

**Our Ref: R00039**

**12<sup>th</sup> September 2018**

By email and post: [programme.officer@reading.gov.uk](mailto:programme.officer@reading.gov.uk)

C/O Jane Greenway  
Programme Officer  
Planning Section,  
Reading Borough Council,  
Civic Offices,  
Reading,  
RG1 2LU

Dear Ms Gibbons,

**READING LOCAL PLAN EXAMINATION  
WRITTEN HEARING STATEMENT ON BEHALF OF UNITE STUDENTS LTD**

I write on behalf of Unite Group plc (hereafter Unite) in respect of their interest in Reading. This follows the representations made through the preparation of the Local Plan and the Regulation 19 Consultation held in January 2018. It is understood that the Examination in Public (EiP) is due to begin on 24<sup>th</sup> September 2018.

We note that the Council has made minor updates to the Local Plan prior to Submission, however, these did not include any amendments to draft policy H12 'Student Accommodation'. Furthermore, whilst there was a further update to the SHMA in July 2018 had no further consideration to student numbers. This hearing statement has had consideration to the Council's responses to the Inspector's initial questions dated 2<sup>nd</sup> August 2018 and the Local Plan Background Paper (EV0002) dated March 2018.

Unite have concerns over the Council's draft policy position which restricts the location of purpose-built student accommodation (PBSA) development on or adjacent to existing further or higher education campuses, or as an extension or reconfiguration of existing student accommodation. This is referred to within draft strategic policy H1 and H12 which is a dedicated planning policy for guiding student housing delivery within the borough. Unite Students feel this policy would deter the delivery of student housing as there would be a presumption against proposals for new student accommodation on other sites unless it can be clearly demonstrated how the proposal meets a need that cannot be met on campus or sites adjacent to existing further or higher education campuses. The policy also does not fully grasp the positive role that student housing can have on the wider delivery of more conventional forms of housing, including family homes.

This hearing statement therefore relates to the following main matters and questions:

- 1. Issue 2 - Is the housing requirement justified and deliverable and has it been calculated in accordance with national policy and guidance?**
- 2. Issue 7 - Are the policies for Housing justified, deliverable and consistent with national policy?**

- Q10. Is Policy H12 justified and based on robust and up to date evidence?
- Q4a. Would the standards apply to student accommodation (particularly internal space) and if so, is this approach justified?

**Issue 2 - Is the housing requirement justified and deliverable and has it been calculated in accordance with national policy and guidance?**

The supporting text of Draft Policy H1: Provision of Housing recognises the pressing need for additional housing in Reading and the surrounding area but does not recognise in any form the important contribution that purpose-built student accommodation can make to meeting this demand. The Council can demonstrate 6.01 years supply of housing when measured against the objectively assessed need. This need is likely to change as a result of a range of factors which include, but are not limited to:

1. Increased employment in Reading;
2. Growth of student population due to growth of Reading University (with potential increases in numbers staying in Reading after completion of academia);
3. Arrival of Crossrail services towards the end of 2019, improving connectivity with London; and
4. Population growth across the South East of England.

The SHMA (2016) does not indicate issues in meeting the 10,930 dwellings target by 2026 through existing permissions and Local Plan allocations, however, it acknowledges that meeting the objectively assessed needs identified (699 homes per year) beyond the 6.01 years will be more challenging.

Therefore, the importance of PBSA needs to be recognised towards the delivery of conventional housing. We believe that draft policy H1 needs to be amended to recognise the important contribution that PBSA can make in meeting the housing supply and the Council need to recognise that PBSA does not compromise the delivery of conventional housing. Furthermore, there have been a number of examples where Inspectors have granted consent for student development on sites which have been allocated for residential development. These include 315-349 Mill Road, Cambridge (APP/Q0505/W/15/3035861) where the Inspector found that whilst there has been a rise in the provision of student accommodation, there is no clear indication that the shortage of student rooms reported in the Local Plan have been met and student accommodation is a form of housing which relieves the overall pressure for housing within the Borough. In addition, the Inspector noted that The Planning Practice Guidance enables student accommodation to be included towards the housing requirement, based on the amount of accommodation released to the housing market. Reference is made to data used by Cambridgeshire County Council, indicating a ratio of 3.5 student places to one house released.

The SHMA (2016) confirms the following key facts regarding the demand for PBSA in Reading:

1. Table 131 of the SHMA forecasts that the University will have a total of 16,095 students attending the University in 2018; and
2. The Demand and Impact Assessment prepared by Cushman and Wakefield and submitted to support this application (LPA Ref. 172045) confirms that the private purpose-built student accommodation market provides 1,558 rooms (2017/2018);

**Issue 7 - Are the policies for Housing justified, deliverable and consistent with national policy? - Is Policy H12 justified and based on robust and up to date evidence**

***Evidence on the Need for Purpose Built Student Accommodation***

The Council's SHMA (2016) confirms a growth in student numbers at the University from 13,135 in 2015, to 16,095 in 2016.

The University of Reading have provided evidence of the need for student accommodation in the Borough which accompanied their planning application at St Patrick's (LPA Ref. 172045). This confirms that there is already an unmet demand with waiting lists over the last 4 years exceeding 700 students and that student numbers for the academic year September 2017 to August 2018 were 15,026, with numbers for the next three academic years predicted to annually rise by a magnitude in the region of 500 – 700 students per annum.

In addition, the Demand and Impact Assessment prepared by Cushman and Wakefield and submitted to support this application (LPA Ref. 172045) confirms the following key facts providing up to date evidence on the need for student accommodation within the Borough:

1. The University has grown full-time student numbers by 18% over the last five years, increasing the demand for accommodation bedspaces;
2. There has been a 59% increase in the number of students aged 20 or under over this period, with University accommodation allowing the institution to offer good levels of pastoral care and eliminate the behavioural impacts of young students in the local community;
3. The University has increased non-UK students by 49% over the last five years and there is a need to deliver on campus accommodation to suit their particular needs;
4. Reading has seen a 16% increase in the number of students living in HMOs over the last five years, double the national average increase of 8%;
5. Reading Borough Council's own research (HMO Article 4 Review 2015) shows that the growing student population is 'having deleterious impacts on local residential areas'; and
6. Rising demand has not been met within the city as there has been a reduction in HMO licenses granted between 2012 and 2017.

The Council have not provided up to date evidence to support draft policy H12 with the exception of identifying student growth within their SHMA (2016). They have though acknowledged this submitted evidence to support the planning application at St Patrick's in their response to the Inspector's initial questions. But this states that "getting a handle on the future accommodation needs of students can be difficult, particularly over a 20-year plan period when the University only plans for student numbers five years ahead. Reliable figures for long-term planning are hard to derive, and there is a complex interrelationship of different types of accommodation".

It is clear that the University is expanding and without sufficient dedicated student accommodation, this may hinder the University's growth, and in turn the contribution the University and its student population contributes to the local and regional economy. It is fundamental that the growth of these HEI institutions is supported given the Council's strategic outreach and contribution to the local economy that PBSA makes. Though Unite understands that the delivery of student housing needs to be managed in accordance with strategic need and local priorities; we believe the council needs to demonstrate greater flexibility in its ability

to be pragmatic towards projected increases in student numbers. This needs to be sustained up to the plan period of 2031 and underpin the spatial strategy given the total removal of student admission controls, which has resulted in an upward trend in the number of students applying to University and subsequently being accepted onto undergraduate degrees in England over the last three years since the relaxation.

***Draft Policy H12 and Onerous Restriction on Location of Purpose-Built Student Accommodation***

The supporting text for Policy H12 acknowledges the many benefits of the growing student population in Reading and recognises the need for new student accommodation. However, it also states that this need should mainly be met on campus or through reconfiguration and redevelopment of existing halls of residence. The Council have provided very little justification for this approach aside from stating that the growth should not result in the need for 'significant new accommodation'. The supporting text to the draft policy at paragraph 4.4.95 confirms the importance of enough student accommodation being provided to enable students to live close to where they study. The supporting text then goes on to state at paragraph 4.4.96 a clear disparity between the SHMA 2016 and more recent evidence from the University. The SHMA notes that, as this is in line with historic high student numbers, that it should not result in the need for significant new accommodation. However, more recent evidence provided by the University to support the planning application at St Patricks indicates that this growth will indeed generate a need for new accommodation. The headline being that the University student numbers have increased by 18% over the last 5 years.

Therefore, it is clear that draft policy H12 and the evidence which underpins it has consideration to an increasing student population as confirmed by their SHMA (2016) but does not go far enough to explore the University's evidence and it is not clear if they have been consulted on this draft policy with regard to their landholdings.

***Reading University's Position as Stated within Representations to the Draft Local Plan***

In the University of Readings representation submitted in January 2018, it is clear that they have had little involvement with the drafting of the policy through their objection to the "onerous requirement it places on geographic location, noting their key concern over the potential impact that the draft policy could have on the growth of their institution". The University therefore also holds similar concern on the current wording of draft Policy H12 which seeks to limit new student accommodation to locations on or adjacent to existing further of higher education campuses, or as extensions or reconfiguration of existing student accommodation. The emerging draft policy would cover the Plan period to 2036 and will therefore have a strong influence on development that can be conducted by the University over a considerable length of time

Furthermore, whilst the Council have acknowledged that there will be a growth in student numbers and deemed this not to be significant to warrant the need for new significant student accommodation, however, there is no evidence provided as to whether there is enough land on existing campuses, or sufficient expansion opportunities at existing sites to facilitate new student accommodation. The Council in their response to the Inspector's initial questions states 'that the amount of land in existing University use in Reading and across the boundary of Woking is extensive. Whiteknight's Campus totals around 120 ha and it is estimated that there is at least another 17ha of land in university or student accommodation use'. However, there are other considerations when considering land at existing campuses and whether there are other environmental or historic constraints alongside a potential conflict which might restrict the University

expanding its educational facilities. These have not been considered or assessed by the Council when drafting Policy H12.

It should be noted that, Reading University in their representation to the pre-submission plan Reg 19 at paragraph 3.20 state *“The University would agree that the high number of students seeking to study at the University can lead to a high demand for student housing. Where dedicated student housing is not available, this can result in the forming and accommodating of market housing as student accommodated HMOs. Dedicated student accommodation, distributed in sustainable locations could help reduce the reliance on students creating HMOs from market housing and reduce the impacts described within paragraph 4.4.58 of the Pre-Submission Plan, thereby improving townscape character. The provision of dedicated student housing could also allow existing market housing to remain available to meet general housing needs rather than be converted to a student HMO, whilst potentially allowing existing HMOs to revert back to general market housing”*. The University further states *“to grow and maintain its position, the University requires student accommodation in locations close to (i.e. with sustainable access to) the main campus. It is considered that Option (iii) does this, but that draft Policy H12 requires amendment to include sustainable locations “close to” the main campus”* (para 3.24).

The restriction of student accommodation to existing campus locations, as drafted, would therefore not be consistent with national policy and is clearly not justified by up to date evidence which makes clear that there is an increasing demand for PBSA. It is acknowledged that the Council wish to prevent student accommodation taking up land that could otherwise accommodate market / affordable housing in contribution of its OAHN needs. However, as stated in section 1 the Council need to recognise that PBSA actually contributes towards the delivery of conventional housing. Furthermore, PBSA at sustainable locations would satisfy student needs in a far more efficient and controlled manner than those same students relying on HMO accommodation and could in turn free up housing for other housing market needs. Although, this is recognised at Appendix 1 of the Local plan, this is not accurately represented through the draft policies for housing (H1) and student accommodation (H12). It should be recognised that many sites outside of the established student locations in Reading are highly sustainable, particularly in terms of access to goods and services and public transport connections. The ability of these sites to deliver student housing must be looked at on a site by site basis as it is possible that some sites will be more appropriate for PBSA than for family sized dwellings.

This policy is highly restricted geographically for no sound planning reason and given the reasons explained above, should be amended as follows:

- The Policy should read, “New student accommodation will be provided on or adjacent to existing further or higher education campuses, other sustainable locations, or as an extension or reconfiguration of existing student accommodation”.
- The next sentence, “There will be a presumption against proposals for new student accommodation on other sites unless it can be clearly demonstrated how the proposal meets a need that cannot be met on the above sites” should be deleted.

***Q4a. Would the standards apply to student accommodation (particularly internal space) and if so, is this approach justified?***

The supporting text of Draft Policy H5: Standard for New Housing sets out the standards for new build housing. The inspector has asked for clarification as to whether these standards should apply to student accommodation, we would recommend that the text should include the clarification that these standards do not apply for student accommodation.

We trust that the above is helpful in the context of the EiP. It would be appreciated if you could confirm receipt of this Hearing Statement in respect of Unite Students interest in Reading. If you have any queries on the comments enclosed please contact myself or Beth Hawkins.

Yours sincerely,

A black rectangular redaction box covering the signature of Matthew Roe.

MATTHEW ROE  
Director