

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 2026-2041
HEARING STATEMENT: MATTER 8 - SAFE, HEALTHY AND SUSTAINABLE TRANSPORT
ROK PLANNING ON BEHALF OF UNITE GROUP PLC**

I write on behalf of the applicant, Unite Group Plc (Unite), to submit a Hearing Statement in response to the matters, issues and questions raised by the Inspector (K Ford) concerning the Examination of the Camden Local Plan, which will set out the spatial strategy for Camden to 2041.

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

- Camden Draft Local Plan Regulation 18 Consultation – dated 13th March 2024.
- Camden Draft Local 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 on behalf of Unite to the New Local Plan Regulation 19 Stage Consultation, dated 27th June 2025 and hereafter referred to as 'Reg. 19 reps', this Statement focuses on Matter 8 (Safe, Healthy and Sustainable Transport) and specifically part 2 of Policy T2 (Prioritising, Walking, Wheeling and Cycling) which relates to cycle parking provision.

Policy T2 (Prioritising Walking, Wheeling and Cycling)

The draft wording of the relevant part C.2 of Policy T2 (Prioritising, Walking, Wheeling and Cycling), which relate to our Hearing Statement is as follows:

'Require development to provide for high quality, accessible, inclusive, convenient, and safe cycle parking facilities, exceeding the minimum standards outlined in the London Plan, and design requirements outlined within Camden Planning Guidance on Transport. Higher levels of provision will be expected in areas well served by cycle route infrastructure, taking into account the size and location of the development.'

There have been no main or minor modifications proposed to the relevant part of the policy as confirmed in the Schedule of Proposed Main Modifications (SD51) and Schedule of Proposed Minor Modifications (SD50).

Inspector's Question

The Inspector's Matters, Issues and Questions (ED04) set out the Inspector's question in relation to Policy T2, under Matter 8 – Safe, Healthy and Sustainable Transport, under the Issue:

"Whether the Plan is positively prepared, justified, effective, consistent with national policy and in general conformity with the London Plan in relation to transport".

With reference to Policy T2, this includes questions 3 and 4. Whilst question 4 above does not cover the relevant parts of the policy to which our Reg 19 reps relate, we also hope to address the overarching question of whether Policy T2 is justified and effective.

Matter 8: Issue: Question 3

3. Are the requirements in criterion C.2 of the policy in relation to the requirement to provide cycle parking facilities that exceed the minimum standards outlined in the London Plan justified?

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

- Part C.2 of the Policy is reworded to allow greater flexibility for developments with regards to the cycle parking standards set out in the London Plan, not encouraging provision greater than these

standards which significantly overprovide in comparison with recorded uptake. This should be especially relevant where it can be demonstrated that a scheme lies in a highly accessible location.

- Part C.2 of Policy T2 is amended to clarify that this is not applicable to PBSA schemes.

In response to our Reg 19 reps, Camden have commented within their Proposed Submission Local Plan (Regulation 19) Consultation Responses – Excel Spreadsheet (SD31):

“The cycle standards in the London Plan have been adopted following consideration at examination in public and form part of the development plan of all London boroughs. The Local Plan must be in general conformity with the London Plan. No change is considered necessary.”

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

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

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

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

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

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



We have provided results in the table below, which outlines the low level of cycle parking spaces used across various sites in London, dated 2018, 2023 to the most recent survey in June 2025. The results are summarised in the table below:

Unite property	Number of student bed spaces	Number of bikes recorded in the bike store as of June 2025	% uptake	% uptake (2023 survey)	% uptake (2018 survey)
Unite Students, Drapery Place, 65 Leman St, London, E1 8EU	677	0	0.00%	3.24%	/
Unite Students, Blithehale Court, 10 Witan St, London, E2 6FG	307	11	3.58%	4.9%	3.01%
Unite Students, Sherren House, 16 Nicholas Rd, Stepney Green, London, E1 4AF	255	13	5.10%	2.35%	5.98%
Unite Students, Rahere Court, Toby Ln, London, E1 4DW	186	9	4.84%	3.76%	5.12%
Unite Students, Stratford One, 1 International Wy, London, E20 1GS	1001	14	1.40%	1.7%	3.56%
Unite Students, Angel Lane, 2 Angel Ln, London, E15 1FF	759	20	2.64%	1.17%	3.44%

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

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

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

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

Secondly, PBSA schemes are generally within walking distances of places of study with students tending to locate adjacent to their place of study for convenience. Alternatively, the PBSA is located within areas of high public transport accessibility, allowing the majority of journeys to be undertaken on foot or via public transport. This is the case with Unite's schemes within Camden which are located within a short distance walk from underground stations including Camden Town and Mornington Crescent Stations, as well as providing excellent overground links from Euston Station and bus links.

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

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

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

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

Provision 'exceeding' these standards as encouraged in Part C.2 of the draft policy will only exacerbate the space lost to cycle parking. These spaces could otherwise be used more efficiently and effectively to cater for growing demand for student bedspaces and greater amenity space for occupiers.

Such high levels of cycle parking has also meant that there has needed to be a reliance on greater

proportions of high-density cycle parking i.e. two-tiered spaces.

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

Suggested policy modifications

The following amendments to the policy wording of Part C is suggested (additions in bold and deletions in strikethrough):

C. To promote cycling in the borough and ensure a safe and accessible environment for cyclists, the Council will:

- 1. expect schemes that increase travel demand to provide for, and make contributions towards high quality, connected, accessible, inclusive, convenient, and safe cycle routes, in line with or exceeding London Cycle Design Standards/national LTN 1/20 standards, including the implementation of improvements to strategic primary and secondary cycle routes in the borough set out in the Camden Transport Strategy Delivery Plan;*
- 2. require development to provide for high quality, accessible, inclusive, convenient, and safe cycle parking facilities **on a case-by-case basis**, ~~exceeding the minimum standards outlined in the London Plan~~, and design requirements outlined within Camden Planning Guidance on Transport. Higher levels of provision will be expected in areas well served by cycle route infrastructure, taking into account the size and location of the development;*
- 3. require major development schemes to make provision **where appropriate**, for high quality, accessible, and inclusive facilities that promote cycle usage, including changing rooms, showers, dryers and lockers;*
- 4. seek on-site provision of, or contributions towards, the off-site provision of, improved cycle hire (and e-scooter hire) provision, including both “docked” and “dockless” systems in accordance with Policy T4 (Shared Transport Infrastructure and Services);*
- 5. require development to be easy and safe to cycle through (permeable) and well connected to the wider cycle network;*
- 6. seek contributions towards bridges suitable for cycle use, where appropriate (for example over railways and the Regents Canal); and*
- 7. seek contributions towards other relevant infrastructure and “behaviour change” measures as set out in the Council’s Cycling Action Plan.*

Summary

Noting the potential additional bedspace delivery as a result of the removal of unnecessary cycle parking,



as well as the direction of travel of the New London Plan, Unite respectfully request that the evidence provided is given due consideration.

We suggest a reduced requirement or flexibility regarding the level of provision, which will in turn allow for the provision of greater student bedspaces and/or greater amenity space for occupiers to cater for growing demand.

Unite reserve the right to further their comments via participation in the Matter 8 (Safe, Healthy and Sustainable Transport) 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,



Matthew Roe
Director
ROK Planning Ltd

