

The University Estate Strategy outlines how the University will develop and improve the estate and outlines routes to help realise the commercial value of the estate for the benefit of the University of London and its federation members.

Both Policy S4 and H9 will have real-life impacts on the University's ability to meet its purpose, and develop the estate in a way which benefits its students and staff, as well as the wider community. The below responses are therefore made in relation to the Inspectors MIQs.

Matter 10, Issue 2, Policy S4

At both Regulation 18 and 19, UoL made representations to Camden noting that the wording of Policy S4 needed to provide greater flexibility and preciseness, in order to be effective and give UoL the certainty it needs to continue to develop and expand its estate as necessary.

The Council's response at Reg 19 consultation, in relation to Policy S4, states:

"Comments noted. The Plan covers the period to 2041. Given this it is considered that the wording of the policy is appropriate as circumstance may change over that period. Furthermore, should the university with [sic] to increase academic [sic] floorspace at some point in the future, we consider the Bloomsbury Campus Area to be the most appropriate location for this to happen. In recognition of the universities ambitions to improve academic facilities though, we propose a minor modification to reflect this."

The Minor Amendment proposed by the Council for Policy S4 is:

*"Propose the following modification to Policy S4, Part A.4 - consolidate, **improve** and increase academic space" - Reason for modification: "For clarity - to respond to the comments made by Policy Paragraph Proposed Modification Reason for Modification UCL (Responder ID 523)"*

UoL do not consider that this proposed modification provides sufficient flexibility for UoL and as such the below responses are made to the MIQs.



Question 11. Is reference to “University of London or its member institutions” an appropriate term of reference in Policy S4?

UoL has not detailed comments on this wording of Policy S4, but would note that the specific reference to UoL is too constrained. We would suggest replacing "University of London or its member institutions" with "the Higher Education Institutions" .

Questions 12. Is Policy S4 sufficiently flexible to enable Higher Education institutions to adapt to meet changing needs?

UoL do not consider Policy S4, along with its proposed modification, provides suitable flexibility. At present, point 6 of the policy states:

“consolidate, improve and increase academic space (including student support facilities and other ancillary space) in a way that celebrates the Universities’ achievements and creativity and supports the Plan’s other priorities for the Campus Area;”

UoL’s representations on the required changes to the wording of the policy stand, and aren’t repeated here for reasons of brevity. The addition of ‘improve’ doesn’t not sufficiently alter the wording of the policy to provide the flexibility or certainty needed.

In addition, as space would become available from improved and consolidated space, it is likely that parts of the estate would become available for other supporting associated uses. The draft policy does not allow for a change of use of poor-quality academic space, which is not capable of being suitably improved, into an appropriate supporting use, including Purpose-Built Student Accommodation and other appropriate residential uses. The wording of the policy therefore unnecessarily restricts UoL’s ability to effectively manage its estate.

Furthermore, the policy fails to suitably acknowledge the requirement to balance the need for improvements to the provision of high-quality spaces, including Purpose-Built Student Accommodation, and the constraints the area has in terms of heritage assets. UoL’s estate is largely comprised of heritage assets or is located within the Bloomsbury Conservation Area. The existence of significant heritage assets creates a constraint on the estate’s need to grow. The draft policy fails to suitably address this by expressing explicit support for high-quality schemes which meet identified need for student accommodation and other associated uses.

Question 13. How was the boundary map for Policy S4 determined? Is it justified and effective?

The boundary map for Policy S4 relates to the area that has been the subject of the University of London’s vision for the area that has subsequently be used to inform the Camden’s Bloomsbury Vision SPD. Whilst the identified boundary for Policy S4 includes the main campus of UoL, the Estate is more fractured and dispersed across a wider area of Bloomsbury.

As such, UoL consider that it would be better to make reference to the South Camden area in general, rather than the Bloomsbury Campus area specified within the tightly drawn boundary map. This would allow UoL greater flexibility in providing the necessary facilities in the most appropriate part of its estate, in order to better serve its students and staff.



Matter 3, Issue 2, Policy H9

Policy H9

Question 43. Is the Council's approach to identifying a target of 200 additional places in student housing per year justified and effective?

UoL have previously raised that the evidence base for Policy H9 is out of date and would need to be updated to ensure that the draft policies aligns with the London Plan evidence base.

In relation to Policy H9, the Council's response states:

"Policy H9 sets a target of 200 additional student bedspaces a year.

We will however review the Local Plan target as the new London Plan emerges, and will aim to meet or exceed Camden's share of any new London Plan target, based on the updated proportion of London's resident students that are resident in the borough.

Policy S4 Bloomsbury Campus Area sets out the Council's overarching priorities for the Campus Area and supports the delivery of the Bloomsbury vision. The policy states that "We will support the development of student housing in the Campus Area to serve the University of London or its member institutions where it will not compromise meeting the need for additional academic space."

Given this, we do not feel it is appropriate to include a target for student accommodation [sic] in Policy S4."

UoL welcome this commitment to review the targets as the new London Plan emerges. They are however concerned that if the evidence base the Council are relying on for updated figures is not published before the adoption of the Local Plan, then the target would remain out of date. We would suggest that the wording of the policy is amended to set a minimum target of 200 additional places per year, or the relevant amount as identified by the London Plan, whichever is greater. This would ensure that the authority is able to meet the most up to date need for student accommodation, which contributes to the overall housing need for Camden.

Question 44. How does the policy demonstrate general conformity with London Plan?

Yes - the policy is generally in line with the London Plan.

Question 45. Should Policy H9 make specific reference to the Bloomsbury Campus Area?

UoL consider that a Bloomsbury Campus Area specific target, as a proportion of the overall target, should be set out in the policy. This would be reasonable given that a significant amount of the student housing provision is likely to come from within this area.

Inclusion of a target would safeguard the delivery of student housing in this appropriate location, rather than allowing it to be dispersed into locations which may be further from the area in which there is demand. Generally students want to be located as close to their university as possible, to avoid having to pay for travel and make the most of the facilities on campus. Whilst there is general policy support for student accommodation within the Bloomsbury Campus Area, the identified need may be met elsewhere in the borough in a less suitable location.

The policy should confirm that significant weight will be afforded to PBSA within the Bloomsbury Campus Area because of sustainable location, and the need to deliver accommodation in the most suitable area, in order to balance heritage harm and make delivery viable.



The policy should also acknowledge that the area is constrained due to existing built densities, and that it is entirely within the Bloomsbury Conservation Area which includes a high quantity of designated and non-designated heritage assets.

Question 46. In B.1 of the Policy what is meant by “disproportionate loss”, how will it be determined and is it effective?

UoL have no detailed comments on this, however the wording of the policy should be more precise as it could lead to ambiguity in decision making.

Question 47. Is the requirement in B.3 of the Policy to comply with relevant standards for houses in multiple occupation justified?

UoL have no detailed comments on this.

Question 48. In B.12 of the Policy how will an “appropriate contribution” be determined?

UoL have no detailed comments on this. The policy refers to Policy H4 D, which provides further information this. So, it seems reasonable for this policy not to re-define this.

Question 49. The Viability Study identifies that purpose-built student accommodation viability is stronger in the south of the borough. How has spatial variation informed the borough wide implementation of Policy H9?

UoL have no detailed comments on this other than to re-emphasise points raised under question 45, that there should be a Bloomsbury Campus Area specific target as this is the most suitable and viable location for PBSA schemes.

Question 50. What indicators, baselines and targets will be used to monitor affordable housing and housing mix outcomes and what triggers would prompt an early review or policy adjustment?

UoL have no detailed comments on this.

I trust that the above clearly sets out the reasoning for the need to amend the wording of draft Policy SC3 and that this suggested amendment can be incorporated within the new Local Plan, to protect the flexibility needed by the Trust and other similar bodies in continuing to deliver the highest quality patient care, excellent education and world-class research.

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