

PLANNING APPLICATION: PA/24/00243

Purpose Built Student Accommodation (PBSA) London Plan Guidance (LPG)

This schedule has been prepared to set out how the 7 Brannan Street application proposal (planning ref. PA/24/00243), referred to as the Proposed Development below, complies with London Plan Policy H15 and relevant sections of the Mayor of London’s Purpose Built Student Accommodation (PBSA) London Plan Guidance (LPG).

Relevant Policy / Guidance Text	7 Brannan Street Compliance
London Plan Policy H15	
<p>A. Boroughs should seek to ensure that local and strategic need for purpose-built student accommodation is addressed, provided that:</p> <ol style="list-style-type: none"> 1. at the neighbourhood level, the development contributes to a mixed and inclusive neighbourhood 2. the use of the accommodation is secured for students 3. the majority of the bedrooms in the development including all of the affordable student accommodation bedrooms are secured through a nomination agreement for occupation by students of one or more higher education provider 4. the maximum level of accommodation is secured as affordable student accommodation as defined through the London Plan and associated guidance: <ol style="list-style-type: none"> a) to follow the Fast Track Route, at least 35 per cent of the accommodation must be secured as affordable student accommodation b) N/A 	<p>The Proposed Development aligns well with the objectives of London Plan Policy H15, which supports the delivery of PBSA in appropriate locations due to the positive impacts it brings to the local economy and contribution it can make to meeting London’s housing need.</p> <p>The application Site forms part of the Isle of Dogs and South Poplar Opportunity Area and site allocation ‘4.13 Wood Wharf’ within the LBTH Local Plan, which is identified for mixed use development. Opportunity Areas are recognised in the London Plan as the “capital’s major reservoir of brownfield land with significant capacity to accommodate new housing, commercial and other development” to meet the existing and future potential needs as the population continues to grow in London. The proposed introduction of PBSA at Wood Wharf will support a more diverse ecosystem of land uses and help to develop the relationship that Canary Wharf Group is encouraging to support links with higher education provision in the wider area.</p> <p>London Plan policy H15 reiterates the need for the majority of bedrooms to be secured through a nomination agreement. The Applicant has been engaging with a number of</p>

- c) the affordable student accommodation bedrooms should be allocated by the higher education provider(s) that operates the accommodation, or has the nomination right to it, to students it considers most in need of the accommodation.
- 5. the accommodation provides adequate functional living space and layout.

Boroughs, student accommodation providers and higher education providers are encouraged to develop student accommodation in locations well connected to local services by walking, cycling and public transport, as part of mixed-use regeneration and redevelopment schemes.

higher education institutions within the immediate area regarding a nominations agreement and securing the use of the accommodation for students. Interest has been received, including from UCL, which has provided the Applicant with a letter of support that was enclosed within the application. The Applicant will continue to engage with interested institutions to secure a nomination agreement in principle, in advance of a nominations agreement being agreed following the grant of planning permission and pursuant to an appropriately worded Section ('S106') obligation, which is included in the draft S106 Agreement prepared to date between CWG and LBTH.

London Plan Policy H15 states that boroughs should seek to secure the maximum level of accommodation as affordable student accommodation as defined through the London Plan and associated guidance. To follow the Fast Track Route (i.e. without requirement for the application to be supported by viability evidence), at least 35% of the accommodation must be secured as affordable student accommodation.

In accordance with Policy H15, the Proposed Development will provide 35% of the proposed student bedrooms (totalling 320 number of bedrooms) as affordable student accommodation in line with the rental levels set out in the London Plan. The principle of the application following the Fast Track route has been agreed with LBTH and GLA officers during the pre-application and planning application determination periods to date. The provision of the affordable bedrooms will be secured through appropriately worded S106 obligations, as is set out in the draft S106 Agreement prepared to date between CWG and LBTH. The affordable student accommodation bedrooms will be allocated by the high education provider in line with Policy H15 Part A(4c).

The submitted Design and Access Statement (DAS) and Planning Statement and commentary below demonstrate that the Proposed Development will provide a high quality layout and living space, including multiple internal and rooftop communal living spaces that will be accessible to all residents. The application site is very well located to access the public transport, services and facilities within Wood Wharf and the nearby Canary Wharf and will form an important part of the diverse regeneration of the area.

The GLA Stage 1 Report confirms that the student accommodation proposed would meet an identified strategic need and contribute towards the housing targets for the Isle of Dogs OA in Policy SD1 and Tower Hamlets in Policy H1.

PBSA LPG		
<p>2.1 Box 1: the role of PBSA in meeting different policy objectives as part of mixed and inclusive neighbourhoods</p>	<p>Housing need is met by PBSA directly through housing students (including those with particular affordability and/or disability-related needs); and indirectly through helping to alleviate pressure on traditional rented homes. As such, it is counted as part of housing supply; and may also have a role in supporting wider housing delivery in an area... PBSA, particularly where it incorporates ASA, should therefore now have more potential to attract students out of the private rental sector. In turn, this should help alleviate demand pressures reflected in rents and availability of family-sized homes at the London-wide level.</p>	<p>The London Plan sets out that student accommodation contributes towards meeting borough housing delivery targets at a ratio of 2.5:1 (i.e. every 2.5 student bedrooms equates to 1 conventional residential unit) and is not in addition to the need for self-contained housing units. As such, the proposed 912 student bedrooms would contribute the equivalent of 364 new residential dwellings towards the borough's housing delivery targets, with the added benefit of helping to relieve pressure on the private rented sector by freeing up family sized housing to meet general housing need.</p> <p>The Proposed Development will make a positive contribution to housing delivery, accounting for c. 10% of the London Plan's annual target for LBTH and c. 9% of LBTH's Local Plan annual housing target.</p> <p>The GLA Stage 1 Report confirms that the student accommodation proposed would meet an identified strategic need and contribute towards the housing targets for the Isle of Dogs OA in Policy SD1 and Tower Hamlets in Policy H1.</p>
	<p>Support the economy is achieved by the students spending in their local areas and taking on part-time jobs during their studies. Being able to offer accommodation guarantees (e.g. to first-year students) through PBSA is also important to the universities competing for students domestically and internationally and contributes to their ongoing viability, growth and world-class status. In turn, many people who study in London stay here after graduating, and go on to be part of London's highly qualified workforce and pool of innovative entrepreneurs. This underpins crucial economic sectors, from research and development to creative industries and professional services.</p>	<p>In addition to the points set out above, students living in the Proposed Development would support the local economy and the viability of local services, leisure facilities and the night-time economy. The 912 PBSA bedspaces within the Proposed Development are estimated to generate £6.4 million annually in additional local spending. The spending impact of the new employees of the Proposed Development would equate to up to £86,000 per annum.</p> <p>Furthermore, the introduction of PBSA will help contribute to the mixed and balanced communities and the 'ecosystem' of housing options at Canary Wharf, which can encourage people to move to the area as students, then stay in the area to work, and live in BtR or other rented accommodation at Wood Wharf and progressing to home ownership. The additional bedspaces will also help support the growth and co-location of higher education institutions in this part of the borough, which is exemplified by UCL's recent acquisition of additional teaching and research space at 1 Canada Square in Canary Wharf to expand their School of Management, with clear links to the businesses across the Estate.</p> <p>The GLA Stage 1 Report confirms that the proposed development would contribute to a mixed and inclusive neighbourhood.</p>
	<p>Regeneration impacts are realised through the new activity and people that are brought to an area: people who live, spend and work in the neighbourhood, adding to and typically diversifying what exists currently. Some students may go on to be longer-term residents, particularly where there is an</p>	

	appropriate mix of conventional housing (and workspace) in an area that they can 'graduate' into.	
2.2 Locating in well-connected, well-served areas	<p>Paragraph 2.2.3: London-wide, areas likely to be suitable for PBSA will include:</p> <ul style="list-style-type: none"> • the Central Activities Zone (CAZ) and Inner London Opportunity Areas • Metropolitan and Major town centres • areas of Public Transport Accessibility Levels (PTALs) 5 or 6 and Inner London PTAL 4 	<p>The Site is in a sustainable location, being within an inner London Opportunity Area, a Metropolitan Centre and within the CAZ. It is allocated for mixed use redevelopment and benefits from excellent transport links to local bus services, the Elizabeth Line, London Underground (LUL), Docklands Light Railway and National Rail Services. The Site has an existing PTAL of 3 at the time of submission of this application, but the western end of Brannan Street, within 80m of the Site to the west, has a PTAL of 6a, which represents an "Excellent" level of accessibility to public transport. The Site is located in close proximity to the services, facilities and transport infrastructure of the Canary Wharf estate that adjoins the Wood Wharf neighbourhood to the west.</p> <p>The Site represents an appropriate location for student accommodation due to its accessible location within the wider Wood Wharf development site, located within walking distance of the wide range of services and facilities within the Wood Wharf neighbourhood and the wider Canary Wharf estate to the west.</p> <p>LBTH Officers also supported the appropriateness of the location for PBSA, considering it an excellent location in presentation to Members at the LBTH Planning Committee on 25th November 2024.</p>
2.3 Avoiding over-concentration and spreading the benefits	<p>This section of the LPG is more focussed on Borough policy formation to manage concentration of PBSA development, but para. 2.3.3 makes reference to the need for a balanced approach to differing proportions of conventional housing and PBSA in different parts of London, alongside recognising the more positive opportunities for PBSA to contribute to local and strategic objectives.</p>	<p>The principle of providing PBSA at the application site is supported by relevant planning policy, and information regarding the contribution of the Proposed Development towards wider housing delivery is set out above.</p> <p>The application submission demonstrates that the Proposed Development would not result in an over-concentration of PBSA in the area of the application site. It is supported by a Student Demand Study which identifies the need for the Proposed Development in this location, and identifies the lack of PBSA provision in the local area relative to provision elsewhere in the Borough. It also identifies the proximity of the application site to a range of higher education institutions, which is a further example of the appropriateness of the site's location for PBSA use.</p>

<p>2.4 Integrating with the neighbourhood</p>	<p>Text in relation to design and management of PBSA, encouraging submission of construction and student management plans through planning conditions.</p>	<p>The Proposed Development has been designed to respect existing residential amenity, having regard to its location and orientation, which is broadly in keeping with the approved parameters for Wood Wharf OPP Development Plot F1 (which relates to the same land as the 7 Brannan Street site) relative to neighbouring buildings.</p> <p>The Student Management Plan that is submitted with this application also includes measures for future student occupants to sign up to, that will help to manage their use of the building to preserve existing residential amenity and ensure the Proposed Development will make a positive contribution to the neighbourhood it is located in. LBTH officers have considered the measures set out within the submitted Student Management Plan to be sufficient to ensure appropriate management and mitigation of occupiers of the building to preserve local residential amenity. Submission of a Student Management Plan is also proposed to be secured by way of a condition.</p> <p>Positive feedback was received from LBTH design officers and the GLA regarding the proposed building design throughout the pre-application process. The Proposed Development will deliver a high quality and distinctive building which responds appropriately to its context and the character of the surrounding area, and makes a positive contribution to the wider redevelopment and regeneration of the local area, in accordance with relevant national, London wide and local planning policy.</p> <p>It was confirmed in GLA Stage 1 Report that the scale, massing, and articulation of the proposed building are supported and would contribute positively to the emerging cluster of tall buildings on the skyline.</p> <p>The Proposed Development includes 156sqm (GIA) of flexible ground floor Class E(a)(b) floorspace, which will complement and contribute to the wider retail offer at Wood Wharf.</p>
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<p>2.5 Housing mix: affordable student and accessible accommodation</p>	<p>Section relates to mixed and inclusive neighbourhoods include the building scale and consideration of affordability, as well as wheelchair accessibility and other disability-related needs that vary within the student population.</p> <p>Para. 2.5.7: ...the ASA [Affordable Student Accommodation] may not be evenly or proportionately dispersed across all room types and sizes. This may mean that accurate measurement should be based on the percentage of floorspace, rather than percentage of habitable rooms. In doing so, it is reasonable to include the kitchen/living space within the net internal area of the cluster flats, rather than just the area behind each individual bedroom door.</p>	<p>In accordance with Policy H15 and Local Plan Policy D.H6, the Proposed Development will provide 35% of the proposed student bedrooms (totalling 320 number of bedrooms) as affordable student accommodation in line with the rental levels set out in the London Plan. The principle of the application following the Fast Track route has been agreed in principle with LBTH and GLA officers during the application process to date.</p> <p>There is no stated definition of habitable room within the LPG, however the tables below set out information provided to LBTH and GLA officers during September and October 2024 in relation to proportions of ASA by habitable room (which are calculated based on student bedrooms, Living, Kitchen, Dining (LKD) rooms) and floorspace.</p> <p>The Table 1 demonstrates that there will be a total of 1,005 habitable rooms across the Proposed Development, of which 384 will be for ASA. This equates to a total of 38.2% for the affordable and 61.8% for the private.</p> <p><i>Table 1 – Proposed PBSA by Habitable ('Hab') Room</i></p> <table border="1" data-bbox="1020 760 1934 1068"> <thead> <tr> <th colspan="2">Affordable (ASA) Hab Rooms</th> <th colspan="2">Private Hab Rooms</th> </tr> <tr> <th>Type of Hab Rooms</th> <th>Total</th> <th>Type of Hab Rooms</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>LKDs</td> <td>64</td> <td>LKDs</td> <td>29</td> </tr> <tr> <td>PBSA Beds</td> <td>320</td> <td>PBSA Beds</td> <td>592</td> </tr> <tr> <td>Overall Total</td> <td>384</td> <td>Overall Total</td> <td>621</td> </tr> </tbody> </table> <p>Table 2 below provides floorspace figures in relation to the proportion of student accommodation that residents of affordable bedrooms would be able to access, relative to the area accessible to residents of private bedrooms only (all figures are sqm GIA). The table provides separate areas for bedrooms, Living / Kitchen / Dining Rooms (LKDs), circulation space accessible to either affordable or private residents, and an area for shared communal amenity spaces (i.e. the amenity floors accessible to all residents). This demonstrates that, in addition to the proposed affordable bedrooms, affordable residents would have access to LKDs and the variety of proposed communal amenity</p>	Affordable (ASA) Hab Rooms		Private Hab Rooms		Type of Hab Rooms	Total	Type of Hab Rooms	Total	LKDs	64	LKDs	29	PBSA Beds	320	PBSA Beds	592	Overall Total	384	Overall Total	621
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spaces that are shared with private residents, which amounts to 37.6% of the relevant student floorspace.

Table 2 – Proposed PBSA Floorspace Breakdown

Affordable Floorspace			Private Floorspace			Overall Total Floorspace	Affordable %	Private %
Type of Floorspace	Area (sqm)	Total Area (sqm)	Type of Floorspace	Area (sqm)	Total Area (sqm)			
Affordable bedrooms	5,112	8,223	Private bedrooms	11,720	13,653	21,876	37.6%	62.4%
LKDs	1,464		LKDs	658				
Affordable only circulation space	1,200		Private only circulation space	533				
Shared communal amenity areas	447*		Shared communal amenity areas	744*				

**1,189 sqm GIA shared communal amenity areas apportioned based on combined total of Bedrooms, LKDs and circulation space for each of the affordable and private floorspace categories)*

Paragraph 2.5.6: To ensure ASA is distributed across the development, with no difference in quality or access to services pointing to the accommodation being affordable.

The Proposed Development has been designed through conversations with a leading student housing provider to ensure the accommodation is of high quality and meets the needs of incoming students. ASA and private PBSA is provided within the same building and will be of equivalent quality. ASA clusters are proposed, which are aligned with market feedback on demand for ASA units.

Box 3: Accessible Student Accommodation Standards

To ensure sufficient choice for people who require an accessible bedroom, development proposals for PBSA accommodation should provide (as a minimum) accessible and adaptable rooms, as set out in paragraph 19.2.1.3.2 of BS 8300:2:2018 Design of an accessible and inclusive built environment – Buildings Code of Practice. This means:

4 per cent (or at least one room, whichever is greater) wheelchair accessible bedrooms.

The Proposed Development includes 5% of the rooms as accessible from the point of occupation and an additional 5% can be adapted for persons with ambulant mobility impairments. One room would be adaptable to include a hoist system and a further 5% accessible room provision could be provided as accessible should the need arise. This approach has been agreed with LBTH officers and draft S106 obligations have been agreed to secure the provision, which will be responsive to future student need should it arise.

	1 per cent (or at least 1 room, whichever is greater) with a tracked hoist system (see examples in Figures 31 and 32 of the code of practice), and a connecting door to an adjoining (standard) bedroom for use by an assistant or companion.	5% wheelchair accessible rooms proposed, of which 1 room is provided with ability to include a hoist. S106 obligation agreed with LBTH that allows monitoring of future requirement for accessible bedroom provision, subject to demand.
	5 per cent easily adaptable wheelchair-accessible rooms for independent use.	5% of the units proposed will be easily adaptable to an ambulant accessible studio format to BS8300:2018.
2.6 Housing and place-making for inclusive wellbeing	Section relates to allowance for different student needs, with areas for study, relaxation, socialising, laundry, etc and to provide internal and external communal amenity space and roof and lower levels.	<p>The proposed student accommodation will be well lit and ventilated with all habitable rooms having good levels of outlook and privacy. The bedrooms have been designed with an efficient and comfortable layout to provide sufficient space for a bed, desk and chair, bathroom facilities and storage space. A mix of student rooms will be provided, including studios and cluster units.</p> <p>Studio rooms and cluster rooms will be provided with the necessary facilities students will need for washing and cooking, in addition to a considerable amount of internal communal amenity spaces which will also be provided at ground floor, mezzanine, level 9 and level 44. These areas will amount to 1,219 sqm. With the inclusion of on-floor shared amenity areas provided alongside cluster units on the majority of floors, the total internal communal amenity provision would increase to 3,330 sqm (3.6 sqm per student), which compares favourably to other PBSA proposals.</p> <p>The shared amenity spaces will provide a range of uses, including a games room, tv/cinema, private dining, study areas and a café/ bar. In addition to the proposed internal spaces, an external terrace is provided at level 44, providing a further 141 sqm of external amenity for students to enjoy.</p> <p>The Proposed Development will therefore provide a range of multi-functional communal living space for future occupants, providing much needed high quality student accommodation within Wood Wharf, and meeting the relevant accessibility requirements in accordance with Policy H15 of the London Plan and Policy D.H6 of LBTH Local Plan.</p> <p>The GLA Stage 1 Report acknowledges that the proposed amenity spaces are dispersed throughout the building and provide good quality functional living spaces.</p>

3.1 Aligning with need – nominations agreements	Securing a proportion of PBSA accommodation through a nominations agreement.	
3.2 Expectations – what and when?	Letter of comfort from a Higher Education Provider to be obtained prior to submission of planning applications.	The Applicant has been engaging with a number of higher education institutions within the immediate area regarding a nominations agreement and securing the use of the accommodation for students. Interest has been received, including from UCL, which has provided the Applicant with the letter of support enclosed within the planning application. The Applicant will continue to engage with interested institutions to secure a nomination agreement in principle, in advance of a nominations agreement being agreed following the grant of planning permission and pursuant to an appropriately worded S106 obligation.

End.

DP9 Ltd