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Dear Charlotte

**EXAMINATION OF THE NEWHAM LOCAL PLAN 2022-2040
HEARING STATEMENT: MATTER 14 – TRANSPORT AND INFRASTRUCTURE
ROK PLANNING ON BEHALF OF UNITE GROUP PLC**

I write on behalf of the applicant, Unite Group Plc (Unite), to submit a Hearing Statement in response to the matters, issues and questions raised by the Inspector (William Fieldhouse) concerning the Examination of the Newham Local Plan, which will set out the spatial strategy for Newham to 2038.

The submission of this Statement follows representations made on behalf of Unite to the previous stages of the draft Local Plan's preparation, as follows:

- Representations to the Newham Local Plan Refresh Issues and Options Consultation – December 2021
- Representations to the Newham Draft Local Plan Regulation 18 Consultation – February 2023.
- Representations to the Newham Draft Local Regulation 19 Consultation – September 2024.

Introduction

Unite Students is the UK's leading manager and developer of purpose-built student accommodation (PBSA), providing homes to 68,000 students across 153 properties in 23 leading university towns and cities. In London, Unite provide homes to circa 12,567 students across 32 properties with further schemes under consideration at full application and pre-application stages.

This includes existing properties in Newham including Angel Lane (759 beds) and Stratford One (1001 beds), as well as further schemes under construction including Hawthorne House (previously known as Jubilee House, 716 beds) and Meridian Square (952 beds).

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Following on from the representations submitted on behalf of Unite to the New Local Plan Regulation 19 Stage Consultation, dated 16th September 2024 and hereafter referred to as 'Reg. 19 reps', this Statement focuses on Matter 14 (Transport and Infrastructure) and specifically parts 4 and 5 Policy T3 (Transport Behaviour Change), which relate to cycle parking provision.

Policy T3 (Transport behaviour change)

The draft wording of the relevant parts of Policy T3 (Transport Behaviour Change), which relate to our Reg 19 reps is as follows:

4. *All new development should deliver high quality, sustainable transport storage (including cycle parking, in line with, or higher than, London Plan standards) and should meet the following requirements, as relevant:*

...

- d. *Provision for larger 'non-standard' cycle parking (such as for cargo bikes) should comprise a minimum of five per cent of spaces, or one space where the total level of parking provision is below twenty spaces.*

5. *Major developments should make provisions for safe and convenient charging of E-bikes and mobility scooters*

There have been no main modifications proposed to these parts of the policy as confirmed in the Schedule of proposed modifications (SD004) and Submission Local Plan (tracked changes) (SD005b).

Inspector's Question 14.3

The Inspector's matters, issues and questions; written statements; and hearings programme document (IN3) sets out the Inspector's question in relation to Policy T3 at Q14.3:

Q14.3 Is policy T3 justified, effective and consistent with national policy and the London Plan? In particular:

- a) *The requirement in part 1 for all new development to be car free (apart from the stated exceptions).*
- b) *The statement in part 2 that development that proposes a drive-through will not be supported.*
- c) *The requirement in part 4 (f) for all major employment development to include facilities for washing and changing.*
- d) *The requirement in part 6 (a) for any new development that includes parking to provide EVCP on residential spaces.*

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- e) *The requirement in part 6 (c) for major developments with zero parking on site to provide contributions towards EVCPs in other parts of the borough.*
- f) *The thresholds for transport assessments in part 7 and Table 15 having regard to national planning guidance*

Whilst parts a) to f) above do not cover the relevant parts of the policy to which our Reg 19 reps relate, we address the overarching question of whether Policy T3 is justified and effective.

This was explored within in our Reg 19 reps, which ultimately argued that the level of cycle parking required would be ineffective and unjustified for PBSA developments. Unite recommended that:

- Part 4 of the Policy is reworded to allow greater flexibility for PBSA developments with regards to the cycle parking standards set out in the London Plan, not encouraging provision greater than these standards which significantly overprovide in comparison with recorded uptake. This should be especially relevant where it can be demonstrated that a scheme lies in a highly accessible location.
- Part 4d of Policy T3 is amended to either clarify that this is not applicable to PBSA schemes or remove the unreasonable percentage requirement and instead encourage suitable provision.
- Part 5 of the Policy should also be amended to allow for greater flexibility where it can be demonstrated that the site is in a highly accessible location, or where cycle hire schemes or pool bikes are being provided in proximity of the site.

In response to our Reg 19 reps, Newham have commented within their Newham Local Plan Refresh Regulation 18 Consultation Report: Transport Comments document (SD044) that:

“A change to this policy approach has not been made. We did not consider this change to be appropriate as we are following the cycling parking standards laid out in the London Plan (2021). The Council is satisfied that the plan remains sound without the proposed changes.”

Whilst the policy requests provision in line with the current London Plan standards, the ‘Towards a New London Plan’ document, consulted on by the GLA between 9 May 2025 and 22 June 2025, recognises that industry feedback has highlighted that the current standards set for minimum amounts of cycle parking can have significant cost implications and are not always well used. As such, as part of the new London Plan, these will be reviewed to help to achieve the right combination of quantity and quality.

This direction of travel is reinforced in the ‘Homes for London: A Package of Support for Housebuilding in the Capital’, prepared by the government and Mayor of London, and published on 23 October 2025. Within this document the GLA propose to:

“reduce requirements for cycle parking at residential developments, taking into account higher

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densities of development in London and the rise of dockless cycle and e-scooter hire. Additional flexibility will also be proposed in how the cycle storage is provided to avoid costly requirements e.g. for extra basement levels or loss of housing units; this could include off-site provision, contributions in lieu, and other options."

As such Unite argue that there is a clear indication that the GLA are looking to reduce standards / add a greater level of flexibility to future cycle parking standards in both imminent guidance documents and the next iteration of the London Plan.

On this basis, it can be argued that adding an element of flexibility into new Newham Local Plan's policy should also be considered.

The need for an element of flexibility is further evidence by the low levels of uptake of cycling parking in general across Unite's schemes in London. Their most recent survey, undertaken in June 2025, demonstrated that overall, across London there is a 1.82% take up equating to 1 space per 55 students. At the property that showed the highest levels of take up, this was just under an 8% uptake of existing cycle parking spaces, equating to a maximum demand of approximately one cycle space per 13 students. The results are summarised in the table below:

Property name	Borough	Number of student bed spaces	Average number of bikes in the bike store as of June 2025	% take up
East Central House	Islington	246	4	1.63%
Sherren House	Tower Hamlets	255	13	5.10%
Station Court	Haringey	227	13	5.73%
Mary Brancker House	Camden	182	11	6.04%
Piccadilly Court	Islington	209	9	4.31%
Beaumont Court	Camden	232	2	0.86%
Rahere Court	Tower Hamlets	186	9	4.84%
Emily Bowes Court	Haringey	694	6	0.86%
Elizabeth Croll House	Islington	102	1	0.98%
Blithehale Court	Tower Hamlets	307	11	3.58%
North Lodge	Haringey	528	12	2.27%
St Pancras Way	Camden	571	17	2.98%
Stratford One	Newham	1001	14	1.40%
Angel Lane	Newham	759	20	2.64%

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Student Living Heights	Islington	136	2	1.47%
Olympic Way	Brent	699	2	0.29%
Stapleton House	Islington	862	6	0.70%
Arch View House	Brent	678	0	0.00%
Arbour House (Sebastian St)	Islington	188	14	7.45%
Cross Court House	Islington	240	2	0.83%
Romano Court	Islington	295	0	0.00%
Walmsley Studios (St John St)	Islington	166	4	2.41%
Drapery Place	Tower Hamlets	677	0	0.00%
Totals:		9440	172	1.82%

Whilst Unite recognises that high quality cycle parking for their student occupiers is fundamental for facilitating cycle ownership and use, increases in cycle parking provision associated with the current and previous iteration of the London Plan, has simply led to a greater amounts of under-utilised cycle parking.

An increase in the provision of cycle parking for PBSA has not resulted in an increase in cycle ownership for students.

There are a number of reasons as to why cycle use amongst students remains low, despite significant amounts of quality cycle parking within their place of resident.

Firstly, for student occupiers, particularly over-seas students, it is simply impractical to bring their bicycle to their place of study. Students, being brought to their place of study by parents are unlikely to have any remaining space within their cars to transfer bicycles as well; with this being further complicated for overseas students travelling by air. This leads to a low number of students using bicycles for their daily travel needs. There are also alternative cycle hire options, offering a more practical solution for cycle access.

Secondly, PBSA schemes are generally within walking distances of places of study with students tending to locate adjacent to their place of study for convenience. Alternatively, the PBSA is located within areas of high public transport accessibility, allowing the majority of journeys to be undertaken on foot or via public transport. This is the case with Unite's schemes within Newham which are located within a maximum walking distance of 10-minutes of Stratford Station, providing excellent underground, overground and bus links.

There are also other contributing factors that may discourage some students from cycle ownership and use, related to a perception around cycle safety in London and poor cycle parking facilities at

Universities.

Finally, the influence and take up of cycle hire schemes, such as lime bikes which have immensely grown in popularity since the publication of the current London Plan cycle standards, provide an affordable alternative to private cycle use. They preclude the need for private cycle ownership and storage, eliminating the need for students to bring bicycle to their accommodation, invest in the safety, security and maintenance associated with private ownership of both standard and larger bikes.

The overprovision of cycle parking spaces is therefore an issue in PBSA developments. PBSA is developed at higher densities than conventional housing and as a consequence and in order to provide these levels of cycle parking, large areas of floorspace typically at ground floor level, are required. Large cycle parking stores take up unnecessary space which could have instead provided additional PBSA bedrooms and/or amenity space.

By way of an example, Unite were required to provide a minimum of 423 cycle spaces for a student scheme in the London Borough of Islington under current policy standards. This translates to a floor area of approximately 465 sqm or 385 sqm based on the typical requirements of 1.1sq.m for a Sheffield stand, or 0.91sq.m for a dual-stacking system respectively. This would therefore result in the unnecessary loss of up to 465sqm of student bedspaces or amenity space.

Provision 'higher than' these standards as encouraged in Part 4 of the draft policy, or the addition of standards for larger 'non-standard' spaces as proposed under Part 4d will only exacerbate the space lost to cycle parking. This space could otherwise be used more efficiently and effectively to cater for growing demand for student bedspaces and greater amenity space for occupiers.

Such high levels of cycle parking has also meant that there has needed to be a reliance on greater proportions of high-density cycle parking i.e. two-tiered spaces.

Unite therefore maintain that greater flexibility should be afforded to PBSA developments with regards to the cycle parking standards set out in the emerging Newham Local Plan. These should not encourage provision which significantly overprovides in comparison with recorded uptake. This should be especially relevant where it can be demonstrated that a scheme lies in a highly accessible location, or where cycle hire schemes or pool bikes are being provided in proximity of the site.

With regards to standards for the provision for larger 'non-standard' cycle parking (such as cargo bikes), and the requirement for provision for the charging of E-bikes and mobility scooters, these should be proportional to the expected demand for these spaces to support persons of reduced mobility who rely on adapted bicycles. PBSA for example is like to have a lower demand for 'non-standard' and mobility scooter parking. Meanwhile the proximity of cycle hire schemes or pool bikes are likely to influence the need for E-bike charging.

Suggested policy modifications

The following amendments to the policy wording of Parts 4 and 5 are suggested (additions in bold and deletions in strikethrough):

4. *All new development should deliver high quality, sustainable transport storage ~~(including cycle parking, in line with, or higher than, London Plan standards)~~ and should meet the following requirements, as relevant:*
 - a. **A quantum of cycle parking appropriate to the type of development and levels of take up.**
 - b. *Storage should be safe, secure, well lit, clean and prominent.*
 - c. *Storage should be accessible to all, allowing parking of a wide variety of mobility options **where appropriate** – including bicycles, foldable bikes, e-bikes, tandems, cargo bikes, buggies and mobility scooters.*
 - d. *For homes with three or more bedrooms with standalone bike parking, the provision of at least one more cycling parking space than number of bedrooms is encouraged.*
 - e. *Provision for larger 'non-standard' cycle parking (such as for cargo bikes) should **be considered where appropriate** ~~comprise a minimum of five per cent of spaces, or one space where the total level of parking provision is below twenty spaces.~~*
 - f. *Larger 'non-standard' cycle parking should provide enough space to park and manoeuvre a non-standard cycle, be step-free, provide a range of stand types, and be clearly labelled to avoid misuse.*
 - g. *Major employment development should include facilities for changing and washing for cyclists.*
5. *Major developments should **consider** ~~make~~ provisions for safe and convenient charging of E-bikes and mobility scooters **where appropriate**.*

Summary

Noting the potential additional bedspace delivery as a result of the removal of unnecessary cycle parking, as well as the direction of travel of the New London Plan, Unite respectfully request that the evidence provided is given due consideration.

We suggest a reduced requirement or flexibility regarding the level of provision, which will in turn allow for:

- 1) A focus on a greater amount of single rather than two tier cycling racks such that the cycle provision is as accessible and user friendly as possible.
- 2) The provision of greater student bedspaces and/or greater amenity space for occupiers to cater for growing demand.

Unite reserve the right to further their comments via participation in the Matter 14 (Transport behaviour change) Hearing as part of the Examination in Public on 5 February 2026.

I trust this Statement is in order and look forward to confirmation of safe receipt. If you require further clarification or wish to discuss this further, please do not hesitate to contact either Erlina Hale (erlina.hale@rokplanning.co.uk), Immie North (imogen.north@rokplanning.co.uk) or myself at this office.

Yours Sincerely,



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