



May 16<sup>th</sup> 2023

## **1 PORTAL WAY, ACTON, W3 6RS 21/0181/OUTOPDC REPRESENTATION FROM THE OLD OAK NEIGHBOURHOOD FORUM**

This is the fourth objection to this application from the Old Oak Neighbourhood Forum, submitted in the period since the application was first validated in November 2021.

A fresh consultation on revised proposals was initiated by OPDC by letter on 19<sup>th</sup> April 2023. Our further objection relates to the revised 'description' used in the application.

### **Phase 1 proposals that Building F should be consented as either co-living accommodation or student housing**

Application 21/0181/OUTOPDC is hybrid seeking full permission for *a ground plus 18 storey building (100.175m AOD) providing 384 co-living units (Sui Generis) OR 384 student accommodation units (Sui Generis).*

The proposal that the use of this building should be granted an 'either/or' permission we consider to be unacceptable.

We have raised this with OPDC officers, pointing out that the 'description' on an application is legally significant and that the public have a right to know what uses are proposed when submitting representations on an application. OPDC have responded saying *We consider that it is legitimate. Co-living and Student Accommodation are both Sui Generis uses. Any planning permission would restrict the use of Building F to one of these uses. No other type of Sui Generis use would be permitted.*

We disagree that an application proposing either/or uses is legitimate. At the Forum's meeting on 2<sup>nd</sup> May, our members discussed the quantum of student accommodation already approved and in the pipeline at North Acton.

We wrote to Imperial College's Director of Public Affairs and Chief of Staff on April 23<sup>rd</sup> pointing out that 'The [updated consultation material from London Communications](#), accessed via links from the College website and that of Frame Re, included a set of FAQs. One of these FAQs was 'Are you building more student halls' to which the answer published until recently was *Student halls don't form part of our plans at the moment. We would like One Portal Way to be as diverse as possible, catering to many different types of people – young and not-so-young, renters and*

*buyers, living alone or in larger households. Since the area already has significant amount of student accommodation, our preference is to focus on other groups.*

We asked why the College has changed its position when revising the application? To date we have had no reply.

Since we raised this point, we note that this original wording has been removed from the previously published FAQs and substituted with new wording saying *We have recently made some amendments to the proposals. The amended plans submitted in April 2023 allow for either co-living or student accommodation in one of the buildings (building F). This is in response to Imperial's growing requirement for high-quality purpose-built student accommodation to support those studying at the university.*

This stealth change to a FAQ response is characteristic of the Orwellian doublespeak used by a globally recognised university and public body which chooses not to answer queries about its actions and decisions.

### **London Plan and OPDC Local Plan policy on student accommodation**

London Plan Policy H15 states *Boroughs should seek to ensure that local and strategic need for Purpose built student accommodation is addressed, provided that:* 1) *at the neighbourhood level, the development contributes to a mixed and inclusive neighbourhood.*

Prior to the examination of the Local Plan, local residents raised in representations their concerns at the numbers of units of student accommodation being granted consent at North Acton. The Inspector examined this issue at Hearing 11 of the EIP.

OPDC's written response to the Inspector stated that *OPDC considers that its Policy H10 (Student Housing) already provides appropriate safeguards to prevent the delivery of new student housing undermining the delivery of conventional self-contained housing supply and housing targets so a restrictive approach to student housing is not necessary.*

Following the hearing, OPDC responded further, providing a table of PBSA units and stating *The table 1 below shows that there are 2,795 completed or started student bed spaces in North Acton and Acton Wells provided as PBSA schemes. In accordance with the draft new London Plan ratio approach, this comprises 14% of the place housing supply target of 6,000 homes. **OPDC is also not aware of any other student schemes in the pipeline for the place and officers do not consider this to be evidence of overconcentration of student housing in North Acton and Acton Wells. The remainder of the housing supply target for this place is currently expected to be provided as conventional housing.** (our emphasis).*

OPDC also stated *Performance Indicator IH\_12 (KD24) will monitor the number of student beds completed and permitted within the monitoring period, categorised by place, and the proportion of which are considered affordable. Should this indicator demonstrate a significant rise in student accommodation within North Acton and*

*Acton Wells and in other locations within the OPDC area, officers will revisit the potential for defining an overconcentration of student accommodation.*

This OPDC response to the Inspector (OPDC O30) dates from 2021. Our analysis of PBSA units in the pipeline, in or close to North Acton (including pending decisions), is that further student units/bedspaces are in prospect as below:

Holiday Inn site Victoria Road (decision pending) 699 units

5-7 Park Royal Road (decision pending) 988 units

Imperial's One Portal Way 384 units

**Total 2,071 units**

It is clear that since 2021 there has been a continuing market demand for PBSA accommodation as one of the most profitable parts of the development market. It is similarly clear that OPDC's forecast *that The remainder of the housing supply target for this place is currently expected to be provided as conventional housing* will not in reality materialise.

The Forum's view is that:

- This proliferation of PBSA units has already become an over-concentration and is leaving students and young people isolated in separate high-rise high-density buildings each of which purports to self-sufficient in providing amenities and social and studying spaces.
- The demographic of North Acton has become distorted by earlier decisions of LBE on behalf of OPDC, and the principle aim of Local Plan Policy P7 will not be achieved (*worded as A new neighbourhood town centre will sit within a high quality and coordinated public realm along Victoria Road and Portal Way*).
- North Acton is a student dormitory only, with none of the positive features and social/educational assets of a university town, or a planned university campus.
- There is an imminent risk of PBSA accommodation at and close to North Acton rising above 5,000 units. A properly planned 'student village' or university campus of this scale would have provided a far better and integrated physical and social environment than the ad hoc results of a series of speculative developments.
- Prospects for attracting a range of retail/commercial and other 'town centre' uses are continuing to be diminished. Students are not around for much of the summer.
- In its Local Plan OPDC has failed to take note of and learn from the experience of planning authorities in other cities which have introduced policies and threshold measures to resist excessive concentrations of student housing at specific locations (e.g. Birmingham, Brighton, Bristol, Leeds, Loughborough, Oxford, and Nottingham).

**Specifically the proposals for 384 units of PBSA at One Portal Way are contrary to Place Policy P7 and Housing Policy H10 part v) and to London Plan Policy H15 A1. We ask that this is considered as a further ground for refusing this over-ambitious hybrid application.**

Old Oak Neighbourhood Forum  
May 2023