

## **Local Plan Independent Examination**

### **OPDC Response to Matter and Issue 11**

**Matter 11: Whether the Plan’s policies and proposals for student housing would be justified (representation 2/SP4/15 from West Acton RA amongst others. This was also an issue with various organisations at Regulation 18 stage)**

**Although I am content with the officers’ response to this Matter set out in Appendices E and J to Key document 5, a Hearing session will be required if representors exercise their right to be heard.**

#### **OPDC response:**

- 1.1 The GLA has provided updated projections for the growth in numbers of full time students in London and has established a requirement for 3,500 Purpose Built Student Accommodation (PSBA) bed spaces to be provided annually across London for the duration of the Draft New London Plan (document OSD14). These projections continue to show a demand for PSBA. These projections were informed by engagement with the Mayor’s Academic Forum. OPDC recognises the need to provide for student accommodation to meet strategic/local need in existing London Plan Policy 3.8(B) (document OSD27) and Draft New London Plan Policy H17 while also managing potential negative impacts. OPDC proposes to amend paragraph 8.79 to reflect these new projections.
- 1.2 At the Regulation 18 stage representations from community groups indicated a concern that North Acton has an overconcentration of student housing. Such community groups’ representations were aimed at seeking restrictions on additional rental products, including student housing in order not to undermine a broad and balanced mix of housing being achieved in North Acton. Conversely, student housing providers (such as Imperial College London) gave representations in support of no restrictions on the provision of PBSA in order to meet need and provide mixed and balanced communities. OPDC considers that Policy H10 (Student Housing) already provides appropriate safeguards to prevent the delivery of new student housing undermining the delivery of conventional self-contained housing supply and housing targets so a restrictive approach to student housing is not necessary.
- 1.3 Further, the Local Plan place policy for North Acton, P7 (North Acton and Acton Wells) supports a mix of housing types, including student housing, in order to deliver mixed and balanced communities. As recognised in P10, student housing will be supported where it meets local and London-wide housing needs, given the surrounding area’s prevalence of universities and other higher education institutions, the forecast increase in student numbers across London and the London Plan and the emerging Draft London Plan (OSD14) requirements for boroughs to work with the Mayor to ensure that local and strategic need for purpose-built student accommodation is addressed.

- 1.4 The Local Plan also supports the delivery of 50% conventional affordable housing (Policy SP4 (Thriving Communities), subject to viability and delivering and/or contributing to new high quality social infrastructure and improving existing social infrastructure.
- 1.5 Applications considered against Policy H10 will be required to provide affordable student accommodation in accordance with Mayoral guidance in relation to the Mayor's Affordable Housing and Viability SPG and Draft New London Plan Policy H17. Policy H10c requires student housing schemes to deliver at least 35% of accommodation as affordable student accommodation in order to benefit from the fast track route in line with Draft New London Plan (OSD14) Part E of Policy H6 Threshold approach to applications.
- 1.6 Student housing applications will also be required to provide an appropriate contribution to social infrastructure in accordance with Policy TCC4 (Social Infrastructure).
- 1.7 Any proposal for student housing, including within North Acton (as set out in Policy P7(c)(ii)) will need to be considered against Policy H10. Policy H10 seeks to ensure developments containing student housing:
  - 1.7.1 contribute to the vibrancy and diversity of an area, especially in the early phases of the plan period;
  - 1.7.2 are located in areas with high PTAL or are easily accessible by non-motorised forms of transport;
  - 1.7.3 do not undermine the delivery of conventional self-contained housing supply and housing targets; and
  - 1.7.4 do not result in the overconcentration of student housing in any one specific location.
- 1.8 Policy H10 requires that all proposals for student housing will need to be accompanied by a Residential Management Plan.
- 1.9 Any proposals for student housing will be subject to the amenity Policy D6 (Amenity) of the Local Plan. New development will need to deliver a high standard of amenity during construction and operation in terms of privacy, overshadowing, air quality, noise and light pollution, daylight/sunlight, wind and microclimate for future users of the development proposals and neighbouring uses. This includes requiring applications to provide a Daylight, Sunlight and Microclimate Assessment where the scale of the proposed development has the potential to affect the amenity of sensitive neighbouring uses and by requiring development proposals to achieve the benchmarks for amenity contained in Table 5.1 to Policy D6 or such alternatives as are agreed with the OPDC.
- 1.10 At the Regulation 19 (2) stage a number of changes were made to strengthen Policy H10 and supporting text following comments received during Regulation 19 (1) so that it supports a sustainable mix of different housing types. These include:
  - The policy has been amended and supporting text has been added in order that proposals should demonstrate they are meeting a local or London need for student housing (Reference H10/6).
  - A policy line on adequate internal private living space and communal space to meet needs has been included. (Reference H10/2). All schemes also benefit from Local Plan policies on securing high quality design through Policy D1.
  - The student accommodation must either be operated directly by a higher education institution [or the development must have an undertaking in place from initial occupation, to provide housing for students at one or more specified higher education institutions, in accordance with the Draft New London Plan. (Reference H10/8)
  - Clarity on suitable locations i.e. within or directly adjacent to a designated town centre and having a PTAL rating of 4 or higher (Reference A63, A69)

1.10 In summary, the policies and proposals for student housing in Policy H10 seek to meet a local or London-wide need, help to deliver mixed and balanced communities, provide affordable student accommodation, and contribute towards social infrastructure. Further there are safeguards in place to protect the amenity of neighbouring uses. Therefore, OPDC considers that the policies for student housing in the Local Plan are justified because they represent the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.