

Our Ref: R00040

27th July 2018

By email and post: bankssolutionsuk@gmail.com

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Dear Ms Masters,

**TOWER HAMLETS LOCAL PLAN EXAMINATION
WRITTEN HEARING STATEMENT ON BEHALF OF UNITE STUDENTS**

I write on behalf of Unite Students (hereafter Unite) in respect of their interest in Tower Hamlets. This follows the representations made through the preparation of the Local Plan and the Regulation 19 consultation held in November 2017. It is understood that the Examination in Public (EiP) is due to begin on 6th September 2018.

Unite have concerns over the Council's position on the priority for conventional forms of housing over non-conventional types which the Council identifies as 'including student housing'. This is referred to within draft strategic policy H1 and draft policy H6; a dedicated policy for student housing delivery within the borough. Unite feel this policy would deter the delivery of student housing and also does not fully grasp the positive role that student housing can have on the wider delivery of more conventional forms of housing, including family homes. In addition purpose built student housing can free up existing housing stock as recognised by the London Plan.

This hearing statement therefore relates to the following main matters:

- Main Matter 2 – Basis for the LP and Spatial Strategy; and
- Main Matter 6 – Local Housing Need (Student Housing).

Main Matter 2 – Basis for the LP and Spatial Strategy

Our previous representations supported the outline principle for Purpose Built Student Accommodation (PBSA) within the Borough which the Council states makes a positive impact to the local economy, the community and the borough's higher education provision. However, it is fundamental that the growth of these HEI institutions is supported given the contribution to the local economy that PBSA makes. Though Unite understands that the delivery of student housing needs to be managed in accordance with strategic need and local priorities; we believe the council needs to demonstrate greater flexibility in its ability to be pragmatic towards projected increases in student numbers. This needs to be sustained up to the plan period of 2031 and underpin the spatial strategy given the total removal of student admission controls, which has resulted in an upward trend in the number of students

applying to University and subsequently being accepted onto undergraduate degrees in England over the last three years since the relaxation.

More importantly, this has enabled the opportunity for some Universities to expand their institutions considering the additional numbers. This makes it even more important to deliver the necessary supporting infrastructure including student housing delivery to consolidate their growth. For these reasons we do not believe that the draft Local Plan provides a clear, positively prepared and justified vision for PBSA within the borough. This is further expanded upon in the following paragraphs.

Main Matter 6 – Local Housing Need (Student Housing)

The following paragraphs set out key evidence which highlights that draft Policy D.H6 has not gone far enough to support the expanding student population within the borough. We note that the Council have updated the wording of the draft policy in response to the consultee responses, but we do not feel this amendment has gone far enough. The wording of the draft policy is as follows:

“Proposals involving new purpose-built student accommodation should be directed to locations which are within close proximity to the borough’s higher education institutions and or in highly accessible locations and must:

- a) not compromise the supply of land for self-contained homes;
- b) have an undertaking in place to provide housing for students at one or more specific education institutions, or otherwise provide an element of affordable student accommodation;
- c) respect existing residential amenity; and
- d) provide 10% of student rooms which are easily adaptable for occupation by wheelchair users”.

We firstly set out the strategic and local need for PBSA in Greater London and Tower Hamlets.

Strategic and Local Need for Student Accommodation

Greater London

Paragraph 3.52 of the London Plan acknowledges the significant contribution London’s Universities make to its economy and the labour market and states that their future growth should not be compromised by an inadequate provision of new student accommodation. It states that there could be a requirement for 20,000 to 31,000 places over the 10 years to 2025 (as recommended by the 2014 Mayor’s Academic Forum on student housing). London Plan Policy 3.8 ‘Housing choice’ seeks to ensure that strategic and local requirements for student housing meeting a demonstrable need are addressed by working closely with stakeholders in higher and further education and without compromising capacity for conventional homes. The subtext to the policy goes on to recognise London’s universities contribution to the economy and labour market, stating the potential growth must not be compromised by inadequate provision for new student accommodation.

The Draft New London Plan reinforces this with paragraph 4.17.1 states :

“The housing need of students in London whether in Purpose-built Student Accommodation (PBSA) or shared conventional housing is an element of the overall housing need for London determined in

the 2017 London SHMA. London's overall housing need in the SHMA is expressed in terms of the number of conventional self-contained housing units and all new flats, houses or bedrooms in PBSA all contribute to meeting London's housing need.

The completion of new PBSA therefore contributes to meeting London's overall housing need and is not in addition to this need. The supporting text at paragraph 4.71 of the draft London Plan confirms that "every three student bedrooms in PBSA that are completed equate to meeting the same need that one conventional housing unit meets and contribute to meeting a borough's housing target at the same ratio of three bedrooms being counted as a single home."

It is evident there is a strategic need for additional student accommodation across all London Boroughs to address the lack of existing provision and to meet future demand.

Tower Hamlets

A recent student demand assessment that Unite commissioned for their planning application at Middlesex Street, Tower Hamlets dated 6th June 2018 confirms the following key facts with regard to the number of students currently within Tower Hamlets:

1. Full-time UK students living in Tower Hamlets have grown by 69% since 2007/2008 (HESA Student Record 2016/2017). This amounts to 20,540 students (HESA Student Record 2016/2017);
2. The highest concentration of students live in the postcode sector E1 4 (18%);
3. Over 45% of the full-time UK student population in Tower Hamlets are from outside the UK (HESA Student Record 2016/2017); and
4. Tower Hamlets is home to the third largest university main campus location in Greater London – Queen Mary University of London.

It is therefore very apparent that the student population in Tower Hamlets has significantly expanded over the last 10 years and is set to further expand. The following paragraphs set out the amount of PBSA currently in Tower Hamlets alongside the pipeline and then builds on the institutions which currently operate in the borough.

Amount of Purpose Built Student Accommodation

As confirmed by the HESA Student Record (2016/2017) there are currently 4,280 PBSA beds which are provided through university halls and private halls along with 899 PBSA beds in the pipeline. Therefore, in total there are 5,179 PBSA beds in the borough. As noted above, there are a total of FT students of 20,540 in Tower Hamlets. This equates to 4.80 students per bedspace (excluding the pipeline) and 3.97 (including the pipeline).

It is therefore clear that the current supply of PBSA in Tower Hamlets does not meet the need and to be able to meet this need the draft Local Plan Policy needs to provide further flexibility in its approach. CBRE in their assessment have estimated that the current provision only meets the need of 41% of the full-time student population who currently live in the borough and could demand accommodation (HESA Student Record 2016/2017). In summary:

1. 33% of full-time UK students living in Tower Hamlets live in other rented accommodation (HESA Student Record 2016/2017). More than three times more students live in other rented accommodation than private PBSA. This indicates the HMO market has absorbed much of the need for student housing in the borough.
2. Full-time students living in other rented accommodation in Tower Hamlets have more than doubled in numbers during 2007/2008 to 2016/2017 (HESA Student Record 2016/2017).
3. Tower Hamlets Borough Council could generate additional income through the reduction of council tax exemptions via students moving from private rented accommodation in the community to the student accommodation offered at Middlesex Street.

These key facts indicate that the current PBSA market, is severely under supplied and the private rented market is absorbing those full-time students who need accommodation but cannot find any in the PBSA market. It should be further noted that there is an economic benefit to the council through the opportunity to generate additional council tax revenue if students move from private dwellings into PBSA and that existing housing stock being available for the general population. .

Number of Student Institutions

In terms of student institutions in Tower Hamlets, the key campuses have over 19,500 students enrolled and are located at:

1. Queen Mary University of London (Whitechapel Campus);
2. Coventry University (London Campus);
3. Glasgow Caledonian University London Campus;
4. BPP University (Business School);
5. Newcastle University London Campus; and
6. London Metropolitan University (Satellite Campuses).

The number of full-time UK students studying in Tower Hamlets has therefore grown by 56% since 2007/2008 (HESA Student Record 2016/2017). Furthermore, over 8,000 full-time UK students travel 2km or more to attend a university campus location in Tower Hamlets.

Summary and further representations to Draft Policy D.H6

There is a clear need which has been demonstrated for PBSA within Tower Hamlets. Unite believe that greater consideration should be given to the wider benefits and that the delivery of PBSA can bring availability of more conventional forms of housing. As touched on earlier, the deliverability of student housing is paramount to solving the housing crisis in city-regions such as London with student housing known to impact on local housing markets and economies in the following ways:

- Release of other market housing on to the general market such as the alleviation of concentrations of HMOs to family housing. This can effectively relieve the current pressure of certain areas in the borough currently experiencing high concentrations of HMOs;
- Strong demand for higher quality university product amongst International and Post-graduate students thus stimulating further investment;
- PBSA has played an integral role in allowing the HE sector to expand over the past 20 years;

- PBSA can be far more suitable for certain central location sites, particularly wherein site circumstances would not allow for the levels of amenity space provision required in larger residential schemes.

Unite consider this part of the policy should further be re-worded to ensure the delivery of student housing is not deterred unfairly. This is alongside other mechanisms which have been used to deter the delivery of student housing including CIL, which is highly set as a charging levy in Tower Hamlets on all new student housing schemes. Thus, the delivery and viability of student housing has been adversely impacted in prime Central London locations given an unfair advantage to competing land uses in terms of competitive returns and the deliverability of development.

Draft Policy D.H6 needs to further recognise that PBSA does not compromise the supply and delivery of land for self-contained homes but in fact contributes towards it. This key policy theme is identified in the Draft London Plan and this should be reflected at local level in Tower Hamlets as a key priority. The Appeal decisions at **Appendix A** further confirm the principle that PBSA contributes towards the delivery of housing.

In addition to this, It is clear that there is an overwhelming demand for PBSA within Tower Hamlets with only 4.8 students per bedspace (excluding pipeline). Through the recognition of this key policy theme identified in the New London Plan and evidenced by Inspectors in the above appeal decisions, the delivery of PBSA will result in self-contained dwellings being released back into the market and providing wider benefits to the Borough as detailed above.

PBSA should be positively planned for by Tower Hamlets and there should be flexibility in the policy approach of D.H6 in terms of appropriate locations for PBSA. It is clear that with the HEI offering in Tower Hamlets that students travel into the borough and some distance. Through the provision of more PBSA the students who study at these HEIs will bring about wider benefits. This is further explained in the following paragraphs.

Accessibility

Part (d) of the draft policy requires PBSA to provide 10% of their student rooms as easily adaptable for occupation by wheelchair users. This follows the policy theme (Draft Policy D5) as set out in the London Plan which Unite have challenged and the reasons for this are detailed in the following paragraphs.

The requirements for conventional residential accommodation should not be applied to student housing as in reality, the typical demand from students per annum falls significantly below the 10% mark. This is evidenced by Unite's experience in London which highlights that less than 0.5% of their London portfolio is occupied by wheelchair users. This is a steady and consistent trend as evidenced by Unite's longer term experience. Further, Building Regulations require that 5% of units are wheelchair accessible. This ensures that, whether there is a planning policy position on wheelchair housing or otherwise, an element of wheelchair accessible units is provided which is still more than 10 times the identified need for such units.

One of the consequences is that in order to meet the requisite design standards this results in larger student bedrooms and kitchens, thus fewer standard units per development can be provided. This

has the knock-on effect of reducing the overall supply of PBSA number of units; increasing the cost and rent levels of existing stock and placing more pressure on the supply of conventional homes. We would stress that Unite are committed to providing wheelchair accessible units and ensuring their student accommodation schemes are inclusive to all. Unite operate a policy of meeting the needs of an individual user and not applying a one size fits all policy. Indeed, should individual bedrooms need to be adapted; this can be done quickly and relatively easily to meet requirements. Unite have undertaken such additional alterations in discussion with the end user and provided a bespoke solution to a student's needs. Adjoining carers' rooms have been provided also before the student took their place at university. Given the nature of student accommodation where 'sign up' is carried out in well in advance of the term starting (at least 3 weeks even during Clearing), it is therefore not considered necessary to over provide on wheelchair accessible units which will not be used. Student accommodation is not like a hotel where any one can come off the street and request a room.

In addition, we understand the 10% requirement was introduced in order to help meet a shortfall in wheelchair accessible housing within conventional housing. Generally, those who live in conventional dwellings are of an older demographic thus the percentage of those who have a disability and require wheelchair accessibility is far greater than the demographic affiliated with student accommodation. The normal age range of students is between 18 and 25, this explains why there has never been a shortfall in wheelchair provision within student housing, highlighting that the 10% requirement is wholly unreasonable and blatantly unnecessary. We therefore recommend that specific reference is made within the sub-text to draft policy D5 (Accessible Housing) which provides more clarity in relation to the tenure that the 10% requirement applies to, by listing those tenures that are included or excluded.

Whilst we acknowledge this is an important requirement, Unite have over 140 PBSA properties across the UK with 27 buildings in the London portfolio. Of these c.9500 London bedrooms, we have provision for 528 students that may need a wheelchair room. This is over 5.5% of our total London rooms. Over the last 5 years, Unite have provided 41 students with these rooms. For this current year, Unite have 7 students in need of wheelchair sized rooms out of an approximate total of c.9500 bedrooms. This equates to a 0.07% take up and thus demonstrating an exceptionally low need for accessible bedrooms.

Therefore, we recommend there is no evidence to support the need for PBSA schemes to include more than 1% of built out accessible rooms. Certainly, any policy requirement to require provision in excess of the relevant Building Regulation which requires 5% of the total number of rooms to be adaptable is unnecessary and unsound.

Recommendations to Amendments to Draft Policy D.H6

We therefore recommend to the Inspector that the current policy wording is revised as follows:

"proposals involving new purpose-built student accommodation should be directed to locations which are within ~~close~~ proximity to the borough's higher education institutions ~~and~~ or in highly accessible locations and must:

- a) ~~not compromise the supply of land for self-contained homes;~~
- b)

- c) have an undertaking in place to provide housing for students at one or more specific education institutions, or otherwise provide an element of affordable student accommodation;
- d) respect existing residential amenity; and
- e) provide 10% of student rooms which are easily adaptable for occupation by wheelchair users."

Cycle Parking Standards for Students

Appendix 3 'parking standards' associated with Draft Policy D.TR3 'Parking and Permit Free' identifies that PBSA should provide 1 cycle parking space per 1 student (long stay) and 1 cycle parking space per 40 students (short stay).

Unite are supportive of the provision of cycle spaces to encourage sustainable travel, however, the proposed rates for 1 space per bedroom unit is considered unnecessary and unsound for several reasons set out in the following paragraphs. Student housing is developed at higher densities than conventional housing and as a consequence and in order to provide these levels of cycle parking, large areas of floorspace typically at ground floor level, are required which could otherwise be used more efficiently and effectively for living or town centre uses thus reducing the viability of the scheme. Unite's experience has shown that cycle parking provision within consented student schemes where this has been provided at policy compliant levels is severely underused.

Evidence which refers to a recent survey (February 2018) undertaken by Unite to understand the present uptake of cycle utilisation across their student accommodation sites. The study demonstrates that the maximum average demand for cycle parking storage is 5% of bed places, which has been found across the 27 of Unite' sites which equates to a demand of one cycle space per 20 students. By way of an example, Unite were required to provide a minimum of 423 cycle spaces for a student scheme in the London Borough of Islington which translates to a floor area of approximately 465 sqm or 385 sqm based on the typical requirements of 1.1sq.m for a Sheffield stand or 0.91sq.m for a dual-stacking system respectively. Based on an average student cluster bedroom size of approximately 11sq.m, this would result in the unnecessary loss of approximately 35-42 bedroom units. Additionally, it has been demonstrated that an increase in the provision of cycle parking for student accommodation would not directly result in an increase in cycling patterns amongst students. Firstly, student housing schemes are generally in close proximity of places of study [allowing majority of journeys to be undertaken on foot and are in areas with high levels of public transport accessibility providing an alternative means of transport. Secondly, the influence and take up of Cycle hire schemes provide an affordable means of transport, precluding the requirement for private cycle ownership and storage which eliminates the need for students to invest in safety, security and maintenance associated with private ownership. By way of justification for the increase in cycle parking requirements, the GLA refer to the evidence base document 'Cycle Parking – Part of the London Plan, December 2017' which notes that the 2013 Early Minor Alterations to the London Plan included minimum standards for cycling for the first time, as it considered that student accommodation is essentially residential in nature and as such should be consistent with residential standards. Subsequently, the evidence base recognises that further alterations did not include similar rises in cycle parking for student accommodation. The cycle parking requirements for residential development should not be applied to student accommodation and it is considered that the proposed levels of cycle parking for student housing should be considered on a case by case basis as supported by the evidence referred to above.

We propose to broaden the wording of the policy D.TR3 and appendix 3 to ensure a more flexible approach to the requirement is undertaken. Cycle parking requirements for student accommodation shall "be considered on a case by case basis" should be inserted into Appendix 3. The level of provision should consider the location of the development and accessibility to public transportation, but as a maximum the provision should be 25% of the total number of bedrooms.

We trust that the above is helpful in the context of the EiP. It would be appreciated if you could confirm receipt of this Hearing Statement in respect of Unite Students interest in Tower Hamlets. If you have any queries on the representations enclosed please contact myself or Beth Hawkins.

Yours sincerely,



MATTHEW ROE
Director