

REF: R00136/IN/EH/MR

BY EMAIL ONLY - CamdenLPPO2025@outlook.com

Pauline Butcher
C/O Camden Council
Town Hall
Judd Street
WC1H 9JE

13 March 2026

Dear Pauline

**EXAMINATION OF THE CAMDEN LOCAL PLAN
HEARING STATEMENT: MATTER 3 – MEETING CAMDEN’S HOUSING NEEDS
ROK PLANNING ON BEHALF OF UNITE GROUP PLC**

I write on behalf of the applicant, Unite Group Plc (Unite), to submit a Hearing Statement in response to the questions raised by the Inspector (K Ford) concerning the Examination of the Camden Local Plan.

The follows representations made on behalf of Unite to previous stages of the Local Plan’s preparation:

- Camden Regulation 18 Consultation – dated 13th March 2024
- Camden Regulation 19 Consultation – dated 27th June 2025.

Introduction

Unite Students is the UK's largest owner, manager, and developer of purpose-built student accommodation (PBSA). With more than 143 properties in 22 leading university towns and cities, Unite Students is home to around 64,000 students, living predominantly in en-suite study bedrooms with rents covering bills, insurance, and 24-hour security.

Driven by a common purpose: to provide a 'Home for Success' to live, work and invest, Unite Students is committed to raising standards in the student accommodation sector with the support of over 60 university partners.

Founded in 1991 in Bristol, the Unite Group is an award-winning Real Estate Investment Trust (REIT), listed on the London Stock Exchange. For more information, visit Unite Group's corporate website www.unitegroup.com or the Unite Students' site www.unitestudents.com.

Following on from our representations submitted to the Regulation 19 Consultation, dated 27th June 2025 and hereafter referred to as 'Reg 19 reps', this Statement focuses on Matter 3 – Meeting Camden’s Housing Needs and specifically Issue 2:

“Whether the Plan will be effective in delivering affordable housing to meet the Borough’s needs and in providing an appropriate mix and standard of homes for different groups in the community during the Plan period?”

This includes questions from the Inspector relating to Policies H1, H4 and H9 as set out in the Inspector’s Matters, Issues and Questions (document ED04).

Matter 3: Issue 2 – Questions 9 to 13

9. How does Local Plan policy support the delivery of the strategic target and approaches to the delivery of affordable housing set out in Policies H4 and H5 of the London Plan?

Please refer to Questions 29, 33, 35, 38 and 41 where the inconformity of Policy H4 (Maximising the supply of affordable housing) Part D with London Plan Policy H15 (Purpose-built student accommodation) is discussed.

10. How well is the approach to affordable housing supported by robust evidence of financial viability, having regard to other requirements of the Plan and how clearly does it set out the decision making process for viability?

Please refer to Question 38.

11. Is the type and tenure of housing needed for different groups in the community assessed and reflected in the Plan, including the groups of society set out in the NPPF?

Unite support Policy H1’s (Maximising Housing Supply) recognition that PBSA contributes towards housing supply and the inclusion of Policy H9 (Purpose-built student accommodation) which supports the housing requirements of students.

13. Having regard to the requirements of the NPPF, how do policies in the Plan assess and reflect the size, type and tenure of housing needed for different groups in the community and are they in general conformity with the London Plan?

Please refer to Questions 43-50 on the inconformity of Policy H9 with the London Plan.

Matter 3: Issue 2: Policy H1 – Question 14

14. Is support for purpose built student accommodation in Policy H1 justified?

Unite strongly support Policy H1 Part B2, which recognises PBSA’s contribution towards securing a sufficient supply of homes, on the basis that:

1. London Plan Policy H15, NPPG Paragraph: 025 Reference ID: 68- 034-20190722 and numerous planning decisions acknowledge that PBSA counts towards housing targets. For example, the committee report for the permission granted at 'Printworks' in Haringey (LPA ref. HGY/2023/2306 & HGY/2023/2307), for 287 PBSA beds, states:

"The proposal would contribute to meeting housing targets which equates to 114 conventional homes on the basis of the 2.5:1 ratio in the London Plan (a net gain of 101 homes)".

The report highlighted that London's PBSA market falls short of meeting the City's demand.

2. PBSA now makes an even greater contribution at a ratio of 2.4:1. Applying this revised Housing Delivery Test measurement rule book ratio to the Printworks scheme would increase its equivalent contribution from 114 to 119 conventional homes.
3. This is significant given that the Five-Year Housing Land Supply 2026-2030 statement (dated 30 September 2025) states Camden will only have a 2.8 year supply over the plan period (2026/27 to 2030/31).
4. PBSA's ability to relieve pressure on the overall housing market is acknowledged by NPPG Paragraph: 004 Reference ID: 67-004-20190722 and Camden's Reg 19 reps response (document SD31) which states that PBSA can reduce the pressure for students to share existing large homes.
5. NPPF Paragraphs 61-63 support a positive approach to housing allocations stating that to support the Government's objective to boost the supply of homes it is important that a sufficient amount and variety of land can come forward and that the needs of groups with specific housing requirements (e.g. students) are addressed.

Matter 3: Issue 2: Policy H4 – Questions 29, 33, 35, 38 and 41

29. Is the policy consistent with national policy and in general conformity with the London Plan?

For PBSA, the application of the London Plan's requirements is supported, however Part D's alternative to 'strongly encourage contributions of self-contained affordable housing on these development sites' is strongly opposed.

Camden's Reg 19 reps response uses their shortfall in affordable housing supply to justify this alternative option. Nevertheless, prioritising the delivery of conventional affordable housing over affordable student accommodation contradicts London Plan Policy H15 and its supporting text (paragraph 4.15.14) which clearly states that C3 affordable housing should not be required where compliance with Part A is achieved.



As PBSA itself contributes towards housing supply, developments should not be required to provide conventional housing on site alongside PBSA.

From a practicality perspective, providing the two housing types on the same site is difficult. While the draft Policy and Camden's response acknowledge this may not always be feasible due to differing core and layout requirements, they do not account for PBSA being managed whilst conventional housing is not, making Student Management Plan strategies difficult to implement.

A standalone affordable housing block requires its own separate facilities, including extensive external children's play space under the London Plan. Providing two sets of facilities would significantly affect the development footprint, likely leading to reductions in the massing of the PBSA block, impacting design, efficiency, general arrangement and viability. In comparison, a solely PBSA development is tenure blind and incorporates ancillary and amenity facilities throughout the development.

33. Is Policy H4 of the Camden Local Plan in conformity with Policy H4 of the London Plan?

Please refer to Question 29.

35. What effect is the policy expected to have on affordable housing provision in the Borough?

PBSA's alternative option of onsite affordable housing provision will significantly hamper the viability and deliverability of affordable student accommodation for the following reasons:

1. Applying affordable housing contributions to PBSA in the same manner as conventional residential uses fails to consider the fundamental differences between these development types.
 - a. PBSA development incurs numerous additional costs that largely do not affect conventional housing, including 24/7 staffing (management, housekeeping, facilities and security personnel), higher CIL rates, and various planning obligations.
 - b. Affordable student accommodation does not benefit from CIL relief in the same way as conventional affordable housing. Whilst Unite support reduced CIL rates for affordable student accommodation, this approach is not currently adopted by the GLA or any London Borough.
 - c. Under current London Plan Policy H15, PBSA schemes are subject to nominations agreements which must include all the affordable student accommodation.
2. This is in addition to challenging macro-economic circumstances experienced not only by the housing market but also by PBSA. Higher interest rates, build cost inflation, a heightened regulatory environment (namely through BSR) and additional safety and energy requirements are impacting PBSA delivery. According to PBSA providers, build costs in London are now circa. £150,000-£175,000 per bed, roughly double figures from 8 years ago.

BSR reported that only 33% of applications between January to March 2025 were decided within



the given 12-week determination period. The PBSA sector reports Gateway 2 alone adding around 8 months and a 45-week BSR approval process on average.

Overall, project timescales are being extended by approximately 2 years, significantly impacting project delivery, particularly as development debt is currently priced at between 8-10% p.a. To put this into context, a 400-bed London scheme previously delivered within 2 years, could now incur £10m-£15m in additional costs assuming 8% interest.

Unlike conventional housing, delays in PBSA delivery can result in the loss of an entire year's income. Even delays of one month beyond the beginning of term, will leave buildings unoccupied but still incurring costs as students will have found alternative accommodation.

3. Given the viability implications of higher PBSA costs detailed above, allowing the option to provide conventional affordable housing instead may lead developers to forgo affordable PBSA units and associated nominations agreements. This would conflict with London Plan policy, reducing the number of affordable units and units that can be secured through university nominations agreements.
4. This could lead to a shortfall in affordable student accommodation, failing to meet growing demand and resulting in higher rental levels for deliverable bedspaces and/or increasing HMOs. This will have significant impacts on students both in London and the wider UK having access to the accommodation required to facilitate their education.
5. Schemes that remain deliverable will likely need to sacrifice communal amenity space in favour greater bedspaces and other financial contributions to ensure viability.

38. Have the viability impacts of the policy been tested? If so, what were the findings? Does the viability evidence support Camden's affordable housing targets and tenure mix?

Unite have reviewed BNP's Viability Study (April 2025) and raise the following concerns:

1. Only one typology (100 self-contained studios and 50 twodios) has been tested which is not representative, with the bulk of the PBSA sector, including Unite's properties, largely comprising en-suite cluster bedrooms. The different typologies accommodate varying bedspaces numbers in a given floorspace, impacting both development income and amenity requirements.
2. Working off BNP's build costs (£325 for PBSA, £295 for conventional affordable housing) will lead to significant misjudgements on viability as these are significantly below those currently experienced by Unite in London of £425+ per sq ft.
3. Referring back to Question 29 above, Unite query whether the viability implications of providing conventional affordable housing alongside PBSA have been considered, including the



requirement for a separate block with its own facilities, likely reducing the massing achievable for the PBSA.

4. For financial contributions, the study uses an assumption of £8,000 per residential unit but there is insufficient evidence to confirm whether 1) this is applicable to PBSA, 2) the rate at which this has been applied to PBSA and 3) if all financial contributions have been considered.
5. From their extensive experience, an operational cost of £3,000 per room is at the lower end of the scale; only achievable by Unite's most efficient layouts allowing for better price negotiations. A more realistic budget is £3,500 per room for larger schemes (i.e. 500+ beds) and £4,000 per bed for smaller schemes.
6. The rental assumptions are also at the lower end so when combined with all of the above, Unite have serious concerns regarding the viability evidence provided.

41. Is there sufficient flexibility in the policy?

Considering the responses to Questions 29, 35 and 38, Unite strongly encourage the removal of Policy H4 Part D's 'alternative option' to achieve support in terms of flexibility and London Plan compliance.

Matter 3: Issue 2: Policy H9 – Questions 43 to 50

43. Is the Council's approach to identifying a target of 200 additional places in student housing per year justified and effective?

Unite object to a borough-level target for PBSA on the basis that:

1. Paragraph 4.15.3 of London Plan Policy H15 specifically states that borough-level targets have not been set as *'the location of this need will vary over the Plan period with changes in higher education providers' estate and expansion plans, availability of appropriate sites, and changes in Government policy that affect their growth and funding'*.
2. Camden should maintain this flexibility to accommodate market trends.
3. PBSA developments are high density and just one development could exceed the target for the whole year.
4. Camden's response to our Reg 19 reps acknowledges the need for sufficient student accommodation to support higher education providers' growth across the borough. Removing the borough-level target would allow PBSA to better respond to providers' needs.

44. How does the policy demonstrate general conformity with London Plan?

Unite object to the approach taken in Parts B1-B2, which seeks to prioritise conventional housing over PBSA, and its inconformity with the London Plan on the basis that:

1. Camden's Reg 19 response argues that the priority given to self-contained housing reflects the intense competition for the borough's limited supply of land from non-housing uses such as hotels, and from alternative forms of housing such as PBSA. Firstly, this conflicts with London Plan Policy H15's supporting text (paragraph 4.15.1):

'However, new flats, houses or bedrooms in PBSA all contribute to meeting London's housing need. The completion of new PBSA therefore contributes to meeting London's overall housing need and is not in addition to this need'.

Secondly, unlike hotels, Camden themselves acknowledge in Policy H1 that PBSA contributes towards housing supply. Therefore, their response is entirely unjustified.

2. A series of appeal decisions demonstrate that Inspectors have granted consent for student developments where the LPA perceives a conflict with the development plan on the basis that the site should provide conventional housing. These include:
 - 315-349 Mill Road, Cambridge (APP/Q0505/W/15/3035861)
 - Land at Fish Strand Hill, Falmouth, Cornwall (APP/D0840/W/17/3177902)
 - Land at Ocean Bowl, Falmouth, Cornwall (APP/D0840/W/17/3182360)
3. The reasons outlined under Question 14 above.
4. As such, Unite argue that Parts B1-B2 should be removed in their entirety and that PBSA should instead be encouraged on any well-connected and well-served sites.

Unite also highlight inconformity with regards to Part B3's application of HMO standards and B12's alternative affordable housing requirement as detailed elsewhere in this statement.

Part C4's overly restrictive nature, placing a mandatory requirement for permanent housing in place of PBSA, is also of concern. Adopting a one-size-fits-all approach to land use:

- a. Limits Camden's ability to facilitate a resilient planning strategy that adapts and responds to changing economic conditions;
- b. Fails to accommodate for fluctuating market demands and local needs; and
- c. Undermines the benefits of a diverse and dynamic local economy.

Permitting flexibility through mixed-use developments would support more vibrant, sustainable and dynamic communities. It also creates opportunities for the efficient conversion of PBSA buildings to uses



such hotels where feasible.

45. Should Policy H9 make specific reference to the Bloomsbury Campus Area?

No comment.

46. In B.1 of the Policy what is meant by “disproportionate loss”, how will it be determined and is it effective?

Please refer to Question 44 which requests the removal of Parts B1-B2 in their entirety.

47. Is the requirement in B.3 of the Policy to comply with relevant standards for houses in multiple occupation justified?

Unite object to the application of HMO standards to PBSA on the basis that:

1. Whilst Unite agree with Camden’s Reg 19 response in that PBSA ‘should provide residents with a place for rest, relaxation, safety, privacy, and society’, their claim that HMO standards apply to most student housing is false.
2. Applying HMO regulations to PBSA fails to consider:
 - a. PBSA developments are typically of higher densities.
 - b. PBSA developments cater to student needs, with shared facilities that support academic and personal development. They typically provide a better offering of internal and external amenity comprising gyms, games rooms, social areas, and study areas for example.
 - c. HMOs are designed for a broader range of tenants with standards focusing on living conditions, safety, and amenities.
3. The London Plan and PBSA LPG apply no standards to PBSA and do not encourage boroughs to do so. There is no policy justification for deviation from the London Plan and PBSA LPG.
4. Unite continue to support this approach given that PBSA designs are linked to operator branding / innovation and evolve over time in response to market trends. Future policy should continue to recognise the transitional nature of PBSA and that living standards can remain acceptable without standards being applied.

Unite therefore argue that B3 should be removed in its entirety.

48. In B.12 of the Policy how will an “appropriate contribution” be determined?

Please refer to Questions 29, 35 and 38. Unite request that Part B12 is amended to ‘provides affordable student accommodation in accordance with Policy H4 Part D’.

49. The Viability Study identifies that purpose built student accommodation viability is stronger in the south of the borough. How has spatial variation informed the borough wide implementation of Policy H9?

Unite support the current policy which promotes PBSA throughout the Borough where accessible to public transport. The inclusion of locational limits would be strongly opposed.

Summary

In summary, Unite suggest a number of amendments to Policies H4 and H9 to ensure the requirements are justified and consistent in line with national policy and the London Plan.

Appendix 1 summaries the suggested policy modifications.

Unite reserve the right to further their comments via participation in the Matter 3 Hearing as part of the Examination in Public starting in May 2026.

I trust this Statement is in order and look forward to confirmation of safe receipt. If you require clarification or wish to discuss this further, please do not hesitate to contact either Erlina Hale [Redacted], Immie North [Redacted] or myself at this office.

Yours Sincerely,

[Redacted Signature]

Matthew Roe
Director
ROK Planning Ltd
[Redacted]
[Redacted]



APPENDIX 1

Policy H4 Maximising the supply of affordable housing

...

- D. Where a development of build to rent housing, purpose-built student accommodation, or large-scale purpose-built shared living is proposed, we will apply the distinctive affordable housing provisions of the London Plan for the relevant housing type., ~~but as an alternative will strongly encourage contributions of self-contained affordable housing on these development sites in accordance with the guideline mix set out in criterion 6 of Part B above where feasible, having regard to whether developments are able to include separate blocks and/ or stair/ lift cores.~~

Policy H9 Purpose-built student accommodation

- A. The Council will aim to ensure that there is a supply of student housing available at costs to meet the needs of students from a variety of backgrounds in order to support the growth of higher education institutions in Camden and Camden's international academic reputation.
- B. The Council will seek a supply of student housing to meet ~~or exceed~~ Camden's ~~needs target of 200 additional places in student housing per year~~ and will support the development of student housing provided that the development:
- ~~1. will not involve a disproportionate loss of self-contained homes (particularly homes with 3 bedrooms), having regard to the overall addition to housing supply;~~
 - ~~2. will not involve a site identified for self-contained housing through a current planning permission or a development plan document, unless it can be demonstrated to the Council's satisfaction that the site no longer has a realistic prospect of timely development for self-contained housing;~~
 - ~~3. complies with any relevant standards for houses in multiple occupation and any relevant residential design standards to provide safe, functional, adaptable and accessible spaces, including shared spaces, outdoor amenity space and laundry facilities;~~
 4. includes a range of accommodation to suit students with differing lifestyles and incomes, including cluster flats where possible;
 5. for the full duration of all terms in the academic year, will be secured for students at the Council's recognised higher education institutions, which will generally be those in Camden and adjoining London boroughs that are funded by the Office for Students;
 6. will have nominations agreements in place to provide housing for students at one or more recognised higher education institutions, including nominations agreements for any affordable student accommodation incorporated in the development;

7. will be accessible to public transport and will not have a detrimental impact on the transport network;
8. contributes to creating a mixed, inclusive and sustainable community;
9. protects residential amenity in accordance with Policy A1;
10. will be accompanied by a Student Management Plan, and a Non-student Management Plan where alternative uses are proposed outside term-time;
11. will be managed as a single planning unit; and
12. provides affordable student accommodation ~~or otherwise provides an appropriate contribution to affordable housing~~ in accordance with Policy H4, particularly Part D.

C. The Council will resist development that involves the net loss of student housing unless:

1. either it can be demonstrated that the existing accommodation is incapable of meeting contemporary standards or expectations for student housing;
2. or adequate replacement accommodation will be provided that satisfies the criteria in Part B above;
3. or it can be demonstrated that the accommodation is no longer needed because the needs of students at the institutions that it serves can be better met in existing accommodation elsewhere;
- ~~4. and in the case of proposals satisfying points 1, 2 or 3, the development creates an equivalent or greater amount of floorspace in an alternative permanent housing use, such as self-contained housing (in Use Class C3), including an appropriate amount of affordable housing having regard to Policy H4 and treating the entire housing floorspace proposed as additional housing floorspace.~~