

H8: Purpose-Built Student Accommodation

Topic Paper

LB Newham (2025)

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1. Introduction

- 1.1 This topic paper has been prepared in response to representations received on Policy H8: Purpose Built Student Accommodation (PBSA) in Newham's Submission Local Plan (2024). These comments were submitted during the Regulation 19 consultation on the emerging Local Plan, held between July-September 2024.
- 1.2 Representations received during this consultation were submitted by a mixture of Higher Education (HE) institutions, developers, a charity and resident-led interest groups. The comments can broadly be categorised across the following key themes:

Limiting over-saturation

- Developers, the University of East London and University College London objected to the policy approach in relation to preventing over-saturation of purpose-built student accommodation in the Stratford and Maryland neighbourhood, and more broadly preventing over-saturation of this form of housing in other parts of the borough. They considered the approach to be contrary to the London Plan and felt that purpose-built student accommodation made an important contribution to the borough's land supply and to the mix and balance of housing in neighbourhoods. They also raised the strong demand for purpose-built student accommodation in Stratford and Maryland, noting the number of institutions located in the neighbourhood. Some developers and University College London also felt that the location requirements of the policy should allow for accommodation to be located close to town centres, not just within their boundaries.
- Stratford Original BID highlighted concerns with how new student accommodation developments could be better integrated in the existing community, including the business community. PEACH felt accommodation should only be built where there is demonstrable need.
- Dominus Stratford Limited, Unite Group Plc, Watkin Jones, University College London and University of East London objected to the requirement to not allow a net increase in bed spaces of existing purpose-built student accommodation in areas of over-saturation. They felt this was unduly restrictive and would not allow for viable redevelopment of existing accommodation.
- Developers raised that purpose-built student accommodation has the potential to take students out of the private rented sector, freeing up housing for the wider community.
- Watkin Jones felt the plan should seek to specifically protect purpose-built student accommodation floorspace and large-scale purpose-built shared living floorspace from redevelopment.

Oversaturation

- More broadly, developers raised concerns regarding the negative connotations associated with the term 'over-saturation', the definition of the term 'adjacent', as well as how to apply the policy to developments that have been approved but not yet built and the need to clarify how overconcentration will be measured.

Affordable housing requirements

- Developers and the University of East London considered that the affordable housing target proposed by the policy was excessive, and would not be viable to deliver. Shelter and Newham Temporary Accommodation Action Group highlighted the need to deliver family homes for students with families and specifically international students with dependents.

Nominations Agreements

- Developers felt the more stringent nominations agreement requirements in areas of oversaturation were overly restrictive, and did not reflect that students may wish to live in different locations to their university. RAD CHP Ltd recommended that the policy be amended to require a cascade mechanism for direct lets for all purpose-built student accommodation developments, should a nominations agreement not be secured by the point of first occupation.

Quality of accommodation

- Unite Group PLC and Watkin Jones objected to the requirement for developments to provide ancillary communal space for study and sporting facilities that meet the needs of the student population within a development unless the accommodation is located within 1,200 metres of existing student campus-based facilities. They considered this requirement was onerous, and should be dealt with on a case-by-case basis.
- Unite Group PLC recommended lowering policy requirements in policy H11 to provide wheelchair-accessible bed spaces to 1% fitted out with a further 4% adaptable. This is because demand in accommodation is lower than what is required through policy, and adaptations if needed can be made swiftly.
- Watkin Jones argued that play space requirements should not apply to PBSA as it does not generate a need for such infrastructure.

1.3 This paper aims to:

- Set out the policy context around the delivery of PBSA;
- Outline how much PBSA has been delivered and approved in the borough in recent years;
- Set out the need for PBSA in Newham; and
- Set out the justification for the policy approach set out in Newham's submission Local Plan.

2. Policy context

2.1 National Planning Policy Framework (2023)

- 2.1.1 The National Planning Policy Framework (2023) sets out in paragraph 63 that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies, including housing for students.

2.2 The London Plan (2021)

- 2.2.1 The London Plan (2021) Policy H15 sets out requirements around the delivery of PBSA. This policy includes the following requirements:
- Boroughs should seek to ensure that local and strategic need for PBSA is addressed.
 - PBSA should contribute to mixed and inclusive neighbourhoods.
 - PBSA should be secured for students.
 - The majority of the bedrooms in PBSA developments, including all of the affordable student accommodation bedrooms, should be secured through a nomination agreement for occupation by students of one or more higher education provider.
 - The maximum level of accommodation should be secured as affordable student accommodation, as defined through the London Plan, and should follow the threshold approach to applications, which requires at least 35 per cent of the accommodation to be secured as affordable student accommodation or 50 per cent where the development is on public land or industrial land appropriate for residential uses.
 - Affordable student accommodation bedrooms should be allocated by the higher education provider(s) that operates the accommodation, or has the nomination right to it, to students it considers most in need of the accommodation.
 - Accommodation should provide adequate functional living space and layout.
 - PBSA should be directed to locations well-connected to local services by walking, cycling and public transport, as part of mixed-use regeneration and redevelopment schemes.

2.3 London Plan Guidance: Purpose-built Student Accommodation (2024)

- 2.3.1 The London Plan Guidance (LPG) on PBSA, published in October 2024, outlines further guidance for London Local Planning Authorities (LPAs) to inform their policy on PBSA when developing the Local Plan, clarifying the London Plan (2021) expectations around the H15 policy requirements. The key elements of the guidance relevant to policy making include:
- i. The LPG outlines the role of PBSA in achieving policy objectives of mixed and inclusive neighbourhoods:

- The LPG notes the role of PBSA in meeting housing need and relieving pressure on general needs housing.
 - The LPG highlights that PBSA can support the local economy through students spending in their local areas and taking on part-time jobs during their studies.
 - PBSA delivery may also result in positive regeneration impacts through diversifying the activities and population of existing communities.
- ii. Boroughs should seek to locate PBSA in well-connected, well served areas. Areas likely to be suitable for PBSA include:
- the Central Activity Zones (CAZ) and Inner London Opportunity Areas;
 - Metropolitan and Major town centres;
 - areas with PTALs 5 or 6, or in Inner London PTAL 4; or
 - other town centres with high or medium residential-growth potential.
- iii. The LPG provides guidance on how boroughs can avoid over-concentration of PBSA delivery and spread the benefits of this housing type:
- While acknowledging PBSA can diversify housing stock in areas of predominately general needs housing, the LPG states that concentrations of PBSA may be 'crowding out' conventional housing schemes. Such dominance may be particularly acute under certain market conditions and in areas where development sites are limited. Local Plans should ascertain the locations and extent to which the spatial concentration or proliferation of PBSA, relative to conventional housing delivery, is hindering the creation of mixed and inclusive neighbourhoods.
 - Boroughs should also identify more positive opportunities for PBSA to help contribute to local and strategic objectives. This information can be utilised to develop spatial policies and highlight the significance of neighbourhood or pipeline housing mix in decision-making.
- iv. PBSA developments should be integrated with their neighbourhood:
- Boroughs should consider how PBSA contributes to place making through the mix of uses, design and management of the accommodation. This can be achieved through requiring PBSA to incorporate publicly accessible uses, other employment spaces or satellite university teaching, research and library provision.
 - The LPG encourages developers to work with landowners, residents, businesses and statutory bodies with responsibilities and interests beyond the site to help secure neighbourhood integration.
 - Boroughs should require publicly available resident and construction management plans secured through planning permission, enabling communities and students to hold building managers to account.

- Boroughs should consider wider infrastructure impacts of the development, including existing residents' ability to comfortably and conveniently access the infrastructure they need.
- v. The LPG provides guidance on delivering affordable student accommodation:
- Boroughs must maximise Affordable Student Accommodation (ASA), with at least 35% of bedspaces being ASA (or 50% on public/industrial land) to qualify for the Fast-Track Route; otherwise, ASA must undergo viability testing.
 - On larger sites (typically more than 0.25 ha) the inclusion of (C3) housing may be acceptable as part of pursuing mixed and inclusive neighbourhood objectives. This may be particularly relevant where C3 delivery is relatively poor, including on sites where previous C3 consents have not been built out.
- vi. Guidance on providing accessible accommodation:
- Wheelchair accessible room provision is expected at a level of 5%, with a further 5% adaptable, in line with guidance in BS8300:2:2018 Design of an accessible and inclusive built environment – Buildings – Code of Practice.
 - PBSA building design, more generally, should consider the needs of residents and visitors with a range of disabilities and impairments, not just those requiring wheelchair access.
- vii. Guidance on place-making for inclusive wellbeing:
- PBSA developments should meet requirements of London Plan Policy H15 A(5). The design should provide for students' needs – study, relaxation, socialising, retreat, privacy, exercise, laundry, support and worship. Bedrooms should reflect these needs. Buildings should also accommodate visitors' needs, such as toilets in communal areas.
 - Both internal and external communal amenity space provision within PBSA developments should be commensurate with the number of students.
 - Internal and external communal amenity space should be high quality, with a suitable range of amenities that are accessible to all users (such as a variety of seating, lighting, shade and temperature control, and suitable work surfaces).
 - Management and maintenance of spaces and facilities should typically be secured through a management plan
- viii. The LPG sets expectations for how boroughs should structure policies around nominations agreements and ASA delivery, aligning with need:
- The LPG encourages boroughs to embed policy requirements for early letters of comfort with Higher Education Providers (HEPs) before planning application decisions.

- The LPG supports the inclusion of clear S106 policy expectations to ensure enforceability of ASA commitments. The guidance includes a model fall-back mechanism that boroughs can adopt or adapt in their Local Plans to ensure ASA is delivered even when nominations agreements are delayed.

3. Delivery of Purpose-Built Student Accommodation in Newham to date

- 3.1 Newham has seen very high levels of student bed spaces approved and delivered in the borough, particularly in the Stratford and Maryland neighbourhood. A list of schemes which have been approved or completed since 2019/20 (the first year of the 2021 London Plan period) is provided below.

Table 1: PBSA schemes which have been approved or completed since 2019/20

Scheme name	Net number of bed spaces	2.5:1 Ratio applied as per 2021 London Plan Policy H1 ¹	Submission Local Plan Neighbourhood	Status
Hallsville Quarter Phase 3	377	151	Canning Town	Approved planning permission
Lascars Avenue WEST and Royal Albert Quay WEST	628	251	Royal Albert	Resolution to Grant
Royal Albert Quay EAST and Lascars Avenue EAST	457	183	Royal Albert	Resolution to Grant
UCL East	1,800	720	Stratford and Maryland	Approved planning permission; 524 beds paces completed
Duncan House	511	204	Stratford and Maryland	Completed
Jubilee House	716	286	Stratford and Maryland	Approved planning permission
Poland House	182	73	Stratford and Maryland	Approved planning permission
Grove Crescent Road	397	159	Stratford and Maryland	Approved planning permission
IQL North	909	364	Stratford and Maryland	Resolution to Grant
Plot M2, Car Park C, Westfield	520	208	Stratford and Maryland	Resolution to Grant
14 Marshgate Lane	316	126	Stratford and Maryland	Approved planning permission
Stratford High Street	465	186	Stratford and Maryland	Approved planning permission

¹ This ratio calculates the number of general needs homes that the PBSA expected to free up as a consequence of its development.

East Village Plot N16	504	202	Stratford and Maryland	Approved planning permission
Land adjacent to Meridian Steps	952	381	Stratford and Maryland	Approved planning permission
University Of East London Stratford Campus	650	260	Stratford and Maryland	Resolution to Grant
Total	9,384	3,754	-	-

4. What is the need for Purpose-Built Student Accommodation in Newham?

- 4.1 The London Plan 2021 sets out the overall need for PBSA in London. There is a need for 3,500 PBSA bed spaces to be provided annually over the Plan period in London, a total of 35,000 bed spaces between 2019/20 and 2028/29; notwithstanding this, more recent evidence suggests a lack of PBSA supply relative to growing numbers of students.²
- 4.2 As of April 2025, 9,384 bed spaces have been permitted or completed in Newham since the financial year 2019/20. This equates to around 27 per cent of London's wider need for PBSA, completed or permitted in one borough in only half of the London Plan's (2021) ten-year plan period. In particular, high delivery of PSBA is occurring in the Stratford and Maryland neighbourhood, which has seen the recent opening of the UCL East and London College of Fashion campuses.
- 4.3 Newham's Strategic Housing Market Assessment (SHMA) sets out that it is expected that students attending new university campuses in Stratford will increase the number of students studying in Newham from 15,000 to 25,000 between 2021 and 2023, as a result of the opening of the London College of Fashion Campus and UCL East. The SHMA recommends that the borough should deliver around 210 bed spaces of PBSA annually. This is calculated by applying an assumption that around 6% of London full time students will be studying in Newham, so 6% of London's need figure (35,000 bedspaces across the London Plan period) should be delivered in Newham. The 6% assumption is based on HESA data that a total of 407,910 full time students enrolled in London HEPs in 2020/21 (i.e. 25,000 students studying in 2023 / 407,910 = 6.12%). Delivering this many PBSA bed spaces per year would equates to 4% of the borough's annual London Plan housing target.
- 4.4 For the purposes of comparison with the data in the Newham SHMA, a list of higher education institutions with a campus in the borough and the numbers of students enrolled is provided below. Data is taken from HESA 2024³ apart from the UCL East and LCF data which come from alternative sources footnoted below.

Key Anchor institutions

- UEL (20,735 students)
- UCL East (approximately 4,000 students)⁴
- UAL (London College of Fashion) (LCF) (Approximately 5,500 students)⁵

² GLA (2024) [London Plan Guidance Purpose-built Student Accommodation](#)

³ Higher Education Statistics Agency (HESA) (2024). Who's studying in HE, Table 1: HE student enrolments by HE provider 2023/24 (Available at: <https://www.hesa.ac.uk/data-and-analysis/students/whos-in-he>).

⁴ Queen Elizabeth Park (2025). UCL East, (Available at: <https://www.queenelizabetholympicpark.co.uk/east-bank/ucl-east>).

⁵ UAL (2025). Life at LCF, (Available at: <https://www.arts.ac.uk/colleges/london-college-of-fashion/student-life-at-lcf>).

Other institutions

- Global Banking School (1,790 students)
- London Churchill College (1,325 students)

- 4.5 This data shows a total of around 33,350 students are studying in Newham. The number of approved and completed PBSA bed spaces in the London Plan period (9,384), plus bed spaces completed before 2019/20 (2,205 in Stratford plus 1,200 at UEL Docklands campus), means that there will be a PBSA room available per 2.5 students studying in Newham if current permissions are built out. Approved and completed PBSA bed spaces in the borough (9,384) also equate to 27% of London's need for PBSA across the London Plan period, a significantly higher proportion of delivery to meet need when compared with the number of students studying in Newham compared to the whole of London (6%).
- 4.6 Both UEL and UCL submitted representations to the Regulation 18 and Regulation 19 consultations on Newham's Draft Local Plan. Neither institution raised additional information with regards to increased need figures beyond those identified above over the course of the plan period.

5. Policy approach to meeting need for PBSA

5.1 Policy text: H8.1 and H8.2

5.1.1 Policy H8.1 and H8.2 in the Draft Submission Local Plan set out the spatial approach to the delivery of PBSA as follows:

Table 2: Policy text extract H8.1 and H8.2 in the Draft Submission Local Plan

Draft Submission Local Plan policy text	
1.	New purpose-built student accommodation in Stratford and Maryland neighbourhood will only be supported where: <ol style="list-style-type: none"> it is located within or adjacent to an existing campus development in the neighbourhood; or it is solely providing a replacement facility with no net increase in bed spaces.
2.	New purpose-built student accommodation in all other neighbourhoods outside Stratford and Maryland will only be supported where: <ol style="list-style-type: none"> it is located within or adjacent to an existing campus development in the borough; or it is in a town centre or local centre location well connected by public transport (with a minimum Public Transport Accessibility Level of 4); and it will not create an over-saturation of purpose-built student accommodation; or it is solely providing a replacement facility with no net increase in bed spaces or it is located within or adjacent to an existing campus development in the borough.

5.2 Representations received on Policy H8 in respect of meeting need

5.2.1 Representations received on this policy in respect of meeting need are summarised below:

Table 3: Summary of representations received on H8: Purpose Built Student Accommodation relevant to need

Representor	Comment
<i>Comments related to need for PBSA</i>	
Watkin Jones	The representation draws on evidence set out in Newham's Strategic Housing Market Assessment and a Student Needs Assessment accompanying an application at Grove Crescent Road to detail the need for new PBSA. Trends show second year, third year and post-graduates favouring PBSA over other forms of accommodation. The representation highlights the strategic-level high demand for PBSA across London and in Stratford (with the recent opening of the UCL East Campus).

	<p>Concerns are raised in the comments that the policy approach set out in the Draft Submission Local Plan Policy H8 is too restrictive, and should instead comply with the requirements of the London Plan.</p> <p>Watkin Jones contends that PBSA should not solely be allowed within town or local centres or campuses.</p> <p>The representation sets out the benefits of PBSA delivery, including its contribution to housing targets and freeing up general needs homes.</p> <p>Objections are raised concerning policy H8's limitations on new accommodation delivery in Stratford and Maryland. The representation states that no justification is provided for this policy position.</p> <p>Watkin Jones consider the need for PBSA to be directly adjacent to existing campus developments is unduly restrictive and a reasonable travel distance (for example 1,200m) should instead be incorporated into the policy.</p> <p>The policy should allow for moderate increases in bed spaces in existing developments to viably accommodate and encourage the sustainable renewal of older stock to address matters such as poor energy performance and fire risk.</p> <p>The policy should evidence the harm being caused by "over-saturation" of PBSA. Baseline housing mix data should be taken into consideration in this analysis.</p> <p>The Council should evidence how the over-saturation criteria have been formulated.</p> <p>Policy H2 should protect existing PBSA developments, given their important role in the modern housing market. They suggest deletion of the justification text that sets out there is no need to specifically protect PBSA from conversion to other forms of housing.</p>
Unite Group Plc	<p>The representation sets out that demand for PBSA has not kept pace with supply and the growth of campuses in the borough. It discusses attendance at UEL and other emerging campuses in the borough, and references SHMA data on the growth in the student population studying at HE providers in Newham.</p> <p>Unite raise that the policy limitations on new delivery in the Stratford and Maryland neighbourhood are contrary to the London Plan and NPPF.</p> <p>The representation references the contribution PBSA makes to boroughs' housing land supply.</p>

	<p>The comments reference an appeal in Haringey where the Inspector acknowledged that the London PBSA market currently does not come close to providing the amount of accommodation required to house London's students.</p> <p>The representation highlights that PBSA delivery can reduce pressure on the private rental sector and demand for HMO accommodation.</p> <p>Concerns are raised with regards to the policy not allowing for increases to the number of bed spaces in existing PBSA developments in Stratford and Maryland and areas of over-saturation. This is likely to make re-development unviable, and could mean PBSA is developed on other areas of land. This goes beyond the requirements of the London Plan policy.</p> <p>The policy does not set out or justify how the over-saturation thresholds have been formulated. Unite do not consider there is evidence that over-saturation causes harm or amenity impacts. They consider that the policy is discriminatory to student populations, and contrary to London Plan policy. Instead, PBSA development can help contribute positively to diverse and sustainable communities.</p> <p>Reference is made to appeal decisions across the UK where Inspectors have deemed that percentages greater than a 25% student population were found to not be harmful.</p> <p>The representation states that the London Plan makes no reference to 'over-saturation' or defining PBSA thresholds, and therefore this requirement is a deviation from Policy H15.</p> <p>The representation recommends:</p> <ul style="list-style-type: none"> - The removal of location limits on PBSA. - Removing the requirement for redevelopment of PBSA developments to deliver no net-increase in bed spaces. - Removing references to oversaturation.
University of East London (UEL)	<p>UEL recommend removing the text requiring existing PBSA redevelopments to not result in a net increase in bed spaces as it is too onerous.</p> <p>UEL consider Part 1 of the policy should be expanded to include reference to UEL's Docklands Campus.</p>
Stratford Original BID	<p>Stratford Town Centre has seen a high increase in PBSA in a very short period. Stratford Original BID consider that the impacts of this have not</p>

	been fully considered, particularly in relation to community integration, including the business community.
IQL Office LP	IQL Office LP support new purpose-built student accommodation delivery in the Stratford and Maryland neighbourhood.
Get Living Plc	The representation raises concerns that the policy would hinder the delivery of further PBSA on the remaining development plots at East Village, despite the principle of student accommodation being recently accepted and approved on Plot N16 of the development.
PEACH: The People's Empowerment Alliance for Custom House	PEACH consider new purpose-built student accommodation should only be built when there is a demonstrated need for it.
Hadley Property Group	<p>Hadley Property Group oppose the policy requirements in the Stratford and Maryland neighbourhood. They consider Stratford Town Centre to be the most sustainable location for PBSA in the borough.</p> <p>Hadley suggests that at a minimum, PBSA in Stratford and Maryland should be supported where it is delivered alongside and supports the delivery of housing.</p> <p>Hadley consider the policy is not flexible enough to meet the needs of universities in this area that are unable to provide the necessary accommodation for their students within or adjacent to their existing campus. PBSA in an accessible location that is a short journey by walking, cycling or public transport to existing campuses should be supported.</p>
University College London (UCL)	The restriction for proposals in the Stratford and Maryland neighbourhood to not result in net additional bed spaces are unnecessarily restrictive. UCL consider instead that new proposals should be subject to the usual development tests, namely that they are accessible by sustainable transport modes and from the higher education provider(s) to which the proposals are linked.
St William Homes LLP	<p>St William supports the acknowledgement of need for student housing in certain locations in the Borough.</p> <p>St William request that H8.2 is updated to also consider locations in close proximity to town centres. Sites immediately adjacent to town or local centres can equally benefit from high levels of public accessibility and should not be precluded.</p>

Unibail-Rodamco-Westfield	Unibail-Rodamco-Westfield have raised concerns that the policy approach in Stratford and Maryland will overly constrain the supply of PBSA, where there is set to be a significant increase in students studying in HE Institutions over the next ten years. They recommend removing restrictions to deliver PBSA in the Stratford and Maryland neighbourhood.
Dominus Stratford Limited	<p>The Newham Local Plan should set out clearer support for PBSA in the right locations, in accordance with the London Plan and national planning policy and guidance. Dominus Stratford Limited consider further PBSA is needed in the borough to meet the growth needs of HE providers in the borough. The representation notes the positive impacts delivering PBSA has in freeing up general needs accommodation and relieving pressure on the private rental sector.</p> <p>Dominus Stratford Limited consider the policy is overly restrictive, particularly the policy requirements in the Stratford and Maryland neighbourhood. They have submitted information from a needs assessment prepared to support a planning application at 302 - 312 High Street, Stratford, which shows a need for PBSA in Stratford and in Newham more widely. They consider the proposed policy approach is contrary to the London Plan, and will constrain delivery of PBSA to meet need.</p> <p>Dominus Stratford Limited consider Newham's SHMA does not set out what annual number of PBSA beds will be needed to keep pace with HE provider expansion in the borough. They consider a higher need figure should be included in the policies supporting text.</p> <p>The representation suggests that assessments of the acceptability of PBSA in all areas of the borough should be based on needs assessments and ensuring the accommodation is well-connected to local services by walking, cycling and public transport.</p> <p>Dominus Stratford Limited object to the policy approach to not allowing increases in bed spaces at sites which already provide PBSA. This does not allow for the best use of previously developed land, a design-led approach, optimisation of development, or for the redevelopment of PBSA to meet identified needs. It is also not considered viable.</p> <p>Dominus Stratford Limited consider the term "over-saturation" is negative and not defined or explained. They consider the term implies a prejudice against student populations.</p>
RAD CHP Ltd	The representation discusses the growth of campuses in the borough. Failure to deliver more PBSA will place pressure on the existing housing stock, as discussed in Newham's SHMA.

	<p>RAD CHP Ltd consider the policy will unduly restrict PBSA delivery and is not aligned with the London Plan. The policy in its current form will not meet need for new PBSA (arising from existing campuses and new HE institutions in the borough), and does not acknowledge that PBSA delivery contributes to meeting London Plan housing targets.</p> <p>They consider the 800 beds figure in the oversaturation criteria is not justified.</p> <p>RAD CHP Ltd consider that there should be adequate distinction in policy between 'new build' PBSA which occupies land which could otherwise be utilised for C3 housing, and the repurposing of existing buildings for PBSA.</p>
Places for London	<p>Places for London consider Part 2 of the policy to be overly restrictive, particularly requirements for new PBSA to be adjacent to an existing campus in the borough or within a town centre. The differences from the London Plan policy on PBSA delivery are not justified, and are therefore unsound.</p> <p>The draft Local Plan should provide a criteria for assessing 'over saturation / concentration' issues on a site by site / area by area basis, as recommended by the London Plan and draft GLA guidance.</p> <p>They consider that Newham should provide greater support for mixed forms of housing (including student housing) within site allocations close to town centres (particularly Canning Town) and public transport hubs. This will help to meet growing need for PBSA and relieve pressure on the private rental sector.</p>
Shelter and Newham Temporary Accommodation Action Group	<p>Shelter and Newham Temporary Accommodation Action Group consider the policy should cover building affordable student accommodation for families. This is a particularly acute issue for international students who have come to the UK with their dependents, who are required to live in overcrowded conditions. The representation attaches a publication discussing this issue.</p> <p>The policy should consider allocating a percentage of family dwellings needed when considering planning applications for purpose-built student accommodation.</p> <p>Policy H1 in the Local Plan should include further information on what types of households are most affected by the lack of quality homes in the borough, including international students and their families</p>

<i>Comments related to affordable housing requirements for PBSA</i>	
Watkin Jones	Watkin Jones consider there is no evidence to justify the specific need for 60% affordable student accommodation, including in the Local Plan Viability Report (April 2024).
Unite Group Plc	<p>Unite consider the policy is not justified, and is unviable. This is contrary to the London Plan, and will negatively impact PBSA delivery in Newham and the provision of communal amenity space, alternative uses to enhance viability and planning contributions in new PBSA developments.</p> <p>Unite consider the policy requirement should align with the London Plan affordable housing policy.</p>
University of East London (UEL)	UEL consider the target of 60% affordable student accommodation would have a significant impact on viability and should be reduced, particularly where PBSA proposals are being brought forward directly by Higher Education Providers.
IQL Office LP	IQL Office LP consider the affordable housing target to be unsound. They recommend that it is instead made consistent with the London Plan affordable student accommodation requirements.
Get Living Plc	Get Living Plc consider the affordable housing target to be unsound and not supported by the Local Plan Viability Assessment. They recommend that this is instead made consistent with the London Plan affordable student accommodation requirements.
Unibail-Rodamco-Westfield	Unibail-Rodamco-Westfield recommend reducing the affordable student accommodation target to align with the London Plan's fast track route.
Dominus Stratford Limited	Dominus Stratford Limited do not consider the affordable housing requirement to be justified or viable. They consider this requirement will constrain supply of PBSA. They suggest the target is amended to reflect London Plan policy, with an option for developers to deliver use class C3 affordable housing.
RAD CHP Ltd	The affordable housing target for PBSA is not sufficiently evidenced or justified, and is not consistent with the approach taken in neighbouring boroughs or the London Plan. It will increase the rents of market homes and will deter new PBSA, raising demand and prices for existing accommodation. It will also continue to place pressure on the rented sector in the borough. RAD CHP Ltd reference evidence from the Newham SHMA about numbers of properties with Class N Council tax

	exemptions for students.
<i>Comments related to clarity of the policy in relation to meeting need</i>	
Watkin Jones	<p>The policy should define what is meant by an “existing campus development”</p> <p>In respect of 1(b), the policy should clarify the use of the term “facility”</p>
Dominus Stratford Limited	<p>Dominus Stratford Limited request clarity on the meaning of the terms “adjacent” and “campus”.</p> <p>Within the policy implementation relevant to over-saturation, they consider that there is a lack of clarity as to what is meant by “net residential approvals and completions”.</p>
RAD CHP Ltd	<p>The policy needs to be clarified, in order to refer to both existing and “emerging” “planned” or “permitted” campus development in the borough.</p> <p>The policy should clarify whether part 2.d relates to PBSA located within or adjacent to an existing or permitted campus development in the borough.</p> <p>The policy should clarify the over-saturation criteria to confirm that the 800 figure is bed spaces additional to, not inclusive of, those already approved/existing within 300m.</p>

5.3 Consideration of representations concerning need and policy soundness

Meeting housing need through mixed and inclusive neighbourhoods

- 5.3.1 Developers, Shelter and resident groups have collectively raised the importance of PBSA delivery being linked to need. Developers have also expressed concerns about the policy approach in the Submission Local Plan being too restrictive, negatively impacting HEPs and developers’ ability to meet need for PBSA. However, we maintain that the policy approach in Policy H8 is positively prepared, to meet the needs of both students and those requiring general needs accommodation in the borough.
- 5.3.2 Given the limited availability of land across the borough, the policy approach in H8 seeks to balance the need for PBSA bed spaces alongside the need to deliver more general needs housing in the borough, which is, as demonstrated by the [Newham Strategic Housing Market Assessment \(2022\)](#) (SHMA), the majority of Newham’s

housing need across the Local Plan period. The policy approach set out in H8.1 and H8.2 will help to ensure that the delivery of general needs housing is not undermined, thereby contributing to the delivery of mixed and balanced communities in line with the Local Plan objectives, London plan objectives and the PBSA LPG.

- 5.3.3 While the Stratford and Maryland neighbourhood has seen a significant increase in permitted PBSA bedspaces, Stratford and Maryland remains a location in the borough where a high proportion of our housing need will be met. The Newham housing trajectory shows that 12,019 general needs homes are planned to be delivered in Stratford and Maryland across the Submission Local Plan period, which represents 23% of planned general needs delivery across the new plan period. It is therefore important to ensure that housing delivery in this neighbourhood delivers sufficient general needs homes to ensure we don't undermine our ability to address the highest housing needs in the borough, namely for family and affordable homes (which represent 59% and 53% of need respectively)⁶. This is also why Policy H2 of the Local Plan does not seek to specifically protect PBSA from conversion to other forms of housing, noting it is not a priority need that requires protection in the same way as affordable housing, family homes and priority specialist needs.
- 5.3.4 A number of representations, including from Watkin Jones, Unite Group Plc; RAD CHP Ltd and Dominus Stratford Limited suggested in consultation responses to the Submission Draft Local Plan that PBSA could free up (C3) general needs housing by taking students out of the private rental sector who would otherwise be occupying HMOs in borough. As per the London Plan, net non-self-contained accommodation for students should count towards meeting housing targets on the basis of a 2.5:1 ratio i.e. an assumption that 2.5 students occupy a general needs unit. As per Table 1, currently 3,754 general needs homes are anticipated be made available as a result of approved and completed permissions across the 2021 London Plan period. However, in Newham⁷ an Article 4 Direction has been active since 2013, requiring planning permission for a change of use from a C3 dwelling house to a C4 small HMO. This Article 4 Direction has limited the number of HMOs in the borough, with Newham reporting 3,105 licenced HMOs as of 2023. Consequently, it is less likely that HMOs will automatically be freed up or converted to family homes as a result of increased PBSA delivery, given their limited availability in the borough. This limits the impact of PBSA development increasing the availability of family homes, which represent one of the boroughs priority housing needs along with affordable housing. It is also important to note that Newham has a higher occupancy rate than many other boroughs, meaning that PBSA developments may not result in significantly more people being housed compared with general needs housing developments.
- 5.3.5 Additionally, developing more PBSA does not guarantee that the borough's housing needs will be met. The most significant housing needs in the borough are family homes and affordable housing. Increased PBSA delivery will consume the limited land available for building those family and affordable homes needed and which can

⁶ See Figure 51 in the Newham SHMA

⁷ Excluding the area formerly administered for planning purposes by the LLDC

be secured through the planning system. Furthermore, even if through building more PBSA general needs accommodation is freed up to meet housing need, there is no guarantee freed up homes will meet the needs of the many residents in Newham requiring access to affordable or family homes, especially as these residents will be competing against sharers who can afford higher rents.

5.3.6 PBSA is also an inflexible form of housing compared to general needs housing (C3). If demand for PBSA falls and buildings are not occupied, it will be difficult to change the use of these developments to meet our housing needs. Despite a rising student population, PBSA could be susceptible to fluctuations in demand. These fluctuations in demand could be caused by:

- Recent changes to immigration policy that have reduced numbers of international students coming to the UK to study. International students represent the largest market segment for PBSA, with Higher Education Statistics Agency (HESA) data from 2021/22 showing 40% of international students chose to live in PBSA⁸. The Home Office figures show a 31% drop in UK-sponsored study visas from 498,068 in 2023 to 393,125 in 2024⁹. This drop-off followed new visa restrictions that were announced in May 2023 and then later made effective from January 2024. These restrictions prevent postgraduates from bringing dependent family members and new students from switching to work visas before completing their courses. In London, the number of students with permanent addresses outside of the UK fell from 209,860 in 2022-23 to 207,685 in 2023-24 according to HESA (2024)¹⁰.

In May 2025, the government announced further immigration reforms targeting student visa sponsors. These reforms include:

- Stricter compliance thresholds;
- A new risk rating system to assess sponsor performance;
- Recruitment limitations for underperforming institutions; and
- Mandatory registration with a quality assurance framework for overseas agents.

This tightening of immigration policy for international students is likely to reduce the demand for PBSA in London.

⁸ This HESA data from 2021/22 was referenced from an article by CBRE UK (2024). The future of international students in the UK and what this means for PBSA, (Available at: <https://www.cbre.co.uk/insights/articles/the-future-of-international-students-in-the-uk-and-what-this-means-for-pbsa>).

⁹ Home Office (2025). Why do people come to the UK? Study, (Available at: <https://www.gov.uk/government/statistics/immigration-system-statistics-year-ending-december-2024/why-do-people-come-to-the-uk-study>).

¹⁰ Higher Education Statistics Agency (HESA) (2024). Who's studying in HE, Figure 7: HE student enrolments by HE provider and permanent address, (Available at: <https://www.hesa.ac.uk/data-and-analysis/students/where-from#non-uk>).

- Increasing living costs mean more students, both UK and international, are opting for lower-cost accommodation such as university-owned accommodation or a private rented home¹¹.
- Rising living costs have led to more students choosing to live at home and commute to university. Since the London student accommodation need was calculated for the London Plan 2017 (amended 2018), the number of full-time students living at home in London has risen by 39% from 73,850 in 2018/19 to 102,405 in 2023/24 according to data from HESA (2024)¹². Housing need projections do not account for the dramatic rise in students living at home and commuting to university. Students now living at home and commuting represent 24.2% of students in London and 40% of UK domicile students in London according to data from HESA (2021/22)¹³.

5.3.7 Despite the restriction of PBSA in areas of over-concentration such as Stratford and Maryland, we consider that the policy is positively prepared to meet need, namely outside identified areas of 'over-concentration'. The policy is supportive of new PBSA in town or local centre locations with a minimum PTAL of 4, provided it will not create an overconcentration of PBSA and undermine the delivery of general needs housing. While representations have highlighted the accessibility of Stratford as a location for PBSA delivery, other town and local centre locations within the borough also have excellent connections to central London, particularly those located in proximity to the District and Hammersmith and City lines, the DLR, the Elizabeth line and Jubilee line. Town and Local Centres are considered the most appropriate location for new PBSA as they can effectively support these densely occupied forms of development, and are most accessible to a range of users. They have better public transport and infrastructure in place to manage large congregations of people, as well as a range of facilities that people need (and can benefit from) in the course of a single trip. In turn, there is also the opportunity for centres to benefit from the additional spend and investment generated from increased numbers of people.

5.3.8 In areas of over-concentration, new PBSA delivery will also be supported where it linked to an adjacent existing or approved campus development, allowing for existing HE providers to meet their accommodation needs. This approach is positively prepared, seeking to secure associated local jobs and economic benefits that student accommodation accompanied by campus expansion can produce. This also aligns with the Local Plan objectives to deliver an inclusive economy to support people in hard times, supporting the local economy through improving the quantity, range and

¹¹ Unipol (2024). International Student Housing Survey, (Available at: <https://www.unipol.org.uk/media/eamh54s5/the-international-student-housing-survey-briefing-paper.pdf>).

¹² Higher Education Statistics Agency (HESA) (2024). Where do HE students study? Table 57: Full-time HE student enrolments by HE provider and term-time accommodation, (Available at: <https://www.hesa.ac.uk/data-and-analysis/students/where-study#accommodation>).

¹³ This HESA data from 2021/22 was referenced from an article by Higher London (2024). Commuter Students in London: A briefing note, (Available at: <https://londonhigher.ac.uk/wp-content/uploads/2024/03/Commuter-students-in-London-A-briefing-note-2.pdf>).

affordability of employment space in the borough, while also delivering the homes required to meet the diverse needs of our population.

- 5.3.9 In order to prevent unrestricted densification of existing PBSA in the Stratford and Maryland neighbourhood and other areas of over-concentration, the policy also places limits on redeveloped PBSA providing a net increase of bedspaces in these locations. Developers have raised concerns as to the sustainability and viability of this policy restriction. However, we consider this policy approach to be effective and justified, ensuring that policy restrictions elsewhere in these areas do not result in unsustainable densification of existing PBSA developments. It is also noted that currently all PBSA developments in these areas are less than 15 years old, and therefore aren't anticipated to be redeveloped in the plan period. Therefore, the policy position is considered to be effective, and would not unduly restrict redevelopment of existing PBSA developments.

Measuring over-concentration

- 5.3.10 The implementation text for policy H8 of Newham's Submission Local Plan sets out indicators, which seek to monitor over-concentration of student bed spaces in each neighbourhood:

Table 4: Implementation text extract for Policy H8

Draft Submission Local Plan implementation text (ALL)
<p>This policy will seek to monitor over-saturation of student bed spaces in each neighbourhood. For the purposes of this policy, over-saturation of purpose built student accommodation in a neighbourhood or resulting from a development is considered to be:</p> <ul style="list-style-type: none"> • over 25 per cent of net residential approvals and completions over the plan period being delivered as purpose built student accommodation in a neighbourhood; and/or • a proposal would lead to over 800 beds of student housing being located within a radius of 300 metres from an existing purpose built student accommodation site or approved development.

- 5.3.11 While developers have raised concerns about these criteria, stating there is no evidence of harm of overconcentration of student populations, these criteria have been formed on the basis of PBSA development limiting land available for general needs housing development, rather than concerns relating to student population increase.
- 5.3.12 Having a threshold for overconcentration is in conformity with GLA guidance for LPAs in their (2024) LPG. The LPG advises LPAs on the role of PBSA in delivering an appropriate balance of PBSA and conventional housing, contributing to Local Plan objectives to deliver mixed and inclusive neighbourhoods. The LPG suggests policies could indicate a threshold of concern (i.e. the proportions of student housing, relative

to conventional housing, that would likely be considered harmful, and the reasons for this), and could seek to limit the number of units (bed spaces) within a defined area, for example as part of a masterplan vision. It also suggests that plans could encourage separation between PBSA developments, where there are cumulative impact concerns within a small area.

- 5.3.13 In order to align with the LPG's recommendation to develop a threshold to reduce harm, the Council has considered recent appeal decisions relating to suitable thresholds and developed a methodology that works in the Newham context. The appeal decision that have informed these thresholds are set out below:

Table 5 Analysis of appeal decisions that have informed the Draft Submission Local Plan overconcentration thresholds

Threshold	Appeal reference that informed the threshold	Summary of appeal decision and policies being tested	How we have used this appeal decision to develop our threshold
Over 25 per cent of net residential approvals and completions over the plan period being delivered as purpose built student accommodation in a neighbourhood	APP/X5210/A/09/2116573	<p>The appeal related to the development of a part four/part five-storey building plus basement, to provide 31 affordable homes and 114 student accommodation rooms, internal communal amenity areas and kitchens, landscaped garden amenity areas and cycle storage.</p> <p>One of the reasons for refusal related to the scheme's excessive proportion of high density student accommodation, which failed to deliver an appropriate mix of dwellings to suit the site conditions and the locality contrary to policy H8 (mix of units) and SD1A (sustainable communities) of the London Borough of Camden Replacement Unitary Development Plan 2006.</p> <p>Camden made this case on the basis that resident students represented 25% of all usual residents in the ward on the basis of the 2001 Census.</p> <p>The appeal was subsequently dismissed by the Planning Inspector.</p>	<p>The threshold of 25 per cent, used in the Camden appeal has informed the proposed threshold for over-concentration.</p> <p>We have used housing coming forward over the plan period to measure overconcentration, rather than population. This approach relates more closely to the rationale behind the policy's over-concentration limits i.e. ensuring we do not undermine our ability to meet our priority housing needs on limited available land.</p> <p>This change also allows for regular monitoring of over-concentration, to better respond to changes in housing delivery in wards across the plan period.</p>

<p>A proposal would lead to over 800 beds of student housing being located within a radius of 300 metres from an existing purpose built student accommodation site or approved development</p>	<p>APP/E5900/A/08/2077312</p>	<p>The appeal related 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). The appeal was refused, in part, on the basis that the proposal would result in an over-concentration of student accommodation and a subsequent loss of amenity to existing residents. It was also not considered to be beneficial to the emerging mixed-use character and function of the area and was considered to have negative social, cultural, physical and economic impacts. The policies used in the reasons for refusal included policy HSG14 in the Tower Hamlets UDP 1998, policies CP1 and CP24 in the Interim Planning Guidance (October 2007) and policy 3A.22 in the London Plan.</p> <p>The appeal decision discusses how the existing and committed population of students in the immediate locality (533 bedspaces), would be increased to 790 students in this part of Bethnal Green as a result of the appeal decision. After balancing the potential positive and negative impacts of this population increase, the Inspector concluded that the increase in student bedspaces from 533 to 790 would not accord with the Government's policies expressed in PPS 1 of promoting sustainable, liveable and mixed communities. The increase in transient population upon social fabric wasn't considered to lead to stability, which was considered to</p>	<p>The 800 bed space threshold has been informed by the appeal decision, which considered 790 bedspaces represented an overconcentration of bedspaces in the area of Bethnal Green the appeal site was located in.</p> <p>The radius of 300 metres 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 (just under 20 per cent of the average size of a Newham ward – 161.25 ha).</p>
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		underpin community cohesion and quality of life for the community.	
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5.3.14 An analysis of overconcentration in neighbourhoods based on the above thresholds is provided below:

Neighbourhood	Student bed space approvals and completions in draft Local Plan period	Other approvals and completions in draft Local Plan period – general needs units plus specialist and supported housing bed spaces ¹⁴	Percentage (%) of net approvals and completions over the plan period being delivered as PBSA in neighbourhood
Stratford and Maryland	4,808	4,712	51%
Canning Town	377	2,449	13%

5.3.15 As shown in the above table, the Stratford and Maryland neighbourhood has seen a significant overconcentration of PSBA approvals and delivery. Therefore, Policy H8 in the submission Local Plan resists further delivery of PSBA in the neighbourhood. The policy does, however, include an exception to this is where delivery is proposed adjacent to or within an existing campus development in the neighbourhood, and has a nominations agreement with this campus provider, as discussed more fully in paragraph 5.3.8 above. This approach is positively prepared to meet the expansion needs of existing HEPs in the borough over the course of the plan period.

Affordable housing requirements for Purpose-Built Student Accommodation

5.3.16 Policy H8.3 in the Draft Submission Local Plan requires the following:

Table 6: Policy text extract for Policy H8.3

Draft Submission Local Plan policy text
<p>3. New purpose-built student accommodation should provide at least 60 per cent affordable student accommodation as defined within the London Plan 2021. Developments for purpose-built student accommodation that do not achieve a policy compliant level of affordable student accommodation on site are required to submit a detailed financial viability assessment, demonstrating that the maximum viable mix will be delivered.</p>

¹⁴ This calculation does not include the ratio applied to net non-self-contained communal accommodation set out in paragraph 4.1.9 of the London Plan (2021), which counts one point eight bedrooms/units being as a single home for these types of homes.

- 5.3.17 Developers and HEPs have raised concerns that the affordable housing policy is not sufficiently justified and should instead be aligned to the London Plan. However, we consider the policy approach to be sound, being both effective and justified. Our proposed target for affordable student accommodation aligns with our strategic affordable housing target, which seeks to meet identified need for affordable accommodation. The target in policy H8 both seeks to meet the needs of student requiring affordable housing, which also ensuring there is no financial incentive for developers to deliver PBSA over affordable housing as a result of differing affordable housing requirements.
- 5.3.18 Student accommodation costs in London are becoming increasingly unaffordable for students. A report from Unipol and the Higher Education Policy Institute (HEPI)¹⁵ in December 2024 found the maximum student loan (£13,348) is now less than the average student rent in London (£13,595), which has risen by 18% in the last two academic years. This leaves students with almost no remaining income to cover basic living costs. As a result, students will need to find other sources of income to cover these living costs, either from parents or guardians, or by working alongside their studies. According to a HEPI (2024)¹⁵ survey, 65% of full-time undergraduates in Greater London had paid employment while studying. Experts suggest that higher education is divided into two tiers: students who must work while studying and those who can focus solely on their degree¹⁶. Students having to take on part-time employment alongside their studies could negatively impact their academic outcomes, as well as their mental and physical wellbeing.
- 5.3.19 A significant proportion of domestic ‘commuter’ students in London are now opting to remain living with parents or guardians and commute to university. This is supported by research from Donnelly and Gamsu (2018)¹⁷, who found students from lower social class groups were significantly more likely live at home while studying. This has negative impacts on student’s academic and social experiences as they have less accessibility to campuses and less time interacting with other students. As suggested in a HEPI report by Maguire and Morris (2018)¹⁸, “commuter students obtain poorer outcomes from their higher education, and will be less engaged and satisfied with their academic experience”.
- 5.3.20 Students from lower socio-economic backgrounds may also be prevented from moving to London due to living and commuter costs. This reduces social mobility

¹⁵ Neves, J., Freeman, J., Stephenson, R., & Sotiropoulou, P. (HEPI)(2024). Student Academic Experience Survey 2024, (Available at: <https://www.hepi.ac.uk/wp-content/uploads/2024/06/SAES-2024.pdf>).

¹⁶ Adams, R. (2024). More than half of UK students working long hours in paid jobs, The Guardian, 13 June. (Available at: <https://www.theguardian.com/education/article/2024/jun/13/more-than-half-of-uk-students-working-long-hours-in-paid-jobs>).

¹⁷ Donnelly, M. & Gamsu, S. (2018). Social, ethnic and spatial inequalities in student mobility. (p.4), (Available at: https://www.suttontrust.com/wp-content/uploads/2019/12/Home_and_away_FINAL.pdf).

¹⁸ Maguire, D. & Morris, D. (HEPI) (2018). Homeward Bound: Defining, understanding and aiding ‘commuter students’, (p.6), (Available at: https://www.hepi.ac.uk/wp-content/uploads/2018/12/HEPI-Homeward-Bound-Defining-understanding-and-aiding-%E2%80%99commuter-students%E2%80%99-Report-11429_11_18Web-1.pdf).

within our institutions and means we lose out on attracting some of the most talented students from low-income backgrounds.

- 5.3.21 These factors outline the impact of rising PBSA costs on students' wellbeing, academic performance, and social mobility, further justifying our proposed target for affordable student accommodation, aligned with our strategic affordable housing target. While the policy does not seek to align with the fast track route set out in the London Plan, it does seek to ensure that the maximum level of accommodation is secured as affordable student accommodation, as per the PBSA LPG.
- 5.3.22 This policy approach seeks to ensure the delivery of student accommodation is optimised on a case by case basis. We consider that as economic circumstances improve, the policy will become easier to deliver over the plan period. The policy also allows for the submission of a viability assessment in circumstances where developments are unable to achieve the policy target, thereby ensuring the plan remains effective and deliverable.

Clarifications to the policy wording

- 5.3.23 In representations received on meeting need for PBSA, some representors raised concerns relating to the clarity of the policy. These are considered in further detail below:
- Watkin Jones, Unite and Dominus Stratford Limited raised concerns about the use of the word '*saturation*', used in Policies H8.2.c and H8.4.b to describe the over-saturation of PBSA. They suggested the term and policy provisions conveyed prejudice against the student population and would make them feel unwelcome. The council reject these suggestions, as the rationale for the policy requirements are primarily to ensure neighbourhoods have a mix and balance of housing types and sizes, meeting the borough's housing needs, which are predominately for general housing needs. However, we consider amending the word '~~saturation~~' to '**concentration**' would better align with the London Plan and associated planning guidance (LPG), which refers to the concept as 'over-concentration'.
 - RAD CHP Ltd raised ambiguity in the wording of Policies H8.2.a, H8.4.c, and H8.5, which require PBSA to be located near an existing campus development in the borough. The respondent questioned whether "existing" also includes approved but not yet built campus developments. To support the positive preparation of the policy in meeting the accommodation needs of HEPs in the borough, we consider that a modification clarifying the policy wording to refer to "an existing **or approved** campus development" or "existing student **or approved** campus-based facilities." would be beneficial.
 - RAD CHP Ltd raised concerns about the justification for the oversaturation criteria, questioning whether the 800 bedspaces proposed in one of the over-saturation thresholds are in addition to, not inclusive of, those already approved/existing within 300 metres. To support the effectiveness of the policy,

we have proposed a modification to the Implementation text for the Inspector's consideration. This clarifies that the threshold defining oversaturation should be measured from the proposal site rather than from nearby approved developments.

- Dominus Stratford Limited raised that there was a lack of clarity as to what is meant by "net residential approvals and completions" in the policy's implementation text. We consider an addition to the implementation text could support the effectiveness of the policy, through further clarifying how the threshold will be measured.
- Watkin Jones and Dominus Stratford Limited also raised concerns about the ambiguity of the term "campus", noting that some higher education institutions do not have a defined campus. Additionally, Dominus Stratford Limited questioned the meaning of "adjacent to" in the context of policy requirements. To support the effectiveness of the policy requirements and ensure clarity, we have proposed definitions of both terms as modifications for the examiner to consider.

5.3.24 Noting the above concerns, we propose that the following wording amendments to the policy H8 could help address these issues and improve the effectiveness of the policy, and have therefore presented them for the inspectors' consideration below. Suggested for deleted policy wording is shown with a ~~strike through~~ and the new policy wording is marked in **bold**.

Table 7: Proposed modifications to Policy H8 for the Inspector's consideration

Policy wording	Policy part
<p>1. New purpose-built student accommodation in Stratford and Maryland neighbourhood will only be supported where:</p> <p>a. it is located within or adjacent to an existing or approved campus development in the neighbourhood; or</p> <p>b. it is solely providing a replacement facility with no net increase in bed spaces.</p> <p>2. New purpose-built student accommodation in all other neighbourhoods outside Stratford and Maryland will only be supported where:</p> <p>a. it is located within or adjacent to an existing or approved campus development in the borough; or</p> <p>b. it is in a town centre or local centre location well connected by public transport (with a minimum Public Transport Accessibility Level of 4); and</p> <p>c. it will not create an over-saturation concentration of purpose-built student accommodation; or</p> <p>d. it is solely providing a replacement facility with no net increase in bed spaces or it is located within or adjacent to an existing or approved campus development in the borough.</p>	Policy H8

<p>3. New purpose-built student accommodation should provide at least 60 per cent affordable student accommodation as defined within the London Plan 2021. Developments for purpose-built student accommodation that do not achieve a policy compliant level of affordable student accommodation on site are required to submit a detailed financial viability assessment, demonstrating that the maximum viable mix will be delivered.</p> <p>4. New purpose-built student accommodation should:</p> <ul style="list-style-type: none"> a. secure the majority of the bedrooms in the development, including all of the affordable student accommodation bedrooms, through a nomination agreement, for occupation by students of one or more higher education providers; or b. in areas of over-saturation concentration, secure all of the bedrooms in the development through a nomination agreement, for occupation by students of one or more higher education providers; and c. where purpose-built student accommodation is being delivered within or adjacent to an existing or approved campus development in the borough in accordance with H8.1.a or H8.2.d, the nominations agreement should be secured for occupation by students of the higher education provider that the development is located is within or adjacent to. <p>5. Developments delivering purpose-built student accommodation should provide ancillary communal space for study and sporting facilities that meet the needs of the student population within a development unless the accommodation is located within 1,200 metres of existing or approved student campus-based facilities for studying and/or sport and recreation that have sufficient capacity to meet any increased need.</p> <p>6. Developments for purpose-built student accommodation should include an appropriately detailed and resourced residential management plan.</p>	
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<p>This policy will seek to monitor over-saturationconcentration of student bed spaces in each neighbourhood. For the purposes of this policy, over-saturationconcentration of purpose built student accommodation in a neighbourhood or resulting from a development is considered to be:</p> <ul style="list-style-type: none"> • over 25 per cent of net residential approvals and completions over the plan period being delivered as purpose built student accommodation in a neighbourhood; and/or • a proposal would lead to over 800 beds of student housing, including existing or approved purpose built student accommodation sites, being located within a radius of 300 metres from the proposal site an existing purpose built student accommodation site or approved development. <p>In assessing overconcentration, student accommodation and other forms of net non-self-contained communal accommodation will be measured using the net number of bed-spaces they provide, while general needs housing will be measured on a unit basis.</p> <p>For the purposes of this policy only, adjacent to is defined as ‘being within 300 metres of’.</p> <p>For the purposes of this policy, ‘campus’ is defined as ‘a cluster of teaching and student facility buildings and purpose built student accommodation that serve a single college or university’.</p>	<p>H8 Implementation text - ALL section</p>
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5.3.25 We have also proposed the following modifications to the policy that are considered to be minor, to reflect the change in terminology used from over saturation to overconcentration.

Table 8: Proposed modifications to Policy H8 for the Inspector’s consideration

Policy wording	Policy part
<p>Where a new development would lead to an over-saturationconcentration of student accommodation in a neighbourhood (see definition of over-saturationconcentration in the ‘ALL’ implementation text for Policy H8 above), accommodation should either:</p> <ul style="list-style-type: none"> • only re-provide the same number of bedrooms as the existing development and should not result in a net increase of student bed spaces; or • deliver a campus-based expansion linked to an existing higher education campus in the neighbourhood. These developments should be located within or adjacent to an existing campus development in the borough. 	<p>H8.2 Implementation text</p>

<p>Areas of over-saturationconcentration will be assessed in accordance with the definition of over-saturationconcentration in the 'ALL' implementation text for Policy H8 above.</p> <p>In areas that don't experience over-saturationconcentration of purpose-built student accommodation, the majority of purpose-built student rooms are required to be secured through a nominations agreement as part of a development's legal agreement. This agreement should ensure that reasonable endeavours are used to secure the majority of the bedrooms in the development, including all of the affordable student accommodation bedrooms, for occupation by students of one or more higher education providers by the point of first occupation.</p> <p>At pre-application stage, a letter of comfort should also be provided by the interested Higher Education Provider(s), showing the provider's intent to continue discussions with the developer and indicate their likelihood to enter into contractual obligations with the developer in relation to the proposals. The letter of comfort should also outline the provider's present and future accommodation needs, and how the design of the development meets these needs.</p> <p>If a nominations agreement cannot be secured by the point of first occupation, the local planning authority should be notified to show that all reasonable endeavours have been taken. In the interim, a cascade mechanism of direct lets should be secured. The following hierarchy will be applied:</p> <ul style="list-style-type: none"> • full-time higher-education students at local Higher Education Providers (within Newham's borough boundary). • those at other London HEPs with good sustainable transport connections to the site. • any other higher-education student at a London HEP campus. • as a last resort, any other higher-education student with a need to reside in London. <p>Proposals that would create or worsen an over-saturationconcentration of purpose-built student accommodation should secure all of the bedrooms in the development through a nomination agreement with a higher education provider(s). Where purpose-built student accommodation is being delivered within or adjacent to an existing campus development in the borough in accordance with H8.1.a or H8.2.d, the policy requires the nominations agreement to be secured for occupation by students of the higher education provider that the development is located is within or adjacent to.</p> <p>Proposals creating an over-saturationconcentration will need to</p>	<p>H8.4 Implementation text</p>
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<p>provide additional certainty around a nominations agreement being signed prior to first occupation of the development in accordance with the requirements of parts 4.b and 4.c of the policy. Developments seeking to comply with parts 4.b and 4.c of the policy will not have a cascade mechanism of direct lets forming part of their legal agreement. Without sufficient certainty of nominations provided throughout pre-application and application discussions, an application will be refused.</p> <p>In order to demonstrate certainty around a nominations agreement being signed, it is expected that the Higher Education provider(s) who are expected to sign up to a development's nominations agreement attend pre-application meetings for a proposal. This is to demonstrate that the design of a development has taken into consideration the needs of the Higher Education provider whose students the development will be accommodating.</p>	
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5.4 Summary on soundness: Meeting need

- 5.4.1 In summary, we consider the approach within the plan to meeting the need for PBSA accommodation to be sound, as discussed below in relation to each of the tests of soundness:
- Positively prepared – The policy is positively prepared to meet need for PBSA accommodation across the plan period, while also ensuring such delivery does not undermine the delivery of general needs housing to meet pressing housing needs in the borough. While considerations of over-saturation have been included in the policy, delivery of PBSA in well-connected town and local centres outside of these locations is supported and will help to ensure we continue to meet London's wider need for PBSA across the plan period.
 - Justified – our policy approach is based on analysis of existing PBSA delivery, approved bedspaces in the borough's Local Plan housing trajectory and evidence of housing need set out in Newham's Strategic Housing Market Assessment. The oversaturation criteria are clearly defined and based on appeal decisions adapted for the Newham context, as set out in Table 5. The policy also seeks to avoid any associated over-densification of existing PBSA developments in areas of overconcentration, which may result from the wider policy restrictions in these areas.
 - Effective – we consider the policy to be deliverable across the plan period. A small number of amendments, to further support the clarity of the policy for developers, have been provided for the Inspector's consideration.
 - Consistent with national policy – we consider our approach accords with national policy in that it seeks to meet the needs of the student population in Newham, in accordance with the requirements set out in Section 2 of this topic paper. The

policy has also been informed by the London Plan, and the guidance set out within the PBSA LPG. While our affordable housing requirements for PBSA differ from the London Plan, our proposed target for affordable student accommodation aligns with our strategic affordable housing target. The target both seeks to meet the needs of student requiring affordable housing, which also ensuring there is no financial incentive for developers to deliver PBSA over affordable housing as a result of differing affordable housing requirements.

- 5.4.2 While we are satisfied the policy set out in the Submission Local Plan is sound, we have proposed a small number of wording amendments to the policy H8 that could help increase the clarity of the policy, and have therefore presented them for the inspectors' consideration in table 7. We have also proposed a small number of modifications, which are considered to be minor, to the policy to align with terminology used in the GLA's PBSA LPG.

6. Requirements for Nominations agreements

6.1 Policy text: H8.4

6.1.1 Policy H8.4 in the submission Local Plan requires the following:

Table 9: Policy text extract for Policy H8.4

Draft Submission Local Plan policy text	
4.	<p>New purpose-built student accommodation should:</p> <ol style="list-style-type: none"> secure the majority of the bedrooms in the development, including all of the affordable student accommodation bedrooms, through a nomination agreement, for occupation by students of one or more higher education providers; or in areas of over-saturation, secure all of the bedrooms in the development through a nomination agreement, for occupation by students of one or more higher education providers; and where purpose-built student accommodation is being delivered within or adjacent to an existing campus development in the borough in accordance with H8.1.a or H8.2.d, the nominations agreement should be secured for occupation by students of the higher education provider that the development is located is within or adjacent to.

6.2 Representations received on Policy H8 in respect of nominations agreements

6.2.1 Representations received on this policy in respect of nomination agreement requirements are summarised below:

Table 10: Summary of representations received on H8: Purpose Built Student Accommodation relevant to nominations agreement

Comments related to nominations agreements requirements for PBSA	
Watkin Jones	<p>The representation highlights that the London Plan recognises students do not always live in the area they study. Therefore, the policy is not in conformity the London Plan.</p> <p>Requiring a Nominations Agreement for all PBSA assumes that all Higher Education (HE) institutions have the commercial ability to commit to long term accommodation contracts. This favour institutions with stronger balance sheets.</p> <p>Nominations agreements are only one indicator of need for PBSA.</p> <p>Policy requirements should allow more flexibility in signing up to nominations agreements, and HE providers should not need to attend pre-application discussions.</p>

Unite Group Plc	<p>With regards to ‘over-saturation’ there is no robust justification for the definition provided or any evidence that increased concentrations of PBSA can lead to adverse impacts.</p> <p>All references to ‘over-saturation’ should be removed, alongside the separate nomination requirements for these areas.</p> <p>Unite consider the policy’s nomination agreement requirements are contrary to the London Plan.</p>
IQL Office LP	Linking nominations to adjacent institutions would reduce flexibility and be contrary to the London wide need basis of the London Plan.
Get Living Plc	Linking nominations to adjacent institutions, would reduce flexibility and be contrary to the London-wide need basis set out in the London Plan.
Hadley Property Group	<p>Hadley agrees with the changes to nominations agreements with higher education providers to not have to be located in Newham.</p> <p>The requirement to secure all bedrooms within a development in ‘areas of over-saturation’ through a nomination agreement is not supported, and it is not in line with the London plan and does not reflect student preferences.</p>
University College London (UCL)	UCL supports the omission of the requirement for purpose-built student rooms to be secured through a nomination agreement with a Newham-based higher education provider.
Dominus Stratford Limited	<p>Dominus Stratford Limited support part 4.a. of the policy.</p> <p>They consider part 4.b. goes significantly beyond the London Plan, and the concept of “over-saturation” requires justification. They consider the impacts of PBSA are better managed through management plans and the delivery of onsite affordable housing. They recommend deleting this part of the policy.</p> <p>They consider part 4.c. would lead to an unfair commercial advantage for adjacent HEIs, which will lead to a constrained supply. Instead, the policy should seek nominations with adjacent providers “in the first instance”.</p>
RAD CHP Ltd	The supporting text’s reference to a cascade mechanism for direct lets, should a nominations agreement not be secured by the point of first occupation, is supported and should be applied uniformly to all PBSA proposals in the borough.

6.3 Consideration of representation concerning nominations agreements

- 6.3.1 Policy H8.4.a aligns with the policy expectations set out in the London Plan Policy H15, for the ‘majority of the bedrooms in the development including all of the affordable student accommodation bedrooms are secured through a nomination agreement for occupation by students of one or more higher education provider’. This approach is positively prepared to meet a broad range of accommodation needs, including from institutions outside the borough. The cascade mechanism of direct let set out within the H8.4 implementation text is in conformity with the guidance from the GLA’s PBSA LPG.
- 6.3.2 As per the comments set out in Table 10, developers have primarily raised concerns around the justification parts H8.4.b and H8.4.c of the policy. Policy H8.4.b aims to ensure PBSA delivery in areas of over-concentration aligns with the growth needs of existing and approved education campuses in the borough. H8.4.c ensures that where purpose-built student accommodation is being delivered within or adjacent to an existing campus development in the borough in accordance with H8.1.a or H8.2.d, the nominations agreement are secured for occupation by students of the higher education provider that the development is located is within or adjacent to.
- 6.3.3 Watkin Jones, Unite Group Plc, IQL Office LP, Get Living Plc, Hadley Property Group, Dominus Stratford Limited and RAD CHP Ltd have argued that this approach is contrary to the approach set out within the London Plan. They have also raised concerns that this favours institutions with stronger balance sheets and gives an unfair commercial advantage for adjacent HEPs. Instead, it is argued that the policy approach should fully align with the London Plan policy.
- 6.3.4 We disagree with these contentions, and concerns that the policy favours larger HEPs. The justification for this policy approach links to the broader rationale for the policy requirements to prevent further overconcentration of PBSA, undermining general needs housing delivery (this is discussed more fully in Section 3 of the topic paper). The policy approach and the nomination requirements flow from this policy expectation, and seek to ensure mixed and inclusive communities as per the PBSA LPG. This means that in areas of over-concentration, nomination agreement requirements ensure PBSA delivery supports local campus-based expansion. While developers have noted that that policy provides a commercial advantage to larger HEPs, it is also important to note that the majority of students in Newham study within larger HEPs, namely UEL and UCL. Therefore, we consider the policy remains positively prepared to meet the needs of students studying in the borough.
- 6.3.5 Developers have also contended that students may prefer to live in PBSA outside of the borough their HEP is located within; however, the policy would still allow for this under H8.4.a outside of Stratford and Maryland and other areas of overconcentration. Watkin Jones have argued that HE providers should not need to attend pre-application discussions. However, we consider this approach improves the effectiveness of the policy’s implementation, by providing a higher level of

certainty that the proposal will comply with the requirements of H8.4.b and H8.4.c. Without this level of certainty at the application stage, applications are likely to be refused.

- 6.3.6 The policy also ensures that PBSA secured within or adjacent to university campus developments is occupied by the students of the adjacent HEP. This policy aims to locate students in proximity to their university campus, as close proximity offers several benefits; saving costs and time commuting, better access to study spaces and classes, more social opportunities through interaction with fellow students, and improved health and wellbeing through greater access to sports facilities, medical facilities and counselling centres. This was supported by students' opinions in the Knight Frank/UCAS student accommodation survey (2024)¹⁹, which found location of the accommodation to be the third most important factor when choosing accommodation in your first year.
- 6.3.7 More broadly, the nomination agreement requirements in the policy help to ensure there is a need for accommodation delivery to meet the needs of the student population, as speculative developments risk accommodation failing to be occupied upon construction.

6.4 Summary on soundness: Nominations agreements

- 6.4.1 In summary, we consider the approach within the plan to nominations agreements for PBSA accommodation to be sound, as discussed below in relation to each of the tests of soundness:
- a. Positively prepared – We consider the policy is positively prepared to meet the needs of students studying in the borough, the majority of which study at existing larger HEPs in the borough, including UCL and UEL. H8.4.a is also positively prepared to meet a broad range of accommodation needs, including from institutions outside the borough.
 - b. Justified – The justification for this policy approach links to the broader rationale for the policy requirements to prevent further overconcentration of PBSA in the borough, undermining general needs housing delivery. The policy approach and the nomination requirements flow from this policy expectation, and seek to ensure mixed and inclusive communities as per the PBSA LPG. This means that in areas of over-concentration, nomination agreement requirements ensure PBSA delivery supports local campus-based expansion. The policy also ensures that PBSA secured within or adjacent to university campus developments is occupied by the students of the adjacent HEP, securing the benefits to this student population.

¹⁹ Knight Frank/UCAS (2024). Student Accommodation Survey, (Available at: <https://content.knightfrank.com/research/1663/documents/en/knight-frank-ucas-student-accommodation-survey-report-2024-11543.pdf>).

- c. Effective – we consider the policy to be deliverable across the plan period. Including requirements for HEPs to attend pre-application meetings improves the effectiveness of the policy's implementation, by providing a higher level of certainty that the proposal will comply with the requirements of H8.4.b and H8.4.c. Without this level of certainty at the application stage, applications are likely to be refused. More broadly, the nomination agreement requirements in the policy help to ensure there is a need for accommodation delivery to meet the needs of the student population, as speculative developments risk accommodation failing to be occupied upon construction.
- d. Consistent with national policy – we consider our approach accords with national policy in that it seeks to meet the needs of the student population in Newham, in accordance with the requirements set out in Section 2 of this topic paper. The policy has also been informed by the London Plan, and the guidance set out within the PBSA LPG, namely the cascade mechanism for direct lets for accommodation secured under H8.4.a.

7. Quality of accommodation

7.1 Communal spaces for study and sports

7.1.1 Policy H8.5 in the submission Local Plan requires the following:

Table 11: Policy text extract for Policy H8.5

Draft Submission Local Plan policy text
<p>5. Developments delivering purpose-built student accommodation should provide ancillary communal space for study and sporting facilities that meet the needs of the student population within a development unless the accommodation is located within 1,200 metres of existing student campus-based facilities for studying and/or sport and recreation that have sufficient capacity to meet any increased need.</p>

7.1.2 Representations received on this policy requirement are summarised below:

Table 12: Summary of representations received on H8: Purpose Built Student Accommodation relevant to requirements for ancillary communal space for study and sporting facilities

Comments related to quality standards for PBSA	
Watkin Jones	Suggest that sporting facilities reference is deleted or replaced with “socialising”. Needs for wider infrastructure such as sporting matters can be addressed by university provision, and/or the applicable CIL contribution locally.
Unite Group Plc	<p>Additional requirements for sports facilities on site are onerous and go beyond the requirements of the London Plan.</p> <p>Recommend removing the requirement for all sites to provide sports facilities and instead consider this on a site-by-site basis.</p>

7.1.3 While Unite Group Plc and Watkin Jones consider the policy requirements to be onerous, particularly sporting facilities which they consider should be delivered by university provision. However, we consider the policy is justified, noting this provision isn’t required where accommodation is located within 1,200 metres of existing student campus-based facilities (a 15 minute walk, to support the delivery of a network of well-connected neighbourhoods). Policy H8.5 aims to relieve pressure on local social infrastructure for study and exercise facilities and improve the wellbeing of PBSA residents by providing them to spaces to study, socialise, and exercise within their accommodation if this is not provided in close proximity.

7.1.4 This policy is in conformity with the London Plan policy and GLA’s LPG on PBSA, which require:

- adequate functional living space and layout (London Plan Policy H15);
- design and space in the building as a whole should provide for different student needs – such as study, relaxation, socialising, retreat, privacy, exercise, laundry, support and, in some cases, worship. (GLA PBSA LPG paragraph 2.6.3)
- both internal and external communal amenity space (only accessible to students and their visitors), commensurate with the number of students, should be provided. This space should be additional to living rooms; it is a separate need, and distinct from any spaces accessible to the wider community, which are also encouraged (see S2.4 above). Quantums should also be informed by an understanding of: the adequacy of public space and alternative on-campus provision (e.g. libraries, student union facilities) in the area; and the size of studios and cluster-flat living rooms. (GLA PBSA LPG paragraph 2.6.4).

7.1.5 The worsening mental health crisis, particularly among students, make communal spaces for studying and sports vital for students' wellbeing. There has been a sharp rise in mental health issues reported by students in the past decade. The Office for Students (2025) found that mental health conditions reported by students in 2022/23 are almost five times higher than a decade ago.²⁰ However, surveys of students where responses are confidential have found far higher rates of poor mental health than reported to universities. A 2022 survey by Student Minds²¹ found 57% of respondents self-reported a mental health issue and 27% said they had a diagnosed mental health condition.

7.1.6 Policy H8.5 offers ancillary communal space for study and sporting facilities within close proximity to student accommodation. Communal study areas allow students to work outside of their bedrooms, within a short walk, enabling them to work collaboratively, establish connections, and learn together. Sports facilities provide students the opportunity to maintain their physical and mental wellbeing. This access to sporting facilities is key to maintaining student's wellbeing as supported by research from the Department of Health²² that shows being active can reduce your risk of depression by 30%.

7.1.7 Students highlighted the importance of these facilities in the Knight Frank and UCAS student accommodation survey (2024)¹⁹, which underscored students' priorities for their accommodation needs. According to the survey, 80% of students selected facilities (e.g. WiFi, gym) as 'extremely' or 'very' important, and 53% of students in university PBSA said one reason why they wouldn't recommend their current term-time accommodation to other students was no, or poor facilities (e.g. social space or gym) in the building. There was evidence for the impact on wellbeing, with 79% of all students found the standard of amenity space was important to support their

²⁰ Office for Students (2025). Student characteristics data: Population data, (Available at: <https://www.officeforstudents.org.uk/data-and-analysis/student-characteristics-data/population-data-dashboard/>).

²¹ Students Minds (2023). Student Minds Research Briefing, (Available at: https://www.studentminds.org.uk/uploads/3/7/8/4/3784584/student_minds_insight_briefing_feb23.pdf).

²² Department of Health (2011). Start Active, Stay Active, (Available at: https://assets.publishing.service.gov.uk/media/5d78da9340f0b61d00078622/withdrawn_dh_128210.pdf).

wellbeing. The survey¹⁹ also found that the quality of the PBSA can support students' academic outcomes with 69% in private PBSA agreeing the quality of PBSA had an impact on their academic outcomes.

- 7.1.8 Based on the above research and London Plan policy and guidance, we consider policy H8.5 to be justified, noting the importance of ensuring students have access to quality accommodation with necessary supporting facilities to support their mental health and studies. This in turn supports the Local Plan objective to prioritise improving physical and mental health and well-being, to ensure we reduce health inequalities through a health integrated approach to planning.

7.2 Residential management plans

- 7.2.1 Policy H8.6 in the submission Local Plan requires the following:

Table 13: Policy text extract for Policy H8.6

Draft Submission Local Plan policy text
<p>6. Developments for purpose-built student accommodation should include an appropriately detailed and resourced residential management plan.</p>

- 7.2.2 Policy H8.6 conforms with the guidance set out in the PBSA LPG, which encourages management plans to secure management and maintenance of spaces and facilities and allow local communities and residents to hold building managers to account. The implementation text for this policy part sets out expectations of what management plans should include. These reflect the LPG recommendations, and help to ensure the implementation of the policy is effective.
- 7.2.3 The management plan also holds the PBSA building managers accountable to reduce the impacts of any anti-social behaviour that may come from the student population impacting the local community, by implementing codes of conduct for residents.
- 7.2.4 The policy implementation outlines that residential management plans should set out how students can conveniently access staff who can offer trained pastoral support, with links to the Higher Education provider(s) signed up to nomination agreements. This implementation requirement is justified by research from Worsley, Harrison & Corcoran (2021)²³, who studied eight focus groups of students across two universities from northern England. The study found the role safeguarding staff with

²³ Worsley, J., Harrison, P., Corcoran, R. (2021). The role of accommodation environments in student mental health and wellbeing, (Available at: <https://bmcpublichealth.biomedcentral.com/articles/10.1186/s12889-021-10602-5>).

pastoral care experience to be vital in supporting students struggling with mental wellbeing.

- 7.2.5 The residential management plan can also help manage the availability and impact of accommodation being utilised temporarily outside of term time for other purposes. For example, in the summer months, it could outline how the accommodation is to be used (e.g. for tourists, summer or language schools, and conference accommodation), and how any associated impacts of these temporary uses may be mitigated. This would help to ensure optimal use of the building outside of its principal use, while ensuring any associated impacts are carefully considered and managed.
- 7.2.6 In summary, the management plan requirements are justified, and again support the Local Plan objectives to prioritise improving physical and mental health and well-being and improve housing quality across the borough.

7.3 Design quality

- 7.3.1 Policy H11 set outs the design quality policies that apply to PBSA these include H11.1, H11.3, H11.5 and H11.6:

Table 14: Policy text extract for Policy H11

Draft Submission Local Plan policy text
<p>1. All new residential development should be designed to:</p> <ul style="list-style-type: none"> a. locate building structural elements to enable internal reconfiguration and minimise irregular geometry that limits reconfiguration of internal layouts; and b. promote health and wellbeing of residents by providing good living and environmental conditions including high levels of natural daylight, sunlight, natural ventilation and individual climate controls, by maximising internal levels of daylight through orientation, articulation and incorporation of breaks in massing.
<p>3. New developments of specialist and supported housing or residential other than general needs housing should have evidenced regard to the following applicable quality design standards: [...]</p> <ul style="list-style-type: none"> e. Purpose-built student accommodation should provide either: <ul style="list-style-type: none"> i. ten per cent of new bedrooms to be wheelchair-accessible in accordance with Figure 52 incorporating either Figure 30 or 33 of British Standard BS8300- 2:2018 Design of an accessible and inclusive built environment. Buildings - Code of practice; or ii. 15 per cent of new bedrooms to be accessible rooms in accordance with the requirements of 19.2.1.2 of British Standard BS8300-2:2018 Design of an accessible and inclusive built environment. Buildings - Code of practice.

5. Major residential developments should incorporate shared amenity spaces that foster social interaction and a sense of community. External communal amenity spaces should be designed to:
 - a. provide 50m² for the first ten residential units or private rooms (if not self-contained) and 1m² for each additional residential unit or private room (if not self-contained); and
 - b. provide overlooked, attractive, landscaped spaces easily accessible to all residents. Direct access should be provided where possible between the communal courtyards and adjacent private terraces; and
 - c. offer spaces with a variety of functions; and
 - d. avoid external spaces that face onto major roads with higher levels of noise and air pollution; and
 - e. provide onsite play provision in accordance with both the requirements of London Plan 2021 Policy S4 and Local Plan Policies GWS5 and, where relevant, D2. Of-site play space will only be supported in exceptional circumstances where it can be demonstrated that it would lead to the provision of facilities, accessible to the development site, which are of greater quality and quantity than can be provided onsite.
6. Developments which include affordable housing should ensure:
 - a. affordable housing is of an equivalent quality to private residential units in terms of its location, orientation, proportion, external appearance, communal entrances and amenity areas, without resulting in a significant increase in the cost of tenants of affordable housing's service charges.
 - b. access to any on-site services and facilities are provided via a membership model, available to all residents at a comparable cost to other Newham-run and private facilities in the locality.

7.3.2 Representations received on this policy in respect of the aforementioned quality requirements are summarised below:

Table 15: Summary of representations received on H11: Housing Design Quality

<i>Comments related to quality standards for PBSA</i>	
Unite Group Plc	Unite recommends lowering policy requirements in policy H11 to provide wheelchair-accessible bed spaces to 1% fitted out with a further 4% adaptable. This is because demand in accommodation is lower than what is required through policy, and adaptations if needed can be made swiftly. They have objected to this requirement in the draft LPG for PBSA delivery, and consider it contradicts the requirements of the London Plan Policy E10. They emphasise the differences between building regulations and planning policy, and include references to other plan examinations they have participated in where similar policy thresholds have been lowered.

7.3.3 London Plan Policy D5 (Inclusive Design) and Policy D7 (Accessible Housing) set out a strategic commitment to creating inclusive environments and ensuring that new development meets the highest standards of accessibility. Although London Plan Policy D7 primarily addresses general needs housing, its principles extend to all forms of residential accommodation, including PBSA. The accessibility thresholds set out in policy H8 are in conformity with the London Plan’s inclusive design objectives and reflect best practice in delivering accessible and equitable student accommodation. The policy approach is justified, aligned with the Local Plan objective to design homes to recognise, celebrate and function well for Newham’s diverse communities.

7.3.4 Notwithstanding this, since the publication of the Regulation 19 Local Plan consultation, the PBSA LPG was published. This document includes new guidance on the delivery of wheelchair accessible units within PBSA developments, as set out below:

Table 16 Extract from GLA PBSA LPG (2024)

Box 3: Accessible Student Accommodation Standards

To ensure sufficient choice for people who require an accessible bedroom, development proposals for PBSA accommodation should provide (as a minimum) accessible and adaptable rooms, as set out in paragraph 19.2.1.3.2 of BS 8300:2:2018 Design of an accessible and inclusive built environment – Buildings Code of Practice. This means:

- 4 per cent (or at least one room, whichever is greater) wheelchair accessible bedrooms, in accordance with Figures 52 and 54 of the code of practice
- 1 per cent (or at least 1 room, whichever is greater) with a tracked hoist system (see examples in Figures 31 and 32 of the code of practice), and a connecting door to an adjoining (standard) bedroom for use by an assistant or companion
- 5 per cent easily adaptable wheelchair-accessible rooms for independent use.

The design guidance and definitions in the rest of the paragraph 19.2.1.3.2, and those in paragraph 19.2.1.3.1 are also relevant.

7.3.5 Noting the concerns of Unite Group Plc, we propose that the following wording amendments to the policy H8 could help improve the effectiveness of the policy and further align the policy expectation with the PBSA LPG, and have therefore presented them for the inspectors’ consideration below. Suggested for deleted policy wording is shown with a ~~strike through~~ and the new policy wording is marked in **bold**.

Table 17: Proposed modifications to Policy H11.3.e for the Inspector's consideration

Policy wording	Policy Part
<p>[3]e. Purpose-built student accommodation should provide accessible student accommodation in accordance with the requirements of 'Box 3: Accessible Student Accommodation Standards' set out in the London Plan Guidance: Purpose-built Student Accommodation (October 2024).</p> <p>either:</p> <ul style="list-style-type: none"> i. ten per cent of new bedrooms to be wheelchair-accessible in accordance with Figure 52 incorporating either Figure 30 or 33 of British Standard BS8300-2:2018 Design of an accessible and inclusive built environment. Buildings – Code of practice; or ii. 15 per cent of new bedrooms to be accessible rooms in accordance with the requirements of 19.2.1.2 of British Standard BS8300-2:2018 Design of an accessible and inclusive built environment. Buildings – Code of practice. 	Policy H11.3e

7.3.6 Alongside the above requirements, Policy H11 of the Submission Local Plan includes a number of standards that seek to ensure PBSA delivered in the borough is of a high quality, with good access to light and outdoor communal amenity space. These requirements are in conformity with London Plan Policy H15, recognising the importance of high-quality design in PBSA. While these requirements have received broader comments in relation to the requirement's soundness, the majority of these comments do not relate directly to their delivery in PBSA schemes.

7.3.7 We did, however, receive a comment from Watkin Jones in respect of H11.5.e around PBSA needing to deliver playspace.

Table 18: Summary of representations received on H11: Housing Design Quality

Comments related to quality standards for PBSA	
Watkin Jones	The representation argues that play space requirements should not apply to PBSA as this does not generate a need for such infrastructure.

7.3.8 We consider the existing policy requirement to be in conformity with the requirements of the London Plan policy S4 (Play and informal recreation). However, in order to improve the effectiveness of the policy, we propose that the following wording amendment to the policy H11 could help improve the effectiveness of the policy and further align the policy expectation with the wording of London Plan policy S4. We have therefore presented an amendment for the inspectors' consideration below. This would exclude PBSA from needing to provide playspace. Suggestions for deleted policy wording is shown with a ~~strike through~~ and the new policy wording is marked in **bold**.

Table 19: Proposed modifications to Policy H11.5.e for the Inspector's consideration

Policy wording	Policy Part
[5]e. where the development is likely to be used by children and young people , provide onsite play provision in accordance with both the requirements of London Plan 2021 Policy S4 and Local Plan Policies GWS5 and, where relevant, D2. Off-site play space will only be supported in exceptional circumstances where it can be demonstrated that it would lead to the provision of facilities, accessible to the development site, which are of greater quality and quantity than can be provided onsite.	Policy H11.5e

7.4 Summary on soundness: Quality requirements

- 7.4.1 In summary, we consider the policies in the plan that seek to ensure the quality of PBSA accommodation to be sound, as discussed below in relation to each of the tests of soundness:
- Positively prepared – The policy is positively prepared to meet the diverse design needs of students, contributing to improved physical and mental health aligned with the Local Plan's objectives.
 - Justified – our approach builds upon and is in conformity with the requirements of the London Plan and the PBSA LPG. It also supports Local Plan objectives to improve residents' mental and physical health and to design homes to recognise, celebrate and function well for Newham's diverse communities.
 - Effective – we consider these policies to be deliverable across the plan period. A small number of amendments, to further support the clarity and implementation of the policy for developers, have been provided for the Inspector's consideration.
 - Consistent with national policy – we consider our approach accords with national policy, in accordance with the requirements set out in Section 2 of this topic paper, as well as NPPF (2023) considerations of achieving well-designed and beautiful places (section 12).