

**Camden Planning Guidance**

# **Student Housing**

**March 2019**



# Student Housing

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# 1 Introduction

## What is Camden Planning Guidance?

- 1.1 The Council has prepared this Camden Planning Guidance (CPG) on Student Housing to support the policies in the Camden Local Plan 2017. This guidance is therefore consistent with the Local Plan and forms a Supplementary Planning Document (SPD) which is an additional “material consideration” in planning decisions.
- 1.2 The Camden Local Plan 2017 has greater statutory weight than the Student Housing CPG, and where there is any apparent conflict between the two documents, the Local Plan will prevail.
- 1.3 This document should be read in conjunction with and within the context of the relevant policies in Camden's Local Plan, other Local Plan documents and other Camden Planning Guidance documents.
- 1.4 This document was adopted on 15 March 2019 following statutory consultation from November 2018 to January 2019, and replaced section 3 of CPG2 Housing 2011 (with amendments to 2018).

## What does this guidance cover?

- 1.5 This guidance provides information on the development of housing specifically for occupation by students, including new build, conversion and change of use. This housing is sometimes referred to as dedicated or purpose-built student accommodation, although it can also include buildings converted from another use. It provides specific guidance on:
  - Securing a supply of student housing
  - Creating a mixed, inclusive and sustainable community
  - Design, standards and facilities
  - Planning obligations for student housing
- 1.6 This CPG also includes a Glossary after the final section to provide definitions of technical terms and acronyms.
- 1.7 Living in satisfactory housing conditions is a key element of health, wellbeing and quality of life, and this is as true for students as it is for the wider population. There are measures throughout this guidance that aim to support the health and wellbeing of the occupiers of student housing developments and neighbouring occupiers, but these are a particular emphasis of Section 4 Design, standards and facilities

## Relevant Local Plan policies

- 1.8 The Student Housing CPG supports Camden Local Plan 2017 Policy H9 - Student housing.
- 1.9 Other relevant policies in the Local Plan include:

- G1 – Delivery and location of growth
- H1 - Maximising housing supply
- H2 - Maximising the supply of self-contained housing from mixed use schemes
- H3 - Protecting existing homes
- H4 - Maximising the supply of affordable housing
- H6 – Housing choice and mix
- H8 - Housing for older people, homeless people and vulnerable people
- H10 - Housing with shared facilities
- C1 – Health and wellbeing
- C2 – Community facilities
- C5 – Safety and security
- E3 - Tourism
- A1 - Managing the impact of development
- A2 - Open space
- D1 – Design
- CC1 – Climate change mitigation
- CC2 – Adapting to climate change
- CC3 – Water and flooding
- T1 – Prioritising walking, cycling and public transport

## Resources

- 1.10 The table included here provides a list of key organisations and sources that have informed this guidance, the links were current at the time of drafting.

Building Regulations	<ul style="list-style-type: none"> <li>• <a href="#">Approved Document M:access to and use of buildings, volume 2: buildings other than dwellings</a> (accessed March 2019)</li> </ul>
Camden Authority Monitoring Report	<ul style="list-style-type: none"> <li>• Provides details of housing permissions and completions (for self-contained housing and student housing) by year - <a href="http://camden.gov.uk/web/guest/local-plan">camden.gov.uk/web/guest/local-plan</a> (navigate via Planning and building development/ Planning policy/ Monitoring, data and evidence) (accessed March 2019)</li> </ul>
Camden Local Plan 2017	<ul style="list-style-type: none"> <li>• <a href="http://camden.gov.uk/localplan">camden.gov.uk/localplan</a> (navigate via Planning and building development/ Planning policy/ Local plan documents) (accessed March 2019)</li> </ul>
Higher Education Statistical Agency (HESA)	<ul style="list-style-type: none"> <li>• Collects, processes and publishes data about higher education (HE) in the UK, including data about the location of term-time addresses for HE students - <a href="http://hesa.ac.uk/services/custom/data">hesa.ac.uk/services/custom/data</a> (accessed March 2019)</li> </ul>
Housing health and safety rating system	<ul style="list-style-type: none"> <li>• Camden Council guidance - <a href="http://camden.gov.uk/web/guest/housing-health-safety-rating-system#ouvi">camden.gov.uk/web/guest/housing-health-safety-rating-system#ouvi</a> (navigate via Housing/ Landlords, home owners and private tenants/ Housing health and safety rating system) (accessed March 2019)</li> <li>• Government guidance - <a href="http://Housing%20health%20and%20safety%20rating%20system%20(HHSRS)%20guidance%20for%20landlords%20and%20property-related%20professionals%20-%20GOV.UK">Housing health and safety rating system (HHSRS) guidance for landlords and property-related professionals – GOV.UK</a> (accessed March 2019)</li> </ul>
Management codes of practice	<ul style="list-style-type: none"> <li>• Unipol National Code - <a href="http://www.nationalcode.org/">www.nationalcode.org/</a> (accessed March 2019)</li> <li>• Universities UK Accommodation Code of Practice <a href="http://universitiesuk.ac.uk/policy-and-analysis/Pages/accommodation-code-of-practice.aspx">universitiesuk.ac.uk/policy-and-analysis/Pages/accommodation-code-of-practice.aspx</a> (accessed March 2019)</li> </ul>
Mayor of London's policy and guidance	<ul style="list-style-type: none"> <li>• The London Plan March 2016 <a href="http://london.gov.uk/what-we-do/planning/london-plan/current-london-plan">london.gov.uk/what-we-do/planning/london-plan/current-london-plan</a> (accessed March 2019)</li> <li>• Housing Supplementary Planning Guidance, Mayor of London, March 2016 <a href="http://london.gov.uk/what-we-do/planning/implementing-london-plan/planning-guidance-and-practice-notes/housing-supplementary">london.gov.uk/what-we-do/planning/implementing-london-plan/planning-guidance-and-practice-notes/housing-supplementary</a> (accessed March 2019)</li> </ul>

Minimum HMO standards	<ul style="list-style-type: none"> <li>• <a href="https://camden.gov.uk/web/guest/houses-multiple-occupation#iwxu">camden.gov.uk/web/guest/houses-multiple-occupation#iwxu</a> (navigate via Housing/ Landlords, home owners and private tenants/ House in multiple occupation (HMO)/ Further information) (accessed March 2019)</li> </ul>
NHS Healthy Urban Development Unit (HUDU)	<ul style="list-style-type: none"> <li>• HUDU provides advice and support on assessing the health and wellbeing impacts of development - <a href="https://healthyurbandevelopment.nhs.uk">healthyurbandevelopment.nhs.uk</a> (accessed March 2019)</li> </ul>
Office for Students	<ul style="list-style-type: none"> <li>• Provides details of higher education institutions receiving public funding - <a href="https://officeforstudents.org.uk/advice-and-guidance/the-register/">officeforstudents.org.uk/advice-and-guidance/the-register/</a> (accessed March 2019)</li> </ul>
Secured by Design	<ul style="list-style-type: none"> <li>• <a href="https://securedbydesign.com/guidance/design-guides">securedbydesign.com/guidance/design-guides</a> (accessed March 2019)</li> </ul>



## 2 Securing a supply of student housing

### KEY MESSAGES

Development of student housing should:

- provide for students at the area's recognised higher education institutions
- be let exclusively to these students during term-time, particularly the months of October, November, February and May
- be managed as a single planning unit
- not involve loss of existing self-contained homes or prejudice planned provision of self-contained homes

- 2.1 This section provides detailed guidance on how the Council will ensure that development of student housing meets the identified needs of students at the area's Higher Education institutions on a permanent basis, and in this way justifies the distinct requirements that apply to student housing (eg in relation to affordable housing and space standards) as outlined in Camden Local Plan Policy H1 – *Maximising housing supply*, Policy H4 – *Maximising the supply of affordable housing*, Policy H6 – *Housing choice and mix* and Policy H9 – *Student housing*.

### HIGHER EDUCATION

Higher education courses are programmes leading to qualifications, or credits which can be counted towards qualifications, which are above the standard of GCE A-levels or other Level 3 qualifications such as access to higher education diplomas, advanced apprenticeships and level 3 NVQs. They include degree courses, postgraduate courses and sub-degree courses such as those leading to HNCs or HNDs.

- 2.2 This section specifically covers:
- Identified student needs;
  - Recognised higher education institutions;
  - Short stays, term time and the academic year;
  - Managing the development as a single planning unit;
  - Securing student housing on a permanent basis; and
  - Protecting existing and planned provision of self-contained homes.
- 2.3 Policy H1 of the Camden Local Plan 2017 aims to maximise the supply of housing and exceed a target of 16,800 additional homes from 2016/17 to 2030/31. Within this target, Policy H1 aims to deliver at least 11,130 additional self-contained homes (742 per year), while Policy H9 aims to deliver at least 2,400 places in student housing (160 per year).

### SELF-CONTAINED HOMES

Homes where all the rooms, including the kitchen, bathroom and toilet are behind a door that only one household can use.

**STUDENT HOUSING**

Student housing is subject to the distinct arrangements under Policy H9 where it:

- is primarily occupied by students and managed by an education institution or independent provider for that purpose;
- is restricted to occupation by students during term-time;
- is generally let to each student for the full duration of all terms in the academic year, and not less than the full duration of one term; and
- provides some common facilities and/ or services.

- 2.4 The Local Plan indicates that self-contained homes have the greatest potential to provide for a variety of household types with a reasonable standard of privacy, amenity and flexibility. Non self-contained housing with shared facilities can be the best way of tailoring facilities or support to suit the characteristics of a particular group such as students, but provides less flexibility for alternative occupiers and can create a greater risk of conflict between people with different cultures and lifestyles. Policy H1 therefore identifies self-contained housing is the priority use of the Local Plan.
- 2.5 The Local Plan recognises that 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. Higher education is becoming increasingly competitive, and the availability of dedicated student housing at a reasonable price can be a significant influence on students choosing between Universities. The Council therefore acknowledges the need for more student housing in the borough and is generally supportive of proposals for additional provision, but has concerns about potential impacts of new student housing, and seeks to ensure that these are weighed appropriately against the benefits of development. Policy H9 includes a set of criteria designed to ensure that proposals for student housing development address these concerns.
- 2.6 The distinct arrangements that apply to student housing (eg in relation to affordable housing) and other characteristics such as low vacancy rates and growth in rents have made it a popular development option, and created concerns that development of self-contained housing may be squeezed out by student proposals in parts of the borough. In 2013/14, 1,200 additional student bedrooms were completed in Camden, compared with 400 self-contained homes. In this context the Council seeks to ensure that student housing developments meet genuine student needs and do not displace existing or planned provision of self-contained homes.

**Meeting genuine student needs**

- 2.7 We will use a number of planning obligations to ensure that any development of student housing meets genuine student needs. The obligations will require that:

- the term-time occupiers are students registered on courses at the area's recognised higher education institutions;
- the development is occupied exclusively by these students during term-time;
- the housing is let to each student for the duration of all terms in the academic year (generally not less than 38 weeks), and not less than an academic term;
- the development is managed as a single planning unit and individual rooms or flats are not disposed of as independent self-contained homes; and
- the development continues to be used as student housing on a permanent basis.

2.8 These obligations are necessary to ensure:

- the development meets the need for student housing identified in the Local Plan and the London Plan;
- the development meets long term housing needs and is not let during term time as visitor accommodation or accommodation for those attending short courses at language and business schools;
- all term time occupiers of the development are genuine students, both at initial occupation and in subsequent academic years;
- management as a single planning unit secures term time occupation by genuine students and protects the amenity of the community, occupiers and neighbours (see the section of this guidance about Management plans), and
- development is not described as 'student housing' in order to provide self-contained homes without complying with the requirements that apply to self-contained housing in relation to affordable housing, space standards, accessibility and wheelchair users.

### **Identified student needs**

2.9 The Local Plan explains how the target for additional student housing was set in paragraphs 3.242 to 3.244. The target has been set on the basis of provision for students aged 18 and over and attending higher education institutions. In the context of the borough's need for self-contained housing and the priority given to it in the Local Plan, the Council will generally resist the provision of student housing for other groups. More information about provision for other students is provided in the section of this guidance about Access and links to higher education institutions.

### **Recognised higher education institutions**

2.10 The area's recognised higher education institutions will generally be those in Camden and adjoining London Boroughs funded by the Office for Students. The Office for Students (OfS) is the successor body to the

Higher Education Funding Council for England. The Local Plan indicated that recognised institutions are those supported by the HEFCE.

- 2.11 In the 2018/19 academic year there were 9 recognised institutions based in Camden and 13 in adjoining boroughs. In some circumstances, we may agree that occupiers can include students on courses at alternative institutions. These circumstances are explained in the section of this guidance about Access and links to higher education institutions. Appendix A provides a list of London's higher education institutions funded by the Office for Students in the 2018/19 academic year.

#### **OFFICE FOR STUDENTS (OFS)**

The Office for Students (OfS) regulates higher education providers on behalf of all students. The OfS also distributes government higher education funding to more than 300 providers in England, supporting courses where teaching costs are particularly high (such as medicine) and areas prioritised by government. Teaching costs are only partly met by OfS grants, the greater part is met through student tuition fees. This body is the successor to the Higher Education Funding Council for England (HEFCE)

#### **Short stays, term time and the academic year**

- 2.12 An academic year is regarded as the period from 1 August in one year to 31 July in the next year. The Council understands that many students do not require accommodation in the borough for the full academic year, and that alternative uses of student housing outside term time can reduce the cost of accommodation to students by reducing the length of a student's lease and generating an additional source of income for the provider. The section of this guidance about Alternative uses outside term time explains the arrangements we will consider to provide for year-round occupation of student housing.
- 2.13 There is a growing market for letting housing for short stays (short stays refer to lets for periods of less than 90 days). This market is attractive to landlords because the weekly rate tends to be significantly higher than the weekly rent for lets of 6-12 months. However, Policy H3 of the Local Plan resists the permanent conversion of housing to short-stay accommodation. Similarly, the Council will seek to ensure that student housing is let to each student for the full duration of all terms in the academic year, and resist the term-time use of rooms in student housing for short stays by non-students.
- 2.14 We consider that letting to students on a shorter-term basis and letting to non-students during term time would both have harmful impacts on the availability of appropriate student housing, including:
- increased upwards pressure on student rents;
  - reduced security of tenure for students;
  - risk of students being unable to complete an academic year due to the need to find new accommodation between terms;
  - reduced accommodation available to students;

- high turnover of occupiers;
- increased incidence of noise and disruption to study;
- increased fear of crime;
- reduced cohesion of the student community.

#### **SHORT TERM LETS**

Accommodation let for periods of less than 90 days, as defined by the Greater London Council (General Powers) Act 1973 (as amended).

- 2.15 Term times vary widely between institutions and often vary between courses within an institution. At Camden's higher education institutions, the academic year for undergraduates generally commences in September and ends in June, and the months of October, November, February and May fall entirely within term time. The total length of term time for each undergraduate course is generally around 33 weeks in each academic year, but the total period that falls within term time across all undergraduate courses may be as long as 38 weeks. Consequently, we will use planning obligations to ensure that rooms are let to each student for the full duration of all terms in the academic year (where letting to non-students is permitted, we will generally require the accommodation to be let to students for not less than 38 weeks), and are not let that to non-students for any part of October, November, February and May. The 38-week minimum period for student tenancies is consistent with the advice of the Mayor's Housing SPG 2016 in relation to affordable student housing. For more information, please see the subsection of this guidance about Alternative uses outside term time.
- 2.16 In some cases, a student may not require accommodation for the full duration of all terms in the academic year, for example where the course requires a student to be absent for one or more terms to undertake practical training in a work environment, pursue independent research for a dissertation or thesis, or attend a related institution in another region or country. The Council may consider arrangements that permit student lettings for an individual academic term or a period of less than 38 weeks where the provider can demonstrate to the Council's satisfaction that the proposed arrangements would more appropriately serve the course and study patterns of the higher education institutions linked to the accommodation by planning obligations or nominations agreements. In such cases, we will expect planning obligations to ensure that the minimum length of student tenancies is not less than an academic term. For information about nominations agreements, please see the subsection of this guidance related to Affordability and nominations agreements.

#### **Managing the development as a single planning unit**

- 2.17 We will expect obligations to require management of the student housing as a single planning unit and prevent disposal of individual rooms or flats as independent self-contained homes. These obligations will ensure that:

- the development can be managed to meet genuine student needs and protect the amenity of the community, occupiers and neighbours; and
- development is not described as 'student housing' in order to avoid complying with the requirements that apply to self-contained housing in relation to affordable housing, space standards, accessibility and wheelchair users.

### **Managing occupation and amenity**

- 2.18 As indicated in the previous subsections of this guidance, we expect student housing to meet a number of obligations in relation to its occupation to ensure that it meets genuine student needs (eg term-time occupation exclusively by students at recognised higher education institutions). In addition, we expect the accommodation to be managed in a way that protects the amenity of the community, occupiers and neighbours (see the section of this guidance about Management plans). Effective management of the occupation and amenity of the accommodation will only be possible if it is managed as a single planning unit, and individual rooms are not disposed of separately.

### **Requirements applying to self-contained housing and the disposal of individual student rooms or flats**

- 2.19 As indicated in the opening paragraphs of this section, self-contained housing is the priority use of the Local Plan. However, the different requirements that apply to student housing have made it a popular development option, and in 2013/14 the number of completed student bedrooms was three times the number of completed self-contained homes.
- 2.20 The different requirements that apply to student housing include those relating to affordable housing, space standards, accessibility and wheelchair users. Local Plan Policy H4 requires developments of self-contained housing to provide specific types of affordable housing that are managed through a regulatory system and remain at an affordable price for future eligible households. Local Plan Policy H6 requires developments of self-contained housing to meet the nationally described space standard (including a minimum size of 37 sq m GIA for a studio flat with a shower rather than a bath), and requires development of new-build self-contained homes to incorporate measures that aid accessibility for wheelchair users and other people with mobility difficulties. To ensure development is not described as 'student housing' in order to avoid complying with the requirements that apply to self-contained housing, obligations should prevent the disposal of individual student rooms or flats as independent self-contained homes.
- 2.21 These distinct arrangements also mean that student housing could not be released readily to meet the general needs of the wider population. We would expect such release to involve a material change to the use of the building and significant conversion works, involving new planning considerations and potentially new planning obligations. Consequently, it



would not be appropriate for individual rooms or flats in student housing to be disposed of as independent self-contained homes.

### **Securing student housing on a permanent basis**

- 2.22 We will expect obligations relating to the use of student housing to remain in place on a permanent basis (rather than for a fixed period) to ensure that:
- the student housing continues to be available to meet the needs of future generations of students;
  - development is not described as 'student housing' in order to avoid complying with the requirements that apply to self-contained housing in relation to affordable housing, space standards, accessibility and wheelchair users.

### **The needs of future generations of students**

- 2.23 As explained in the opening paragraphs of this section, the Council acknowledges the need for more student housing, and the Local Plan includes a target of 160 places per year to 2030/31. This reflects rapid growth in the number of higher education students living and studying in Camden in recent years, the sector's plans for future growth, and the need to provide accommodation at a reasonable price to compete with other Universities.
- 2.24 In Camden, from 2001 – 2011 there was an increase of 43.6% in the number of full-time students aged 18 or over that were term-time residents (Census data). Figures for the academic years 2010/11 – 2015/16 show a lower but substantial increase of 8.2% in the number of resident higher education students (data from Higher Education Statistical Agency – HESA).
- 2.25 There is no prospect of the need for student accommodation abating. Many higher education institutions with an existing base in London are planning further growth in their student intake (including Camden-based UCL), and many institutions operating elsewhere are seeking to establish an outpost in London. The growth in places available at higher education courses coincides with continuing growth in private sector rents. Data from the Valuation Office Agency for 2013/14 to 2017/18 shows that median monthly rents in Camden for a one-bedroom flat increased from £1,430 to £1,517 (+6.1%), and across all property sizes the median increased from £1,625 to £1,733 (+6.6%).
- 2.26 Given the steady increase in the number of students at higher education institutions in Camden and the pressure this places on the private rented stock, Local Plan Policy H9 seeks to protect existing student housing. To prevent further pressure on rents from future loss of newly developed student housing, we will expect development of additional student accommodation to be secured on a permanent basis, and resist any proposal to withdraw the accommodation from student-use after a fixed period.

### **Requirements applying to self-contained housing and securing student housing on a permanent basis**

- 2.27 Different requirements apply to self-contained and student housing in relation to affordable housing, space standards, accessibility and wheelchair users (see the subsection of this guidance about Requirements applying to self-contained housing and the disposal of individual student rooms or flats). These different requirements justify an obligation that secures student housing on a permanent basis in the same way that they justify retention and management of the accommodation as a single planning unit. Securing the student housing on a permanent basis will ensure that development is not described as 'student housing' in order to avoid the more challenging requirements that apply to self-contained housing, and ensure that housing designed for students cannot pass into use for general housing needs at the end of a fixed period without adaptation.

### **Protecting existing and planned provision of self-contained homes**

- 2.28 As indicated in the opening paragraphs of this section, self-contained housing is the priority use of the Local Plan, and the distinct arrangements that apply to student housing have made it a popular development option and created concerns that student proposals could squeeze out development of self-contained housing in some parts of the borough. Consequently, Policy H9 indicates that student housing proposals should not:
- involve the net loss of 2 or more self-contained homes;
  - prejudice our ability to meet the Local Plan target of 742 additional self-contained homes per year; or
  - involve a site identified for self-contained housing through a current planning permission or a development plan document unless it is shown that self-contained housing could no longer be developed.

### **Net loss of two or more self-contained homes**

- 2.29 Given that self-contained housing is the priority use of the Local Plan, the Council's view is that student housing development should not involve loss of self-contained homes. Policy H9 specifically resists loss of two or more self-contained homes for consistency with Policy H3 *Protecting existing homes*. We recognise that student housing contributes to the overall supply of housing in the borough, and accept that the net loss of a single self-contained home may be justified to enable student housing development on a site that would otherwise be inaccessible. However, where the loss of any further self-contained homes would be required to enable provision of student housing, we consider that they should be replaced as part of the development.



### **Meeting the target of 742 additional self-contained homes per year**

- 2.30 The Local Plan indicates that in 2016, on the basis of identified sites and limited contribution from windfall sites, we anticipated delivery of a total of 17,016 homes up to 2031, including almost 14,800 self-contained homes and just over 2,200 student rooms. On that basis, we would expect to meet the Local Plan target for 11,130 self-contained homes up to 2031 (742 per year) without difficulty. Furthermore, our monitoring indicates a recent reduction in the rate of student housing development, with additional student bedrooms completed as follows:
- 2014/15 - 1,054 completed;
  - 2015/16 - 498 completed, and
  - 2016/17 - 248 completed.
- 2.31 On the basis of the 2016 trajectory and recent monitoring, it is unlikely that development of student housing will prevent us meeting the target for self-contained housing provided it does not involve development of sites previously identified for self-contained housing. However, the development market can change very rapidly, and we will keep this situation under the review through the Council's Authority Monitoring Report. We will have regard to both the annual target of 742 self-contained homes, and the cumulative contribution to the 11,130 target for self-contained homes from 2016/17 to 2030/31.

### **Sites identified for self-contained housing**

- 2.32 The Local Plan priority for self-contained housing is set out in Policy H1 *Maximising housing supply*. Policy H1 also indicates that we will resist alternative development of sites identified for housing or self-contained housing unless it is shown that these are no longer developable. The approach of Policy H9 is therefore consistent with the approach of Policy H1.
- 2.33 As indicated in the previous subsection, the Local Plan anticipated delivery of almost 14,800 self-contained homes up to 2031, compared with a target of 11,130. However, this level of delivery is dependent on a number of very large sites (particularly the Growth Areas at King's Cross, Euston, and Kentish Town Regis Road), and may not be achieved if one or more of these is lost or delayed. Factors which could lead to under-delivery include:
- a delay to major infrastructure delivery which in turn delays the release of sites – notably in relation to the construction of the HS2 high speed rail link and the release of development land in the Euston Growth Area;
  - inability to accommodate existing activities as part of the development or on an alternative site – this could potentially affect a number of sites, such as the Parcelforce Worldwide depot at 24-58 Royal College Street;

- a slow-down in the housing market which causes sites identified for housing delivery to remain in their existing use or be developed with a much lower share of housing compared with non-residential uses – there are indications of a slow-down in Camden following the UK EU membership referendum - sales volumes for 2016/17 and 2017/18 were over 20% lower than the sales volume for 2015/16, and the annual average house price fell by 4.8% during 2016/17 then recovered by 6.0% during 2017/18.

2.34 Given these risks to the anticipated delivery of self-contained housing, in accordance with Local Plan Policies H1 and H9 we will resist student housing development on sites that have been identified for self-contained housing through a development plan document (such as the Camden Site Allocations Document 2013). Local Plan Policies H1 and H9 and supporting paragraph 3.27 also indicate that we may resist alternative development of sites that have an existing consent for self-contained housing (an existing consent is one that has not expired, or remains effective because development has been started). Where student housing is proposed on a site identified for self-contained housing, we will consider its acceptability having regard to:

- the priority for self-contained housing set out in Local Plan Policy H1;
- whether there is a reasonable prospect of a viable scheme for self-contained housing coming forward by 2031;
- the impact of the proposal on the supply of land for self-contained land for housing;
- whether we are meeting or exceeding our cumulative target for additional self-contained homes over the period 2016-31; and
- whether the priority for self-contained housing is outweighed by other material considerations (eg whether developing the site for student housing will release a redundant student housing site for self-contained housing, or whether the site has particular characteristics and constraints that make it more suitable for student housing or self-contained homes.

### 3 Creating a mixed, inclusive and sustainable community

#### KEY MESSAGES

Development of student housing should:

- contribute to creating mixed, inclusive and sustainable community
- secure a nominations agreement with one or more recognised higher education institutions that are accessible from the development
- either involve a nominations agreement for all student rooms, or involve a nominations agreement for a proportion rooms at defined affordable rents
- manage any alternative uses outside term-time to ensure that they support reduced housing costs for students without prejudicing the primary student housing use
- be subject to a Student Management Plan, and a Non-student Management Plan where alternative uses are proposed outside term-time

3.1 This section provides detailed guidance on how the Council will ensure that development of student housing contributes to creating a mixed, inclusive and sustainable community by avoiding harmful concentrations of student housing, linking to recognised higher education institutions that are accessible from the development, using nominations agreements to control housing costs in the development, managing uses outside term-time to support reduced housing costs and managing occupiers to prevent harm to amenity, as outlined in Camden Local Plan Policy H9 – *Student housing*, particularly clauses (e), (g), (i) and (j).

3.2 This section specifically covers:

- Mixed communities and concentrations of student housing;
- Access and links to higher education institutions;
- Affordability and nominations agreements;
- Alternative uses outside term time; and
- Management plans.

#### Mixed communities and concentrations of student housing

3.3 Local Plan Policy H9 (i) indicates that student housing should contribute to creating a mixed, inclusive and sustainable community. Some parts of Camden already have significant concentrations of resident students and student housing, and the Council will resist proposals to intensify these where we consider they would have an unacceptable impact on the mix, inclusiveness and sustainability community.

3.4 Where this issue has been considered in planning appeals, decision letters have acknowledged the contribution students can make to an

area through spending and working in local businesses and participating in the voluntary sector, and the potential for new student housing to free up conventional homes. However, they have also recognised that student housing is often associated with a concentration of relatively short term residents who, by reason of their particular social needs, the unique nature of activity associated with student life and demand for facilities and services can have an unwelcome impact on an established community. Local Plan paragraph 3.262 indicates that 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.

- 3.5 Information about existing concentrations of students in the Borough is appended to this guidance. Appendix B provides ward-level data from the Census and other sources showing the ratio of students to usual residents and how this has changed over time. Appendix C shows the location and scale of student housing provision across the Borough.
- 3.6 Appendix B indicates that higher education students represent approximately 11% of usual residents across the borough. Four wards have significantly higher proportions, namely King's Cross (38%), Bloomsbury (33%), St Pancras and Somers Town (22%) and Regent's Park (18%). From 2001 to 2011, the number of resident students across the Borough grew by over 40%, but growth rate appears to have slowed from 2011 to 2018. In both periods, St Pancras and Somers Town was the ward that experienced the greatest growth in resident students.
- 3.7 The Appendix B data needs to be treated with some caution. The data represents all resident students, most of whom live in the general housing stock rather than student housing. Across the Borough, around a third of students live in student housing, although the proportion is over 50% in Bloomsbury and King's Cross. In addition, the data is from different sources and is not available on the same basis. For 2001 - 2011, the data relates only to full-time students, but includes all students aged 18 or over, some of whom will not be in higher education. For 2011-2018, the data relates to part time and full time students, but only includes students in higher education.
- 3.8 We will consider the impact and appropriateness of student housing proposals on a case by case basis, taking into account the specific characteristics of the proposed development and the area in which it is proposed. Thresholds are provided in paragraph 3.12 to guide student housing towards areas where the mix, inclusiveness and sustainability of the community is least likely to be harmed, however a planning application will not necessarily be refused where it exceeds these thresholds. When considering the impact of a development on the mix, inclusiveness and sustainability of the community, the Council will have regard to:
  - relevant development plan policies, including area-based and site-based policies in the Fitzrovia Area Action Plan 2014, the Euston Area Plan 2015 and Camden Site Allocations 2013;
  - proximity to recognised higher education institutions;

- the character of the area and the mix of uses (in particular whether the area has a primarily residential or academic character);
- census data, HESA data, population projections and development monitoring;
- existing concentrations of resident students and student housing in the area;
- any current planning permissions for additional student housing in the area;
- the thresholds in paragraph 3.12 of this guidance, and the prevailing population density in the ward;
- any evidence of issues arising from an existing concentration of students in the area, including those identified in paragraph 3.4 of this guidance;
- the wider housing mix in the area, including the presence and distribution of any permanent residential occupiers in the area, the extent of student renting in the general market and the presence of any other housing catering primarily for young people and/ or short term residents; and
- the anticipated impact of the proposal on residential amenity and any permanent residential occupiers in the area.

- 3.9 A number of area-based planning policies apply in the borough, and in some cases these have specific implications for student housing. Area-based policies are found in two development plan documents, the Fitzrovia Area Action Plan 2014 (FAAP) and the Euston Area Plan 2015 (EAP), and a number of Neighbourhood Plans (four are adopted, several more are in preparation).
- 3.10 In Fitzrovia, the Council will guide development of further student housing to existing student housing sites (FAAP Land Use Principle 7), thus favouring concentration rather than dispersal. In the Euston area, at least 75% of new housing in the area should be permanent self-contained housing (in Use Class C3) (Strategic Principle EAP1), thus the proportion of the area's new housing within student housing developments should not exceed 25%. None of the Neighbourhood Plans adopted so far have addressed student housing, but this may well change in future.
- 3.11 The Camden Site Allocations 2013 development plan document identified a number of sites that could potentially deliver additional student housing, including Site 21 (land adjacent to the Senate House, WC1E), Site 37 (24-58 Royal College Street, NW1) and Site 41 (20 Highgate Road, NW5). Sites in the Euston area also have potential to deliver student housing within a limit of 25% of all the area's new housing, as indicated by the Euston Area Plan 2013. The Camden Local Plan 2017 (Appendix 2 Housing Trajectory) estimates that these sites collectively have capacity for 1,360 student beds. The Council has commenced a review of Camden Site Allocations 2013, which may identify additional opportunities.

- 3.12 On the basis of past appeal decisions, as a guide we consider that proposals for student housing are most likely to intensify an existing concentration in a way that has an unacceptable impact on the mix, inclusiveness and sustainability of the community where one or both of the following thresholds are exceeded (but exceeding the thresholds will not necessarily lead to rejection of a proposal):
- resident students represent over 25% of usual residents in the ward; and/ or
  - the proposal would lead to over 800 beds in student housing being located within a radius of 300 metres from the proposal site.
- 3.13 The threshold of 25% arises from a dismissed appeal relating to a proposal in the Borough for 114 student rooms in Sidmouth Street (Bloomsbury Ward), where resident students represented 25% of all usual residents on the basis of the 2001 Census (Planning Inspectorate reference APP/X5210/A/09/2116573). The threshold of 800 beds arises from a dismissed appeal relating to a proposal in Three Colts Lane, Tower Hamlets for an additional 257 student beds adjacent to existing blocks providing 533 student beds (total 790 beds) (Planning Inspectorate reference APP/E5900/A/08/2077312). The 300 metre radius relates to the NPPF definition of edge of centre in the context of retail proposals. It will generally be possible to walk between any two sites in a 300 metre radius within 5-6 minutes. The area within any 300 metre radius is 28.3 ha (less than a quarter of average size of a Camden ward – 121.1 ha). On the basis of the average population density across the Borough, the usual resident population of the area would be just under 3,000, and 800 student beds would potentially house 28% of the overall population.
- 3.14 Where we consider that there is a risk of harm to the mix, inclusiveness and sustainability of the community from a proposal for student housing, the Council will consider whether the harm can be mitigated by measures such as:
- the provision of self-contained housing for general needs on part of the site, including affordable housing, in line with the priority land-use identified in Local Plan Policy H1; and/ or
  - inclusion of provisions in a Management Plan to address relevant sources of harm (eg late-night congregations of students in outside spaces) (see the sub-section of this guidance about Management plans).
- 3.15 As indicated in Local Plan paragraph 3.262, where mitigation of the harm is not possible, the Council will resist student housing proposals.

### **Access and links to higher education institutions**

- 3.16 Local Plan Policy H9 clause (e) indicates that student housing should serve higher education institutions that are accessible from it, while clause (h) indicates that student housing should also be accessible to public transport, workplaces, shops, services, and community facilities.



The sub-section of this guidance Meeting genuine student needs indicates that student housing should generally serve students registered on courses at higher education institutions in Camden and adjoining boroughs that are publicly funded by the Office for Students (OfS). The higher education institutions receiving funding for the 2018/19 academic year are listed in Appendix A.

### **Access to publicly funded institutions in Camden and adjoining boroughs**

- 3.17 Local Plan paragraph 3.253 indicates that student housing should serve institutions that are within walking or cycling distance, or accessible by public transport with existing or committed capacity to meet the demand arising from the development. Provided that student housing development is located in an area with good public transport connections, we consider that the publicly-funded higher education institutions in Camden and adjoining boroughs will satisfy Policy H9 (e) and paragraph 3.253.
- 3.18 The boroughs adjoining Camden that have publicly funded institutions are City of Westminster, City of London, Islington and Barnet. In Appendix A, Figure 3 and Figure 4 list 22 higher education institutions in Camden and adjoining boroughs that were publicly funded in 2018/19. Where a student housing provider agrees that a student housing development should serve these institutions, we will use planning obligations to ensure the development is only occupied during term-time by students registered on courses at those institutions.

### **Institutions in other London boroughs**

- 3.19 Figure 5 in Appendix A indicates that there were 17 higher education institutions with public funding in 2018/19 that are in London boroughs other than Camden and adjoining boroughs. Those in Southwark, Tower Hamlets and Kensington and Chelsea are relatively close to the borough, but most are a significant distance from Camden in locations likely to offer more convenient and affordable housing options. Students are likely to seek a balance between the cost, convenience and quality of housing and the cost, convenience and quality of travelling to college, and may be unwilling to travel long distances unless this leads to a saving in housing costs. In this context, providers should consider whether student housing in Camden is likely to be attractive to students studying at more distant institutions.
- 3.20 Where a student housing provider proposes to admit students on a course at a publicly funded institution in a borough other than Camden and adjoining boroughs, we will expect the provider to submit evidence to show that the institution:
- considers that there is a need for additional provision to serve students registered on its courses;
  - would be willing to refer students to the proposed student housing;

- is easily accessed from the proposed student housing (eg within 30-45 minutes travel time by bicycle or by public transport).

- 3.21 Where the Council is satisfied that student housing can appropriately serve a publicly-funded institution in a London borough other than Camden and adjoining boroughs, we will use planning obligations to provide for the development to be occupied during term time by students registered on courses at that institution. This may be as a substitute or an addition to the obligation that the development is only occupied during term time by students registered on courses at publicly funded higher education institutions in Camden and adjoining boroughs.

### **Institutions without public funding**

- 3.22 The Local Plan notes in paragraph 3.252 that there are a number of colleges in the borough without public funding that help to support London's international academic reputation, and in some instances the Council may support development of student housing by these colleges. These can include colleges that specialise in courses that are not prioritised for public funding and colleges that prepare international students for courses at London Universities.
- 3.23 We will consider any proposals for student housing to serve such institutions on their own merits, but will generally expect the proposals to satisfy the following criteria:
- the student housing should be directly provided by or on behalf of the institution (the link to the institution should be secured by a planning obligation);
  - the institution should provide higher education courses which are above the standard of GCE A-levels or other Level 3 qualifications;
  - the institution should be recognised formally by UK public authorities, for example by being licensed by the Home Office to sponsor international students requiring a visa (under Tier 4 of the points-based system).
- 3.24 Where the proposed student housing relates to an institution outside the Borough, we will expect the student housing to be accessible from it, and satisfy the accessibility tests provided in paragraph 3.20 of this guidance.

### **Affordability and nominations agreements**

- 3.25 Local Plan Policy H9 clause (g) indicates that student housing should have 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. This requirement is based on the London Plan 2016 and section 3.9 of the Mayor's Housing SPG 2016, and arises from concern amongst higher education institutions and student bodies that high housing costs in London are harming their ability to attract students from less wealthy backgrounds and compete with institutions elsewhere.



3.26 The Local Plan and the Mayor's Housing SPG indicate that the affordability of student housing developments should be secured by one of two routes:

- all places in the student housing should be directly let to students by a higher education institution or be subject to one or more nominations agreements between the provider and one or more higher education institutions which ensures that the housing is occupied by students registered on courses at those institutions ("the full nominations agreement route");
- a proportion of the student housing should be let to students at affordable rents set in accordance with the Mayor's Housing SPG ('the affordable rent route').

#### **NOMINATIONS AGREEMENT**

An agreement between a student housing provider and a higher education institution that ensures that some or all of the places in the student housing are occupied by students registered on courses at that institution. The nature and duration of nominations agreements will vary, but may involve an institution giving a commitment to underwrite the rents of a specified number of spaces in the housing in return for commitments from the provider about the terms of the lease offered to students, including rent levels.

3.27 We require an affordable housing statement to be submitted with any planning application for student housing setting out which of the two routes the applicant will adopt to secure the affordability of the development, proposals for securing nominations agreements, the proposed proportion of affordable student housing (where applicable), the proposed rent levels (where applicable), and the proposed mechanism for annual rent updates and recalibrations with the affordable rent calculation set out in the Mayor's Housing SPG (where applicable). Details of the two routes are provided in the following subsections of the guidance.

#### **The full nominations agreement route**

3.28 The Camden Local Plan Viability Study October 2015 assessed rent levels for student housing using online publications and tools and discussions with active local agents, including BNP Paribas Real Estate. The Study estimated that rents in schemes that are let to students by a high education institution or that have a nominations agreement in place are generally at least 15 – 25% lower than market rents in schemes that are directly let to private providers. Consequently, in accordance with the Mayor's Housing SPG, the Council will not require the inclusion of affordable student housing where all places in the scheme will be let by a higher education institution, or are subject to nominations agreements with one or more institutions covering all places in the scheme. (The nominations agreements should generally be with institutions in Camden or adjoining boroughs – see the subsection of this guidance Access and links to higher education institutions).

- 3.29 Nominations agreements do not need to be in place at the time that an application is determined, but the provider must agree through a planning obligation to enter into one or more nominations agreements with higher education institutions prior to occupation of any part of the development, and to continue to maintain these or to enter into new ones for as long as the development remains in student housing use. We recommend that providers should have discussions with higher education institutions at an early stage in the application process to ensure that the housing will meet their needs in relation to design and costs.
- 3.30 Where the student housing will be provided by or on behalf of an individual institution, a planning obligation will be used to ensure that term-time occupation is by students registered on courses at that institution, and that nominations agreements will be secured in the event of sale to a private provider.

### **The affordable rent route**

#### **Affordable rent levels for student housing**

- 3.31 Where a provider does not commit to securing nominations agreements covering all places in a proposed student housing development, the affordable rent route is the alternative provided by the Local Plan and the Mayor's Housing SPG. An affordable rent for student housing is defined in the SPG as an annual rental cost of no more than 55% of the maximum student maintenance loan for living costs available to a UK full-time student in London living away from home. Weekly rents are calculated on the basis of a 38 week letting. The SPG indicates that affordable rents must include the same packages of services and utilities that are included in the market rent paid for other rooms in the development.
- 3.32 For the academic year 2016/17, the SPG indicates that the annual cost of an affordable rent for student housing is £5,886 or less, and the weekly rent for a 38-week letting is £155 or less. The rents for subsequent years are published in the London Plan Annual Monitoring Report. For the academic year 2018/19 the annual cost of an affordable rent for student housing is £6,245 or less. The Mayor's Housing SPG suggests that an annual rent can be updated annually on the basis of a nationally recognised index such as the CPIH (the Consumer Prices Index including owner occupiers' housing costs, published by the Office for National Statistics), but that rents should be recalibrated regularly (eg every three years) with the Mayor's figure as calculated in the London Plan Annual Monitoring Report. The level of affordable rents for student housing and the mechanism for annual updates and recalibrations will be secured through a planning obligation.

#### **Proportion of affordable student housing**

- 3.33 The Mayor's Housing SPG advises that the proportion of affordable student housing should be the maximum reasonable proportion subject

to viability. Thirty-three per cent of London students received the former means-tested maintenance grant for living expenses for the academic year 2013/14, and the SPG indicates that this can be used as an indicator of the level of need for affordable student housing. Using the Mayor's proposed rent levels for affordable student housing, the Camden Local Plan Viability Study October 2015 found that 30 to 50% affordable housing would generally be viable for schemes directly let to students by private providers. Consequently, where student housing will be directly let to students by private providers, the Council will apply a target of 33% for the proportion of places in the student housing that should be let at affordable rents.

- 3.34 If a developer of student housing considers the target of 33% affordable student housing would not be viable to deliver, we will expect submission of a financial viability assessment to justify the proportion of affordable student housing proposed. Where the proportion proposed is significantly below 33%, we will also seek an independent verification of the appraisal funded by the developer. Section 3 of Camden Planning Guidance CPG2 Housing 2016 (as amended March 2018) provides more information about how the Council will consider financial viability.
- 3.35 We will use a planning obligation to secure the proportion of places in a student housing development to be delivered at the affordable rent levels set by the Mayor's Housing SPG 2016 and subsequent London Plan Annual Monitoring Reports. We will also expect planning obligations to specify which parts of the development will be provided as the affordable student housing, or arrange for this to be specified prior to the occupation of any part of the development.

#### **Allocation and nominations agreements**

- 3.36 The Mayor's Housing SPG suggested that affordable student housing would be allocated centrally through a mechanism provided by the University of London Housing Service. This allocation mechanism has not been implemented. However, the SPG also indicates that private providers and higher education institutions can reach their own agreements for the allocation of affordable student housing. Accordingly, where a private provider does not agree to enter into nominations agreements for the entire scheme, we will expect the provider to enter into one or more nominations agreements with one or more higher education institutions in relation to the affordable student housing, to ensure that the affordable places are allocated to students registered on courses at those institutions. (The nominations agreements should generally be with institutions in Camden or adjoining boroughs – see the subsection of this guidance Access and links to higher education institutions). We will use planning obligations to ensure that the affordable student housing is subject to nominations agreements with one or more institutions prior to occupation of the development, and that these are maintained, or new ones are entered into for as long as the development remains in student housing use.

### Draft London Plan

- 3.37 The draft London Plan December 2017 and minor suggested changes July 2018 set out a slightly amended approach to securing the affordability of student housing. The approach is consistent with the Mayor's Housing SPG 2016 and the Camden Local Plan in most respects, but the draft London Plan proposes that affordable student housing should not be required where the majority of places are covered by nominations agreements (rather than nominations agreements for all places in this guidance). The draft London Plan also proposes that where affordable student housing is required, and the proportion of affordable student housing proposed in a development does not reach a threshold of 35%, the developer will be required to submit a financial viability assessment to justify the proportion offered (rather than 33% in this guidance). A panel has been appointed to examine the draft London Plan in public, and its findings are due to be reported in summer 2019. We will keep this Camden Planning Guidance under review, and consider whether any changes are needed once the new London Plan has been published in its final form.

### Alternative uses outside term time

- 3.38 The subsection of this guidance relating to Short stays, term time and the academic year notes that many students do not require accommodation in the borough for the full academic year, and that alternative uses of student housing outside term time can reduce the cost of accommodation to students by reducing the length of a student's lease and generating an additional source of income for the provider. This is consistent with the advice of the Mayor's Housing SPG 2016 about delivery of affordable student housing.
- 3.39 The guidance about short stays explains that term times vary widely between courses and institutions, and indicates that the Council will use planning obligations to secure the availability of appropriate student housing by ensuring that student housing is let to each student for the full duration of all terms in the academic year (generally not less than 38 weeks), and are not let that to non-students for any part of October, November, February and May. Conversely, where alternative uses are proposed outside term time, we will use planning obligations ensure that that student housing is not let to non-students for more than 14 weeks (98 days) in any academic year.
- 3.40 The 14-week maximum period for lettings to non-students is based on:
- the 38-week period for lettings of affordable student housing assumed by the Mayor's Housing SPG 2016;
  - the 14-week residual period (98 days) remaining after subtracting 38-week student lettings from an academic year of 52 weeks; and
  - the legal provisions that Council Tax payers in London should not let their housing on short-term lets for more than 90 days in any calendar year.

- 3.41 The draft London Plan lists a number of alternative uses that may be appropriate outside term time, such as accommodation for conference delegates and students registered on education courses at institutions agreed by the Council, and general visitor accommodation. These uses will be accepted outside term time for student housing in Camden where this is consistent with relevant Local Plan policies, including Policy E3 Tourism. We may use planning obligations to specify the alternative uses of the student housing that are permitted outside term time.
- 3.42 The draft London Plan also advises that alternative uses should not involve a material change to the student housing use, and should not disrupt the primary occupation of the housing by students. We will therefore use planning obligations to ensure that the housing is available to students who wish to let their place for the full academic year (or 51 weeks where one week is designated for cleaning, maintenance and decoration). We will also expect submission of a Non-student Management Plan secured by planning obligation – for more details see the subsection of this guidance about Management plans.
- 3.43 The provision for alternative uses outside term-time is justified on the basis that this can support the affordability of the housing to students, partly by providing for shorter student leases to be made available. We will therefore use planning obligations to ensure that where the duration of a student lease is shorter than a full academic year, the weekly rent is equivalent to the weekly rent for a student lease of 52 weeks (or 51 weeks where one week is designated for cleaning, maintenance and decoration).

## **Management**

### **Management plans**

- 3.44 We require a draft Student Management Plan to be submitted with any planning application for student housing to ensure the health, wellbeing and welfare of students and to mitigate any potential impacts of the development on neighbours and the local community. The Student Management Plan should act as a code of conduct that the provider will abide by in managing the student housing, and include detailed commitments in relation to the following:
- accreditation under one of codes listed in the subsection of this guidance relating to Management codes of practice, or the inclusion of similar provisions within the Student Management Plan;
  - health and safety standards and procedures;
  - security and crime prevention measures and procedures;
  - maintenance and repairs;
  - environmental quality;
  - landlord and tenant relationship;
  - student welfare;

- advice on access to health care, including first aid and mental health first aid;
  - advice on availability of prayer rooms and access to places of worship for different faiths and denominations;
  - move in/out strategy for arriving/departing students;
  - anti-social behaviour and disciplinary procedures;
  - arrangements for liaison with occupiers of nearby properties and the wider local community should any disturbance arise from the operation of the student housing; and
  - administration and compliance procedures.
- 3.45 With regards to anti-social behaviour, the Student Management Plan should describe conditions to be included in the tenancy agreement for each student to ensure that students behave responsibly and with respect for fellow residents, neighbours and property. These conditions could potentially build upon any code of conduct operated by the higher education institutions that the students attend. The Student Management Plan should also describe how the owners will enforce the terms and conditions of the tenancy.
- 3.46 Where an alternative use of the student housing is proposed outside term time, the applicant should also submit a draft Non-student Management Plan to mitigate any potential impacts of the non-student use on other occupiers of the development, neighbours and the surrounding area. This should include similar provisions to the Student Management Plan insofar as the provisions are also relevant to the non-student use. Non-student Management Plans should also include:
- procedures to ensure that lettings to non-students are arranged and confirmed through advanced reservation only and are not available to persons or groups arriving at the student housing without a reservation;
  - procedures to ensure that places in student housing is not let to coach tour groups or other groups who would wish to be dropped-off by bus or coach at the student housing; and
  - measures to encourage non-students to travel actively to and from the student housing (by walking or cycling) or to use public transport, and discourage the use of private cars and taxis, including access to maps and information relating to easy and safe walking routes, public transport services, and directions to bus stops and London Underground/ railway stations.
- 3.47 The Council will use planning obligations to secure Student Management Plans for all student housing developments, and secure Non-student Management Plans where alternative uses are proposed outside term time. Generally, the draft management plans will be appended to the planning obligations, and we will require submission of the finalised management plans for approval by the Council prior to the occupation of the development. We will also require the development to



be managed in accordance with the approved management plans at all times.

### **Management codes of practice**

- 3.48 There are three management codes for student housing approved by government, two for educational establishments and one for private providers. We strongly encourage providers to seek accreditation of student housing developments as compliant with one of the approved management codes, and to commit to this through the Student Management Plan for the development. Where the provider does not adopt such a commitment, we will expect the Student Management Plan to include provisions similar to those found in the approved management codes. Where student housing is accredited under one of the codes, the provider commits to maintaining professional management standards. Accredited student housing managed by a higher education institution is also exempt from the licensing regime for Houses in Multiple Occupation (HMO).
- 3.49 Links to the organisations that operate accreditation under the approved management codes are included in the Resources subsection in section 1 of this guidance. The three approved management codes are:
- Universities UK/ Guild HE Code of Practice for student housing managed by Universities;
  - ANUK (Accreditation Network UK)/ Unipol Code of Standards for larger developments of student accommodation managed and controlled by educational establishments; and
  - ANUK/ Unipol Code of Standards for larger developments of student accommodation not managed and controlled by educational establishments.
- 3.50 Provisions found in the approved management codes include the following:
- equality and diversity practice in relation to management and letting of the student housing;
  - complete and accurate marketing information;
  - contingency arrangements if the student housing is not ready for occupation on the date that tenancies begin;
  - information for tenants about liability for rents and other payments, and records of payments made;
  - information for tenants about management codes and the staff involved;
  - ensuring the student housing is in a good state or repair;
  - information for tenants about WiFi provision;
  - compliance with any applicable HMO licensing;
  - notice to tenants when access is required to rooms covered by the tenancy;

- charges in relation to damage caused by tenants;
- information for students about routine cleaning and maintenance of communal areas;
- provision of furniture and storage space;
- provision of kitchen facilities;
- provision of toilet and personal washing facilities;
- provision of laundry facilities;
- arrangements for mail deliveries;
- surveys of tenant satisfaction;
- minimising risks of health and safety hazards on the basis of the Housing Health and Safety Rating System (HHSRS);
- safety of gas and electricity supply and appliances;
- energy efficiency;
- fire safety;
- security measures;
- lift maintenance and safety;
- arrangements for waste disposal;
- maintenance of any surrounding grounds;
- repayment of deposits;
- arrangements to resolve disputes with tenants; and
- arrangements for handling and acting on complaints from tenants and neighbouring residents.



## 4 Design, standards and facilities

### KEY MESSAGES

Development of student housing should:

- provide a range of accommodation that is affordable to students
- include a range of flat layouts including cluster flats
- be designed to meet relevant standards and provide safe, secure functional, adaptable and accessible spaces
- support the health and wellbeing of students and the provision of community and leisure facilities and open space

4.1 Living in satisfactory housing conditions is a key element of health, wellbeing and quality of life, and this is as true for students as it is for the wider population. Student housing should provide residents with a place for rest, relaxation, safety, privacy and society. The design should include appropriate spaces and layouts that minimise risk to health and safety and support accessibility. and incorporate features to achieve energy efficiency and address other aspects of sustainability. The development should support social cohesion, promote active travel choices and provide access to open space, healthcare, community and leisure facilities.

4.2 This section specifically covers:

- Range of accommodation and affordability;
- Housing health and safety rating system (HHSRS);
- Minimum standards for Houses in Multiple Occupation (HMOs);
- Design of cluster flats, study bedrooms and studios;
- Accessibility and provision for wheelchair users;
- Shared spaces and facilities;
- Safety and security;
- Sustainability and the use of energy and water;
- Transport;
- Public open space; and
- Community, leisure and health and wellbeing.

### Range of accommodation and affordability

4.3 Clause (f) in Policy H9 seeks a range of flat layouts in student accommodation wherever practical and appropriate. Providing a range of flats and study-bedrooms in student housing developments will help to make them attractive to students who would otherwise share private rented accommodation and also help to meet the needs of the student body as a whole, including:

- undergraduates and postgraduates;

- those with financial resources and those dependent on loans;
  - those who prefer group-living and those who prefer live alone; and
  - those with physical, sensory or other disabilities.
- 4.4 Higher education institutions have expressed concern that the high housing costs in London are making it difficult to attract students from less wealthy backgrounds, and that the recent developments of student housing have failed to provide cheaper options because it has been targeted at the luxury end of the market. To address this concern we seek the adoption of lower cost layouts across student housing developments,
- 4.5 Local Plan paragraph 3.255 indicates that we will expect a range of flat layouts, subject to any constraints on the site or development, and any specific characteristics of the proposed occupiers. The Council will generally expect applications to satisfy the following guidelines:
- at least half the bedspaces should be provided in cluster flats providing a number of study-bedrooms with some shared facilities;
  - no more than half of the bedspaces should be provided in studio flats that contain all basic amenities for exclusive use of the occupants (kitchen, bathroom, toilet);
  - a proportion of the bedspaces should be in study-bedrooms and studio flats (where present) designed for single occupancy;
  - a proportion of the bedspaces should be in study-bedrooms and studio flats (where present) designed for double occupancy, this should be the minority of bedspaces unless the scheme is specifically intended for occupation by postgraduates; and
  - consideration should be given to inclusion of other lower cost accommodation, such as two study-bedrooms sharing a kitchen-diner and bathroom.

#### **BEDSPACES**

A measure of the number of people that will occupy residential or visitor accommodation. A single bedroom provides one bedspace, a double bedroom provides two bedspaces, and a twin room provides two bedspaces. A flat containing a double bedroom, a twin bedroom and a single bedroom provides five bedspaces.

#### **CLUSTER FLAT**

A group of study bedrooms sharing communal facilities. The cluster flat will generally provide all the basic needs for everyday life including a kitchen, bathroom and toilet. Typically, a cluster flat comprises 4 to 8 study bedrooms and a communal kitchen-diner (sometimes combined with a living room).

#### **STUDIO FLAT or STUDIO**

A flat where the sleeping area and living area is combined but all the basic needs for everyday life are provided behind a door that only the occupier (or occupiers) can use, including kitchen facilities, bathroom and toilet.

**STUDY BEDROOM**

A bedroom in student housing that provides space for independent study, sleeping and storage of personal possessions. It may include some en-suite personal hygiene or kitchen facilities, but will not include the full range of facilities provided in a studio flat.

**Design of functional, adaptable and accessible spaces**

- 4.6 As indicated in Section 2 of this guidance, student housing is subject to different requirements from self-contained housing in relation to space standards and accessibility. Nevertheless, Policy H6 and supporting paragraphs in the Camden Local Plan indicate that all housing (whether or not it is self-contained) should be designed to provide:
- functional, adaptable and accessible spaces;
  - sufficient space for furniture, activity and movement; and
  - adequately sized rooms and convenient and efficient room layouts.
- 4.7 There are a number of tools the Council can use to ensure that student housing satisfies these basic requirements. These include:
- the housing health and safety rating system (HHSRS);
  - the Council's minimum standards for Houses in Multiple Occupation (HMO);
  - requirements of the Building Regulations and the London Plan in relation to accessibility and;
  - Secured by Design principles and guides.

**HOUSE IN MULTIPLE OCCUPATION (HMO)**

There are a number of types of HMO, but most commonly an HMO is a house or flat which is let to three or more tenants who form more than one household and who share a kitchen, bathroom or toilet.

A household is generally a single person, two people living as a couple or several members of the same family.

The property may have been designed or converted to provide bedsits, or may simply be a shared house or flat.

**SECURED BY DESIGN**

Secured by Design is the official UK Police flagship initiative to promote design of buildings and the built environment to minimise the risk of crime and fear of crime and incorporate physical security measures. The initiative provides design guides, crime prevention advice, security standards and accreditation schemes.

**Housing health and safety rating system (HHSRS)**

- 4.8 The housing health and safety rating system (HHSRS) is a tool used by local authorities to evaluate potential risks and hazards arising from deficiencies in housing that could harm the health and safety of the occupiers. The HHSRS can be applied to all types of housing. The principle behind the HHSRS is that housing:

- should be able to supply the basic needs for the everyday life of the range of households who could normally be expected to live in that type of home; and
  - should not contain any deficiency that might give rise to a hazard which interferes with, or puts at risk, the health or safety, or even the lives, of the occupants.
- 4.9 All housing, including student housing, should be designed and fitted out to avoid the presence of hazards at first occupation, and to minimise the risk of them arising in the future. The HHSRS is not directly triggered by the Local Plan, but is relevant to Policy H6 and a number of other Local Plan policies (eg Policy C1 Health and wellbeing, Policy C5 Safety and security, Policy A1 Managing the impact of development and Policy D1 Design), and is used by environmental health officers if inspection is requested or the property (or part of the property) is subject to the licensing regime for Houses in Multiple Occupation (HMO). Developers and landlords are also encouraged to use the HHSRS when designing and fitting out living accommodation.
- 4.10 The housing health and safety rating system identifies 29 categories of hazard, divided into four broad groups relating to different aspects of health and safety, as follows:
- physiological requirements – includes dampness and humidity, excess heat and cold, and presence of/ exposure to pollutants (eg asbestos, carbon monoxide);
  - psychological requirements – includes lack of space, entry by intruders, adequacy of natural and artificial light and exposure to noise;
  - protection against infection – includes ease of cleaning, access for pests, adequacy of waste storage and disposal, appropriateness of food storage/ preparation areas, washing facilities (personal and clothes),
  - protection against accidents – includes hazards such as risk of falling, fire, trapping fingers or limbs, and straining to negotiate spaces or operate facilities.
- 4.11 The seriousness of an identified hazard is scored in ten bands from A to J. The most serious (bands A to C) are known as Category 1 hazards, and less serious as Category 2 hazards. To comply with the three management codes for student housing identified in Section 3 of this guidance, a property must be free of Category 1 hazards.
- 4.12 Where the Council inspects a property under the HHSRS, the seriousness of any hazards identified will inform the action the Council will take to address the hazard. Where serious hazards are identified, the Council must serve a notice requiring improvement works to be carried out, or prohibit the use of part or all the premises. If student housing developments are not designed with regard to the HHSRS, they may have to be improved after completion.

### Minimum standards for Houses in Multiple Occupation (HMOs)

- 4.13 Local Plan Policy H9 indicates that student housing should comply with relevant standards for Houses in Multiple Occupation (HMOs). The Council's current minimum HMO standards were adopted in 2016. They include space standards and requirements in relation to heating, power, fire detection and alarms, kitchen facilities (food preparation and storage, cooking, ventilation, sink and waste), baths/ showers, wash basins and toilets. The HMO standards also include specific requirements for hostels. The hostel requirements will not generally be appropriate for student housing as they have been devised for accommodation that houses people with a particular common need and where sleeping rooms are shared by multiple individuals (ie dormitories).
- 4.14 Student housing developments may be wholly or partly subject to the Council's HMO licensing regime.<sup>1</sup> Where any part of a proposed development is subject to HMO licensing, we will refer the planning application to the Council's environmental health officers who will assess those elements of the proposal against all aspects of the minimum HMO standards. In determining planning applications, the Council will be guided by the minimum HMO standards in relation to all parts of the proposal.
- 4.15 Developers and landlords are advised to have regard to all aspects of the minimum HMO standards when designing and fitting out student housing. When considering applications, we will particularly have regard to the minimum space standards for sleeping rooms, and the space needed for kitchen facilities, baths/ showers, wash basins, toilets, and the shared living room required for cohesive living. We note that the minimum space standards for sleeping rooms do not allow any space for baths/ showers or toilets, and additional space should be allowed for these where they are provided en-suite for the exclusive use of the occupier (or occupiers) of a study-bedroom or studio. We also note that the HMO standards are intended to provide space for essential furniture items, but not for specific items a student may require, such as a desk. Key elements of the minimum HMO standards are set out in Figure 1, while benchmark areas for student housing are set out in Figure 2.

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<sup>1</sup> The Council operates the mandatory licensing scheme and an additional licensing scheme, together they apply to all properties that meet the definition of an HMO. Student housing development is exempt from the licensing regime where it is managed by higher education institutions and accredited under one of the management codes for student housing identified in Section 3 of this guidance. Other student housing developments are subject to the licensing regime in relation to those elements that meet the HMO definition (ie parts that are let to three or more tenants forming more than one household and who share a kitchen, bathroom or toilet – this includes any common areas that these tenants will use).

**Figure 1. Key elements of minimum HMO standards relevant to student housing**

<b>Sleeping rooms</b>	<b>Minimum floor area single room</b>	<b>Minimum floor area double room</b>
Sleeping room (excluding kitchen and personal hygiene facilities)	9 sq m	11 sq m
Sleeping room in cohesive living accommodation	7.1 sq m	10.2 sq m
<b>Living room</b>	<b>Minimum floor area</b>	<b>Other information</b>
Shared living room for cohesive living accommodation (cohesive living refers to a group of tenants who live together in a similar way to a family)	10 sq m	<ul style="list-style-type: none"> <li>excludes space for kitchen and dining facilities</li> </ul>
<b>Shared kitchen</b>	<b>Minimum floor area</b>	<b>Other information</b>
Shared by 5 people	6 sq m	<ul style="list-style-type: none"> <li>one set of kitchen facilities required</li> <li>add 2 sq m for a kitchen-diner</li> </ul>
Shared by 6-10 people	11 sq m	<ul style="list-style-type: none"> <li>two sets of kitchen facilities required</li> <li>add 4 sq m for a kitchen-diner</li> </ul>
One set of kitchen facilities comprises:	kitchen sink, cooking facilities, kitchen worktop, food storage (dry goods and fridge/freezers), kitchen cupboards, power sockets, refuse storage	
<b>Personal hygiene</b>	where each sleeping room has an en-suite toilet and wash basin: <ul style="list-style-type: none"> <li>up to 5 people can share a fixed bath/ shower</li> <li>6-10 people can share two fixed baths/ showers</li> </ul>	

Camden Minimum HMO Standards (Housing Act 20014) Effective May 2016

- 4.16 The minimum HMO standards include a smaller minimum area for sleeping rooms that form part of an HMO where there is cohesive living. These are devised for shared houses and flats with shared communal space including a shared living room and occupied by a group of tenants who live together in a similar way to a family. Typically, the group will move in together under a single contract. This smaller minimum area for sleeping rooms will not generally be suitable for student housing, but the provision of a reasonably sized living room may reduce the space required for sleeping rooms, as explained in the sub-section of this guidance about Design of cluster flats, study bedrooms and studios.

- 4.17 HMO standards operate in tandem with the housing health and safety rating system (HHSRS), and achieving the minimum space standards will not necessarily ensure that no deficiencies or hazards will arise. Developers and landlords should also pay close attention to the layout of the space and the fittings to ensure that they do not present any hazards or risks to the health or safety of the occupiers.

### **Design of cluster flats, study bedrooms and studios**

- 4.18 The sub-section about Minimum standards for Houses in Multiple Occupation (HMOs) notes that the minimum space standards for sleeping rooms do not allow any space for desks, baths/ showers or toilets. Sleeping rooms provided in student housing typically include a desk and an en suite WC and wash basin, and may also include a shower and kitchen facilities. Consequently, in Figure 2 we have set out a number of benchmark areas that providers should aim to achieve for different configurations of study bedrooms and studios. The benchmarks should not be regarded as minimum standards, but where the benchmarks are not met we may ask developers to provide furnished layout plans to show that bedrooms and studios can be used safely.
- 4.19 As indicated in paragraph 4.17 of this guidance, ensuring that student housing provides sufficient space will not necessarily ensure that no deficiencies or hazards will arise, and developers and landlords should design the layout of the space and the fittings with regard to the HHSRS. Furniture and fittings should not conflict with the operation of doors and windows, while opening doors and windows should not conflict with the use of other fittings. Particular care should be taken to ensure that cooking facilities can be used safely, and include surfaces appropriate for preparing and serving food.
- 4.20 In the sub-section Range of accommodation and affordability, the guidance indicates that at least half the bedspaces should be provided in cluster flats and no more than half should be provided in studio flats. A cluster flat could potentially include any number of study bedrooms, but it must contain sufficient facilities to cater for the intended number of occupiers, in accordance with the Council's minimum HMO standards. The requirements for kitchen and personal hygiene facilities increase with the number of bedspaces, and there are thresholds where an additional set of facilities are required. For example, where study bedrooms do not include kitchen facilities and an en suite bathroom for exclusive use of the occupier:
- a cluster flat with up to four bedspaces will require a shared bathroom with a fixed bath/ shower, a toilet and a wash basin;
  - a cluster flat with five bedspaces will require two shared bathrooms, or one shared bathroom with a separate compartment containing an additional toilet and wash basin;
  - a cluster flat with up to five bedspaces will require a shared kitchen with a full set of kitchen facilities;



- a cluster flat with six to ten bedspaces will require an additional bathroom, with at least one toilet and washbasin in a separate compartment from the fixed bath/ shower; and
- a cluster flat with six to ten bedspaces will require a shared kitchen with two full sets of kitchen facilities.

- 4.21 To protect the safety and security of the occupiers, we will resist the creation of cluster flats containing more than eight study bedrooms. The Secured by Design guidance, Homes 2016, notes that buildings that offer a single room for use of the occupier together with shared facilities are subject to increased criminal activity. Consequently, the guidance advises that no more than 8 bedrooms will be accepted in a communal unit.

**Figure 2. Benchmark areas for study bedrooms and studios in student housing**

<b>Configuration</b>	<b>Single room – benchmark area</b>	<b>Double room – benchmark area</b>
<b>Study bedroom with shower, WC and wash basin</b> (without kitchen facilities or cohesive living)	12.5 sq m	14.5 sq m
<b>Studio</b> with kitchen facilities and shower, WC and wash basin	15.5 sq m	17.5 sq m
<b>Study bedroom in cohesive living with shower, WC and wash basin</b> (without kitchen facilities)	10.6 sq m	13.7 sq m

The benchmark areas are based on Camden's minimum HMO standards but add 1 sq m for a desk/ chair, 3 sq m for kitchen facilities, and 2.5 sq m for a shower, WC and wash basin.

- 4.22 Figure 2 provides a lower benchmark area for cluster flats that are designed for cohesive living. Cluster flats may potentially be considered as cohesive living where the layout is designed to facilitate social interaction between the tenants of the cluster. To be considered as cohesive living, as a minimum the layout of the cluster flat should include a shared living room of at least 10 sq m. Ideally, the layout should also include a kitchen-diner (space for this is not be included within the 10 sq m). Where the cluster flat will provide more than five bedspaces, the area of the living room should exceed 10 sq m.

#### **Accessibility and provision for wheelchair users**

- 4.23 Policy H6 of the Camden Local Plan 2017 indicates that we will encourage design of all housing to provide functional, adaptable and accessible spaces, while Local Plan paragraph 3.257 states that we will expect a proportion of accommodation in student housing developments



to be suitable for occupation by students who are wheelchair users. However, there is no specific target in the Local Plan or the London Plan for the proportion of rooms in student housing that should provide for wheelchair users or other people with disabilities.

- 4.24 The Building Regulations relevant to the accessibility of new-build student housing are in Approved Document M: access to and use of buildings, volume 2 – buildings other than dwellings. Paragraph 0.16 indicates that purpose-built student living accommodation should be treated as hotel/ motel accommodation in relation to space requirements and internal facilities, as set out in paragraphs 4.17 to 4.24 of Approved Document M: volume 2. These include a requirement for at least 5% of bedrooms to be wheelchair accessible.
- 4.25 Design of student housing should meet all relevant objectives and requirements of part M volume 2 of the Building Regulations. These include the following:
- provision of a wheelchair-accessible toilet available for use by disabled visitors is encouraged;
  - wheelchair users should be able to reach all the facilities in the building and visit companions in other bedrooms;
  - one wheelchair-accessible bedroom should be provided for every 20 bedrooms, or part thereof;
  - in wheelchair-accessible bedrooms, wheelchair users should be able to transfer to one side of the bed, and be able to access, manoeuvre around and operate all facilities, including sanitary accommodation and balconies;
  - en-suite sanitary facilities are preferred; and
  - mobility-impaired people often find it easier to use a shower than a bath.
- 4.26 The London Plan 2016 indicates that 10% of hotel bedrooms should be wheelchair accessible (Policy 4.5 London's visitor infrastructure). The draft London Plan showing minor suggested changes (July 2018) provides for bedrooms that are wheelchair accessible and rooms that are accessible to older people and others with ambulant mobility impairments. Where developers of student housing propose to let student housing to visitors outside term-time, we will have regard to London Plan requirements and encourage the provision of accessible bedrooms to exceed the 5% required by Building Regulations – either through the provision of additional wheelchair accessible bedrooms, or provision of bedrooms accessible to ambulant people with mobility impairments.

### **Shared spaces and facilities**

- 4.27 In addition to the basic amenities expected from student housing (kitchen and personal hygiene facilities), the Council will expect developments to include shared lounges/ recreation rooms, outdoor

amenity space and laundry facilities. We will also support the inclusion of facilities that are open to the public in appropriate circumstances.

### Shared lounges/ recreation rooms

- 4.28 Shared lounges/ recreation rooms are essential to provide opportunities for social interaction. Social interaction between occupiers in student housing (including prayer meetings and other acts of worship) supports their health and wellbeing and helps to create a mixed, inclusive and cohesive student community. Shared lounges/ recreation rooms should be inviting and comfortable places to relax and socialise, and should include a variety of spaces providing different functions and facilities, such as meeting areas, prayer rooms, easy chairs and sofas, coffee bars, vending machines, eating areas, free WiFi access, TV/ films and games. As a minimum, they should include a lobby at the main entrance to the building with seating where occupiers can greet external visitors or congregate before travelling together.
- 4.29 When assessing the adequacy of shared lounges and recreation rooms, we will consider the quality and functionality of the spaces provided as well as the overall floorspace provided. The amount of space needed for shared lounges/ recreation rooms will vary depending on the layout of the student housing, the size of the studio flats and study bedrooms, and the proportion of bedspaces provided in cluster flats with a living room that encourages cohesive living (see the subsections of this guidance about Range of accommodation and affordability and Design of cluster flats, study bedrooms and studios for more information about layouts). Where the bedspaces are predominantly provided in studio flats or individual study bedrooms, or the studio flats/ study bedrooms are too small to accommodate visitors, more space will be needed for shared lounges/ recreation rooms. The amount of space needed can also be reduced where accessible outside amenity space or publicly accessible open space is incorporated in the development and is designed to enable social interaction and provide a reasonable level of shelter in wet weather.
- 4.30 As a benchmark, we recommend that for each bedspace, 0.1 to 0.2 sq m of floorspace should be provided in shared lounges/ recreation rooms. This is equivalent to 10 sq m to 20 sq m per 100 students. When assessing the adequacy of proposals, we will take qualitative and quantitative factors into account. In assessing the quantity of provision, we will not include living rooms provided within cluster flats as part of the floorspace provided in shared lounges/ recreation rooms, but will have regard to their role in social and recreational activity. We consider that a level of provision towards the bottom of the range will only be appropriate where:
- shared spaces provide inviting and comfortable environments, are designed to perform a range of functions, and include spaces with access to daylight and sunlight; or
  - the majority of bedspaces are provided in cluster flats with a living room that encourages cohesive living; or

- the majority of the rooms containing the bedspaces are designed with suitable space to entertain visitors; or
- the amount of accessible outside amenity space or publicly accessible open space incorporated in the development is at least 20 sq m per 100 students, and this is designed to enable social interaction and provide a reasonable level of shelter in wet weather.

### Outside amenity space

- 4.31 Local Plan Policy D1 *Design* indicates that developments should incorporate outdoor amenity space and high quality landscape design, and maximise opportunities for greening such as soft-landscaping and tree-planting. Open amenity space within developments, particularly green space, enhances health and wellbeing by providing immediate opportunities for relaxation and stress relief. It may also provide opportunities for exercise, subject to the scale and location of the space.
- 4.32 The Local Plan recognises that providing outdoor amenity space can be challenging in the context of a densely built-up area, and does not set a requirement for a specific quantum per resident. The design of student housing should therefore balance providing outdoor amenity space against making the best use of the site and delivering the maximum reasonable amount of housing, as sought by Local Plan Policies G1 *Delivery and location of growth* and H1 *Delivery and location of growth*.
- 4.33 Outdoor amenity spaces should be accessible to occupiers wherever possible. Sometimes access may not be possible due to increased risk of crime or disturbance to neighbours or occupiers. In these circumstances, we will seek the inclusion of high quality landscaping which provides occupiers with green views and so aids relaxation and wellbeing.
- 4.34 In all cases, outdoor amenity space should make maximum use of opportunities for greening and soft-landscaping. Where the space is accessible to occupiers, it should include functional areas for passive recreation such as socialising, sitting, reading and eating, and provide a reasonable level of protection in wet weather. It should also include opportunities for exercise (eg outdoor gyms) where the use of exercise facilities would not harm the amenity of occupiers and neighbours.
- 4.35 Local Plan Policy A2 *Open space* and our CPG *Public Open Space* seek 9 sq m of publicly accessible open space (discounted by 25% for student housing). Outdoor amenity areas that are for the exclusive use of residents do not contribute to requirements for publicly accessible open spaces. However, where publicly accessible open space is incorporated in a student housing development, it can meet the need for outdoor amenity space. Accessible outside amenity spaces and publicly accessible open spaces that are incorporated in the development can reduce the need for shared lounges/ recreation rooms if they are designed to enable social interaction and provide a reasonable level of shelter in wet weather.

- 4.36 Where accessible outside amenity spaces or publicly accessible open spaces are incorporated in the development, they should be designed and managed to ensure that their use does not:
- harm the amenity of occupiers and neighbours (see Local Plan Policy A1 *Managing the impact of development*); or
  - compromise safety and security, for example by increasing the risk of burglary or theft from the person (see Local Plan Policy C5 *Safety and security*).
- 4.37 Consideration should be given to:
- the potential for noise from congregations of students;
  - the acoustics of the space, particularly where partially enclosed by buildings (eg courtyards);
  - appropriate opening hours; and
  - the potential for access to internal areas intended for the exclusive use of students, particularly cluster flats, study bedrooms and studios.

### Laundry

- 4.38 All students should have access to adequate facilities to wash and dry clothes (and bedding/ towels where laundering these is not a service included in the tenancy agreement). It will rarely be appropriate for occupiers to be reliant on independent commercial launderettes, as there are fewer than twenty remaining in the borough, and these are at risk of loss due to falling revenues and pressure for conversion to higher value uses. A collection/ delivery system for cleaning clothes may be offered, but such arrangements will be too expensive for some students, so alternative facilities should be available.
- 4.39 Where washer/ driers (or washing machines and drying areas) will be provided within cluster flats, study bedrooms or studios, suitable ventilation and additional floorspace should be provided to accommodate them. Where the facilities will be provided in a shared laundry room or launderette, the ratio of machines to students should be sufficient to prevent excessive waiting times and allow for periodic machine malfunctions and failures. The management code for private providers referred to in section 3 of this guidance (the ANUK/ Unipol Code of Standards) recommends at least one washing machine per 75 students.
- 4.40 Launderettes provided in conjunction with student housing may be offered on a commercial basis and made available to the public provided that:
- they do not compromise the safety and security of student property and the areas intended for the exclusive use of students (see Local Plan Policy C5 *Safety and security*); and
  - the manager of the student housing can ensure their continued availability.

### Public facilities

- 4.41 The inclusion of indoor facilities that are open to the public can help to activate ground floor frontages and assist positive interaction with the local community. Examples could include cafes, health facilities, yoga or pilates studios, gyms, prayer halls, places of worship and other cultural and leisure facilities. We will support the inclusion of such facilities in student housing provided that:
- they do not compromise safety and security, for example by increasing the risk of burglary or theft from the person (see Local Plan Policy C5 *Safety and security*);
  - they do not compromise the provision of shared facilities for student use; and
  - they are consistent with relevant Local Plan policies, such as Policy TC1 *Quantity and location of retail development* and Policy TC4 *Town centre uses*.
- 4.42 Indoor facilities that are available to the public will only be considered as part of the provision of shared lounges and recreation rooms where:
- they are closely integrated with the student living areas (without compromising security); and
  - the facility provides a place for students to meet without paying a fee or making a purchase.

### Safety and security

- 4.43 The Council will expect any scheme for student housing to incorporate design measures that promote personal safety and security and reduce the risk of crime and the fear of crime, taking into account the Secured by Design principles and guides, particularly SBD Homes 2016 and any update or replacement guide. Secured by Design is the official UK Police flagship initiative to reduce crime through the design of buildings and the built environment. Applicants should discuss any scheme with Police Design Out Crime Officers at the pre application stage. Further information is provided in our CPG *Design*.
- 4.44 Design measures that should be considered include:
- communal functions placed at the ground floor of the building to retain an active frontage;
  - access control at the main entrance;
  - access control to individual floors and corridors;
  - audio-visual CCTV to increase the level of surveillance;
  - alarmed fire escape doors; and
  - on-site accommodation management.
- 4.45 All management arrangements related to safety and security should be included within the Management Plan(s) for the development, secured as a planning obligation (S106).

## Other aspects of design and provision of facilities

### Sustainability and the use of energy and water

- 4.46 Our Local Plan policies about sustainability and climate change indicate that developments should be designed to mitigate climate change and adapt to its impacts, use water efficiently, improve water quality, address flood-risk and drainage, and mitigate exposure to poor air quality. An energy statement and a sustainability statement (or combined statement) will be required for student housing development involving 500 sq m additional floorspace or more, and an air quality assessment will be required for major developments creating 1,000 sq m floorspace or more,
- 4.47 The design of student housing should reduce energy use through measures including the orientation, form, mass of the development, and window sizes and positions. We will expect major student housing developments to meet London Plan targets for carbon dioxide reduction through the application of the energy hierarchy, and explore the feasibility of connecting to decentralised energy networks in accordance with Local Plan Policy CC1 *Climate change mitigation*.
- 4.48 Local Plan Policy CC3 *Water and flooding* seeks to ensure developments use water efficiently and minimise the risk of flooding where possible. Sustainable Drainage Systems should be incorporated to achieve greenfield run-off rates. Major development and high or intense water use developments should include grey water and rain water harvesting systems. Where such a system is not feasible or practical, developers must demonstrate to the Council's satisfaction that this is the case.
- 4.49 The occupiers of student housing generally pay a flat service charge for utilities so the Council will particularly expect such development to incorporate measures to minimise carbon dioxide emissions and ensure water is used efficiently. There are many measures that can be incorporated to reduce energy and water consumption, including:
- metering electricity, heat and water use;
  - incorporating energy and water efficient measures such as timers, sensors, flow restrictors, individual controls and energy efficient light bulbs;
  - A and A\* rated appliances; and
  - means of monitoring and feedback/education of occupiers on water and electricity usage.
- 4.50 More information is available in Camden Planning Guidance documents, *Energy efficiency and adaptation*, *Water and flooding* and *Air quality*.

### Transport

- 4.51 Student housing can have significant impacts on the transport network and travel choices during and after development. Some of these impacts



may be typical of high density housing developments, but others can have particular characteristics, such as pronounced tidal flows to and from the focus of the University of London in Bloomsbury, and a concentration of students arriving/ departing with luggage at the start and finish of term.

- 4.52 The Local Plan's transport policies focus on promoting sustainable transport choices for people, goods and materials, limiting the availability of car parking through car-free development, ensuring development is integrated into the transport network, protecting transport infrastructure and managing transport impacts. Reducing the use of motor vehicles helps us improve air quality and create safer neighbourhoods. Active travel choices, such as walking and cycling, provide opportunities for social interaction, increase physical fitness and contribute to health and wellbeing. Sustainable transport options also provide more affordable ways to access jobs, training shopping and leisure and enhance social inclusion.
- 4.53 The Council uses a wide variety of tools and requirements to ensure that development supports sustainable transport choices, including cycle parking standards, car-free agreements, Travel Plans and Construction Management Plans. This section identifies some requirements likely to apply to student housing development, but applicants are advised to consider all the information set out in our Camden Planning Guidance about Transport.
- 4.54 Student housing developments should be designed to meet or exceed the minimum standards for cycle parking set out in the London Plan. The design and layout of parking facilities should meet requirements of our Camden Planning Guidance about Transport.
- 4.55 A Transport Statement or Assessment and a Travel Plan may be required for student housing developments. Camden Planning Guidance on Transport provides two sets of thresholds (based on the size of development) that indicate whether a Transport Statement or Assessment is required, and whether a Local or Strategic Travel Plan is required. For the purpose of the thresholds, one student bedroom will be treated as equivalent to one residential unit (in Use Class C3). A Construction Management Plan (CMP) will also be required for developments involving significant impacts on the public highway or significant excavation. Monitoring and Measures financial contributions are required for Travel Plans and CMPs. Transport Assessments and Travel Plans should take account of any proposed alternative uses of the student housing outside term time.
- 4.56 A financial contribution to walking, cycling and public realm improvements will be sought if mitigation measures are required to overcome the impact of the development. A financial contribution to highway works will be sought to repair any construction damage to transport infrastructure and reinstate all affected transport network links and road and footway surfaces.

### Public open space

- 4.57 Students form a significant proportion of users of public open space in Camden. New developments of student housing are expected to mitigate the additional pressure they will place on public open space. Where possible, student housing should be designed to incorporate new publicly accessible open space within the development. Where new provision is not possible, we will seek an equivalent financial contribution to improve the quality and capacity of existing public open space, or fund public realm and green infrastructure projects.
- 4.58 The open space requirement for residential development is 9 sq m per occupier. For student housing, this is discounted by 25% to recognise that most students will not be resident for a full calendar year. Outdoor amenity areas that are for the exclusive use of residents do not contribute to requirements for publicly accessible open spaces. However, where publicly accessible open space is incorporated in a student housing development, it can meet the need for outdoor amenity space.
- 4.59 Our Camden Planning Guidance *Public open space* provides more information about our requirements and the calculation of financial contributions.

### Community, leisure and health and wellbeing

- 4.60 The chapter of the Local Plan about community, health and wellbeing sets out the wide range of ways in which the built environment can influence health and wellbeing. Consequently, health and wellbeing should be integrated into the design of new student housing and the infrastructure that will serve it. Ensuring access to healthcare and other social facilities should be included in this integrated approach.
- 4.61 Local Plan Policy C1 *Health and wellbeing* indicates that proposals creating 10 or more homes or a floorspace of 1,000 sq m or more are required to submit a Health Impact Assessment (HIA) to show likely health impacts and measures that will be incorporated to address negative effects and improve health outcomes. A rapid assessment tool is available for smaller schemes, but developments of 100 homes or more, including student housing, will be expected to submit a comprehensive assessment including details of engagement with health and community stakeholders and their influence on the proposal. More advice on HIAs is available in our Camden Planning Guidance *Planning for health and wellbeing*, and from the NHS Healthy Urban Development Unit (HUDU).
- 4.62 Local Plan Policy C2 *Community facilities* indicates that we will seek contributions towards new and improved community facilities to meet the demands arising from development. Policy C3 *Cultural and leisure facilities* indicates that we will seek provision of new facilities in association with major developments and seek community access to private facilities. New student housing can add significantly to pressure on local facilities such as health and GP services, sports pitches and



halls. Providers of student housing should consider the potential to incorporate public health and leisure facilities into new student housing subject to their impact (including impact on safety and security), the appropriateness of the location and consistency with relevant Local Plan policies. When considering the potential to contribute to health facilities, providers should liaise with Camden Clinical Commissioning Group - [camdenccg.nhs.uk/](http://camdenccg.nhs.uk/).



## 5 Planning obligations for student housing

### KEY MESSAGES

Planning obligations under S106 of the Town and Country Planning Act 1990 will ensure that student housing complies with the requirements of Local Plan Policy H9.

The S106 terms will include measures to ensure that student housing:

- meets genuine student needs on a permanent basis;
- is let to students for the full duration of all terms in the academic year;
- is managed as a single planning unit;
- is managed in accordance with an agreed Student Management Plan;
- incorporates sustainability measures;
- is subject to a Travel Plan and Construction Management Plan;
- contributes where appropriate to improving walking, cycling and the public realm, public open space, and community facilities; and
- is affordable to the student body as a whole or otherwise provides affordable housing for general needs.

The S106 terms may also include measures to control:

- alternative use of the accommodation outside term-time; and
- provision of student lettings for periods of less than 38 weeks.

5.1 The Council will seek planning obligation under S106 of the Town and Country Planning Act 1990 to ensure that student housing complies with the requirements of Local Plan Policy H9, provides for the intended occupiers, meets the expected standards in relation to amenity and sustainability, and is supported by appropriate facilities and infrastructure. The precise terms of the S106 agreement will vary between proposals to reflect the nature and scale of the development, the capacity of local facilities and infrastructure and the anticipated impact of the scheme.

5.2 In general, S106 terms will include obligations ensuring that:

- term time occupiers are students registered on courses at publicly funded higher education institutions in Camden or the adjoining London Boroughs;
- where the Council agrees that the student housing can appropriately serve other institutions, ensuring that term time occupiers are students registered on courses at those institutions;
- the housing is let to each student for the full duration of all terms in the academic year (generally not less than 38 weeks), and not less than an academic term;
- the development is managed as a single planning unit and individual rooms or flats are not disposed of as independent self-contained homes;

- the development will be used as student housing on a permanent basis;
- a Student Management Plan is submitted to the satisfaction of the Council prior to occupation of any part of the development;
- the occupation of the development by students is managed in accordance with the Student Management Plan at all times;
- measures relating to sustainability and the efficient use of energy and water are secured;
- a Travel Plan and Construction Management Plan is secured;
- a financial contribution to walking, cycling and public realm improvements is secured where appropriate;
- a contribution to public open space is secured; and
- a contribution to new and improved community facilities is secured where appropriate.

5.3 Arrangements required under Policy H9 to ensure the accommodation is affordable to the student body as a whole will also be secured through a S106 planning obligation. The precise terms of the S106 agreement will vary between developments to reflect the nature and financial viability of the development. In general, S106 terms will include obligations:

- to provide a specific proportion of the places in the development as affordable student housing; and
- specifying the arrangements for setting the rent of the affordable student accommodation; and
- specifying which parts of the development will be provided as the affordable student accommodation, or arranging for this to be specified prior to the occupation of any part of the development; and
- to enter into a nominations agreement with one or more specified higher education institutions in relation to the affordable accommodation prior to the occupation of any part of the development; or
- to enter into a nominations agreement with one or more specified higher education institutions in relation to the whole student housing development prior to the occupation of any part of the development; or
- to provide an appropriate amount of affordable housing for general needs having regard to Policy H4 Maximising the supply of affordable housing, potentially in the form of a payment-in-lieu.

5.4 Other S106 terms that may be required in connection with Policy H9 where the student housing will be available for other uses outside term-time, the student housing will provide for institutions other than publicly-funded higher education institutions, or the student housing will provide student lettings for periods of less than 38 weeks. These include obligations:

- to ensure that student housing is not let to non-students for more than 14 weeks in any academic year;
- to specify the alternative uses of the student housing that are permitted outside term time;
- to ensure that student housing is available to students who wish to let their place for the full academic year (or 51 weeks where one week is designated for cleaning, maintenance and decoration);
- where the duration of a student lease is shorter than a full academic year, to ensure that the weekly rent is equivalent to the weekly rent for a student lease of 52 weeks (or 51 weeks where one week is designated for cleaning, maintenance and decoration)
- to submit a Non-student Management Plan to the satisfaction of the Council prior to occupation of any part of the development;
- to ensure that the occupation of the development by non-students is managed in accordance with the Non-student Management Plan at all times; and
- where the Council agrees that the student housing can appropriately be let to students for periods of less than 38 weeks, to ensure that the property continues to be used primarily as student housing, and that any alternative uses do not disrupt the primary occupation of the housing by students.



## Glossary

### **Bedspaces**

A measure of the number of people that will occupy residential or visitor accommodation. A single bedroom provides one bedspace, a double bedroom provides two bedspaces, and a twin room provides two bedspaces. A flat containing a double bedroom, a twin bedroom and a single bedroom provides five bedspaces.

### **Cluster flat**

A group of study bedrooms sharing communal facilities. The cluster flat will generally provide all the basic needs for everyday life including a kitchen, bathroom and toilet. Typically, a cluster flat comprises 4 to 8 study bedrooms and a communal kitchen-diner (sometimes combined with a living room).

### **Higher education**

Higher education courses are programmes leading to qualifications, or credits which can be counted towards qualifications, which are above the standard of GCE A-levels or other Level 3 qualifications such as access to higher education diplomas, advanced apprenticeships and level 3 NVQs. They include degree courses, postgraduate courses and sub-degree courses such as those leading to HNCs or HNDs.

### **Higher Education Statistical Agency (HESA)**

Collects, processes and publishes data about higher education (HE) in the UK, including data about the location of term-time addresses for HE students.

### **House in Multiple Occupation (HMO)**

There are a number of types of HMO, but most commonly an HMO is a house or flat which is let to three or more tenants who form more than one household and who share a kitchen, bathroom or toilet.

A household is generally a single person, two people living as a couple or several members of the same family.

The property may have been designed or converted to provide bedsits, or may simply be a shared house or flat.

**Housing health and safety rating system (HHSRS)**

The housing health and safety rating system (HHSRS) is a tool used by local authorities to evaluate potential risks and hazards arising from deficiencies in housing that could harm the health and safety of the occupiers.

**Nominations agreement**

An agreement between a student housing provider and a higher education institution that ensures that some or all of the places in the student housing are occupied by students registered on courses at that institution. The nature and duration of nominations agreements will vary, but may involve an institution giving a commitment to underwrite the rents of a specified number of spaces in the housing in return for commitments from the provider about the terms of the lease offered to students, including rent levels.

**Office for Students (OfS)**

The Office for Students (OfS) regulates higher education providers on behalf of all students. The OfS also distributes government higher education funding to more than 300 providers in England, supporting courses where teaching costs are particularly high (such as medicine) and areas prioritised by government. Teaching costs are only partly met by OfS grants, the greater part is met through student tuition fees. This body is the successor to the Higher Education Funding Council for England (HEFCE).

**Self-contained homes**

Homes where all the rooms, including the kitchen, bathroom and toilet are behind a door that only one household can use.

**Short term lets**

Accommodation let for periods of less than 90 days, as defined by the Greater London Council (General Powers) Act 1973 (as amended).

**Student housing**

Student housing is subject to the distinct arrangements under Policy H9 where it:



- is primarily occupied by students and managed by an education institution or independent provider for that purpose;
- is restricted to occupation by students during term-time;
- is generally let to each student for the full duration of all terms in the academic year, and not less than an academic term; and
- provides some common facilities and/ or services

**Studio flat or Studio**

A flat where the sleeping area and living area is combined but all the basic needs for everyday life are provided behind a door that only the occupier (or occupiers) can use, including kitchen facilities, bathroom and toilet.

**Study bedroom**

A bedroom in student housing that provides space for independent study, sleeping and storage of personal possessions. It may include some en-suite personal hygiene or kitchen facilities, but will not include the full range of facilities provided in a studio flat.



## Appendix A

### Publicly-funded higher education institutions in Camden and other London Boroughs

Note - Appendix A provides the location of the main administrative centres, but many of these institutions are split across different sites, sometimes across borough boundaries.

**Figure 3. Institutions in Camden**

	<b>Institution</b>	<b>Location</b>
1	Birkbeck College (University of London)	Bloomsbury WC1E 7HX
2	The Conservatoire for Dance and Drama	Bloomsbury WC1H 9JJ
3	London School of Hygiene and Tropical Medicine (University of London)	Bloomsbury WC1E 7HT
4	The Royal Central School of Speech and Drama (University of London)	Swiss Cottage NW3 3HY
5	The Royal Veterinary College (University of London)	Camden Town NW1 0TU
6	The School of African and Oriental Studies (SOAS) University of London	Bloomsbury WC1H 0XG
7	University College London* (University of London)	Bloomsbury WC1E 6BT
8	University of London (School of Advanced Study)	Bloomsbury WC1E 7HU
9	University of the Arts, London	Holborn WC1V 7EY

\* The Institute of Education and the School of Pharmacy are now part of UCL

**Figure 4. Institutions in boroughs adjoining Camden**

	<b>Institutions in Westminster</b>	<b>Location</b>
1	Courtauld Institute of Art (University of London)	Strand WC2R 0RN
2	Imperial College London	South Kensington SW7 2AZ
3	King's College London	Strand WC2R 2LS
4	London Business School (University of London)	Regent's Park NW1 4SA
5	The London School of Economics and Political Science (University of London)	Kingsway WC2A 2AE
6	The Royal Academy of Music (University of London)	Marylebone NW1 5HT
7	The Royal College of Art	South Kensington SW7 2EU
8	The Royal College of Music	South Kensington SW7 2BS
9	The University of Westminster	Regent Street W1B 2UW

	<b>Institutions in other adjoining boroughs*</b>	<b>Location</b>
1	City, University of London	Clerkenwell EC1V 0HB (LB Islington)
2	Guildhall School of Music and Drama	Barbican EC2Y 8DT (City of London)
3	London Metropolitan University	Holloway N7 8DB (LB Islington)
4	Middlesex University	Hendon NW4 4BT (LB Barnet)

\* There are no publicly-funded higher education institutions with an administrative centre in LB Brent or LB Haringey

**Figure 5. Institutions in remaining London Boroughs**

	<b>Borough</b>	<b>Institution</b>	<b>Location</b>
1	Bexley	Rose Bruford College of Theatre and Performance	Sidcup DA15 9DF
2	Ealing	The University of West London	Ealing W5 5RF
3	Greenwich	Ravensbourne University London	Greenwich Peninsula SE10 0EW
4	Greenwich	Trinity Laban Conservatoire of Music and Dance	Greenwich SE10 9JF
5	Greenwich	University of Greenwich	Greenwich SE10 9LS
6	Hillingdon	Brunel University, London	Uxbridge UB8 3PH
7	Kensington and Chelsea	Heythrop College (University of London)	Kensington Square W8 5HN
8	Kensington and Chelsea	Institute of Cancer Research (University of London)	Old Brompton Road SW7 3RP
9	Kingston upon Thames	Kingston University	Kingston-upon-Thames KT1 1LQ
10	Lewisham	Goldsmiths College (University of London)	New Cross SE14 6NW
11	Newham	University of East London	Docklands E16 2RD
12	Richmond upon Thames	St Mary's University, Twickenham	Twickenham TW1 4SX
13	Southwark	London South Bank University	Borough SE1 0AA
14	Southwark	The University College of Osteopathy	Borough SE1 1JE
15	Tower Hamlets	Queen Mary University of London	Mile End E1 4NS
16	Wandsworth	Roehampton University	Roehampton SW15 5PU
17	Wandsworth	St George's, University of London	Tooting SW17 0RE

## Appendix B

Figure 6. Higher Education Students – growth and share of usual residents by ward

shaded cells denote values above the borough average	Term-time resident FT students (aged 18 or over) Census 2011	Growth in term-time resident FT students (aged 18 or over) Census 2001-11	Term-time resident FT students (aged 18 or over) as % share of usual residents Census 2011	Ranking 2011 (students as % share of usual residents) (1 = highest student % share)	Registered resident HE students (PT + FT) HESA 2017/18*	Growth in registered resident HE students (PT + FT) HESA 2010/11-2017/18	Registered resident HE students (PT + FT) HESA 2017/18 as % share of GLA 2016-based population projection 2018†	Ranking 2018 (students as % share of population projection) (1 = highest student % share)
LB Camden	25,130	43.6%	11.4%		26,690	14.7%	11.1%	
Belsize	620	-21.5%	4.9%	16	500	-22.5%	3.6%	16
Bloomsbury	3,641	38.4%	33.4%	1	3,810	-12.8%	32.8%	2
Camden Town with Primrose Hill	1,008	48.2%	8.0%	9	1,045	22.2%	7.8%	8
Cantelowes	1,581	68.2%	13.3%	6	1,820	1.4%	13.7%	6
Fortune Green	683	13.8%	5.8%	15	540	-7.7%	4.1%	13
Frognaal and Fitzjohns	1,068	7.9%	8.9%	7	495	-39.6%	3.8%	15
Gospel Oak	678	9.4%	6.0%	13	495	-3.9%	4.1%	14
Hampstead Town	415	-33.1%	3.7%	18	360	-25.0%	3.0%	18
Haverstock	1,031	43.2%	8.3%	8	1,175	17.5%	8.7%	7
Highgate	502	0.4%	4.6%	17	375	-9.6%	3.2%	17
Holborn and Covent Garden	1,934	74.2%	14.9%	5	2,110	22.3%	14.8%	5
Kentish Town	1,068	44.3%	8.0%	10	1,040	21.6%	7.1%	9
Kilburn	766	41.9%	6.4%	11	595	2.6%	4.5%	12
King's Cross	3,793	34.0%	32.0%	2	4,680	24.6%	38.2%	1
Regent's Park	2,675	138.8%	19.8%	3	2,615	25.1%	17.5%	4
St Pancras and Somers Town	2,150	194.5%	15.6%	4	3,810	138.9%	21.9%	3
Swiss Cottage	798	6.4%	6.2%	12	705	-6.6%	4.9%	11
West Hampstead	719	19.8%	6.0%	14	780	17.3%	5.5%	10

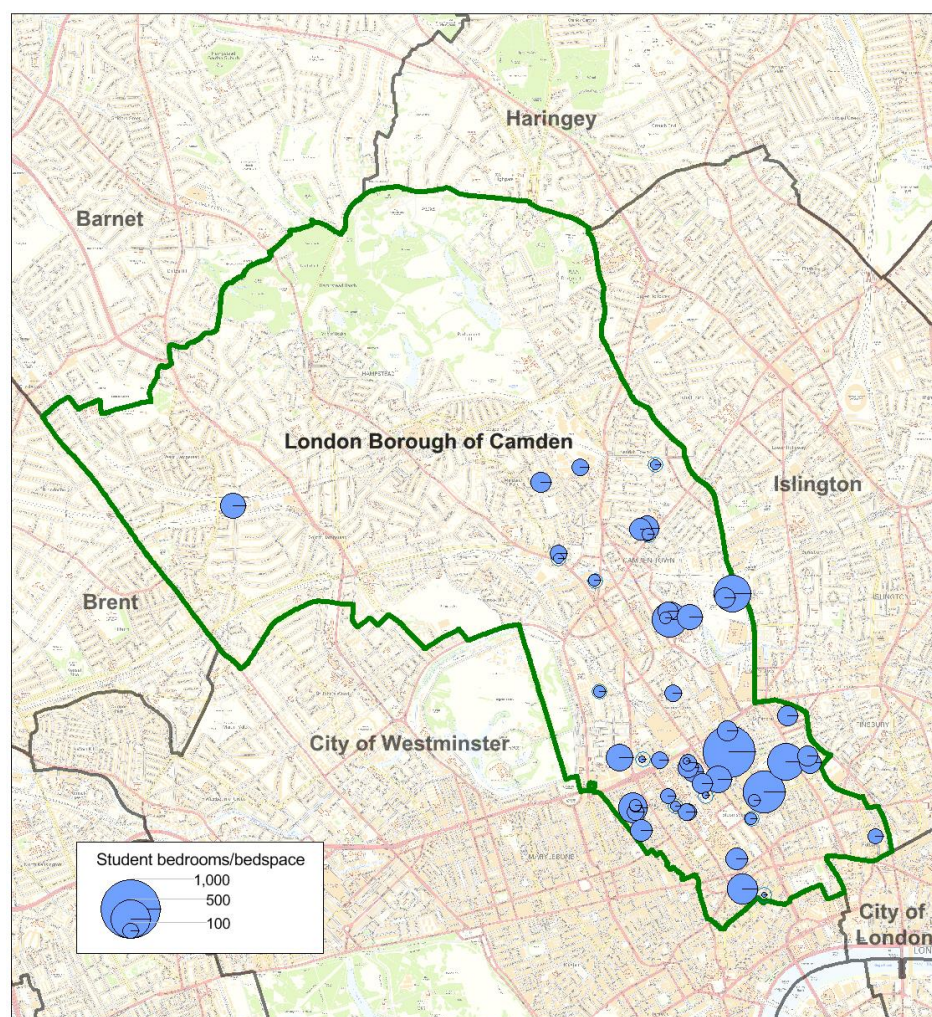
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HESA © 2019

†GLA housing-led projection 'Camden Development, Capped AHS' GLA © 2018

## Appendix C

Figure 7. Location of Student Housing Schemes in Camden



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Student Housing data from Camden Development Monitoring 2018