

London Higher comments

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General comments on the higher education sector in London and purpose built student accommodation:

Background information and data on the strength and diversity of London's HE sector can be found at:

- <https://www.londonhigher.ac.uk/london-he/>
- <https://www.londonhigher.ac.uk/news-resources/publications/key-factsheets/>

There are nearly 40 mainstream HE institutions in London, currently supported by the Higher Education Funding Council for England (HEFCE) which is to be replaced by the Office for Students (OfS).

Besides their direct economic impacts at a local level, HE institutions have an important role by providing a wealth of social, community and cultural activities, as well as interactions with local businesses for regeneration, skills training and knowledge exchange.

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Joint submission by London Higher, Cass & Claredale Halls and the National Union of Students.

Overall we agree and support the policy aims on purpose-built student accommodation (PBSA) as set out in the consultation. We are supportive of the need for 3,500 PBSA bed spaces to be provided annually (section 4.17.2), and the principles involved in defining and calculating affordable student rents in London (4.17.6 and 4.17.7).

Our support for the definition of affordable student accommodation is conditional on the understanding that the calculation used to determine an affordable rent (55% of the maximum amount of maintenance loan available) is based on an average contract length of 38 weeks. It is the short-term nature of student rental periods (namely 38 weeks out of 52), as well as the inclusions of utility and service costs within the rent, that allows for a higher income ratio threshold, of 55%, to be considered as an affordable rent.

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Section: [4.17.3](#)

Joint submission by London Higher, Cass & Claredale Halls and the National Union of Students.

We support this policy but a definition is needed for a higher education institution or provider. This should be a body which is listed on the proposed register to be drawn up and maintained by the newly constituted Office for Students (OfS). The OfS will be operational from April 2018 replacing the current Higher Education Funding Council for England.

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Section: [4.17.11](#)

Joint submission by London Higher, Cass & Claredale Halls and the National Union of Students.

In our opinion the higher education institutions, students and developers in London would be better served if there was more detail in this section of the policy. Given there are a range of types of nomination agreements, will the nature of an agreement be determined by local authorities at a local level?

The policy may mean smaller specialist HE institutions in London (nearly 30% of all mainstream HE institutions) will struggle to gain access to PBSA, as they will find it harder to enter into large financial agreements with developers or HE consortia.

We therefore propose **several aspects need to be clarified in any subsequent Supplementary Planning Guidance (SPG)**, including the nature of a nomination agreement, the role of local planning authorities, and options/consequences following the cessation of any agreement.

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Section: [4.17.12](#)

Joint submission by London Higher, Cass & Claredale Halls and the National Union of Students.

We support the broadest possible use of PBSA over the summer in order that the income generated from that activity can be used to offset the lower rental income achieved from rooms offered at an affordable rent.

However, our support for this is predicated on the understanding that students who have a need for a longer tenancy or accommodation contract that extends beyond 38 weeks, for example students from disadvantaged backgrounds (e.g. care home leavers), healthcare students, international students, and students on two-year accelerated degrees, are given priority and are able to reside in their accommodation without disruption or financial penalty.