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1. **M32. Would Policy H17 provide a justified and effective approach to the provision of purpose-built student accommodation (PBSA) in London? In particular:**
  - a. **Would the criteria set out in Policy H17A be justified and effective in delivering PBSA to meet identified need?**
2. We are pleased to see that the substantial contribution universities make to London's economy is recognised in the draft plan and applaud it for its intentions to ensure that the identified need for PBSA is addressed.
3. The BPF however has concerns that some measures outlined in H17A may be obstructive to the growth of PBSA in the capital and will prevent the plan fulfilling both its own ambitions and those set out in the 2012 NPPF. This is especially worrisome given that London already has an inadequate PBSA stock in comparison with student numbers, demands and needs.
4. H17A (3), which mandates the need for PBSA (that doesn't meet the affordability criteria) to have a nomination agreement in place with a university from initial occupation, causes particular alarm. Smaller PBSA operators will likely not have the capacity to develop schemes appropriate for large Higher Education institutions, yet, the smaller universities they could cater for do not have the resources, expertise or time required to commit to partnerships with developers prior to a scheme's completion. Larger developers are also less likely to engage with these universities if underwrite levels amount to only low numbers of beds. We are fearful therefore that this policy could force smaller providers out of the London market and severely restrict the number of students from smaller institutions living in PBSA. We suggest that this policy be amended so that nomination agreements are encouraged but not mandated.
5. Another issue within the plan related to its ability to meet the GLA's identified need for PBSA is its lack of specific provisions for post-graduate students. This is especially problematic with regard to the definition outlined of affordable student accommodation for PBSA, which states that a room can only be deemed affordable if it is: *'provided at rental cost for the academic year equal to or below 55 per cent of the maximum income that a new full-time student studying in London and living away from home could receive from the Government's maintenance loan for living costs for that academic year'*.
6. Whilst it is possible to get a post-graduate master's or doctoral loan, these are often smaller than the equivalent loans for undergraduate study and cover both tuition fees and maintenance, whilst are also offered on different terms. It is therefore unclear why post-graduates' affordability requirements should be determined by this measure. We

recommend that the plan include supplementary planning guidance on post-graduate accommodation that clarifies how affordable accommodation should be assessed for post-graduate students.

7. The definition outlined of affordability more generally is flawed in its link to student incomes as this does not reflect the realities of block viability, especially in the city centre. The BPF recommend that there be different requirements depending upon the areas schemes are situated and that affordability requirements be linked to a percentage of market rent. This would mean that affordability requirements reflect the economic realities of developing PBSA in London rather than a student income largely determined by national government policy.

**b. Would the approach to affordable student accommodation be justified and effective?**

8. We are pleased that the plan acknowledges the need for temporary alternative summer use of accommodation. The inclusion of visitors as possible users of student accommodation is especially welcome and will help providers meet affordability requirements and reduce term time rent.
9. As outlined in question (a) above, we do however have concerns regarding the definition of affordability outlined and question the lack of separate specifications for post-graduate student residents. We recommend that the plan provide different affordability requirements depending upon the area in which schemes are situated and encourage that these be linked to market rent rather than student income. The plan should also include supplementary planning guidance on post-graduate accommodation that clarifies how affordable accommodation should be assessed for this group of students.
10. The BPF is also worried that many PBSA schemes may not be viable at the 35% threshold requirement outlined. We encourage the GLA to consider how the affordability requirement could be made more flexible to ensure development of private PBSA in London is not constrained. Ultimately, a plentiful and diverse housing offering is needed to bring downward pressure on rents across the residential sector. Any such measure that reduces build-out may therefore be counterproductive. It should be noted that rents and tenancy agreement lengths have respectively flattened and shortened in markets such as Wembley where PBSA competition is now significant.

**c. Would the approach to living space and layout provide good design in PBSA to meet the objectives of good growth policies GG1 to GG4?**

11. We are pleased to see that the proposals largely appear to meet the good growth policies GG1 to GG4.
12. The cycle provisions outlined in policy T5 are however are far too restrictive for PBSA, as we evidenced with data from Unite Students in our initial plan response. Existing cycle bays are currently underutilised and have been created at the expense of other in-demand amenities. They can also be obstructive, creating an unnecessary impediment that prevents members

of the public from moving around with ease. An excessive and unnecessary requirement for more bays may then run counter to the objectives of GG1 (F).

13. The BPF believes a goal of cycle provision for 25% of the student population would be more appropriate than the 100% stipulated and that the plan could encourage innovative alternatives to the simple “one hoop per resident” policy. Alternative measures could include double-racking, folding bike allocations and free membership of cycle hire schemes. We encourage the GLA to amend the plan so that these latter two alternatives permit the developer to remove the one hoop per resident requirement altogether.

14. If the GLA is to go ahead with these proposals, we suggest that a full review of cycling provisions is conducted in 3 years’ time to determine whether they have been successful and continue to be justified.

**d. Overall, would Policy H17 meet the objective of Policy GG4 in delivering the homes Londoners need?**

15. A small number of measures outlined in the plan significantly threaten PBSA’s viability in the capital and would be obstructive to the goal of meeting Policy GG4. With just a handful of changes however the plan could be transformative for the provision of PBSA in London.

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