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5<sup>th</sup> December 2019

Planning Policy  
Brent Borough Council  
By Email ONLY

Dear Sirs

**LONDON BOROUGH OF BRENT  
SUBMISSION UNDER REGULATION 19 - LOCAL PLAN PROPOSED SUBMISSION  
REPRESENTATIONS ON BEHALF OF UNITE STUDENTS**

I write on behalf of our client, Unite Students (Unite), to submit representations to the consultation on the London Borough of Brent's Regulation 19 Local Plan Review. Having submitted representations to the Preferred Options version of the Local Plan at the Regulation 18 Consultation in January 2019, Unite now wish to make further representations at this current consultation stage in order to reinforce their view on the positive policy approach taken by the Council towards student accommodation, as a result of the representations made at the previous consultation. Additionally, Unite wish to comment on the draft policy surrounding co-living accommodation. Unite Students is the UK's leading manager and developer of purpose-built student accommodation (PBSA), providing homes for around 50,000 students in more than 140 purpose-built properties across 28 of the UK's strongest university towns and cities.

The London Borough of Brent has prepared and published the draft Local Plan (Proposed Submission) for consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 as amended. The consultation on the draft Local Plan is due to close on Thursday 5<sup>th</sup> December 2019. This version of the Local Plan takes into account representations made at the previous stages of consultation. Following this consultation, it is understood that the draft Local Plan will be submitted to the Secretary of State for examination (Regulation 22).

**Student Accommodation**

***Proposed Changes to Draft Policy BH7 (Accommodation with Shared Facilities or Additional Support)***

In the representations made to the Preferred Options version of Local Plan, points A to C were seen to be in accordance with Unite's practice and design standards. Therefore, comments were made on points D and E only.

It was argued that the requirements of point D were onerous, as proposals for student accommodation and associated accommodation types would be supported where it:

*"demonstrates that there is a specific Brent, or in the case of education a London, need for the particular use which are secured by planning agreement relating to use of the land or to its occupation by members of specified educational institutions".*

As it is not possible for nominations agreements to be in place prior to the grant of planning permission, it was recommended here that this requirement should be removed.

In response to this recommendation, the latter half of Point D has now been removed so that it reads:

*"demonstrates that there is a specific Brent need, or in the case of education a London need"*

Unite view this amendment as very positive as it removes the need for a nominations agreement to be in place prior to planning permission being granted. Unite would thus urge Brent Council to retain this amendment throughout subsequent iterations of the Local Plan. However, Unite still maintain the argument made previously in the Regulation 18 Representations that the requirement of Point D to demonstrate that there is a specific Brent need, is contrary to the approach of the London Plan and the NPPF, and could prohibit PBSA developments coming forward in the Borough. It is therefore recommended that this policy requirement is removed altogether.

In the previous consultation stage, Point E sought to only grant support for student, and associated accommodation types where it:

*"will not lead to an over-concentration of the type of accommodation in the area which for the following is defined as i. Student Accommodation – no more than 20% of the proposed population of Growth Areas being students"*.

Unite were not in agreement with the 20% restriction and put forward a number of examples and appeal decisions where it was cited that the delivery of PBSA would not cause harm where the student population represented an excess of 30%, and in the examples of Bernard Terrace and St Leonard Street, where the student concentrations were acknowledged to be up to 60%. It was therefore recommended that the 20% restriction should be removed entirely. It has been noted that this recommendation has been taken into account in the Regulation 19 version of the Local Plan as it now reads:

*"will not lead to an over-concentration of the type of accommodation in the area"*

Furthermore, paragraph 6.2.88 of the supporting Policy text has been replaced in the Regulation 19 Local Plan by paragraph 6.2.71 which removes the 20% restriction and references London Plan Policy H17 in relation to student accommodation. Unite wholly support these amendments and strongly advocate that they are carried throughout the versions of the Local Plan to follow. Whilst this policy requirement is now more in line with the approach of the London Plan, which encourages new student accommodation away from existing concentrations in central London (paragraph 5.55), Unite maintain the argument that this policy requirement overall is onerous. This is because there is no evidence or justification provided that a concentration of PBSA creates harm to residential communities. As evidenced in Unite's previous representations to the Regulation 18 Local Plan, PBSA can have a positive impact on residential communities. This can be demonstrated in the appeal of an application at Oakbase House in Chester (APP/A0665/W/16/3166180) where the PBSA proposal was seen to alleviate the pressure on the use of family homes as HMOs. Unite therefore wish to reiterate the objection to this policy requirement and recommend for it to be removed.

## **Co-living Accommodation**

### ***Draft Policy BH7 (Accommodation with Shared Facilities or Additional Support)***

In addition to PBSA, the requirements of draft Policy BH7 are also applicable to co-living accommodation. Having reviewed this policy, the approach to co-living accommodation is seen to largely be in line with the emerging London Plan Policy H18 (Large-scale purpose-built shared living).

However, as explained in the above paragraphs, Unite object to the requirement of Point D to demonstrate that there is a specific Brent need. For co-living accommodation, the requirement is also contrary to the approach of the London Plan and the NPPF and could prevent this type of development coming forward in the Borough. It is therefore recommended that this policy requirement is removed.

Unite also object to point E of BH7 in the context of co-living, requiring these accommodation types not to lead to an over-concentration in the area. As with PBSA, this restriction could prevent co-living developments coming forward. Furthermore, co-living developments could also be seen to alleviate pressure on the use of family HMOs being used for house sharing amongst non-students, as the emerging London Plan recognises that co-living developments can provide a housing option for single person households who cannot or choose not to live in self-contained homes or HMOs. Unite thus recommend that Policy requirement E is removed.

I trust this is in order and look forward to confirmation of safe receipt of these formal representations. I reserve the position to participate in the Examination in Public as necessary.