

Public Examination of the Development Management Local Plan

London Borough of Lewisham response to Inspector's initial query regarding DM8: Student housing

Part 1h refers to ANUK standards which are not explained. Any reference to this guidance should be confined to the accompanying text. 1h also refers to 'any relevant standards for HMOs'. If retained, this reference should be confined to a cross-reference to policy DM6. The Council proposes an editorial change (SM17) to make para 2.78 consistent with the London Plan. This could be an appropriate OM.

(Note a complete list of all the Inspector's initial questions are on the Examination website and can be accessed via the following link:

<http://www.lewisham.gov.uk/myservices/planning/policy/LDF/development-policies/Documents/DMLPInitialQueries.pdf>)

Planning Policy – 13 January 2014

Council response

1. Introduction

- 1.1 DM Policy 8 aims to ensure student housing is provided in the most appropriate manner and provides a list of criteria against which to assess applications for student housing. Specifically part 1h seeks to ensure that the standard of accommodation is of decent quality. It is important to retain the first part of 1h, "complies with national and local standards and codes", in order to serve as a reminder to developers when preparing applications that standards exist and should be complied with and so that the Council can refuse applications that do not comply.
- 1.2 Part 1h in DM Policy 8 makes reference to ANUK. Accreditation Network UK (ANUK) is a network of professionals and organisations that promotes accreditation in private rented student accommodation. There are a number of benefits associated with accreditation schemes. They encourage private landlords to raise their standards in the condition and management of their properties and their relationship with their tenants. It creates good quality accommodation for tenants, ensures a good supply of privately rented property is available and in turn encourages students to be responsible tenants and neighbours. Accreditation is supported by a wide range of private rented sector stakeholders including the Government, national landlord associations, local authorities, Shelter, the National Union of Students and the Chartered Institute of Environmental Health. The Council agrees with the Inspector, that reference to ANUK is not needed within part 1h of DM Policy 8 and proposes that accreditation schemes be referenced in the justification text instead.

1.3 Part 1h in DM Policy 8 makes reference to relevant standards for houses in multiple occupation (HMOs). Private rented HMOs form an affordable option to students who cannot afford to rent privately on their own and prefer to live together as a group sharing communal facilities such as bathrooms and kitchens. The Council agrees with the Inspector, that reference to relevant standards for HMOs in DM Policy 8 should be supplemented in paragraph 2.82 with a cross-reference to policy DM6.

1.4 The Council also agrees with the Inspector, that SM17 (that modifies paragraph 2.78 in light of a representation received by the GLA DMREP11.2) is appropriate as an OM.

2. Suggested modifications

2.1 The Council now proposes the following suggested modifications. Text additions are **underlined in bold** and deletions are ~~struckthrough~~.

DM Policy 8

Student housing

1h. complies with all relevant national and local standards and codes ~~including ANUK~~ and any relevant standards for housing in multiple occupation (HMOs).

Justification

2.81 Site management and maintenance is considered key to successful student accommodation and will be secured by way of a Section 106 agreement, which may cover such matters as provision of on-site wardens, use of communal facilities, elimination of potential noise nuisance and security and safety of occupants.

Furthermore, developers will be encouraged to provide student accommodation that meets national and local standards, such as ANUK accreditation schemes. This is mutually beneficial for both landlord and tenant, with private landlords providing good standards in the condition and management of their properties. This creates quality accommodation and a good supply of privately rented property and in turn encourages students to be responsible tenants and neighbours.

2.82 The conversion of existing buildings to student accommodation is particularly sensitive given the requirements to provide a high quality living environment which is not always possible with the conversion of existing buildings not originally designed for that use. In particular, the Council will not approve applications that cause a loss of residential, employment, retail, leisure or community space and would not accept student accommodation which would be unduly compromised by the layout or position of an existing building. **Schemes that provide student accommodation in HMOs should be compliant with DM Policy 6.**