

LAMBETH LOCAL PLAN EXAMINATION OCTOBER/NOVEMBER 2020

Statement of Common Ground between London Borough of Lambeth and Unite Students

Matter 3.6 Student housing and Matter 6.2 Cycling

Context

This is a statement of common ground (SCG) between the London Borough of Lambeth ('**LB Lambeth**') and Unite Group Plc ('**Unite**') to support the examination of the Draft Revised Lambeth Local Plan Proposed Submission Version January 2020 (the '**Draft Plan**').

At the Local Plan examination hearing sessions on Matter 3.6 (Policy H7 Student housing - 29 October 2020) and Matter 6.2 (Policy T3 Cycling – 6 November 2020), the Inspector asked LB Lambeth and Unite to agree a SCG covering aspects of Policy H7 Student housing and Policy T3 Cycling in the Draft Plan. This is recorded as actions 8 and 35 in the Inspector's list of actions arising from the hearings ([INS06b](#)).

LB Lambeth's proposed amendments

LB Lambeth's proposed amendments to Policy H7 and its supporting text and to Policy T3 and its supporting text are set out in red in **Appendix 1** of this statement.

LB Lambeth has had regard to suggested wording provided by ROK Planning on 12 and 16 November 2020 on behalf of Unite in relation to Policies H7 and T3, included at Appendix 2 of this statement, and subsequent comments from Unite dated 24 November.

With regard to Policy H7, ROK Planning's suggestions go beyond the issues recorded in the Inspector's action 8 and do not fully deal with the mitigation of potential harm to neighbouring residential occupiers, whilst completely deleting all wording relating to the mix and balance of uses. Lambeth refers the Inspector again to the justification for these provisions set out in section 2 of Topic Paper 9 ([TP09](#)).

With regard to Policy T3, ROK Planning's proposed changes also go beyond the point discussed in the hearing. LB Lambeth is not able to accept them in full for the reasons set out below:

- LB Lambeth's proposed amendments clarify where pool bikes are appropriate and how their provision relates to the cycle parking standard; i.e. as *part of* the required cycle parking provision in the case of purpose-built student accommodation, but *in addition* to the required cycle parking provision for other uses such as workplaces.
- The proposed use of pool bikes is not appropriate for shared living schemes which are not fully equivalent to student accommodation. While student accommodation may have a transient population some of whom may not have access to their own bike, this is not likely to be the case for shared living accommodation which is expected to cater for longer-term

residents. For the same reason, the London Plan cycle parking standards include a lower cycle parking standard for student accommodation, but do not otherwise distinguish between other forms of residential accommodation (including shared living).

- Contributions towards Cycle Hire schemes are not an appropriate alternative to pool bikes because they do not provide the same level of convenience or flexibility as pool bikes provided on-site. Unlike Cycle Hire bikes, pool bikes can be taken for longer periods of time, do not need to be docked at their destination, and are available free to the user.
- The proposed student cycle parking standard in the Draft Lambeth Plan follows the London Plan standard (0.75 spaces per student bedroom) and there is no Lambeth-specific justification for deviating from the London Plan and setting a different student cycle parking standard in Lambeth. Indeed, this could set a precedent resulting in different student cycle parking standards between London boroughs, undermining the London Plan. If Lambeth's Plan were to deviate in this way, it would no longer be in general conformity with the London Plan. The proposed amendments in Appendix 1 of this SCG maintain the London Plan standard but allow for part of that standard to be met through the provision of pool bikes in the specific case of purpose-built student accommodation.
- The standards in the London Plan have undergone examination and been found sound. TfL recognises the importance of cycling and TfL's Cycling Action Plan (2018) sets out ambitious plans to continue to grow cycling levels in London, and it is important that this is appropriately supported and complemented through the planning system and the opportunities presented by new development, including student accommodation. Sufficient cycle parking is key to achieving the potential for cycling in London and the minimum cycle parking standards, including student cycle parking, play a vital role in this, ensuring that sufficient convenient, good quality, safe and secure cycle parking is provided, taking into account both future and potential demand.

Unite's comments

Areas of agreement

Unite support the amendment to part iv of policy H7 with respect to the inclusion of a requirement for a satisfactory student management plan. However, Unite feel that further modifications to policy H7 are required in order to make the plan sound. This is detailed further in the following section.

Unite support the additional sentence included within paragraph 5.64 of the supporting text to policy H7.

Unite partly support the general policy direction of the additional wording included within part e. of policy T3, including the fact that pool bikes are appropriate within PBSA development. However, Unite feel this needs to go further and this is detailed further in the following section.

Areas of disagreement

Policy H7

Additional modifications beyond those proposed by the Council (Appendix 1) are considered necessary by Unite in order to make policy H7 sound. These are shown in red at appendix 2 (with the agreed LB Lambeth amendments shown in green) and detailed in the following paragraphs.

As set out in Unite's representations to various stages of the plan, Unite consider the removal of part i. of policy H7 and paragraphs 5.64 and 5.65 of the supporting text to the policy necessary for soundness. In short, these policy elements refer to PBSA compromising the delivery of conventional and affordable dwellings. However, PBSA should in fact be taken to contribute to the delivery of housing in the same way as conventional dwellings do in accordance with paragraph 034 of the NPPG and paragraph 4.15.1 of the draft London Plan Intend to Publish Version.

Indeed, Unite have made representations of this nature to other draft Local Plans within London. Most recently, the Inspectors undertaking the examination of the draft Westminster Local Plan concurred with Unite's representations and concluded within their recommended modifications that the following sentence (Part G, policy 11) should be removed from the plan for soundness; *"the development of new student accommodation should not result in the loss of other types of housing"*.

Similarly, on the basis that PBSA should be taken to contribute to housing delivery in the same way as conventional dwellings (as detailed above), Unite additionally consider the removal of part iv. of the policy and paragraph 5.69 of the supporting text, which refer to an over-concentration of PBSA being detrimental to mixed and balanced communities, necessary for soundness. Notwithstanding the fact that PBSA and conventional housing delivery should be treated in the same way, it is not possible to clearly define an over-concentration. This has been proven by LB Lambeth's proposed amendment to paragraph 5.126 of policy H13 (purpose-built shared living) which deletes the 500m radius stipulation, as set out in LB Lambeth Hearing Statement to matter 3. In any case, the development of PBSA in fact contributes to creating mixed and balanced communities as

acknowledged by LB Lambeth in their proposed modification to paragraph 5.64 of the supporting text.

An additional modification considered necessary for soundness is the removal of the requirement for evidence of a linkage with one or more HEP's within, or within reasonable travelling distance of, Lambeth (part iii.). This is notably contradictory to the draft London Plan which states at paragraph 4.15.3 that *"there is no requirement for the higher education provider to be located within the borough where the development is proposed"*. Indeed, the Inspectors undertaking the examination of the draft Westminster Local Plan recently concurred with Unite's representations and concluded within their recommended modifications that the following phrase (Part G, policy 11) should be removed from the plan for soundness; *"with a main hub in Westminster"*.

Finally, Unite argue that part iii. should also be updated to make clear that a nominations agreement is required from the point of occupation only in accordance with the draft London Plan.

Policy T3

As noted in the section above, Unite partly support the policy direction of the additional wording included within part e. of policy T3, as proposed by LB Lambeth. However, Unite disagree with the current proposed wording which suggests that the number of pool bikes provided should be in accordance with draft London Plan cycle parking requirements (i.e. 0.75 pool bikes per room), and that only pool bikes are appropriate in PBSA developments.

In short, Unite's representations to policy T3 are made on the basis that cycle parking provided in student developments is significantly underused, and that the significant levels of floorspace required for this underused parking can be more efficiently used. The provision of pool bikes at the same level as standard cycle spaces is therefore counter-intuitive, requiring the same level of floorspace.

Indeed, the principle of pool bikes is that they can be used by more than one person and therefore fewer cycle parking spaces are required. Unite therefore argue that the provision of pool bikes should be considered with regards to a reduced overall level of cycle parking, not provided at a level equivalent to standard cycle parking.

Signatures

For LB Lambeth

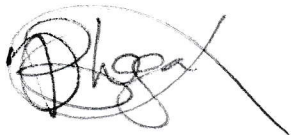
Rob Bristow

Rob Bristow

Director Planning Transport and Development

Date: 24 November 2020

For Unite

A handwritten signature in black ink, appearing to read 'Jagdeep Bhogal', with a large, sweeping flourish extending from the end.

Jagdeep Bhogal

Design & Planning Director

Date: 27 November 2020

Appendix 1

LB Lambeth's proposed amendments to Policies H7 and T3 and associated supporting text are set in red below.

Proposed amendments to Policy H7 and supporting text:

H7 Student Housing

- a) The council will seek to manage the development of sites for student housing to ensure the availability of land to meet priority housing and employment needs and the achievement of mixed and balanced communities. Proposals for student housing will be supported acceptable only where it can be demonstrated that the development:
 - i. does not compromise capacity to meet the need for conventional dwellings, especially affordable family homes, nor displace other key uses such as employment development. Proposals should not result in the loss of employment land or floorspace, unless relevant policy tests (set out in section 6 of the Local Plan) are met, or the loss of existing self-contained dwellings;
 - ii. forms part of a mixed-use development;
 - iii. is supported by evidence of a linkage with one or more higher education ~~institution~~ provider (HEI HEP) in Lambeth, or within a reasonable travelling distance of Lambeth, ~~as defined in the London Plan funded by the Higher Education Funding Council for England~~. This evidence must include confirmation that the proposed rental levels for the student accommodation are supported by the linked ~~HEI HEP(s)~~ and that the majority of the bedrooms in the development including all of the affordable student accommodation will be secured through a nominations agreement for occupation by students of one or more HEP, for the lifetime of the scheme, as required by London Plan policy H15;
 - iv. would not lead to an over-concentration of similar uses which may be detrimental to ~~residential amenity or~~ the balance and mix of uses in the area or place undue pressure on local infrastructure, and includes a student management plan that, to the satisfaction of the, Council will appropriately mitigate potential harm to residential amenity;
 - v. is located in an area with good public transport access, and easy access to local shops, work places, services and community facilities;
 - vi. provides a range of accommodation types, including cluster flats with shared kitchen and bathroom facilities unless justification is provided as to why this would not be appropriate;
 - vii. is well-designed, providing appropriate space standards and facilities and is sustainable by virtue of being adaptable to alternative residential use;
 - viii. provides high-quality cycle parking facilities in accordance with Local Plan policies T3 and Q13. Pool bikes are particularly appropriate for student housing.

- b) Student housing will be secured by planning obligation or condition relating to the use of land or to its occupation by members of specified educational institutions. Where the accommodation is not secured for students, the development will be considered large-scale purpose-built shared living and considered under London Plan policy H16 and Local Plan policy H13 subject to the requirements of policy H2 in respect of affordable housing provision.
- c) The requirements of London Plan policy H15A4 relating to provision of affordable student accommodation will apply.
- d) Leisure facilities within purpose-built student accommodation should be made available for public use in locations where there is an identified shortage of provision. This will be secured through planning obligations.
- e) Temporary use of purpose-built student accommodation during vacation periods for ancillary uses will normally be supported.
- f) The loss of existing student accommodation will be resisted unless ~~adequate replacement accommodation is provided or~~ it is demonstrated that the facility no longer caters for current or future needs and the floorspace is replaced by another form of residential accommodation that meets other development plan requirements.

Supporting text

5.64. ~~In accordance with London Plan policy~~ **Purpose-built student accommodation makes an important contribution to the diversity of housing in Lambeth.** To ensure delivery against the London Plan housing target, the council will seek to ensure that addressing the demand for student housing does not compromise capacity to meet the need for conventional dwellings, especially affordable family homes, or undermine policy to secure mixed and balanced communities.

5.65. When considering whether a proposal for student accommodation would compromise capacity to meet the need for conventional dwellings in the borough the council will have regard to:

- whether a proposal would displace existing C3 residential accommodation
- whether a site has been allocated for housing ~~in the Local Plan or~~
- whether a site has been identified in the London SHLAA and/or Local Plan housing trajectory as having with capacity for conventional housing (except where a proposal achieves that capacity as part of a mixed-use development)
- whether a site has an extant or historic planning permission for C3 housing.

5.66. Higher Education Providers (HEPs) are defined in London Plan footnote 77. While the council recognises that provision for specialist student accommodation is needed to support the growth of London's higher education ~~institutions~~ providers, speculative development of student housing will not be ~~supported~~ permitted. Proposals must be supported by evidence of a linkage with one or more higher education ~~institution~~ provider (HEI HEP) funded by the Higher Education Funding Council for England. This evidence should be provided on submission of a planning application, and will be requested at pre-application stage if this takes place. The accommodation should either be operated directly by an ~~HEFCE-funded HEI~~

HEP or have a nominations agreement or an 'in-principle' agreement in place in accordance with London Plan policy H15 (see also London Plan paragraph 4.15.3). Applications that do not demonstrate to the satisfaction of the council that the accommodation is linked with an HEFCE funded HEI HEP will not be supported permitted. It is important for private providers of student accommodation to have early discussions with HEFCE institutions HEPs to ensure the accommodation is designed and built to meet their requirements. The council will expect developers to demonstrate that they have engaged with the appropriate organisations to ensure that new developments will meet identified need.

5.67. Tenancies should have regard to the likely level of financial support available to the intended occupiers. Proposed rental levels should be submitted, along with evidence that these levels are supported by the linked HEI HEP(s). Where the development is not operated directly by a higher education provider, the affordable student accommodation bedrooms should be part of the purpose-built student accommodation that is subject to a nominations agreement with named HEPs, secured in a legal agreement. The affordable student accommodation should be allocated by the HEP(s) that operates the accommodation, or has the nomination right to it, to students it considers most in need of the accommodation. In applying part H7(c)(iii) of this policy, the council will have regard to paragraph 4.15.4 of the London Plan where 100 per cent affordable student accommodation is proposed.

5.68. To be sustainable, sites should be located close to the institution they are intended to serve (reachable within 30 minutes) or otherwise have good public transport accessibility (Level 4 or above), and easy access to shops, services 97 Draft Revised Lambeth Local Plan – Proposed Submission Version January 2020 Section 5: Housing and community facilities. The council expects developments to provide high quality cycle parking facilities, which are secure, sheltered, integrated and accessible, in line with policies Local Plan T3 and Q13.

5.69. When considering the concentrations of students in a single area, the council will have regard to the character of the area, the existing mix of uses, and the particular impact on any permanent residential occupiers. An appropriate student management plan will be required to mitigate potential harm to residential amenity and monitoring of this plan will be secured as a planning obligation. Schemes will be considered on a site-by-site basis having regard to their scale and any existing concentrations (including any sites with extant planning permissions). Given the existing concentration, quantum and pipeline of this type of accommodation in the Vauxhall Miles Street character area of Vauxhall, additional purpose-built student accommodation in the Vauxhall part of the NEV Opportunity Area is unlikely to be supported in this location to ensure a mixed and balanced community across the Vauxhall part of the NEV Opportunity Area. The London Plan encourages new student accommodation away from existing concentrations in central London.

5.70. Student accommodation should form part of a mixed-use development. Schemes that comprise solely student accommodation will not normally be supported.

5.71. Developments should not place undue pressure on local infrastructure, in particular transport or open space. In this regard, the council will consider whether public transport services have existing or committed capacity to accommodate the additional demand generated and whether public open space has adequate capacity to absorb further use, particularly in open space deficiency areas. Where there is an identified shortage of leisure facilities in the location of the proposal (particularly swimming pools, gyms and other indoor or outdoor sports facilities) as set out in the Infrastructure Delivery Plan, any leisure facilities of this type provided as part of the development should be made available for use by the

general public at times to be agreed with the council. This provision and associated maintenance requirements will be secured through a legal agreement.

5.72. It is accepted that, due to the relatively short tenancies in student housing and the lifestyle of occupants, different amenity standards should apply from those for permanent accommodation. However, accommodation should still be well designed, providing appropriate space standards and facilities and good daylighting. The provision of amenity space will need to reflect the location and scale of the proposal. The ability to accommodate disabled students with disabilities should be fully integrated into any student housing development, with 10 per cent of rooms wheelchair-accessible or easily adaptable for occupation by a wheelchair user in line with London Plan policy D7.

5.73. The council will expect schemes to include a range of accommodation, including clustered study bedrooms with shared facilities, double units, and 98 Draft Revised Lambeth Local Plan – Proposed Submission Version January 2020 Section 5: Housing single and studio units. Cluster flats with shared facilities are likely to be more affordable than en-suite single rooms and self-contained studio units. The provision of a variety of layouts will also allow for greater flexibility for conversion to permanent self-contained housing if in future the building is no longer needed as student accommodation, thus ensuring its sustainability.

5.74. A student management plan should be submitted with all applications, to ensure student welfare and mitigate potential impacts on the local community. This should include an explanation of how student accommodation will be used and managed during university vacations. Examples of temporary use of purpose-built student accommodation during vacation periods for ancillary uses include providing accommodation for conference delegates, visitors, interns on university placements, and students on short-term education courses at any institution approved in advance by the council. Conditions and/or legal agreements will be used to ensure that the ancillary use does not result in a material change of use of the building.

5.75. Given the anticipated growth in numbers of full-time higher education students, existing student housing provision will be protected unless it has been replaced or there is no longer a demand for it.

5.76. The council will continue to liaise with educational institutions, particularly those within and close to the borough, regarding their needs and student accommodation strategies. Student accommodation will be monitored as distinct from overall housing provision, including future demand / supply relationships.

Proposed amendments to Policy T3 (e) and supporting paragraph 8.17:

Policy T3 (e):

The council will require the provision of appropriate secure and covered cycle parking facilities in accordance with the minimum standards set out in the London Plan policy T5 and with Local Plan policy Q13. When designing building layouts sufficient space should be allocated at the outset to meet these requirements. Development proposals for non-residential uses will include provision of showers, changing facilities, drying rooms and lockers for cyclists appropriate to the number of cycle parking spaces provided. Where appropriate, pool bikes should also be provided. In purpose-built student accommodation schemes, part of the required cycle parking provision could be provided as pool bikes. For other types of development, pool bike provision is encouraged in addition to the cycle parking requirement.

Para 8.17:

Lambeth has one of the highest existing and potential rates of cycling in London and so will require enhanced levels of cycle parking as set out in the London Plan. The council considers that the quality of provision is paramount and will not support development that fails to deliver cycle parking to the highest standard 201 Draft Revised Lambeth Local Plan – Proposed Submission Version January 2020 Section 8: Transport and Communications accessible to all. Appropriate and adequate space within developments to allow this must be identified at the outset. Depending on the land use, the provision of pool bikes within the proposed cycle parking provision may be appropriate to encourage the take up of cycling. Pool bikes can be particularly beneficial where occupiers may be unlikely to have access to their own cycle. For example, many students come to study for a short time, often from overseas, and do not have access to their own bike in London. Pool bikes may also be beneficial in workplaces for business-related trips, but should not form part of the required cycle parking provision.

Appendix 2

Wording changes to Policy H7 proposed by **ROK Planning on behalf of Unite Students** (16 November 2020 and 24 November):

Policy H7 Student housing

- a) The council will seek to manage the development of sites for student housing to ensure the availability of land to meet priority housing and employment needs and the achievement of mixed and balanced communities. Proposals for student housing will be **supported** ~~acceptable only~~ where it can be demonstrated that the development:
- i. does not ~~compromise capacity to meet the need for conventional dwellings, especially affordable family homes, nor~~ displace other key uses such as employment development. Proposals should not result in the loss of employment land or floorspace, unless relevant policy tests (set out in section 6 of the Local Plan) are met, or the loss of existing self-contained dwellings;
 - ii. forms part of a mixed-use development;
 - iii. is supported by evidence of a linkage with one or more higher education provider (HEP) ~~in Lambeth, or within a reasonable travelling distance of Lambeth,~~ as defined in the London Plan. This evidence must include confirmation that the proposed rental levels for the student accommodation are supported by the linked HEP(s) and that the majority of the bedrooms in the development including all of the affordable student accommodation will be secured through a nominations agreement for occupation by students of one or more HEP, from the point of occupation for the lifetime of the scheme, as required by London Plan policy H15;
 - iv. ~~would not lead to an over-concentration of similar uses which may be detrimental to residential amenity or the balance and mix of uses in the area or place undue pressure on local infrastructure;~~ **includes a student management plan that, to the satisfaction of the, Council will appropriately mitigate potential harm to residential amenity;**
 - v. is located in an area with good public transport access, and easy access to local shops, work places, services and community facilities;
 - vi. provides a range of accommodation types, including cluster flats with shared kitchen and bathroom facilities unless justification is provided as to why this would not be appropriate;
 - vii. is well-designed, providing appropriate space standards and facilities and is sustainable by virtue of being adaptable to alternative residential use;
 - viii. provides high-quality cycle parking facilities in accordance with Local Plan policies T3 and Q13. Pool bikes are particularly appropriate for student housing.
- b) Student housing will be secured by planning obligation or condition relating to the use of land or to its occupation by members of specified educational institutions. Where the accommodation is not secured for students, the development will be considered large-scale

purpose-built shared living and considered under London Plan policy H16 and Local Plan policy H13.

- c) The requirements of London Plan policy H15A4 relating to provision of affordable student accommodation will apply.
- d) Leisure facilities within purpose-built student accommodation should be made available for public use in locations where there is an identified shortage of provision. This will be secured through planning obligations.
- e) Temporary use of purpose-built student accommodation during vacation periods for ancillary uses will normally be supported.
- f) The loss of existing student accommodation will be resisted unless it is demonstrated that the facility no longer caters for current or future needs and the floorspace is replaced by another form of residential accommodation that meets other development plan requirements.

Supporting text

~~5.64. To ensure delivery against the London Plan housing target, the council will seek to ensure that addressing the demand for student housing does not compromise capacity to meet the need for conventional dwellings, especially affordable family homes, or undermine policy to secure mixed and balanced communities.~~

~~5.65. When considering whether a proposal for student accommodation would compromise capacity to meet the need for conventional dwellings in the borough the council will have regard to:~~

- ~~• whether a proposal would displace existing C3 residential accommodation~~
- ~~• whether a site has been allocated for housing~~
- ~~• whether a site has been identified in the London SHLAA and/or Local Plan housing trajectory as having capacity for conventional housing~~
- ~~• whether a site has an extant or historic planning permission for C3 housing.~~

5.66. Higher Education Providers (HEPs) are defined in London Plan footnote 77. While the council recognises that provision for specialist student accommodation is needed to support the growth of London's higher education providers, speculative development of student housing will not be permitted. Proposals must be supported by evidence of a linkage with one or more higher education provider (HEP). This evidence should be provided on submission of a planning application, and will be requested at pre-application stage if this takes place. The accommodation should either be operated directly by an HEP or have a nominations agreement in place from the point of occupation in accordance with London Plan policy H15 (see also London Plan paragraph 4.15.3). Applications that do not demonstrate to the satisfaction of the council that the accommodation is linked with an HEP will not be permitted. It is important for private providers of student accommodation to have early discussions with HEPs to ensure the accommodation is designed and built to meet their requirements. The council will expect developers to demonstrate that they have engaged with the appropriate organisations to ensure that new developments will meet identified need.

5.67. Tenancies should have regard to the likely level of financial support available to the intended occupiers. Proposed rental levels should be submitted, along with evidence that these levels are supported by the linked HEP(s). Where the development is not operated

directly by a higher education provider, the affordable student accommodation bedrooms should be part of the purpose-built student accommodation that is subject to a nominations agreement with named HEPs, secured in a legal agreement. The affordable student accommodation should be allocated by the HEP(s) that operates the accommodation, or has the nomination right to it, to students it considers most in need of the accommodation. In applying part H7(c)(iii) of this policy, the council will have regard to paragraph 4.15.4 of the London Plan where 100 per cent affordable student accommodation is proposed.

5.68. To be sustainable, sites should ~~be located close to the institution they are intended to serve (reachable within 30 minutes) or otherwise~~ have good public transport accessibility (Level 4 or above), and easy access to shops, services and community facilities. The council expects developments to provide high quality cycle parking facilities, which are secure, sheltered, integrated and accessible, in line with policies Local Plan T3 and Q13.

5.69. ~~When considering the concentrations of students in a single area, the council will have regard to the character of the area, the existing mix of uses, and the particular impact on any permanent residential occupiers. Schemes will be considered on a site-by-site basis having regard to their scale and any existing concentrations (including any sites with extant planning permissions). Given the existing concentration, quantum and pipeline of this type of accommodation in Vauxhall, additional purpose-built student accommodation in the Vauxhall part of the NEV Opportunity Area is unlikely to be supported. The London Plan encourages new student accommodation away from existing concentrations in central London. An appropriate student management plan will be required to mitigate potential harm to residential amenity and monitoring of this plan will be secured as a planning obligation.~~

5.70. Student accommodation should form part of a mixed-use development. Schemes that comprise solely student accommodation will not normally be supported.

5.71. Developments should not place undue pressure on local infrastructure, in particular transport or open space. In this regard, the council will consider whether public transport services have existing or committed capacity to accommodate the additional demand generated and whether public open space has adequate capacity to absorb further use, particularly in open space deficiency areas. Where there is an identified shortage of leisure facilities in the location of the proposal (particularly swimming pools, gyms and other indoor or outdoor sports facilities) as set out in the Infrastructure Delivery Plan, any leisure facilities of this type provided as part of the development should be made available for use by the general public at times to be agreed with the council. This provision and associated maintenance requirements will be secured through a legal agreement.

5.72. It is accepted that, due to the relatively short tenancies in student housing and the lifestyle of occupants, different amenity standards should apply from those for permanent accommodation. However, accommodation should still be well designed, providing appropriate space standards and facilities and good daylighting. The provision of amenity space will need to reflect the location and scale of the proposal. The ability to accommodate students with disabilities should be fully integrated into any student housing development, with 10 per cent of rooms wheelchair-accessible or easily adaptable for occupation by a wheelchair user in line with London Plan policy D7.

5.73. The council will expect schemes to include a range of accommodation, including clustered study bedrooms with shared facilities, double units, and single and studio units. Cluster flats with shared facilities are likely to be more affordable than en-suite single rooms and self-contained studio units. The provision of a variety of layouts will also allow for greater

flexibility for conversion to permanent self-contained housing if in future the building is no longer needed as student accommodation, thus ensuring its sustainability.

5.74. A student management plan should be submitted with all applications, to ensure student welfare and mitigate potential impacts on the local community. This should include an explanation of how student accommodation will be used and managed during university vacations. Examples of temporary use of purpose-built student accommodation during vacation periods for ancillary uses include providing accommodation for conference delegates, visitors, interns on university placements, and students on short-term education courses at any institution approved in advance by the council. Conditions and/or legal agreements will be used to ensure that the ancillary use does not result in a material change of use of the building.

5.75. Given the anticipated growth in numbers of full-time higher education students, existing student housing provision will be protected unless it has been replaced or there is no longer a demand for it.

5.76. The council will continue to liaise with educational institutions, particularly those within and close to the borough, regarding their needs and student accommodation strategies. Student accommodation will be monitored as distinct from overall housing provision, including future demand / supply relationships.

Wording changes to Policy T3 proposed by **ROK Planning on behalf of Unite Students** (12 November 2020):

Policy T3

e) The council will require the provision of appropriate secure and covered cycle parking facilities in accordance with the minimum standards set out in the London Plan policy T5 and with Local Plan policy Q13. Where appropriate justification is provided, the provision of or contributions towards cycle hire schemes and pool bikes will be considered with respect to reduced cycle parking provision. This is particularly relevant to high-density developments located in sustainable locations such as student accommodation and purpose-built shared living. When designing building layouts sufficient space should be allocated at the outset to meet these requirements. Development proposals for non-residential uses should include provision of showers, changing facilities, drying rooms and lockers for cyclists appropriate to the number of cycle parking spaces provided. Where appropriate, pool bikes should also be provided.

Supporting Text

Para 8.19 - Contributions of land and/or finance towards delivery of new cycle hire stations will be sought both within and adjacent to the London Cycle Hire Scheme operating area and in areas where the council is promoting complementary cycle hire schemes. Cycle hire schemes and pool bikes are often popular with occupiers of student accommodation and purpose-built shared living developments. Where appropriate justification is provided, the Council will consider the provision of or contribution towards these schemes in these types of developments in respect of reduced cycle parking spaces.