

Local Plan Independent Examination

OPDC Response to Hearing Actions (Matter 11- Student accommodation)

Definition of overconcentration of student accommodation

- 1.1. At the Hearing Session on Matter 11 (Student Accommodation) there was a discussion about preventing the “overconcentration” of student accommodation and whether this needed to be defined more clearly to help applicants and decision-makers to determine whether there is an oversupply of student accommodation within a particular location in the area. OPDC officers agreed to review recent evidence from elsewhere to explore whether an appropriate definition of overconcentration of student accommodation can be defined.
- 1.2. Several local planning authorities outside of London with large concentrations of universities within their boundaries (for example, Brighton and Hove, Cambridge, Newcastle and Sunderland) have undertaken desktop studies into the supply and demand for student accommodation Housing in Multiple Occupation (HMO) style accommodation, both converted dwellings and Purpose-Built Student Accommodation (PBSA). The studies are not directly comparable to a London context where students may live in one London borough and study in another.
- 1.3. These study areas effectively already have an overconcentration given the large student population and concentration of institutions locally. However, none of these studies attempts to define “overconcentration” as it is difficult to determine the total student numbers in an area or where they live. Rather, they set out the policy levers required to manage student accommodation appropriately, for example by working closely with the institutions to plan growth where it is required and tools to mitigate the impact of overconcentration on the amenity of other residents.
- 1.4. The London Boroughs of Brent, Camden and Southwark have also undertaken desktop studies on the supply and demand of student accommodation. Again, these studies have set out how the local authorities will manage and mitigate the impacts of overconcentration of student accommodation should it occur within a specific area (for example, by using Article 4 or additional HMO licencing) rather than attempt to define it. There is no ready formula or percentage of concentration from which OPDC can determine whether there is an overconcentration in its area.
- 1.5. All the studies recognise that the greatest impact of student accommodation on the community is on the amenity of existing residents. OPDC’s policy provides the appropriate measures to manage this.

- 1.6. The key risk to overconcentration is that conventional housing is not provided as a result. This has been the concern of residents in North Acton and Acton Wells and was reiterated in the Hearing Session. The most appropriate way to measure whether this is the case is to consider the impact on the housing supply targets set out for this place in OPDC's draft Local Plan and the proportion of these that have been taken up with student accommodation.
- 1.7. According to the draft new London Plan, 3 bedrooms in PBSA equate to meeting the same need that one conventional housing unit meets and contribute to meeting a planning authority's housing target at the same ratio of three bedrooms being counted as a single home.
- 1.8. The table 1 below shows that there are 2,795 completed or started student bed spaces in North Acton and Acton Wells provided as PBSA schemes. In accordance with the draft new London Plan ratio approach, this comprises 14% of the place housing supply target of 6,000 homes. OPDC is also not aware of any other student schemes in the pipeline for the place and officers do not consider this to be evidence of overconcentration of student housing in North Acton and Acton Wells. The remainder of the housing supply target for this place is currently expected to be provided as conventional housing.

Table 1 PBSA schemes in North Acton

	Student bed spaces	Dwelling equivalent
1 Victoria Road	659	198
Lyra Court	184	55
The Costume Store	718	215
Holbrook House	498	149
140 Wales Farm Road	736	221
Total	2795	838.5

- 1.9 In conclusion, there is no evidence that there is currently an overconcentration of student accommodation within North Acton and Acton Wells, nor is there a recognised or common definition from other local planning authorities that can be used within the draft Local Plan. Therefore, OPDC officers consider that there are no changes required to the Student Accommodation or North Acton and Acton Wells policies in the draft Local Plan. These policies and the Local Plan's amenity policies will continue to appropriately manage the potential for future student overconcentration.
- 1.10 Performance Indicator IH_12 (KD24) will monitor the number of student beds completed and permitted within the monitoring period, categorised by place, and the proportion of which are considered affordable. Should this indicator demonstrate a significant rise in student accommodation within North Acton and Acton Wells and in other locations within the OPDC area, officers will revisit the potential for defining an overconcentration of student accommodation.