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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 7 – DESIGN AND AMENITY, TALL BUILDINGS AND THE
HISTORIC ENVIRONMENT
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 the representations submitted to the Regulation 19 Consultation, dated 27th June 2025 and hereafter referred to as 'Reg 19 reps', this Statement focuses on Matter 7 – Design and Amenity,



Tall Buildings and the Historic Environment and specifically the Issue:

“Whether the Plan in relation to design, tall buildings and the historic environment is justified, effective and consistent with national policy and in general conformity with the London Plan.

This includes questions from the Inspector relating to policy D2 (Tall Buildings) as set out in the Inspector’s Matters, Issues and Questions (document reference ED04).

Matter 7: Issue 1: Policy D2 – Questions 4 to 10

4. Is Policy D2 positively prepared, effective, justified and consistent with national policy and in general conformity with the London Plan?

Unite generally supports draft Policy D2 which considers areas suitable for tall buildings. The policy uses appropriate rather than maximum building heights which successfully allows for flexibility whilst also ensuring that any tall building that comes forward is accessed against the relevant criteria in the London Plan. This aligns with London Plan Policy D9.

Tall buildings allow for vertical development and thus optimal land use which is essential for the growing student population across London. This is especially beneficial in densely student populated areas where available land is scarce. Tall buildings allow for efficient land use, accommodating a larger number of students in a relatively small area. This promotes higher population density, creating a dynamic and vibrant student community.

This is of particular importance when considering the direction of travel of the Draft NPPF (2025) in which Policy L3 (Achieving appropriate densities) states that “proposals for residential and mixed-use development within settlements should contribute to an increase in the density of the area in which they are situated”. It also goes on to say that “Development proposals that do not make efficient use of land in accordance with this policy should be refused.”.

Well-designed student accommodation buildings can contribute to the aesthetic appeal of the cityscape, creating a distinctive skyline.

5. Is the methodology and findings of the Tall Buildings Study robust? and 6. How has the findings of the Building Heights Study been applied in the Plan and has this been done consistently?

Whilst the Building Heights Study starts off by accessing larger search areas, for the purpose of the policy, the identified ‘Locations where tall buildings may be an appropriate form of development’ which the study results translate into focus on specific sites, the majority of which are site allocations. Although it is beneficial to identify which site allocations may be appropriate for tall buildings, this is likely to exclude a number of other areas where sites have not been allocated but have the potential to be



redeveloped at a higher density or for an upwards extension.

For example, Unite have three existing PSBA sites which are located immediately outside the boundaries of the following tall building locations that under the current policy wording would not be considered 'appropriate' locations for tall buildings yet are likely to benefit from the same tall building potential were they to be redeveloped or extended.

The Unite developments and their adjacent tall building location map references and associated policy numbers / site allocation references that are of interest are as follows:

- Beaumont Court, College Grove NW, London NW1 0RW – located adjacent to Map reference C / Policy S6 - Parcelforce and ATS Tyre Site.
- St Pancras Way, 11 St Pancras Way, London NW1 0PT – located adjacent to Map reference C / Policy S6 - Parcelforce and ATS Tyre Site.
- Mary Brancker House, 54-74 Holmes Rd, London NW5 3AQ – located adjacent to Map reference F / Policy C2 - Regis Road and Holmes Road Depot.

Unite therefore request that flexibility is built into the policy stating that proposals for tall buildings outside these locations may be appropriate subject to meeting the relevant London Plan criteria.

Unite also recommend that the boundaries of the tall building zones are widened to include all areas suitable for tall buildings as opposed to specific sites. In particular Unite request the aforementioned tall building locations are expanded to encompass Beaumont Court, St Pancras Way and Mary Brancker House, for the following reasons:

1. It is both in the client's interest and the borough's interest to intensify existing PBSA sites and that these buildings are provided the opportunity to expand vertically alongside other sites in the immediate vicinity. The inclusion of Unite's existing Camden properties within the tall buildings boundaries promotes efficient land use as utilising already developed areas for vertical expansion minimizes the need for additional land acquisition and ensures optimal utilisation of existing infrastructure, thereby promoting sustainability and responsible urban planning. Expanding the boundaries would allow for vertical development without necessitating significant infrastructure upgrades, promoting a more cost-effective and sustainable approach to growth. This will also encourage higher density development which can in turn make greater contributions towards housing delivery targets.
2. Without the expansion of these boundaries to include Unite's Camden properties, there is a considerable risk of overshadowing and marginalisation. New tall buildings within the designated zones could generate negative daylight, sunlight and amenity impacts, casting shadows over existing PBSA developments and potentially compromising their viability and attractiveness to existing and prospective students. This could lead to a scenario where the existing PBSA sites are left in the shadow of newer, taller structures, impacting their desirability and economic



sustainability. Thus, it is essential that these properties are provided the opportunity to expand vertically if necessary.

Unite included this request in their Reg 19 reps to which Camden responded:

“The approach to tall buildings in the Local Plan and the sites identified reflect the Camden Building Heights Study. Applications for tall buildings that come forward in Camden will be assessed against Policy D2 (Tall Buildings) and all other relevant Local Plan policies.”

This response does not address why these boundaries cannot be extended and it also does not provide clarification that tall buildings can come forward outside of these zones subject to the relevant criteria.

7. How does the Plan reflect the guidance contained in the London View Management Framework?

No comment.

8. Is it clear what heights are acceptable in different locations within the Borough?

Whilst Unite support the use of appropriate rather than maximum building zones, it should be clarified that these heights act as guidance with the actual appropriate height for a site determined at the application stage at which point visual impact, functional impact, environmental impact and cumulative impact are rigorously assessed.

As discussed above, Unite also request the inclusion of a further point of clarification which states that whilst tall buildings are encouraged within the tall building zones identified, proposals for tall buildings outside these locations may be appropriate subject to meeting the relevant London Plan criteria. This is an approach that has been taken at recent Examination in Publics including at Lewisham and Newham.

A more flexible approach would allow for the establishment of tall student accommodation buildings in locations that are closer to educational institutions. This is essential for providing convenient access to campuses, reducing commuting times, and enhancing the overall student experience. Furthermore, allowing tall building development outside designated areas enables better integration of student housing with on-campus facilities, academic buildings, and recreational spaces. This promotes a seamless connection between living and learning environments.

9. Is criterion C.5 of the policy necessary given that the Plan should be read as a whole?

No comment.

10. Is criterion C.9 of Policy D2 (which requires attention to be given to the relationship between building and hills and views, ensuring that any proposal considers local views and preserves

protected strategic views) consistent with the requirements of criterion B4 of Policy D1 (which expects development to respect local views and preserve protected strategic views)?

No comment.

Summary

In summary, Unite suggest amendments / additional clarifications to Policy D2 to ensure the requirements are justified and consistent in line with the current London Plan as well as the direction of travel of the New London Plan and draft NPPF.

Unite reserve the right to further their comments via participation in the Matter 7 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 further 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]

Matthew Roe
Director
ROK Planning Ltd

[REDACTED]
[REDACTED]