

REF: MR/BH/DB/R00150

BY EMAIL ONLY: EIP.programme.officer@southwark.gov.uk

2nd February 2021

Dear Sir / Madam,

**NEW SOUTHWARK PLAN EXAMINATION IN PUBLIC
HEARING STATEMENT IN RESPONSE TO QUESTIONS (MIQ) RAISED BY THE INSPECTOR IN
DOCUMENT EIP88 REGARDING MATTER 9 'INFRASTRUCTURE (INCLUDING TRANSPORT)'
ROK PLANNING ON BEHALF OF UNITE GROUP PLC (RESPONDENT NUMBER NSPPSV198)**

I write on behalf of our client, Unite Group Plc, to submit a Hearing Statement in response to the Matters issues and questions (MIQ's) raised by the Inspector within document EIP88 dated December 2020 regarding the New Southwark Plan (NSP) Examination in Public (EiP).

Unite Students is the UK's leading manager and developer of purpose-built student accommodation (PBSA), providing homes for around 74,000 students in more than 177 purpose-built properties across 27 of the UK's strongest university towns and cities.

This hearing statement has been prepared further to the representations made throughout the preparation of the draft NSP, and specifically the representations made to the NSP Amended Policies version of the plan dated August 2020. This statement responds to the MIQs in relation to Matter 9 'Infrastructure (including Transport), viability and implementation including monitoring', and specifically issue 2, parts 9.19 regarding policy P52 'Cycling'.

MATTER 9 – ISSUE 3 – CYCLING

9.18 – Are the requirements in the policy justified and viable, including criterion 7 re cycle hire fobs?

Policy P52 states that development must:

1. *Ensure the delivery of the Southwark Spine cycle route (Figure 9) and our wider cycling route network. All sites on or adjacent to the network must support and integrate into the network; and*
2. *Provide cycle parking for building users and visitors in accordance with Tables 9 and 10; and*
3. *Provide cycle parking that is secure, weatherproof, conveniently located, well lit and accessible; and*
4. *Provide cycle parking that includes an adequate element of parking suitable for accessible bicycles and tricycles; and*
5. *For commercial uses, provide associated showers and changing facilities that are proportionate to the number of cycle parking spaces provided; and*
6. *Contribute toward the provision of cycle hire schemes and docking stations. Financial contributions will be required from major developments that are commensurate to the size and scale of the proposal. This may also include providing space within the development for the expansion of the cycle hire scheme; and*
7. *Provide a free two year cycle hire fob per dwelling where a docking station is located within 400m of the proposed development.*

In accordance with part 2 of policy P52, table 10 requires cycle parking to be delivered at a level of 1 space per bedroom for student accommodation and co-living development (Sui generis). Unite object to this requirement for the following reasons:

1. The standards are not compliant with the draft London Plan 'Publication Version' dated December 2020 (the draft London Plan) which requires only 0.75 spaces per bedroom. In any case, this standard itself is still considered unnecessary given the additional reasons set out below;
2. Unite's experience has shown that cycle parking provision provided at policy compliant levels is severely underused. Enclosed within Appendix A (Representations to Draft New London Plan - WSP) is supporting evidence which refers to a survey (February 2018) undertaken by Unite to understand the present uptake of cycle utilisation across their student accommodation sites. The study demonstrates that the maximum average demand for cycle parking storage is 5% of bed places, which has been found across the 26 of Unite' sites which equates to a demand of one cycle space per 20 students;
3. This over-provision of unnecessary cycle space can lead to loss of valuable floorspace in which more bedrooms can be provided, thus reducing the efficiency of the use of the land. 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 which 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. Based on an average student cluster bedroom size of approximately 11sq.m, this would result in the unnecessary loss of approximately 35-42 bedroom units;
4. Additionally, it has been demonstrated that an increase in the provision of cycle parking for student accommodation would not directly result in an increase in cycling patterns amongst students. Firstly, student housing schemes are generally in close proximity to places of study, allowing the majority of journeys to be undertaken on foot. Furthermore, they are in areas with high levels of public transport accessibility providing an alternative means of transport. Additionally, the influence and take up of Cycle hire schemes provide an affordable means of transport, precluding the requirement for private cycle ownership and storage which eliminates the need for students to invest in safety, security and maintenance associated with private ownership; and
5. Finally, student housing and co-living accommodation is developed at higher densities than conventional housing. As a consequence, and in order to provide the required levels of cycle parking, large areas of floorspace (typically at ground floor level) are lost. These areas could otherwise be used more efficiently and effectively for living space or town centre uses, providing numerous benefits to a scheme including increasing their viability.

Recommendation: Given the above, it is considered that a 25% provision of cycle parking for student housing should be required. At the very least, the requirements should be updated to align with the draft London Plan standards.

In addition, Unite object to criterion 7 re cycle hire fobs for the following reasons:

1. Should criterion 7 be applied to student developments in combination with the current proposed parking standards (1 space per bedroom), developers would be required to provide each resident with both a dedicated cycle parking space and a free two-year cycle hire fob. This is clearly an unnecessary over-provision;

2. In line with the arguments detailed in point 5 above, areas for cycle parking can otherwise be used more efficiently in student and co-living developments. On this basis, Unite would support pool bikes and contributions towards free cycle fobs where, in turn, this reduces the required level of dedicated cycle parking spaces;
3. Indeed, this approach has been considered recently at the Examination in Public for the draft Lambeth Local Plan which explicitly notes that pool bikes are appropriate in PBSA developments. Whilst the Council currently maintain that pool bikes should be provided in addition to standard requirements, a statement of common ground on the matter has been prepared between the Council and Unite and is currently with the Inspector for consideration.

Recommendation: Any requirement for the provision of pool bikes or free cycle fobs should be applied in lieu of dedicated cycle parking spaces as opposed to in addition to this requirement.

We trust this Hearing Statement will be considered for the Examination in Public. If you should have any questions in the meantime please do not hesitate to contact Bethan Hawkins on 07849 848236 or (bethan.hawkins@rokplanning.co.uk), or myself at this office.

Yours faithfully,



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