

DP4898

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Dear Sir or Madam,

REPRESENTATIONS TO THE ISLINGTON LOCAL PLAN (REGULATION 19 CONSULTATION)

ON BEHALF OF IQ STUDENT ACCOMMODATION

These representations to the Islington Local Plan Strategic and development management policies document (September 2019) are submitted on behalf of our client iQ Student Accommodation ("iQ").

iQ are one of the largest providers of purpose built student accommodation in the UK. iQ has been part of the education eco-system since 2008 and owns and operates 67 properties across 27 UK towns and cities, providing accommodation for 28,000 students. iQ operates four existing student accommodation buildings within LB Islington within which they have nomination agreements in place with City University, London Metropolitan University, UAL, UCL and Kaplan.

In accordance with the requirements of the NPPF (2019), iQ supports Islington's Local Plan review to ensure that changing circumstances affecting the borough are taken into account, along with any relevant changes in national policy.

iQ considers that overall, the Draft Local Plan has been positively prepared however within these representations we highlight areas where the Plan may not be considered justified, effective or consistent with national policy, and therefore iQ considers the Plan to be un-sound at this stage. Accordingly, we wish to comment on the following draft policies:

Policy SP5: Nag's Head and Holloway

Policy SP5 states that *"The London Metropolitan University will continue to play an important role in contributing to the local economy. Increased space for learning should be the focus for development within the university campus. Additional accommodation for students will not be allowed other than on sites allocated for student accommodation in the Spatial Strategy area."*

Whilst iQ supports the recognition given to London Metropolitan University's important role within the local economy, we are concerned that Policy SP5 as drafted is not compatible with the Council's borough-wide approach to student accommodation under Policy H6 (Purpose-built student accommodation).

As a matter of land use principle, Policy H6 states that *"proposals involving the development, redevelopment and/or intensification of purpose-built student accommodation will only be permitted on:*

- (i) Sites allocated for purpose-built student accommodation; or*
- (ii) Sites with existing purpose-built student accommodation, subject to consistency with other Local Plan policies and additional impacts of development being acceptable."*

It is therefore clear that site specific text under Policy SP5 which states that additional accommodation for students will not be allowed other than on sites allocated for student accommodation in the Spatial Strategy area, is inconsistent with the overall Local Plan approach to the circumstances where student accommodation will be acceptable – which includes sites with existing PBSA.

We therefore recommend that Policy SP5 is amended to state that proposals for additional accommodation for students within the Spatial Strategy area will be assessed in line with the approach set out within Policy H6 Purpose-built student accommodation.

Policy H1: Thriving communities

Policy H1, which is a strategic policy, states at part M that *"the provision of additional student accommodation will be restricted. Any proposals for student accommodation will be expected to provide funding for bursaries for students as a priority, and affordable student accommodation"*.

We are concerned that this restrictive statement is not positively prepared, and does not conform with the NPPF (2019) which requires that sustainable development is pursued in a positive way, to reflect the Framework's presumption in favour of sustainable development.

Paragraph 11 of the NPPF states that for Plan making, *"strategic policies should, as a minimum, provide for objectively assessed needs of housing and other uses"*. Paragraph 16, within Chapter 3 Plan-making, states that plans should be *"prepared with the objective of contributing to the achievement of sustainable development"* and *"be prepared positively, in a way that is aspirational but deliverable"*.

Supporting text to Policy H1 at paragraph 3.15 states that *“Given the shortage of land, certain specialist forms of housing, including purpose-built student accommodation and large scale HMOs, are not considered the most appropriate use of the land that is available in terms of maximising uses which deliver the objectives of the Local Plan, including meeting housing needs, and will generally be resisted.”*

Paragraph 61, within Chapter 5 Delivering a sufficient supply of homes, confirms that in terms of housing delivery, *“policies should identify the size, type and tenure of homes required for different groups in the community (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).”*

The supporting Draft Planning Practice Guidance makes it very clear that all student accommodation, whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus, can be included towards the Council’s housing requirement, based on the amount of accommodation it releases in the housing market. The Guidance suggests that by encouraging more dedicated student accommodation may provide low cost housing that takes pressure off the private rented sector and increases the overall housing stock.

Therefore, we believe the Council when plan making should amend Part M of Policy H1 to reflect the above requirements. Rather than stating that *“the provision of additional student accommodation will be restricted”* the Council should apply a more balanced approach, stating that *“the provision of additional student accommodation will be restricted, other than on suitable sites, in line with relevant policies”*. In order for the Council to secure funding for bursaries and affordable student accommodation, there must be circumstances where student accommodation will be permitted in order to provide the required funding.

Policy H6: Purpose-built student accommodation

The overriding principle under part A of Policy H6 which supports the intensification of existing PBSA sites in the Borough is welcomed. This acknowledges the demand for such accommodation and that existing sites are suitable and appropriate for expansion subject to the relevant policies within the Plan itself.

Whilst iQ supports the aims of Policy H6 which seeks to ensure that student accommodation provides a high standard of amenity for occupiers, we have concerns that the current draft policy wording underlined beneath is likely to create confusion, particularly when read alongside Policy H4. We outline the relevant parts of each policy below:

Part B (i) of the draft policy H6 states that [all proposals should provide] *“high quality accommodation in line with policy H4, including the provision of good-sized rooms and communal space in line with the relevant space standards. General needs units must be designed to be ‘visitable’ and shared facilities must be accessible. A high level of amenity must be provided, including limited noise impacts and providing good levels of daylight and sunlight, and natural ventilation”*.

Supporting text to policy H6 at paragraph 3.101 states that *“It is important that student accommodation is high quality, in line with Local Plan policies which look to secure high quality housing, including policy H4; this includes requirements relating to daylight and sunlight and noise. Bedrooms and separate communal/amenity areas must reflect relevant space standards. Kitchen, washing and utility facilities should meet environmental health requirements.”*

Policy H4: Delivering high quality housing

Policy H4 ‘Delivering high quality housing’ at Part A states that *“All new C3 and C4 housing developments (including conversions and changes of use) and specialist housing identified in policies H6 to H11 must be designed and built to a high quality for the duration of its lifetime...”*

Part C goes on to state that *“Residential development must meet or exceed the minimum space standards, and address other requirements for private internal space, as set out in the London Plan and relevant Supplementary Planning Guidance (SPG)...”*

Therefore, as currently drafted, Policy H6 at part B (i) requires student accommodation to meet standards referred to within Policy H4, which in turn requires that *“residential development must meet or exceed the minimum space standards... as set out in the London Plan”*.

The Council’s draft policy text and supporting text repeated above is not compliant with the application of the Government’s Technical housing standards – Nationally described space standard (DCLG, March 2015) and the draft London Plan (July 2019). We explain below:

Within the draft London Plan (July 2018) Table 3.1 sets out Minimum internal space standards for new dwellings. This stems from the application of the Technical housing standards – Nationally described space standard which at Paragraph 1 clearly states that *“This standard deals with internal space within new dwellings and is suitable for application across all tenures.”*

The term ‘dwelling’ is not defined in planning, however it stems from the term ‘Class C3 dwellinghouse’ which is defined in The Town and Country Planning (Use Classes) Order 1987 (as amended) as

“use as a dwellinghouse (whether or not as a sole or main residence) by a single person or by people living together as a family, or by not more than 6 residents living together as a single household (including a household where care is provided for residents), or not more than 6 residents living together as a single household where no care is provided to residents (other than use within Class C4).”

It is commonly accepted that purpose-built student accommodation (which the title of Policy H6 adopts) is a sui-generis use and is not the provision of dwellinghouses. The National space standards and the minimum internal space standards for new dwellings contained within the draft London Plan (July 2018) apply to dwellings and do not apply to sui-generis accommodation.

Therefore, we recommend that the Council amends Policy H6 at Part B (i) by removing reference to “relevant space standards” because there are no relevant space standards applicable. We also recommend that the Council amends Policy H4 accordingly to omit any reference to “*specialist housing identified in policies H6*”. The supporting text to both policies should also be carefully amended to reflect the above.

We respectfully request that our representations are considered. Should you require any further information, please contact either Joseph Daniels or Luke Emmerton of this office.

Yours sincerely

A stylized, handwritten signature in black ink. The letters 'DP9' are written in a bold, cursive-like font, with the '9' having a long, sweeping tail that extends downwards and to the right.

DP9 LTD