

Student housing

- 3.235 This policy particularly relates to housing that:
- is primarily occupied by students, and managed by an education institution or an independent provider;
 - is generally restricted to occupation by students during term-time;
 - is generally let to each occupier for the duration of an academic year, and not less than an academic term; and
 - provides some common facilities and/or services, although the extent of these can vary.
- 3.236 Other policies contain specific provisions for some kinds of housing that may be occupied by students:
- other houses and flats shared by 3 or more occupiers who do not live as a family but are long-term residents sharing some rooms and/ or facilities (houses in multiple occupation or HMOs) are considered in Policy H10;
 - key-worker accommodation such as nurses' homes and hostels are considered in Policies H4 and H5;
 - self-contained houses and flats are considered in Policies H2, H3, H4, H6 and H7; and
 - hotels, serviced apartments and hostels aimed at tourists and backpackers are considered in Policy E3.
- 3.237 In this plan the expressions "academic term" and "term" refer to a continuous period of classes or learning, whether the year is divided into two, three or four. The minimum length of a term is usually eight weeks.

Policy H9 Student housing

The Council will aim to ensure that there is a supply of student housing available at costs to meet the needs of students from a variety of backgrounds in order to support the growth of higher education institutions in Camden and Camden's international academic reputation.

We will seek a supply of student housing to meet or exceed Camden's target of 160 additional places in student housing per year and will support the development of student housing provided that the development:

- a. will not involve the net loss of 2 or more self-contained homes;
- b. will not prejudice the Council's ability to meet the target of 742 additional self-contained homes per year;
- c. will not involve a site identified for self-contained housing through a current planning permission or a development plan document unless it is shown that the site is no longer developable for self-contained housing;
- d. complies with any relevant standards for houses in multiple occupation (HMOs);
- e. serves higher education institutions that are accessible from it;
- f. includes a range of flat layouts including flats with shared facilities wherever practical and appropriate;

- g. has an undertaking in place to provide housing for students at one or more specific education institutions, or otherwise provide a range of accommodation that is affordable to the student body as a whole;
- h. will be accessible to public transport, workplaces, shops, services, and community facilities;
- i. contributes to creating a mixed, inclusive and sustainable community; and
- j. does not create a harmful concentration of such a use in the local area or cause harm to nearby residential amenity.

Where proposed student housing development is not robustly secured as student housing that provides accommodation affordable to the student body in accordance with criterion (g), the Council will expect the development to provide an appropriate amount of affordable housing for general needs having regard to “Policy H4 Maximising the supply of affordable housing”.

We will resist development that involves the net loss of student housing unless either:

- k. it can be demonstrated that the existing accommodation is incapable of meeting contemporary standards or expectations for student housing;
- l. adequate replacement accommodation will be provided that satisfies criteria (a) to (j) above;
- m. it can be demonstrated that the accommodation is no longer needed because the needs of students at the institutions that it serves can be better met in existing accommodation elsewhere.

Where the Council is satisfied that a development involving the loss of student housing is justified, we will expect it to create an equivalent amount of floorspace in another permanent housing use, such as self-contained housing (in Use Class C3), including an appropriate amount of affordable housing, having regard to Policy H4.

- 3.238 The number of students at London’s universities has increased steadily from 2001-2011, and growth is expected to continue. Many education institutions of national and international significance are based in Camden, notably ten publicly funded universities. In addition, Camden has a number of other colleges that prepare young adults for higher education, and the Universities have advised that these colleges can support Camden’s international academic reputation by helping them to attract students, particularly overseas students. The provision of higher education and research makes a major contribution to Camden’s economy and is part Camden’s wider Central London role as a focus of employment, shopping, culture and entertainment.
- 3.239 The 2011 Census indicated that 25,130 full-time students aged 18 over were resident in Camden during term-time, or 11.4% of the usual resident population. We estimate that by 2011/12, Camden had 8,500 places in housing provided specifically for students. This is generally consistent with the recommendation of the Mayor’s academic forum that student accommodation should be available for around 33% of full-time students. Since 2011/12, more than 2,300 additional student places have been provided, and we estimate that the total had reached around 11,000 places by 2015.

- 3.240 The main alternative source of accommodation available to students in Camden is private rented housing. Depending on property size, median private rents in Camden have risen by 6% to 17% from mid-2011 to mid-2014 (based on VOA data in the GLA Rents Map, with the largest rises applying to homes with four or more bedrooms). The Council considers that the provision of additional designated student housing can help to limit additional pressure on the wider private rented market.
- 3.241 Camden provides the main base for a quarter of the publicly funded higher education institutions in London, and has experienced rapid growth in independently operated student accommodation in the last 10 years. We therefore expect a significant number of student housing schemes to come forward in the borough over the Plan period. Policy H9 sets out criteria that we will use to assess proposals involving student housing, including additions and losses. Details of how we will apply the policy are summarised below and set out more fully in our supplementary planning document Camden Planning Guidance on housing.

Student housing target

- 3.242 Given the concentration of recent student housing development in Central London, the London Plan encourages a more dispersed distribution of future provision. Based on the London Plan position, the Council expects the provision of purpose-built student housing in Camden to grow in line with the growth of full-time student numbers across London, and expects the share of London's full-time 18+ students living in Camden to remain at around the same percentage.
- 3.243 The final report of the Mayor's Academic Forum in 2014 estimated that the need for additional places in dedicated student housing in London from 2011/12 to 2025/26 at 2,500 to 3,100 per year. The 2011 Census indicated that Camden was the term-time home of 4.7% of London's full time students aged 18 and over. Data on students registered at London's publicly funded higher education institutions in 2012/13 indicated that Camden's resident students were 6.6% of the London total. The mid-point of the two ranges suggests a London need for 2,800 places, and a Camden share of 5.65%.
- 3.244 We have estimated the need for additional student housing in Camden by multiplying the London requirement by the borough's share, giving a range of from 117.5 to 204.6 places per year. Taking the mid-point, we consider the minimum requirement for additional student housing over the Plan period to be 160 places per year, or 2,400 places in total. This minimum requirement forms our annual target in Policy H9. We recognise that the growth in student numbers and student housing demand may be higher, and Policy H9 therefore supports development to meet or exceed the target.
- 3.245 We consider that there are already identified sites with potential to provide more than 2,200 places in student housing from 2016/17 to 2030/31, which is over 90% of the student housing target. The Council's housing trajectory (included in the Local Plan as Appendix 2) indicates that Camden has a pipeline of sites with planning permission expected to deliver over 900 additional student housing places from 2016/17 to 2020/21. The pipeline represents sufficient deliverable sites to meet the target for student housing for the first five years of the Local

Plan period. Camden's Site Allocations Document 2013 and the Euston Area Plan also designate further sites where student housing could be developed, in most cases as part of a mixed-use scheme. The housing trajectory indicates that these represent sufficient developable sites to provide 1,300 places in student housing over the subsequent ten years of the Plan period. A full review of the Site Allocations document is expected to commence when the current Local Plan proceeds to adoption, and will identify any further sites needed to meet the student housing target in full over the entire Plan period.

- 3.246 In terms of student numbers, UCL is Camden's largest higher education institution. UCL seeks to provide guarantees to offer student housing places to all first-year undergraduate and postgraduate students, and forecasts a growth of 50% in its own students up to 2024/25. On that basis, UCL considers that even an additional 205 places in student housing in each year (the upper end of the Council's estimate of needs) would be a conservative target. Consequently, the Council will consult with UCL and other higher education institutions on a regular basis to review the actual growth in student numbers and need for additional places in student housing.
- 3.247 Student housing forms part of the Council's overall target of 16,800 additional homes over the Plan period (see "Policy H1 Maximising housing supply"). The overall target also encompasses our target for 11,130 self-contained homes and 480 vacant homes returning to use. Subtracting the targets for self-contained homes and reuse of vacant homes from the overall target leaves more than 5,000 homes that could potentially be provided as purpose built student housing over the Plan period, more than double the Policy H9 target. We therefore note that there is considerable scope to accommodate a higher level of student housing provision in response to on-going consultation with higher education institutions.

Additional student housing and the priority for self-contained homes

- 3.248 Policy H1 indicates that self-contained housing is the priority land use of the Plan, while "Policy H3 Protecting existing homes" resists proposals involving the net loss of two or more homes. Given this priority, we will resist proposals for student housing which involve redeveloping two or more self-contained homes, or the development of a site allocated for self-contained homes in the Camden Site Allocations document. We will also resist proposals involving the development of a site that has an existing consent for self-contained housing where the consented scheme would better meet Camden's housing needs and there is a reasonable prospect of the consent being implemented.
- 3.249 The Council separately monitors net additions to self-contained homes, student housing, and other non-self-contained homes. Over the last five years, approximately a third of the additional homes monitored have been spaces in student accommodation. As indicated in connection with Policy H1, the Council is concerned that pressure for development of additional student housing could severely constrain the availability of sites for self-contained housing. Consequently, the Council will resist proposals for student housing that would prejudice our ability to meet the annual target for additional self-contained homes, having regard to their impact on the supply of land for self-contained

housing, whether we are meeting our cumulative target for additional self-contained homes over the Plan period so far, and whether the sites involved have particular characteristics and constraints that make them more suitable for student housing or self-contained homes. In some cases, we may seek a mix of student housing and self-contained homes on the same site.

- 3.250 In accordance with the Housing Act 2004, the Council has agreed minimum standards for houses in multiple occupation, which apply to most student housing that is not provided by an educational institution. These standards set minimum sizes for bedroom, bathroom and kitchen areas, and the minimum facilities that should be provided for occupiers. We will resist proposals for student housing that fail to comply with the relevant minimum standards.

The Institutions to be served

- 3.251 London's publicly-funded Universities are part of the national and regional education infrastructure, support London's role as an international centre of academic excellence, and are a key part of the growing knowledge-based economy. Linking the student housing to publicly-funded Universities is a straightforward way for the provider and the Council to ensure that accommodation is only offered to bona fide students registered for an academic course of study. Where new student housing is proposed we will negotiate planning obligations to ensure that the term-time occupiers are students at one or more recognised institutions, which will generally be institutions supported by the Higher Education Funding Council for England (HEFCE).
- 3.252 There are a number of other colleges in the borough that help to support London's international academic reputation. The final report of the Mayor's Academic Forum 2014 estimated that 14% of London's full-time students could be at colleges of this type. In some instances the Council may support development of student housing by these colleges. Further information about how proposals will be considered is provided in our supplementary planning document Camden Planning Guidance on housing.
- 3.253 Student housing that is remote from the institution that it serves may have a significant impact on public transport services between the two sites. Consequently we will generally expect student housing developments to serve institutions that are within walking or cycling distance, or to be accessible to them by public transport with existing or committed capacity to meet the demand arising from the development. These are most likely to be institutions within Camden or the adjoining boroughs, although institutions in other locations may be acceptable if appropriate walking, cycling and/ or public transport links are available.

Affordability and range of accommodation

- 3.254 The London Plan indicates that student housing should be affordable to the student body as a whole. The final report of the Mayor's Academic Forum 2014 highlighted affordability as an issue, noting that independent providers may charge £300 or more for a room, estimated at twice the rent that would be affordable on the basis of a student loan. The median rent for a studio flat in Camden in mid-2014 was £240 per week (VOA data in the GLA Rents Map).

The Council considers that additional designated student housing can help limit pressure on the wider private rented market, but to do so the rooms will need to be available at a rate that is competitive with the wider market.

- 3.255 To ensure that a proportion of student housing is available at competitive rates, we will:
- expect student housing developments to include a range of flat layouts including clustered study-bedrooms with some shared facilities wherever this is practical and appropriate (having regard to any constraints on the site or the development and any specific characteristics of the proposed occupiers);
 - prevent lease or sale of the accommodation as general market housing;
 - wherever possible expect undertakings with one or more education institutions to tie occupation to students attending the specified education institutions or; and
 - where undertakings are not in place with specific institutions, subject to viability expect student housing developments to include an element of student accommodation that is affordable in the context of average student incomes and rents for comparable accommodation provided by Camden based Universities.
- 3.256 Where affordable student accommodation is expected, we will be guided by the Mayor's Housing SPG (as updated in Annual Monitoring Reports) in negotiating the proportion of affordable housing and its cost, and in making arrangements for its allocation. The SPG suggests that the cost should be no more than 55% of average student income for a UK full-time student living in London away from home, and suggests that the proportion of affordable housing can be set having regard to the financial viability of the development and the proportion of all students receiving a maintenance grant for living expenses (around 30% in 2013). In accordance with the SPG, planning obligations will be used to secure the affordability and availability of the affordable accommodation for as long as the student housing use continues.
- 3.257 The optional Building Regulations intended to secure accessible homes do not apply to student housing. Nevertheless, in accordance with "Policy H6 Housing choice and mix", the Council will seek housing suitable for people with disabilities, and will expect a proportion of accommodation in student housing developments to be suitable for occupation by students who are wheelchair users, having regard to the proportion of wheelchair users among the student body and the wider population.
- 3.258 The Council will use design mechanisms, conditions and planning obligations to meet these expectations, and provide additional details of how they will operate in our supplementary planning document Camden Planning Guidance on housing.

Location of student housing and provision for travel

- 3.259 In two of Camden's Central London wards, students now account for around a third of the population (Census 2011, 18+ full-time students at term time address as a share of usual resident population). Consequently, the Council supports the proposal for greater dispersal of additional student housing in the London Plan, both within the borough and more widely through London. However, a number of factors will be considered when assessing whether locations are appropriate

for student housing.

- 3.260 Like all housing, student housing should be located so it that its occupiers have access to public transport, workplaces and services. The advent of UK student loans has made access to workplaces all the more important, as almost a fifth of Camden's full-time students are in employment (Census 2011, 18+ students at term time address). Services such as GPs and sports facilities are also more likely to be required for locations remote from campus based provision in Central London.
- 3.261 Student housing can have a significant impact on a single public transport route or service, particularly where development towards the north of the borough serves the cluster of Universities in Bloomsbury and the Central London Area. Consequently we will expect student housing to be designed to prioritise walking and cycling, with accessible and secure cycle parking facilities provided in accordance with "Policy T1 Prioritising walking, cycling and public transport". Student housing should also ideally be located within cycling distance of the institutions it serves, or otherwise be accessible to them by public transport services. Public transport and other services that will support new student housing should have existing or committed capacity to accommodate the demand generated by the development. Funding towards services may be sought through planning obligations or CIL as appropriate.
- 3.262 The creation of mixed, inclusive and sustainable communities can be a particular consideration where student housing is proposed, especially given the high concentrations in some parts of Camden. Students are sometimes perceived as short-term residents with little connection to the established community. Specific concerns can include noise disturbance, over-crowding on public transport, or the loss of shops and services that meet the needs of longer term residents. The Council will therefore assess proposals for student housing having regard to any existing concentrations in the area, and the wider housing mix in the community. Where the scale or concentration of student housing proposed is likely to harm the balance and sustainability of the community or otherwise harm local amenity, the Council will seek a range of mitigating measures such as management plans, and will resist proposals where mitigation is not possible.

Protecting existing student accommodation

- 3.263 Given the anticipated growth of full-time students attending higher education institutions in the borough and the potential for pressure on the wider private rented stock, we will seek to protect existing student housing, including housing managed by education institutions and independent providers unless it is replaced or there is no longer a demand for it. Where the loss of student housing is justified, alternative development should provide an equivalent floorspace in another permanent housing use in accordance with "Policy H3 Protecting existing homes". Development could potentially provide housing for people with support needs in accordance with "Policy H8 Housing for older people, homeless people and vulnerable people", and/ or provide self-contained housing in accordance with our priority set out in "Policy H1 Maximising housing supply". In all cases we will expect an appropriate contribution to affordable housing in accordance with "Policy H4 Maximising the supply of affordable

housing”.

- 3.264 Within Camden there is a modest supply of housing with shared facilities which is available to young people and visitors on a short or longer-term basis, usually run by charities and religious institutions. Such housing can be a valuable resource for students arriving in London for the first time, and in some cases is largely occupied by students. However, where this housing is not managed by an education institution or restricted to occupation by students during term-time, we will assess proposals involving its loss on the basis of “Policy H10 Housing with shared facilities (‘houses in multiple occupation’)” rather than Policy H9.