

REF: MR/DB/R00628

BY EMAIL: planningpolicy@wandsworth.gov.uk

28th February 2022

Dear Sir / Madam,

**REPRESENTATIONS TO THE LONDON BOROUGH OF WANDSWORTH 'PUBLICATION' DRAFT LOCAL PLAN (REGULATION 19) (JANUARY 2022)
ROK PLANNING ON BEHALF OF UNITE GROUP PLC**

I write on behalf of our client, Unite Group Plc (Unite), to submit to submit representations to the London Borough of Wandsworth (LB Wandsworth) 'Publication' Draft Local Plan (Regulation 19) (January 2022).

Unite Students is the UK's leading manager and developer of purpose-built student accommodation (PBSA), providing homes for around 74,000 students in more than 177 purpose-built properties across 27 of the UK's strongest university towns and cities.

The Draft Local Plan sets out a vision and spatial strategy to guide the development of the borough from 2023, when the Plan is anticipated to be adopted, to 2038. The 'Publication' Draft Local Plan (the draft Local Plan) is the final draft of the Local Plan produced by the Council before it is submitted to the Planning Inspectorate (PINS).

Unite wish to make representations to the following policies:

- Policy LP28 – Purpose-built student accommodation;
- Policy LP29 – Shared living;
- Policy LP30 – Build-to-rent;
- Policy LP35 – Mixed-use development on economic land; and
- Policy LP51 – Parking.

These representations are set out in the remainder of this letter.

Policy LP28 – Purpose-built student accommodation

Policy LP28 'Purpose-built student accommodation' (PBSA) states that:

- "A. Proposals for Purpose-Built Student Accommodation will be supported where the development:*
- 1. meets all requirements for student accommodation, including affordable provision through the threshold approach, as set out in London Plan Policy H15;*
 - 2. is supported by evidence of a linkage with one or more higher education provider (HEP) in Wandsworth; or within a reasonable travelling distance of Wandsworth;*
 - 3. is accompanied by a site management and maintenance plan which demonstrates that the accommodation will be managed and maintained over its lifetime so as to ensure an acceptable level of amenity and access to facilities for its occupiers, and would not give rise to unacceptable impacts on the amenities of existing residents in the neighbourhood.*

4. *has access to good levels of public transport, and to shops, services and leisure facilities appropriate to the student population;*
5. *would not result in an over-concentration of single-person accommodation at the neighbourhood level which may be detrimental to the balance and mix of uses in the area or place undue pressure on local infrastructure;*
6. *provides a high-quality living environment, including the provision of appropriate space standards and facilities, well-integrated internal and external communal areas, and a high level of amenity (providing good levels of daylight and sunlight, and natural ventilation); and*
7. *provides at least 10% of student rooms which are readily adaptable for occupation by wheelchair users.”*

Unite make comment on points 2, 5 and 7 in turn below.

2. is supported by evidence of a linkage with one or more higher education provider (HEP) in Wandsworth; or within a reasonable travelling distance of Wandsworth

Unite make comments on point 2 as follows:

1. It is entirely unclear why the policy seeks evidence of a linkage with one or more HEP in Wandsworth, or within reasonable travelling distance of Wandsworth, specifically. The borough is well-located and well-connected, particularly at its north-east border with Lambeth;
2. Indeed, this specificity is directly contradictory to the London Plan, which states at paragraph 4.15.3 that *“there is no requirement for the higher education provider linked by the agreement to the PBSA to be located within the borough where the development is proposed”*;
3. No justification is provided for the departure from the London Plan either within the draft policy or within the supporting text to the draft policy;
4. Indeed, it is notable that the draft Westminster City Plan original contained a similar policy clause, with policy 11 stating at point G that PBSA would only be supported *“for students studying at higher education institutions with a main hub in Westminster”*. Following Unite’s participation at the Examination in Public (EIP) for this plan, the Inspector’s recommended this sentence be removed in its entirety in order for the policy to be found acceptable. It is argued the same conclusion must be reached in this instance.

Recommendation: The latter half of point 2. be deleted in accordance with the London Plan approach.

5. would not result in an over-concentration of single-person accommodation at the neighbourhood level which may be detrimental to the balance and mix of uses in the area or place undue pressure on local infrastructure

Unite make comment on point 5 as follows:

1. There is no tangible evidence to suggest that concentrations of PBSA cause harm to the balance or mix of uses in an area, cause additional pressure on local infrastructure or harm local communities. PBSA properties are managed and controlled and occupiers are required to abide by the obligations

set out within Student Management Plans required at application stage, as required by point 3 of draft policy LP28;

2. The PBSA market is mature and well-managed. Considerations of over-concentration conflates PBSA development with uncontrolled HMO accommodation, which is a markedly separate housing product and is entirely unjustified;
3. PBSA is a form of housing. National guidance in fact states that *“all student accommodation, whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus, can in principle count towards contributing to an authority’s housing land supply”* (NPPG, Paragraph: 034 Reference ID: 68-034-20190722). In addition, the NPPG also states that *“encouraging more dedicated student accommodation may provide low-cost housing that takes pressure off the private rented sector and increases the overall housing stock”* (Paragraph: 004 Reference ID: 67-00420190722). Given PBSA is a recognised form of housing, it is not considered sound to unduly restrict concentrations of this form of housing specifically;
4. In any case, no threshold is provided for what will be considered to constitute an over-concentration. It is noted within supporting paragraph 17.35 that schemes will be considered on a site-by-site basis. The policy makes reference to the ‘neighbourhood level’ which is defined within the glossary to the draft plan as *“areas within a 800m radius from the site”*. Beyond this, no guidance is provided as to the methodology for defining an over-concentration;
5. Indeed, it is argued that it is not possible to define an over-concentration. There are various appeal cases across the country where varying levels of student concentrations have been found acceptable. This includes:
 - Wilder Street, Bristol (APP/Z0116/W/18/3212806) - 34% student population found not to be harmful;
 - Small Street, Bristol (APP/Z0116/W/18/3194372) – 37% student population found not to be harmful;
 - Lower Albert Street, Exeter (APP/Y1110/W/17/3178667) – 32% student population found not to be harmful;
 - Selly Oak, Birmingham (APP/P4605/W/21/3275570) – Increase from 36% to 44% student population found not to be harmful;
 - The Old Printworks, Edinburgh (PPA-230-2122) – 60% student population found not to be harmful;
 - Salisbury Court, Edinburgh (PPA-230-2146) – 62% student population found not to be harmful.
6. It is notable that the London Borough of Lambeth include a similar restriction on over-concentration within their adopted policy H7. Unite similarly objected to the inclusion of this restriction at the EIP for the Lambeth Local Plan which ultimately led to the removal of the originally stipulated 500m radius;
7. Furthermore, the supporting text to draft policy LP28 acknowledges at paragraph 17.33 *that “insufficient provision for university students could place additional pressure on the lower end of the private rented sector (PRS), and therefore it is important that provision is made for new facilities close to their places of study in order to cater for existing and projected increases in demand”*. It similarly notes that *“inadequate local provision, with students having to travel long distances to attend college, would also be contrary to sustainable development principles”*;

8. Moreover, paragraph 317.36 continues to state that PBSA should be *“directed to well-connected locations with good level of access to public transport (PTAL 4 or higher), including those supported by good walking and cycling infrastructure. It is also important that Purpose-Built Student Accommodation is sited so student residents have access to a wide range of services and facilities within a 15-minute walking distance”*;
9. The imposition of over-concentration restrictions is directly contrary to these statements. Restricting concentrations of PBSA will prevent this form of accommodation from being located in appropriate areas (i.e. those well-located in terms of access to universities/colleges themselves and to public transport), leading to either the dispersal of PBSA in less appropriate areas in order to meet demand, or the inability to meet demand;
10. Given the above it is considered entirely unsound to seek to restrict concentrations of PBSA where no evidence is provided to justify the perceived harmful impact this would have.

Recommendation: Point 5. should be removed in its entirety.

7. provides at least 10% of student rooms which are readily adaptable for occupation by wheelchair users

Unite make comment on point 7 of policy LP28 as follows:

1. 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 a steady and consistent trend as evidenced by Unite’s longer term experience;
2. Indeed, Unite have over 117 PBSA properties across the UK with 27 buildings in the London portfolio. Of these c.9,500 bedrooms, they have provision for 528 students that may need a wheelchair room. This is over 5.5% of the total London rooms. Over the last 5 years, Unite have provided 41 students with these rooms. For the 2018-2019 academic year, Unite had 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 demonstrates the exceptionally low need for accessible bedrooms;
3. The majority of wheelchair students are housed by the universities close to campus for ease of travel;
4. 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, explaining why there has never been a shortfall in wheelchair provision within student housing;
5. It is notable that paragraph 17.38 of the supporting text to policy LP28 states that to *“ensure conformity with the London Plan, proposals for Purpose-Built Student Accommodation will be required to provide [...] adequate proportions of affordable and wheelchair accessible/easily adaptable student accommodation”*;

6. However, the London Plan (Policy D7) clarifies that the 10% requirement for wheelchair accessible rooms relates only to dwellings which are created via works to which Part M volume 1 of the Building Regulations applies – i.e., to new build dwellings. PBSA developments do not constitute dwellings and therefore the 10% requirement does not apply to these developments. This was confirmed within the Inspector's report to the London Plan. On this basis, the 10% requirement proposed by draft policy LP28 is in fact in conflict with the draft London Plan;
7. Indeed, following Unite's participation in the Local Plan process, further London Boroughs have followed that of the London Plan. This includes Tower Hamlets and Southwark which have both reduced the requirement from 10% (as originally proposed) to 5% of student rooms to be provided as accessible; and
8. In any case, 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.

Recommendation: The 10% requirement should be removed and accessible requirements should instead defer to building regulation requirements of 1% fitted out with a further 4% adaptable.

Policy LP29 – Housing with Shared Facilities

Policy LP29 Housing with Shared Facilities states at part C and D in relation to large scale purpose-built shared living that:

“C. Development proposals for large-scale purpose-built shared living accommodation which is defined as being a ‘sui generis’ use will generally be resisted. Such accommodation will only be permitted where:

1. *it is proposed on a site which is not suitable for conventional housing;*
2. *it is clearly demonstrated that large-scale purpose-built shared living accommodation is better suited to meeting the local housing needs than conventional housing; and*
3. *it would not lead to an overconcentration of single-person accommodation at the neighbourhood level.*

D. Where the principle of large-scale purpose-built shared living accommodation is accepted in line with Part C, proposals must:

1. *meet criteria A1-A10 of London Plan Policy H16;*
2. *demonstrate through the submission of a management plan that the development will be managed and maintained over its lifetime so as to ensure an acceptable level of amenity and access to facilities for its occupiers and would not give rise to unacceptable impacts on the amenities of existing residents in the neighbourhood; and*
3. *provide a financial contribution towards the provision of affordable housing in the borough, in accordance with the London Plan.”*

Unite raise objection to the general resistance towards purpose built shared living as set out in Part C for the following reasons:

1. The London Plan identifies that large-scale shared living developments may provide a housing option for single person households who cannot or choose not to live in self-contained homes or

HMOs and provides a policy basis for this form of development in the form of policy H16. The London Plan therefore provides a policy basis for shared living development, in contrast to draft policy LP29's approach of general resistance;

2. With regards to point 1. of part C of draft policy LP29, large scale shared living development is in fact a form of housing that can contribute to housing supply. Indeed, it is argued that shared living can contribute to freeing up conventional residential properties for families which would otherwise be occupied as a HMO in the same way as PBSA, as acknowledged in the supporting text to draft policy LP28 and national planning guidance;
3. Supporting paragraph 17.45 to draft policy LP29 states that "*It is inevitable that any form of housing will somehow contribute to meeting housing need or demand in the borough; however, given that the borough continues to face intense development pressures from different competing land uses, it is important to protect scarce land for housing which is best suited to meeting the local need*". The acceptance within this statement that shared living can contribute to meeting housing needs is not reflective of the general resistant approach taken by the policy. Furthermore, it should be noted that shared living developments can often be built to much higher densities than conventional residential accommodation and thus serve to meet housing needs more efficiently on constrained sites;
4. Furthermore, supporting paragraph 17.43 states that "*large-scale purpose-built shared living accommodation which is defined as a 'sui generis' use does not provide an alternative route to affordable housing to people on lower quartile incomes*". However, this form of development is required to contribute to the provision of affordable housing via financial contribution in accordance with the London Plan. In addition, there is potential to include discounted-market rent units within shared living developments in similarity with build-to-rent developments, thus providing a further avenue towards affordable accommodation provision;
5. With regards to point 3. of part C of draft policy LP29, the points made earlier in this letter in response to point 5. of draft policy LP28 are relevant. Shared living is best located in sustainable areas close to local facilities and with good public transport accessibility, and thus restricting this form of development in terms of its concentration in specific areas is counter intuitive. Furthermore, there is no evidence nor policy basis to demonstrate that an over-concentration of such development would lead to measurable harm beyond that of similar concentrations of conventional housing products and thus point 3. of draft policy LP29 is considered entirely unjustified;
6. In addition, shared living provides numerous benefits including the creation of mixed and balanced communities in a controlled environment protecting surrounding residential amenity in the form of a management plan (in contrast to uncontrolled small HMO's which would otherwise be required to meet this housing need).

Whilst the objections above are raised to part C, Unite support the inclusion of points 1. – 3. Of part D in accordance with policy H16 of the London Plan.

Recommendation: The general resistance to shared living schemes should be removed. This form of development should instead be supported where it meets the requirements of policy H16 of the London Plan.

Policy LP30 – Build to Rent

Policy LP30 states that:

“A. Development proposals for Build to Rent housing must follow the policy approach set out in London Plan Policy H11, subject to the following additional requirements:

- 1. Where a development has potential to include more than one residential core and/or block, applicants should use this separate core and/or block to provide low cost rented housing to be managed by a registered provider. To follow the Fast Track Route, 50 per cent of the overall affordable housing requirement should be provided as low-cost products within this separate core and/or block, with the remaining 50 per cent at a range of genuinely affordable rents to meet priority housing need in Wandsworth. If the above requirements are not met, the scheme must follow the Viability Tested route. In these circumstances, the Council will seek from the applicant the optimum affordable housing offer for the development as a whole.*
- 2. Where an applicant can demonstrate to the Council’s satisfaction that it is not feasible in design terms to include a separate residential core and/or block in the development proposal, the Council will accept the full affordable housing requirement for the scheme as discount market rent units managed alongside the market rent units, in accordance with the requirements of London Plan policy. To follow the Fast Track Route, the Council will seek 30 per cent of the affordable provision at rents equivalent to London Living Rent level, with the remainder at a range of genuinely affordable rents to meet priority housing need in Wandsworth. If these requirements are not met, the scheme must follow the Viability Tested route.*
- 3. Build to Rent housing should provide a mix of dwelling sizes that meets identified local housing needs, in accordance with Policy LP24 (Housing Mix).”*

Unite object to this policy on the following basis:

- 1. Draft policy LP30 states that proposals for build to rent housing should follow the policy approach set out in London Plan policy H11. However, it then introduces requirements which directly contradict the approach set out by policy H11;*
- 2. Policy H11 is clear that “where a development meets the criteria set out in Part B, the affordable housing offer can be solely Discounted Market Rent (DMR) at a genuinely affordable rent, preferably London Living Rent level”. Thus, requiring developments to meet the criteria of Part B of policy H11 whilst also requiring the delivery of low-cost rented housing to be managed by a registered provider is considered to conflict;*
- 3. Supporting paragraph 17.51 of draft policy LP30 states that “The Council’s preference is to secure low cost rented housing where possible through schemes involving Build to Rent by including this in a separate core and/or block managed independently by a registered provider of affordable housing”. It continues to state that “the onus will be on the applicant to explain the design reasons why it is not feasible to provide a separate core and/or block for low cost rented housing. Only where this has been demonstrated to the satisfaction of the Council, will it be acceptable to provide the full affordable housing requirement as discount market rented accommodation managed alongside the market rented accommodation”. This is considered to go against the onus of the London Plan which states that “Boroughs should take a positive approach to the Build to Rent sector to enable it to better contribute to the delivery of new homes”; and*

4. The benefits of providing DMR units should also be noted. As no separate core is required, better integration between DMR and market rent units can take place in comparison to low-cost rental accommodation. Likewise, a key benefit of build-to-rent, as acknowledged by paragraph 4.11.1 of the London Plan, is that it can accelerate delivery of housing on individual sites. This delivery is likely to be impacted where applicants are required to demonstrate that secondary cores are not feasible as opposed to simply following the London Plan approach.

Recommendation: Draft policy LP30 should be amended to require proposals for build-to-rent developments to follow the approach set out in policy H11 of the London Plan.

Policy LP51 – Parking

Policy LP51 states that:

“A. Development will be supported where:

1. *Cycle Parking is provided in accordance with the minimum levels set out in the London Plan with reference to Table 10.2 and any subsequent amendments. The parking must be easily accessible, secure, and well-located to the unit it is associated with.”*

For PBSA and Shared Living, the requirements set out in Table 10.2 are as follows:

	Long Stay	Short Stay
PBSA	0.75 spaces per bedroom	1 space per 40 bedrooms
Shared Living	1 space per bedroom	<ul style="list-style-type: none"> • 5 to 40 dwellings: 2 spaces • Thereafter: 1 space per 40 dwellings

Unite make comment on these standards as follows:

1. Unite’s evidence shows that cycle parking provision provided at policy complaint levels is severely underused. Enclosed within Appendix A is supporting evidence which refers to a survey (February 2018) undertaken by Unite. The study demonstrates that the maximum average demand for cycle parking storage is 5% of bed places, which has been found across the 26 of Unite’ sites which equates to a demand of one cycle space per 20 students;
2. Over-provision of unnecessary cycle space can lead to loss of valuable floorspace in which more bedrooms can be provided, thus reducing the efficiency of the use of the land. 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;
3. An increase in the provision of cycle parking for student accommodation does not directly result in an increase in cycling patterns amongst students. Student housing schemes are generally in close proximity to places of study allowing the majority of journeys to be undertaken on foot. Furthermore, they are in areas with high levels of public transport accessibility providing an alternative means of transport;

4. The emergence and take up of cycle hire schemes and/or pool bikes 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. Indeed, Unite would support the use of pool bikes in PBSA schemes where this, in turn, allows for a reduction in the number of dedicated cycle spaces to be provided on site. By way of example, following Unite's participation in the EIP to the new Lambeth Local Plan and production of a Statement of Common Ground with the Council, a similar principle has been incorporated as a main modification. Specifically, MM107 proposes to update policy T3(e) to read: *"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"*;
5. Student housing and shared living accommodation is developed at higher densities than conventional housing. As a consequence, and in order to provide the required levels of cycle parking, large areas of floorspace (typically at ground floor level) are lost. These areas could otherwise be used more efficiently and effectively for living space or town centre uses, providing numerous benefits to a scheme including increasing their viability.

It should be noted that Unite support the use of cycles as a sustainable means of transport, but argue that pool bikes and similar schemes are a more efficient method of encouraging cycling amongst students whilst preventing large areas of floorspace from being lost and thus ensuring efficient use of the land.

Recommendation: Given the above evidence, it is considered that a 25% provision of cycle parking for student housing should be required. Alternative means of cycling, including pool bikes, should be considered to meet cycle parking needs for PBSA and shared living.

Policy LP35 – Mixed-Use Development on Economic Land

Policy LP35 sets out the approach to mixed-use development on industrial land outside of SIL's and LSIA's in accordance with policy E7 of the London Plan. Policy LP34 states that proposals for mixed-use development, including residential, in these areas will be supported where:

"1. industrial, storage or distribution floorspace is provided, in accordance with Policy LP35 (Mixed Use Economic Development on Economic Land), and where all other relevant criteria of this policy have been met; or

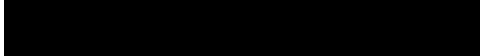
2. there is no reasonable prospect of the site being used for the industrial and related purposes set out in Part A of this policy, as demonstrated through the submission of evidence that a full and proper marketing exercise of the site, for a period of at least 18 months, has been undertaken in line with the requirements set out at Appendix 1 of this Plan."

Policy LP35 provides further detail on the policy approach if route 1 above is proposed. In all circumstances, either full re-provision or intensification of existing industrial uses is required. Unite argue that, as per route 2 of part D. of policy LP34, where there is no reasonable prospect of the site being used for employment purposes in its entirety, a reduced provision can be supported under draft policy LP35. This would accord with paragraph 82(d) of the National Planning Policy Framework which states

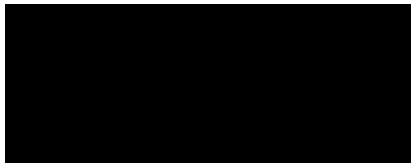
that planning policies should *“be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances”*.

Recommendation: Policy LP35 should be updated to support a reduction in employment floorspace as part of mixed-use schemes where it can be demonstrated that there is no reasonable prospect of the full quantum of existing floorspace being used for employment purposes in its entirety.

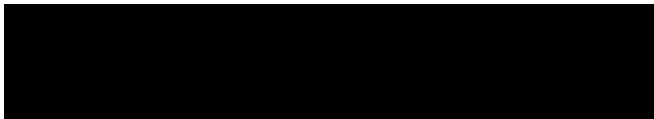
I trust the above representations are in order and look forward to confirmation of their safe receipt. Given the nature of our comments and the points and evidence raised throughout this representation in relation to a number of issues, I reserve the position to further amplify these representations and participate in the Examination in Public as necessary.

Please do not hesitate to contact myself or Daniel Botten  should you have any queries or wish to discuss these.

Yours faithfully,



Matthew Roe
Director
ROK Planning



APPENDIX A



Draft 2018 London Plan – Cycle Storage Standards Occupancy Research

DATE	02 March 2018	PREPARED BY	OS
SUBJECT	Transport Technical Note	CHECKED BY:	AF

INTRODUCTION AND OVERVIEW

WSP has been commissioned by UNITE to undertake a cycle storage demand research note in light of the draft 2018 London Plan. Across their London Estate UNITE experience very low demand for cycle storage. UNITE is concerned that there is no justification for future increases in minimum standards within the draft London Plan and this will lead to further unnecessary unused space within their future redevelopment sites.

BACKGROUND

The GLA has provided the document 'Cycle Parking – Part of the London Plan evidence base' December 2017. It 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 as it included for residential. This, the evidence paper notes, means that not every student living in student accommodation could own a bicycle. It also recognises that since student accommodation does not include car parking, students have a limited budget, live in inner London and that cycling could potentially bring benefits and suitable for distances that they are likely to travel.

The draft London Plan proposes an amendment to the minimum cycle parking standards, based on the findings of the evidence, from the adopted London Plan standard of 1 cycle space for every two bedroom units to effectively one cycle space for every bed space. This is based on the following extracts of Table 10.2 of the Draft London Plan, where every studio unit requires a cycle parking space.

Sui generis	As per most relevant other standard e.g. casino and theatre = D2, room in large-scale purpose-built shared living or student accommodation = studio C3.
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C3-C4	Dwellings (all)	1 space per studio, 1.5 spaces per 1 bedroom unit, 2 spaces per all other dwellings
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PREVIOUS REPRESENTATIONS

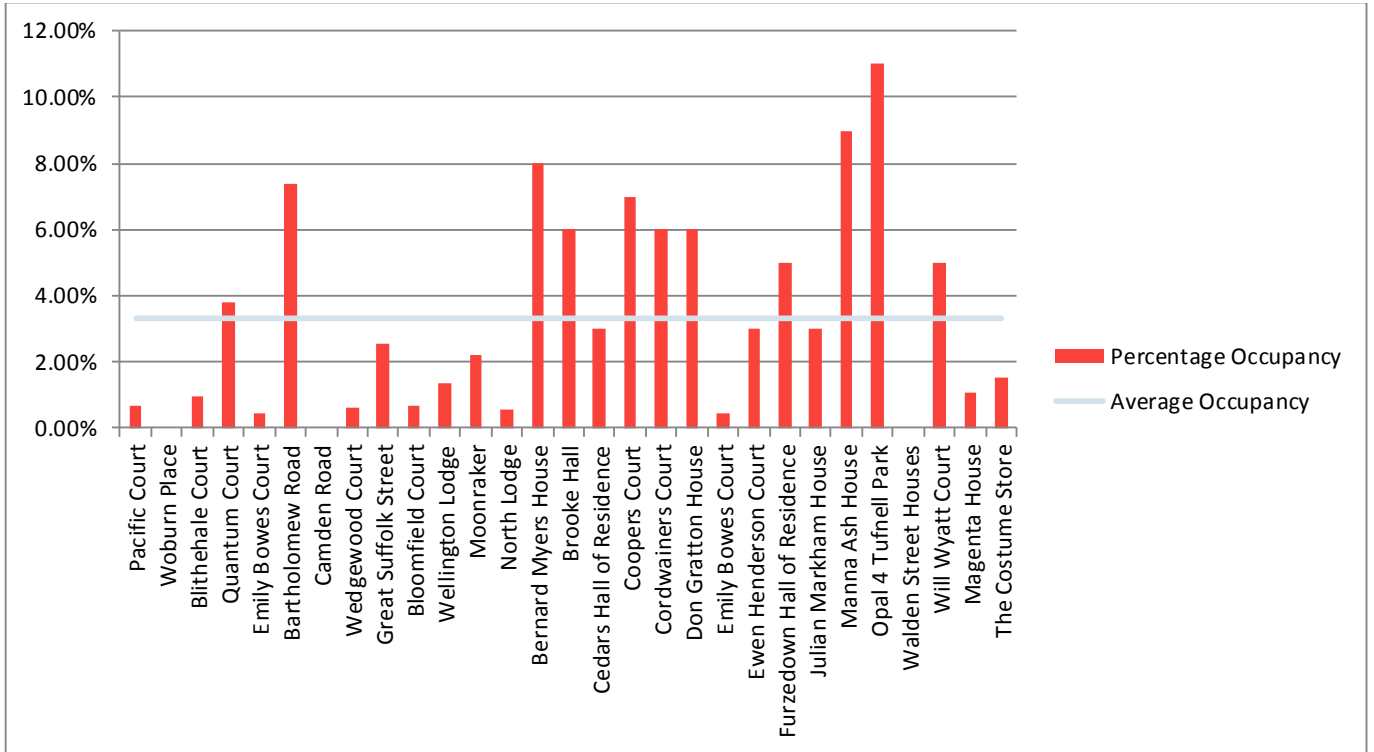
UNITE prepared written representations in 2012 in response to the GLA proposing an introduction of minimum cycle parking standards within the London Plan. The representations found that across the UNITE estate very little cycle parking was used, at around 3%.

An independent study was also undertaken in 2013 on behalf of Knightsbridge Student Housing Ltd and The Student Housing Company 2013 across England. The Note reflected the findings of UNITE's 2012 study, finding low cycle storage usage of around 1 to 6% across five sites and 14 sites in London with occupation from zero to 11%.



Graph 1 demonstrates the cycle ownership across the 2012 and 2013 studies referred to above.

Graph 1- Cycle Storage Demand by Bed Spaces (% Ratio)



STUDY PURPOSE AND RESEARCH FINDINGS

This Note provides an update to the 2012 cycle occupancy data to identify current cycle storage usage and to identify whether there has been a general increase in cycle parking utilisation across their estate.

The Note then discusses the appropriateness of aligning student accommodation (Sui Generis land-use class) with residential land-use class.

UPDATED RESEARCH

UNITE has undertaken further surveys of their student accommodation sites to understand the present uptake of cycle utilisation across their estate. The surveys were undertaken between the 1st to 7th February 2018. The approach was to count the number of bicycles contained within their on-site cycle stores at 5am, timed to capture peak time for cycle storage requirements. This included 26 of their London sites, providing representative data across their London Estate.

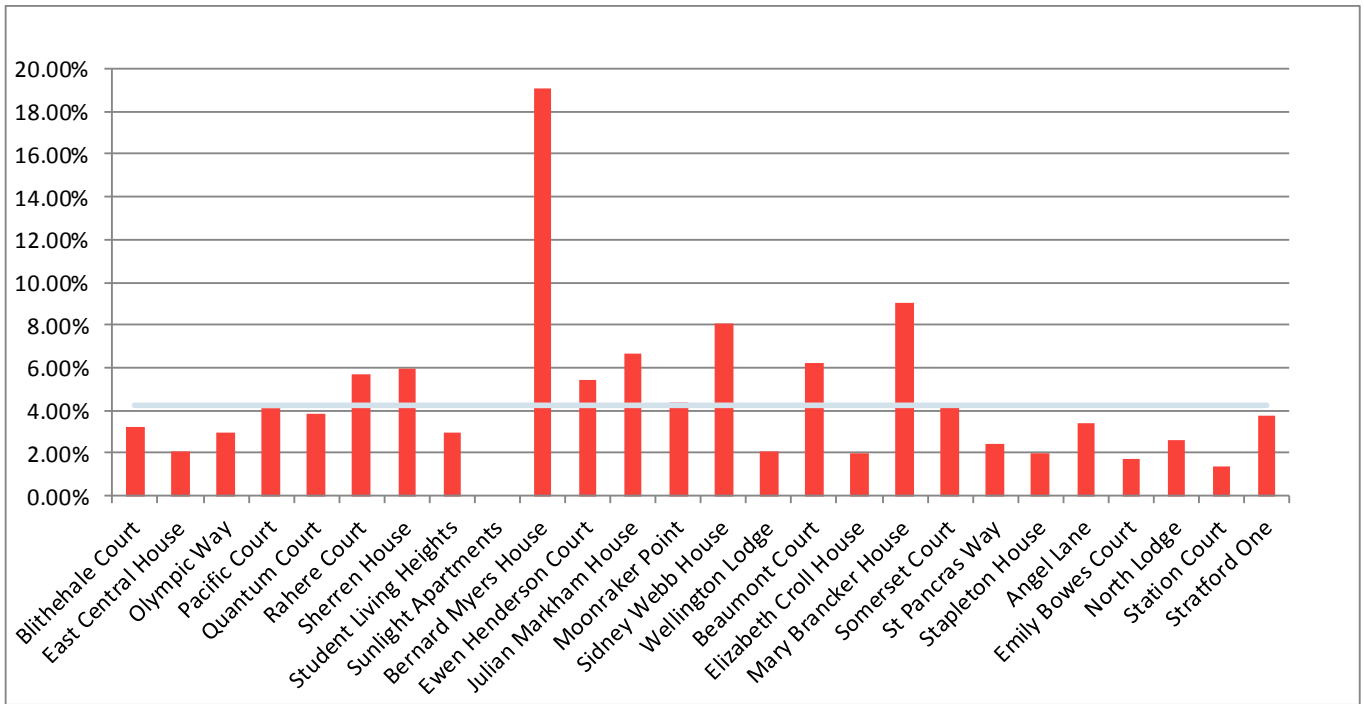


SURVEY FINDINGS

The seven day maximum cycle storage demand across all 26 sites is illustrated by Graph 2 below.

A maximum average demand of 5% of cycle storage has been found across the 26 sites. This equates to a demand of one cycle space per 20 bedroom unit. There was a maximum demand of 20% or 1 per 5 bedroom unit however, as graph 2 illustrates below this was limited to a single site, with the vast majority (90th percentile) ranging from 1 to 8%, or 1 bicycle for every 11.5 bedroom unit.

Graph 2 – Cycle Storage Demand by Bed Spaces (% ratio)

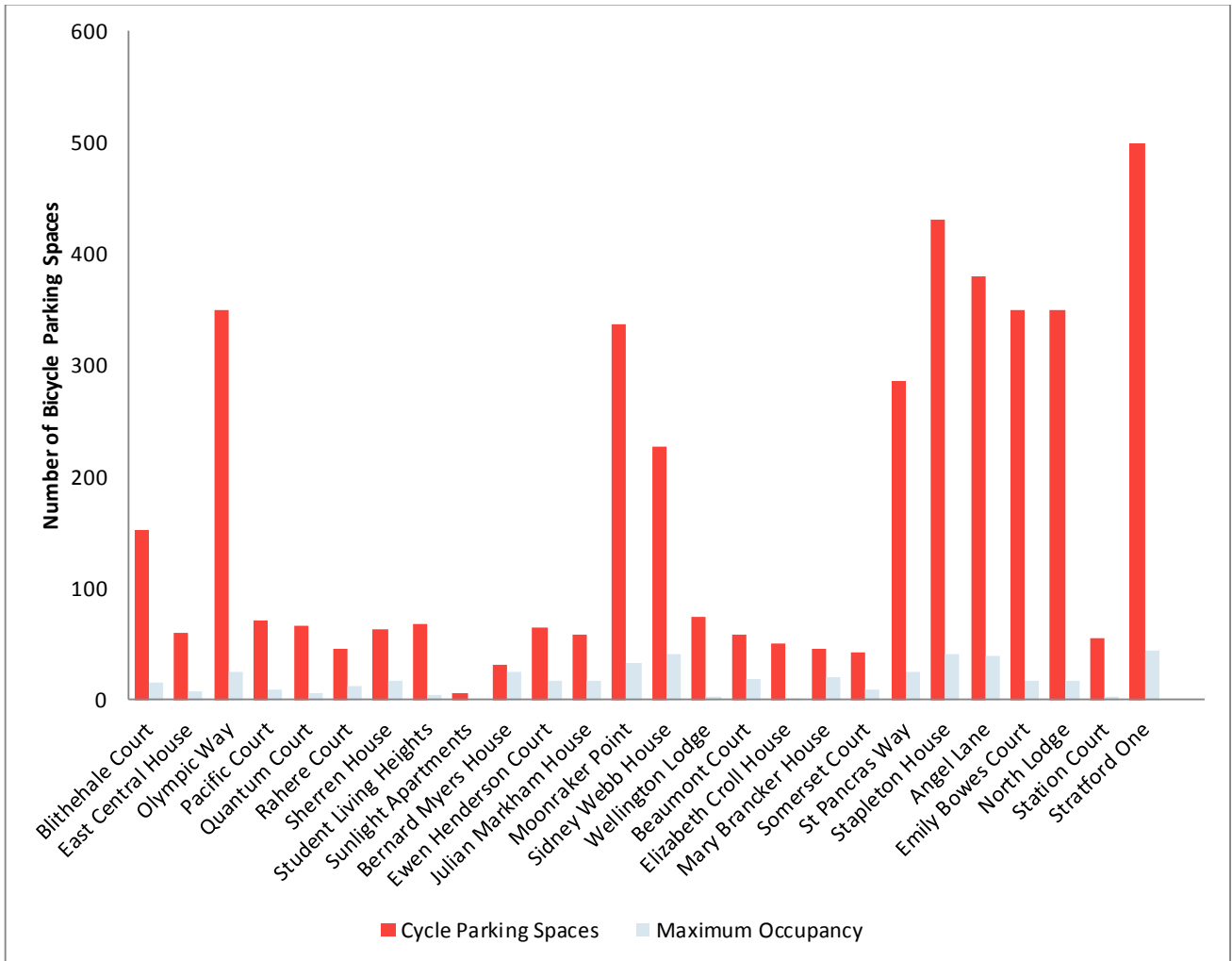


In the last 6 years there has been a negligible increase in cycle storage requirements from 3 to 5% of bicycles stored per bed spaces.

Graph 3, provides an indication of the utilisation of the level of cycle store usage across the UNITE estate. For example, one of the recently completed sites (Stapleton House) experienced a maximum demand of 43 cycles within the cycle store accommodating 430 cycle parking spaces. This store would therefore continually experience 390 empty cycle parking spaces.



Graph 3: Number of Cycle Parking Spaces Compared With Number of Parked Bicycles.



DISCUSSION

Given the consistent low level of cycle parking from 2012 to 2018 and the very low level of cycle parking demand that exists, it strongly indicates that the current level of cycle storage guidance at 1 per 2 bedroom unit is significantly over providing cycle storage capacity.

A further increase in minimum cycle standards to 1 per 1 is unnecessary and would be ineffective at seeking to increase cycling use and would lead to even greater levels of poorly utilised space.



LINKS TO RESIDENTIAL LAND-USE CLASS

The evidence provided by TfL in document referred to above states the rationale behind storage increase relies on bringing student accommodation (Sui Generis) more in line with residential land-use class (C3 land-use class). However, some of the differences in the two land-use classes have been identified which are likely to influence the potential uptake in cycling between the two land-use classes. These factors are summarised below:

- Student accommodation occupiers are more likely to be within a walking distance from their main journey destination and less likely to cycle. Whereas residents are more likely to live further away from their destinations increasing the likelihood of cycling being attractive;
- Student accommodation occupiers are more transient and there are barriers to transferring bicycles to place of study, particularly if studying abroad or reliant on public transport to travel to their student accommodation from their home; and
- Student accommodation sites have zero car parking and occupiers are travelling sustainably from the outset, i.e. there is less scope for modal shift compared to residential.

SUGGESTED APPROACH

Given the above research it is evident that the level of cycle parking utilisation is consistently low. As such, further increase in provision will be ineffective at encouraging future cycle growth. All UNITE sites have ample cycle parking and there is not a lack of cycle parking creating a barrier to cycle ownership. Purpose built student accommodation is also typically built in areas of high public transport accessibility, providing an alternative to travelling by bicycle for destinations further afield.

If there is to be a policy change in relation to cycle parking, it should likely centre around: allowing developers to be able to off-set cycle parking provision with other initiatives to encourage cycle ownership, such as contributions towards cycle hire / share initiatives. These initiatives would be as an alternative to meeting current minimum London Plan cycle parking standards.

There may be other barriers to cycle uptake amongst students that should be explored, such as safety and security issues associated with travel by bicycle or secure storage within higher education campuses.

It may be that cycle storage provision is agreed with the local planning authority on a case by case basis, with the provision based on likely demand. This storage level would be based on factors such as, proximity to higher education, availability of public transport and experience of cycle parking demand at similar sites.

This more flexible approach would allow for alternative use for poorly utilised space, such as increase in student welfare and recreational facilities within the accommodation sites.



Local Plan Review

Consultation on the Publication Draft Local Plan

10 January to 28 February 2022

RESPONSE FORM

The Council is inviting comments over a seven-week period on the Publication version of the Local Plan.

The Draft Local Plan sets out a vision and spatial strategy to guide the development of the borough from 2023, when the Plan is anticipated to be adopted, to 2038. It sets out key objectives for the borough, which are supported by planning policies, area strategies, and – at the smallest scale – detailed guidance for the development of specific sites. Collectively, these identify where development should be targeted and set out how the borough's neighbourhoods and places will change over the next 15 years.

This consultation is the final opportunity to comment on the Local Plan before it is submitted to the Secretary of State for independent 'examination in public'. At this stage in the plan-making process, in accordance with the national guidance, consultation responses should focus on whether the Local Plan has been developed in compliance with the relevant legal and procedural requirements, including the duty to cooperate, and with the 'soundness' of the Plan. Further detail on these concepts is provided in the accompanying guidance notes provided at the end of the form.

How to respond

Please read the consultation documents and other background information made available on the Local Plan website: <http://www.wandsworth.gov.uk/draft-local-plan-publication>

You can respond by completing this form, either electronically using Word or as a print out, and sending it to the Council by:

- Email to planningpolicy@wandsworth.gov.uk
- Post to Planning Policy and Design, Environment and Community Services, Town Hall, Wandsworth High Street, Wandsworth, SW18 2PU.

Alternatively, you can also make comments on the draft Local Plan online via our Consultation Portal, which is accessible at the website listed above.

All responses must be received by **11.59pm on Monday 28 February 2022**. The consultation is open to everyone; however please note that responses will not be treated as confidential and those submitted anonymously will not be accepted.

Part A: Personal Details		
	1. Personal details*	2. Agent's details (if applicable)
Title		Mr.
First name		Matthew
Last name		Roe
Job title (where relevant)		Director
Organisation (where relevant)	Unite Group Plc	ROK Planning
Address	C/O Agent	16 Upper Woburn Place London
Postcode		WC1H 0AF
Telephone		██████████
E-mail address		████████████████████

*If an agent is appointed, please complete only the title, name and organisation boxes for the respondent and complete the full contact details for the agent.

Part B: About You...		
3. Please tell us about yourself or who you are responding on behalf of.		
Do you live in the borough?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Do you work in the borough?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Do you run a business in the borough?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Are you a student in the borough?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Are you a visitor to the borough?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Data protection

Information provided in this form will be used fairly and lawfully and the Council will not knowingly do anything which may lead to a breach of the General Data Protection Regulation (GDPR) (2018).

All responses will be held by the London Borough of Wandsworth. They will be handled in accordance with the General Data Protection Regulation (GDPR) (2018). Responses will not be treated as confidential and will be published on our website and in any subsequent statements; however, personal details like address, phone number or email address will be removed.

For further details regarding your privacy please see the Council's information published at:

www.wandsworth.gov.uk/privacy

Part C: Your Response		
4. Do you consider the Local Plan is:		
4.1 Legally compliant	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
4.2 Sound	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
4.3 Complies with the duty to co-operate	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Further information on these terms is included within the accompanying guidance note, which can be found at the end of the response form.		
If you have entered 'No' to 4.2, please continue with Q5. Otherwise, please go to Q6.		
5. Do you think the Local Plan is <u>unsound</u> because it is <u>not</u>: <i>(Please tick all that apply)</i>		
5.1 Positively prepared	<input checked="" type="checkbox"/>	
5.2 Justified	<input checked="" type="checkbox"/>	
5.3 Effective	<input checked="" type="checkbox"/>	
5.4 Consistent with national policy	<input checked="" type="checkbox"/>	
6. Please give details of why you think the Local Plan is not legally compliant and/or is unsound and/or fails to comply with the duty to co-operate.		
Please make it clear which consultation document your comments relate to and, where applicable, please include the relevant policy name/number, the site allocation name/reference, the Policies Map change, and/or the paragraph number. Please be as precise as possible.		
If you wish to provide comments in support of the legal compliance and/or soundness of the Local Plan, or its compliance with the duty to co-operate, please use this box to set out your comments.		
<i>Please note your response should provide succinctly all the information, evidence and supporting information necessary to support / justify the response. After this stage, further submission will only be at the request of the Inspector, based on the matters and issues they identify for examination.</i>		
Please refer to the covering letter prepared by ROK Planning.		
<i>Please continue on a separate sheet / expand the box if necessary.</i>		

7. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, when considering any legal compliance or soundness matter you have identified at 5 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination.

You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please note your response should provide succinctly all the information, evidence and supporting information necessary to support / justify the suggested change. After this stage, further submission will only be at the request of the Inspector, based on the matters and issues they identify for examination.

Please refer to the covering letter prepared by ROK Planning.

Please continue on a separate sheet / expand the box if necessary.

8. If you are seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? (Please tick box as appropriate)

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

9. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Please refer to the covering letter prepared by ROK Planning.

Please continue on a separate sheet / expand the box if necessary.

If you are not on our consultation database and you respond to this consultation, your details will be added to the database. This allows us to contact you with updates on the progression of the Local Plan and other planning policy documents.

If you do not wish to be added to our database or you would like your details to be removed, then please tick this box.

Signature:

MatthewRoe

Date:

24.02.2022

For electronic responses a typed signature is acceptable.



Local Plan Publication Consultation

Guidance Notes to accompany the Representation Form

Introduction

1. The plan has been published by the Local Planning Authority [LPA] in order for representations to be made on it before it is submitted for examination by a Planning Inspector. The Planning and Compulsory Purchase Act 2004, as amended [PCPA] states that the purpose of the examination is to consider whether the plan complies with the relevant legal requirements, including the duty to co-operate, and is sound. The Inspector will consider all representations on the plan that are made within the period set by the LPA.

2. To ensure an effective and fair examination, it is important that the Inspector and all other participants in the examination process are able to know who has made representations on the plan. The LPA will therefore ensure that the names of those making representations can be made available (including publication on the LPA's website) and taken into account by the Inspector.

Legal Compliance

3. You should consider the following before making a representation on legal compliance:

- The plan should be included in the LPA's current Local Development Scheme [LDS] and the key stages set out in the LDS should have been followed. The LDS is effectively a programme of work prepared by the LPA, setting out the plans it proposes to produce. It will set out the key stages in the production of any plans which the LPA proposes to bring forward for examination.
- The process of community involvement for the plan in question should be in general accordance with the LPA's Statement of Community Involvement [SCI] (where one exists). The SCI sets out the LPA's strategy for involving the community in the preparation and revision of plans and the consideration of planning applications.
- The LPA is required to provide a Sustainability Appraisal [SA] report when it publishes a plan. This should identify the process by which SA has been carried out, and the baseline information used to inform the process and the outcomes of that process. SA is a tool for assessing the extent to which the plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.
- The plan should be in general conformity with the London Plan.
- The plan should comply with all other relevant requirements of the PCPA and the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended [the Regulations].

Duty to Co-operate

4. You should consider the following before making a representation on compliance with the duty to co-operate:

- Section 33A of the PCPA requires the LPA to engage constructively, actively and on an ongoing basis with neighbouring authorities and certain other bodies over strategic matters during the preparation of the plan. The LPA will be expected to provide evidence of how they have complied with the duty.
- Non-compliance with the duty to co-operate cannot be rectified after the submission of the plan. Therefore, the Inspector has no power to recommend modifications in this regard. Where the duty has not been complied with, the Inspector cannot recommend adoption of the plan.

Soundness

5. The tests of soundness are set out in paragraph 35 of the National Planning Policy Framework (NPPF). Plans are sound if they are:

- Positively prepared – providing a strategy which, as a minimum seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring authorities is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- Effective - deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the NPPF.

6. If you think the content of the plan is not sound because it does not include a policy on a particular issue, you should go through the following steps before making representations:

- Is the issue with which you are concerned already covered specifically by national planning policy (or the London Plan)? If so, does not need to be included?
- Is the issue with which you are concerned already covered by another policy in this plan?
- If the policy is not covered elsewhere, in what way is the plan unsound without the policy?
- If the plan is unsound without the policy, what should the policy say?

General advice

7. If you wish to make a representation seeking a modification to the plan or part of the plan you should set out clearly in what way you consider the plan or part of the plan is legally non-compliant or unsound, having regard as appropriate to the soundness criteria in paragraph 5 above. Your representation should be supported by evidence wherever possible. It will be helpful if you also say precisely how you think the plan should be modified.

8. You should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification. You should not assume that you will have a further opportunity to make submissions. Any further submissions after the plan has been submitted for examination may only be made if invited by the Inspector, based on the matters and issues he or she identifies.

9. Where groups or individuals share a common view on the plan, it would be helpful if they would make a single representation which represents that view, rather a large number of separate representations repeating the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

10. Please consider carefully how you would like your representation to be dealt with in the examination: whether you are content to rely on your written representation, or whether you wish to take part in hearing session(s). Only representors who are seeking a change to the plan have a right to be heard at the hearing session(s), if they so request. In considering this, please note that written and oral representations carry the same weight and will be given equal consideration in the examination process.