



Planning Policy

London Borough of Camden

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13/03/2026

Dear Sir/Madam

**Subject: Draft Local Plan Examination – Matters, Issues and Questions**

As an anchor institution within the London Borough of Camden, University College London (UCL) welcomes the opportunity to comment on the Inspectors Matters, Issues and Questions raised during the Local Plan Examination.

**Background to UCL**

Founded in 1826 in the heart of London, UCL is London's leading multidisciplinary university, with more than 16,000 staff and 51,000 students from 150 different countries. UCL's main campus is in Bloomsbury, although it has other buildings in Camden and Greater London

**UCL's Interest**

With an estate of over 250 buildings, UCL is focused on the maintenance and enhancement of its existing estate and facilities, carrying out many refurbishments project as well as new developments, in line with an ambitious growth trajectory and desire to remain at the forefront of world class research and teaching. UCL regularly reviews the estate to accommodate the growing number of students, including seeking temporary

changes of use to existing buildings within Camden for educational uses to meet unprecedented student levels post-Covid. UCL is actively involved with the planning system on a day-to-day basis and is in the process of developing its Estates Masterplan and is actively engaging with the Council on this.

UCL has a positive long-standing working relationship with Camden, and this is personified in the Memorandum of Understanding between the two parties, which aims to increase the potential for new collaborations, explore funding opportunities and increase the exposure of the partnership, with the intention to develop similar agreements with neighbouring boroughs.

UCL prepared representations to the draft Local Plan (Regulation 19) consultation and now wish to respond directly to some of the questions raised in the Inspectors Matters, Issues and Questions. The topics to which these questions relate, are Student Accommodation and Educational Use.

The representations included herein are intended to support and, where necessary, propose modifications to ensure that the final Local Plan is positively prepared, justified, effective, and consistent with national policy, in line with the tests of soundness set out in paragraph 36 of the National Planning Policy Framework (NPPF).

### **Policy H9, Q.43 – Is the Council’s approach to identifying a target of 200 additional places in student housing per year justified and effective?**

UCL supports Camden’s focus on delivering a supply of purpose-built student accommodation (‘PBSA’) within the borough. As a Higher Education Institution, UCL is acutely aware of the lack of supply in PBSA across London, relative to the ever-increasing demand. Not only will further provision of PBSA schemes help to meet future demand, but it will also assist in supporting students who are seen as an important asset to local communities through the diversity and economic benefits they bring to an area.

In relation to Draft Policy H9 (Purpose Built Student Accommodations), as per previous representations, UCL considers the annual target of 200 additional student housing places a significant underestimate of the actual need for this type of accommodation. UCL will reinstate its accommodation guarantee for all first-year undergraduates from September 2026 and is working to provide an accommodation guarantee for first year overseas postgraduates. Based on UCL statistical information, demand for these ‘priority 1 beds’ is expected to increase from 10,100 to 11,600 by 2038. Over the period, this results in an increase of 125 bedspaces per year. If demand for postgraduate domestic students were also to be accommodated, which is UCL’s longer term aspiration, this figure would increase to 15,000, increasing the annual demand to 408 student housing places. Against this demand UCL only have 7,275 beds at present, which will increase to 9,178 in 2026. This highlights a significant shortfall against the identified demand. As previously noted, UCL is just one of the universities based in the Borough, and

therefore their need alone would exceed the annual target, or at the very least take up a significant proportion of the target annual student beds, as outlined in the draft Local Plan.

**Policy H9, Q.45 – Should Policy H9 make specific reference to the Bloomsbury Campus Area**

UCL would support specific reference to the Bloomsbury Campus Area in Policy H9. However, whilst supportive of its inclusion, UCL would highlight that it should not preclude the development of PBSA outside of the Bloomsbury Campus Area.

Whilst the Bloomsbury Campus area represents a desirable, and highly convenient location for the development of purpose-built student accommodation for UCL and its students, given competing demand for the development of academic and ancillary facilities within the area to support the institution, it is unlikely that the student housing need could be fully met within this area. Furthermore, UCL has a number of assets which fall outside of the Bloomsbury Campus Area, and therefore the development of student accommodation on suitable sites within the wider Borough would still meet the needs of the University and its students.

**Policy IE2, Q.12 – Is the preference for housing in circumstances where an office use of a building is no longer feasible in Policy IE2 justified?**

In relation to Policy IE2 (Offices) Part C, this states that before developments resulting in the loss of office will be accepted, marketing evidence over a sustained period ‘should demonstrate that suitable economic uses have been fully explored and evidenced to the Council’s satisfaction.’ It is noted that there is no definition of what ‘suitable economic uses’ are but is assumed that it means other office uses that would not require a change of use.

It is noted that the Council currently regard housing to be the ‘preferable alternative use’ when loss of office has been properly justified. While the need for additional housing is understood and supported (including student accommodation), we consider that the current approach overlooks the needs of the Higher Education sector which plays a key role in the economic life of the borough and in the Knowledge Quarter.

UCL have seen a significant increase in student numbers over the past 10 years (a 76% increase since 2015). The growth of the estate has not been able to align with the increase in students, which has led to increased pressure, specifically on teaching spaces. Based on evidence gathering for the university’s Estate Vision Strategy, this pressure is only going to increase with an estimated 10,000sqm NIA of additional leased/acquired teaching space being required by 2037. Based on these demands, UCL are actively pursuing options over the short to long-term to obtain a sufficient supply of teaching space. However, there is not an available supply of teaching space in Bloomsbury or the wider Camden area, and this is a significant challenge. A result has been that UCL have had to seek temporary changes of use on a number of office premises in and around Bloomsbury in order to meet its needs and this is set to continue.



Given that the educational sector plays an important role in the success of the economy, and is employment generating, particularly in Camden and Bloomsbury, we consider that educational use should also be considered as a priority land use. In particular, this should be the case in the Bloomsbury Campus Area, where the council considers that a continued office use is no longer viable. This would align with the objective set out for the Bloomsbury campus Area in draft Policy S4 to maintain and expand the role of the Bloomsbury Campus Area as the heart of higher education in Camden.

### **Conclusion**

Thank you for the opportunity to contribute to the consultation and we look forward to seeing further positive development of draft planning policies for the borough. If it would be helpful to discuss our views further, please do get in contact with [ucl-property@ucl.ac.uk](mailto:ucl-property@ucl.ac.uk)

Yours sincerely



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