

MAYOR OF LONDON

London Plan Guidance

Purpose-built Student Accommodation

October 2024

Copyright

Greater London Authority

October 2024

Published by:
Greater London Authority
City Hall
Kamal Chunchie Way
London E16 1ZE

www.london.gov.uk

Enquiries 020 7983 4000

Email LondonPlan@london.gov.uk

Other formats

If you require this document in a more accessible format, please get in touch via our [online form](#) and tell us which format you need.

Table of contents

1.	Introduction	2
1.1	About this document	2
1.2	What is purpose-built student accommodation ?	2
2.	Mixed and inclusive neighbourhoods	3
2.1	The role of PBSA in achieving housing, economic development and regeneration objectives	3
2.2	Locating in well-connected, well-served areas	4
2.3	Avoiding over-concentration and spreading the benefits	5
2.4	Integrating with the neighbourhood	8
2.5	Housing mix: affordable student and accessible accommodation	10
2.6	Housing and place-making for inclusive wellbeing	13
3.	Aligning with need – nominations agreements	15
3.1	Background and purpose	15
3.2	Expectations – what and when?	16

London Plan policies

Good Growth objectives:

- GG1 Building Strong and Inclusive Communities
- GG4 Delivering the homes Londoners need
- GG5 Growing a good community

Housing policies:

- Policy H4 Delivering affordable housing
- Policy H5 Threshold approach to applications
- Policy H15 Purpose-built student accommodation

Economy policies:

- E8 Sector Growth Opportunities and Clusters
- E10 Visitor Accommodation

Plan-making

Authorities and other plan-making groups should use this guidance when reviewing or developing Local or Neighbourhood Plans; Community Infrastructure Levy (CIL) charging schedules; development briefs; and guidance. There is no specific plan-making instruction in Policy H15 – but it may be relevant to policies setting expectations for particular areas and sites, as well as more general housing policies.

Planning application type and how the London Plan Guidance (LPG) will be applied

The LPG applies where an application has a component of purpose-built student accommodation (PBSA). That is, any accommodation designed for, and marketed to, students as the primary occupants. It clarifies London Plan (2021) expectations – particularly around policy H15 requirements A(1), A(3), A(5) and B.

Who is this guidance for?

The primary audience is Planning Authorities and others involved in bringing forward proposals for PBSA. It is to help them best provide for student housing need as part of a wider approach to housing and regeneration. This may include developers, providers, funders and London-based higher education providers (HEPs) with student-housing needs.

1. Introduction

1.1 About this document

1.1.1 This document provides guidance primarily to support London Plan Policy H15. The guidance falls in two parts:

- the role of purpose-built student accommodation (PBSA) as part of mixed and inclusive neighbourhoods, and how to optimise its impact on policy objectives (section 2)
- expectations around nominations agreements, and how these relate to alignment with housing need (section 3).

1.2 What is purpose-built student accommodation?

1.2.1 PBSA is housing dedicated, at least in term time, to full-time students.¹ It may be new-build or converted from other uses.

1.2.2 It typically consists of one or more blocks containing a mixture of studio and multi-bedroom 'cluster flats' (linked to kitchen/dining/living rooms); and additional shared amenities targeted at student lifestyles and support (e.g. for socialising, studying, laundry, health and wellbeing).

1.2.3 Blocks are managed by the provider, which is either a university or a specialist landlord; though bedrooms are let individually, usually for an academic year.

1.2.4 It is distinguished from other Build to Rent and large-scale purpose-built shared living products, because of its focus on student needs (and student-occupancy restriction); links with universities; and provision of specific affordable student accommodation (ASA),² as required by the London Plan 2021.

1.2.5 It is counted towards housing completions on a ratio of 2.5:1. Every two-and-a-half bedrooms or units (if studios) built within a PBSA block count as a single home.

¹ A student is defined in the London Plan as a person following a course in higher education as recognised by the Office for Students.

² ASA is defined as bedrooms let at rates that, for the academic year, are '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' (London Plan, 2021).

2. Mixed and inclusive neighbourhoods

2.1 The role of PBSA in achieving housing, economic development and regeneration objectives

Box 1: the role of PBSA in meeting different policy objectives as part of mixed and inclusive neighbourhoods

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.

This is a shift from the situation in the 2010s. Consumer surveys suggest ‘all-inclusive’ rents and properties, and brand quality, are increasingly significant in students’ housing choices. This reflects the desire to have more predictable bills; and dedicated study, sleeping and social spaces that are well designed and maintained. 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. However, current indications suggest a lack of PBSA supply relative to growing numbers of students; this is instead contributing to competition and higher rents in the private rental market, especially as this is facing other constraints.

In areas where there is a lot of ongoing housing development, PBSA, along with related housing types (such as Build to Rent) has the potential to provide diversification that can help with market absorption. In this way, it can support delivery of overall housing numbers while in itself meeting an important segment of housing need.

Support for 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.

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 appropriate mix of conventional housing (and workspace) in an area that they can ‘graduate’ into. This can contribute to the creation of new communities where an area has seen population instability, or where the land use is changing to become more residential – for example, in town centres

- 2.1.1 London Plan Policy H15 acknowledges the role that PBSA has in meeting housing need, in supporting London’s knowledge economy, and in contributing more generally to regeneration – which are needs established at the London level. Box 1 sets this out in more detail, with wider policies of relevance referenced at the start of this document. It is noted that aspects of these roles are enabled in part by its density and the managed and purpose-built nature of the accommodation, especially when compared to unmanaged houses in multiple occupation (HMOs) that are usually the alternative for students.
- 2.1.2 The policy (at A(1)) seeks to ensure that such local and strategic needs are addressed through development proposals, ‘provided that at the neighbourhood level, the development contributes to a mixed and inclusive neighbourhood’. In doing so, the policy recognises that PBSA individually and cumulatively *could* contribute to a mixed and inclusive neighbourhood, *but might not* do so. There is potential for a neutral or negative impact on this important objective (paragraph 4.15.2). Potential negative impacts and opportunity costs relative to other potential land uses have been a concern for many boroughs seeking to balance different needs within their area.
- 2.1.3 To demonstrate the desired contribution, and provide assurance, it follows that PBSA should be carefully located, designed and managed to optimise its impact on neighbourhoods’ mixed and inclusive nature. In turn, this would contribute to other Good Growth objectives, notably GG4 (delivering the homes Londoners need). The following sections advise on how this might be achieved.

2.2 Locating in well-connected, well-served areas

- 2.2.1 Creating successful mixed and inclusive neighbourhoods starts with locating new housing in well-connected areas, where people can meet their different needs by comfortably and conveniently walking, wheeling or using public transport to access a range of destinations. It should be recognised that sometimes this accessibility will be improving as part of wider infrastructure investment and regeneration plans.
- 2.2.2 Part B of the policy encourages the development of PBSA in places that are ‘well-connected to local services ... as part of mixed-use regeneration and redevelopment schemes’. Given intended occupants, relevant services may

include the facilities provided on university campuses, and campus intensification is encouraged where appropriate. Connections may include bespoke arrangements for student residents to access wider university facilities, such as dedicated buses or pool/hire bikes.

2.2.3 London-wide, areas likely to be suitable for PBSA will include:

- 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
- other town centres with high or medium residential-growth potential (see Annex 1 of the London Plan).

2.2.4 Beyond this, other locations that are close or otherwise well connected to university campuses may be suitable. These are likely to be in either of the following:

- PTALs 4 or 3
- other parts of Outer London Opportunity Areas with improving connectivity and facilities.

2.2.5 These locations may be refined further by Local Plans according to their wider spatial and housing strategies. This may include a response to over-concentration as appropriate (see below) and consideration of local HEP growth plans and needs, accommodation strategies and accessibility contexts. For the avoidance of doubt, London Plan CAZ policies (SD4, SD5) concerning the prioritisation of particular land uses also continue to apply in designated areas.

2.3 Avoiding over-concentration and spreading the benefits

2.3.1 London's universities are disproportionately concentrated in a few areas, including within the CAZ. PBSA has clustered in similar areas, particularly in inner London. This has diversified the student accommodation offer from the traditional, university-built PBSA, and private rented homes. Several boroughs where this is the case have sought to limit further growth in such (purpose built) student accommodation, as well as in some cases, HMOs. This reflects their concerns about housing mix in their neighbourhoods and the potential 'crowding out' of conventional housing, given other types of housing need amongst their population. However, in turn, other boroughs (including within outer London, some distance from where London's universities are concentrated) have since seen a particularly high influx of PBSA schemes, giving rise to similar concerns.

2.3.2 PBSA in relation to neighbourhood housing mix can be considered in two ways:

- In support of PBSA proposals that help disperse from traditional concentrations to alternative, suitable locations – perhaps adding an element of student housing to existing residential stock that is primarily conventional housing. This may be particularly relevant where there is a shortage of family homes, which students are currently occupying as HMOs or which they could be in future, in light of PBSA shortages.
- As a more negative consideration, where there are long-standing or more recent concentrations of PBSA, or similar, non-self-contained accommodation,³ relative to conventional housing. This may be spatial (in particular neighbourhoods) or as a proportion of housing delivery, where PBSA may be considered to be ‘crowding out’ conventional housing schemes. Such dominance may be particularly acute under certain market conditions; and where development sites are limited (which would ordinarily be equally attractive for conventional residential use).

2.3.3 PBSA should form part of a wider positive strategy in delivering mixed and inclusive neighbourhoods in most Local Plans. It should be acknowledged that what is considered an appropriate balance of PBSA and conventional housing will differ across London, and within boroughs. Local Plans should identify if and where spatial concentration of PBSA, or proliferation of PBSA delivery compared to conventional housing delivery, is impacting the ability to ensure mixed and inclusive neighbourhoods. They should also identify more positive opportunities for PBSA to help contribute to local and strategic objectives. This could be used to develop spatial policies; or to indicate the significance of neighbourhood or pipeline housing mix in decision-making. Further suggestions are given in Box 2, below.

³ This may include large-scale purpose-built shared living and HMOs. Short-term lets are also suggested as a use that can favour similar areas to these, with cumulative implications for neighbourhood mix and inclusivity.

Box 2: Policies to manage concentration and dominance

Policies could:

- seek to limit the number of units (bedspaces) within a defined area, perhaps as part of a masterplan vision
- encourage separation between PBSA developments, where there are cumulative impact concerns within a small area
- indicate thresholds of concern (i.e. the proportions of student housing, relative to conventional housing, that would likely be considered harmful, and the reasons for this)
- positively encourage PBSA in specific places or character areas where it may be more easily absorbed and achieve wider benefits – including as part of areas of mixed-use regeneration, or on particular smaller-scale redevelopment sites
- on larger sites, where appropriate, consider conventional housing alongside PBSA, recognising the need for both (though see paragraphs 2.5.4 and 2.5.5, below, regarding housing mix).

In considering this type of policy, in addition to broader spatial strategy, character and housing capacity (including the balance with other needs, e.g. employment), plan-making bodies should draw on up-to-date information and evidence concerning:

- existing and emerging housing mix by area, and its relationship with local and strategic need
- cumulative impact of existing PBSA (e.g. on services and infrastructure and council tax revenues) while accounting for planned infrastructure change
- local housing delivery issues, and the positive or negative role PBSA is playing or could play in the area
- housing rental markets and pressures across their housing market area (including build-to-rent and large-scale purpose-built shared living demand and supply), and how additional PBSA may affect these
- the value of some clustering, as opposed to dispersal to less suitable locations, particularly when associated with particular HEP campuses.

- 2.3.4 In the absence of such policies, monitoring evidence from planning records, council tax, the Higher Education Statistics Authority⁴ and ongoing community and stakeholder engagement will be relevant to decision-making where the planning authority has a specific concern. These are also relevant sources of plan-making evidence. It is noted, however (see Box 1), that some of the positive impacts of PBSA are strategic, and harder to perceive than the negatives – especially at a local level. This should be recognised in reviewing such evidence. Account should also be taken of evolving infrastructure, character and growth contexts as investment occurs and overall housing stock increases.

2.4 Integrating with the neighbourhood

- 2.4.1 Creating mixed and inclusive neighbourhoods is also about ensuring that different land uses and housing types knit together to create successful, welcoming places that can be enjoyed by all. These are places that feel cohesive; where people want to live longer-term; and where everyone feels equally able, safe and comfortable to move around the whole area. For PBSA this means considering how to contribute to place-making at this scale through the mix of uses, design and management of the accommodation.
- 2.4.2 Incorporating publicly accessible uses (such as shops and services, open space, and community facilities such as gyms, healthcare or meeting space) within the development is one approach. These uses can help ensure PBSA blocks are not seen as exclusive and/or lacking relevance for the local community. They also help to ‘capture’ student spending power in a way that can contribute to town-centre vitality and viability. And they can add to the amenity offer for students; and present them with employment and volunteering opportunities that can also benefit the community.
- 2.4.3 Other employment space – such as offices, shared workspace and workshops (including affordable workspace) – will also help with this principle. These may be more suitable mixed-use elements where the location or orientation of the space is likely to mean insufficient footfall to sustain shops and services. As well as being mixed and inclusive neighbourhood considerations, these mixed-use elements are again relevant to part B of Policy H15. Affordable workspace may be particularly appropriate in areas of changing land use or regeneration.
- 2.4.4 Another approach is to incorporate satellite university teaching, research or library provision. This can help address concerns that decentralised accommodation makes places ‘dormitories’ without the wider economic benefit of university employment and related economic activity. Contributing to the range of opportunities available locally could also help to underpin successful mixed and inclusive neighbourhoods, by helping to attract more people to live and/or stay in an area. However, this will require the support of an HEP to

⁴ Can provide (at a cost) borough data by ward on student resident numbers, and student numbers at local higher education institutions

demonstrate the commercial feasibility of sustaining split operation sites; and is most likely to be suitable as part of large-scale masterplan development, as seen at White City and Stratford East.

- 2.4.5 These are all possible approaches and should not be seen as prescriptive. A borough's Local Plan policies and wider spatial strategy, and site-specific circumstances, will remain relevant considerations – including whether a site falls within town centre or CAZ boundaries.
- 2.4.6 Uses with wider public access and other communal spaces for the residents and designed to positively integrate with a neighbourhood (e.g. avoiding blank façades) can also help activate ground floors and adjoining spaces. Ensuring more comings and goings, and more lines of sight, can help discourage criminal and antisocial behaviour. This is important in making surrounding streets and public space feel safer for all, including the students themselves. The temporary use of PBSA outside university term-time, such as for other visitor accommodation, is likewise encouraged partly for this reason, to ensure such blocks remain in active use across the year (see London Plan paragraph 4.15.13).
- 2.4.7 Collaboration with other landowners, residents, businesses and statutory bodies, who have responsibilities and interests beyond the site, is also encouraged. This can help secure other aspects of neighbourhood integration.

This work can include:

- wider coordination of uses, lighting and key movement routes to support viability, safety and security, and active travel (masterplans may have a role here)
 - joint funding and commissioning of mutually beneficial services and amenities – such as night-time street wardens, safe havens, transport services (e.g. bike hire, demand-responsive transit) and pocket parks.
- 2.4.8 Neighbourhood experience and desire to stay in an area can also be affected by matters such as noise, refuse disposal, deliveries and (car and bike/e-scooter) parking arising from the design and management of developments. Design should anticipate and address potential concerns. Management plans are also likely to be appropriate. Making management plans publicly available, and securing them through the planning permission by condition or legal obligation, is encouraged. This enables local communities and student residents to hold building managers to account. Construction management plans have an equivalent role during build-out, and are also encouraged for this reason.
- 2.4.9 Wider infrastructure impacts arising from the scale of the development, and the typical age profile of occupants, should also be considered and addressed. This should ensure that the proposed development does not adversely affect the inclusive nature of a neighbourhood by affecting any resident's ability to

comfortably and conveniently access the infrastructure they need. This should include ensuring students themselves have appropriate access to infrastructure, (e.g. health), which may in some cases be specialised or have a different focus to that most relevant to the general population.

2.5 Housing mix: affordable student and accessible accommodation

- 2.5.1 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.

Affordable Student Accommodation (ASA)

- 2.5.2 Policy H15 is clear that boroughs should seek to ensure that the maximum level of accommodation is secured as ASA. ASA provision in a scheme can make an application eligible for the fast-track route (FTR) at levels of at least 35 per cent; or, on land that is publicly owned, or industrial land that is appropriate for residential uses,⁵ 50 per cent. If the FTR requirement is not met, ASA provision should be scrutinised through viability testing in line with Policy H5. Section 106 (S106) agreements should ensure that it is secured and maintained as such for the lifetime of the building's student use.
- 2.5.3 London Plan supporting text (paragraph 4.15.14) states that C3 (conventional) affordable housing should not be required, where part A of the policy has been complied with. While PBSA need should be addressed in line with policy H15, on larger sites (typically more than 0.25 ha) the inclusion of separate conventional (C3) housing⁶ may nonetheless be acceptable and even desirable as part of pursuing mixed and inclusive neighbourhood objectives. This may be particularly relevant where C3 delivery, is relatively poor, including on sites where previous C3 consents have not been built out. However, there may be trade-offs in terms of site use and management efficiency.
- 2.5.4 When considering the balance of C3 affordable housing and ASA in the context of viability constraints, the following are important considerations:
- the acute and increasing need for C3 affordable housing
 - the greater flexibility of C3 housing to meet a wider range of needs
 - rising need for ASA, as student loans have not kept pace with inflation
 - the only source of ASA being new PBSA development (no grant support for it)

⁵ In accordance with Policy E7.

⁶ This typically needs to be in entirely independent blocks to comply with university safeguarding policies, and for management purposes.

- ASA provision being crucial to secure nominations agreements – and hence another aspect of policy compliance (see Section 3, below)
- ASA being vital to enable PBSA to alleviate pressures on family housing by ensuring rents are more comparable to HMO rents
- ASA, when applied to wheelchair-accessible rooms, addressing an intersection of needs that is not typically addressed in the private rental or HMO sector
- ASA contributing to ensuring London's long-term inclusivity as many students become longer-term residents – so that an income-diverse student population contributes to the good growth objective of the city, continuing its tradition of openness, equality and diversity.

These factors should be clearly weighed in arriving at the appropriate balance, and it will rarely be acceptable for ASA to be entirely replaced by C3 affordable housing.

- 2.5.5 It is further noted that, compared to C3 affordable, ASA is disadvantaged by not being eligible for CIL relief. This is also relevant to CIL charging schedules. When revising CIL charging schedules, boroughs should take account of the ASA requirement in the London Plan. Boroughs may wish to consider the viability of the ASA; and apply nil or reduced rates compared to market PBSA, based on the outcome of the viability assessment, where ASA rents are secured.⁷
- 2.5.6 It is expected that the ASA is distributed across the development, with no difference in quality or access to services pointing to the accommodation being affordable (see London Plan paragraph 4.15.10). However, universities note that the preference is for this to be mostly (but not all⁸) within cluster flats rather than as studios. This reflects the fact that such accommodation tends to be allocated predominantly to first-year students, who typically benefit from living with flatmates.
- 2.5.7 In this case, the ASA 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.⁹ 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. Percentage of floorspace also enables assessment across different product types when PBSA and other housing products are being assessed within the same scheme.

⁷ Saved text from the Housing SPG, 2016 (para 3.9.17)

⁸ For example, some neurodivergent students may prefer studios

⁹ As noted in the supporting text to policy H5 at para 4.5.3 and the Affordable Housing LPG.

- 2.5.8 It should be noted that working to keep the cost of other student accommodation more affordable for all is also highlighted as a concern (see London Plan paragraph 4.15.7). For this reason, a significant proportion of cluster flats should be present in all PBSA schemes. Any redesign proposals that involve an increase of studios at the expense of cluster flats should also be discouraged on these grounds, which (as noted above) also links back to the mixed and inclusive neighbourhoods policy consideration.

Accessible rooms and other provision for disabled students

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, in accordance with Figures 52 and 54 of the code of practice
- 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 per cent easily adaptable wheelchair-accessible rooms for independent use.

The design guidance and definitions in the rest of the paragraph 19.2.1.3.2, and those in paragraph 19.2.1.3.1 are also relevant.

- 2.5.9 Wheelchair accessible room provision is expected at a level of 5 per cent, with a further 5 per cent adaptable, in line with the guidance in BS8300:2:2018 Design of an Accessible and inclusive built environment – Buildings – Code of Practice. Further detail is provided in Box 3 above.
- 2.5.10 Rooms built to these standards should again be distributed across different accommodation types, including some in cluster flats. It is noted, however, that wheelchair users may express a preference to be accommodated in lower floors, to enable easier emergency evacuation. It is important to offer equivalent opportunities and choice to disabled students requiring such adaptations as non-disabled students. Ensuring such equality of opportunity also means that all internal and external communal areas should be accessible to disabled students and visitors, including through suitable provision of toilets, wheelchair

charging and parking.¹⁰ Disabled students may also need ASA; this intersection of needs should be accounted for in the housing mix.

- 2.5.11 Providers sometimes query the need for this level of accessible and adaptable room provision, relative to demand. However, PBSA (by definition) should be more readily able to accommodate design modifications to meet access needs, than accommodation in the wider private rental sector – particularly that in older buildings. Older, university-owned PBSA may also be more difficult to make fully accessible, given that this hasn't been designed in from the start. Moreover, certainty of provision is important for students' confidence in committing to study away from home, at an institution of their choice, which is an important aspect of equality of opportunity. Choice of room, enabled by the wheelchair-accessible room pool being of sufficient size, is another dimension of this equality of opportunity. As well as providing appropriately designed rooms and facilities, it is important that people with disabilities are aware of this provision through advertising and marketing that highlights it, and other inclusive design features. A commitment to this should be set out in the management plan.
- 2.5.12 PBSA building design more generally should consider the needs of residents and visitors with a range of disabilities and impairments, not just those requiring wheelchair access. This could include (but is not limited to) other mobility, sensory and dexterity impairments, as well as needs arising from aspects of neurodivergence¹¹ and particular mental health conditions. Design responses should consider the use of colour, light, soundproofing and way-finding; appropriate multi-sensory alert systems; and the ease of opening doors and windows. Wider wellbeing considerations are covered below.

2.6 Housing and place-making for inclusive wellbeing

- 2.6.1 Another feature of an inclusive neighbourhood is achieved through building design and management. This is about ensuring students have a quality of accommodation broadly comparable to that of the wider neighbourhood population that we shape through planning. These considerations are also relevant to the requirements of Policy 15 criterion A(5), which refers to 'adequate' and 'functional' living space and layout.
- 2.6.2 As well as sensible layouts of different bedroom-based amenities that enable their use as intended, without difficulty or compromising safety,¹² there are some wider considerations. These include ensuring good standards of soundproofing, daylight and natural ventilation in private and communal spaces –

¹⁰ While PBSA should be car-free as set out in Policy T6.1E, provision should be made for disabled drivers as set out in Policy T6.1G. This should reflect locally specific need; and be agreed through the Parking Design and Management Plan. It can be onsite or (more typically in high-density schemes) on street.

¹¹ Guidance found in PAS 6463:2022 Design for the mind: Neurodiversity and the built environment is a useful reference here.

¹² Forthcoming LPG on fire safety will provide additional guidance.

where possible achieving dual-aspect shared living rooms or at least a reasonable exterior outlook. However, it is noted that PBSA is designed to provide accommodation quality across the building as a whole, and this should be accounted for in any assessment of adequacy.

- 2.6.3 Design and space in the building as a whole should also provide for different student needs – such as study, relaxation, socialising, retreat, privacy, exercise, laundry, support and, in some cases, worship. Bedroom sizes should recognise that student bedspaces, even in cluster flats, are also spaces for study, storage, private socialising and, in some cases, prayer. Design flexibility of individual rooms and spaces will be important, but usability should be demonstrated, and crowding and conflict avoided. This should include flexibility to accommodate visitors with different needs, including through provision of accessible toilets in communal areas. User feedback from existing accommodation, and more general youth engagement, may provide valuable input on these points.
- 2.6.4 As part of this quality, both internal and external communal amenity space (only accessible to students and their visitors), commensurate with the number of students, should be provided. This space should be additional to living rooms; it is a separate need, and distinct from any spaces accessible to the wider community, which are also encouraged (see S2.4 above). Quantums should also be informed by an understanding of: the adequacy of public space and alternative on-campus provision (e.g. libraries, student union facilities) in the area; and the size of studios and cluster-flat living rooms. Given this, it would be expected that the student number should be capped to the number considered through this process, and the related amount of communal amenity space also secured by condition.
- 2.6.5 Internal and external communal amenity space should be high quality, with a suitable range of amenities that are accessible to all users (such as a variety of seating, lighting, shade and temperature control, and suitable worksurfaces). Such spaces should, individually, be adequately sized and not provided in leftover spaces. They should be integrated within the building design to allow views out and visual interest; to have convenient access to building cores; and to ensure flow between internal and external spaces.
- 2.6.6 Internal communal spaces should have adequate passive ventilation and lighting, including natural daylight where practicable. External communal space should include landscaping and biodiversity enhancements. It should be accessed directly from usable (and preferably communal) internal spaces; and overlooked from actively used spaces to provide a comfortable level of passive surveillance. In tall buildings, consideration should be given to external amenity space not just being at roof level; it is desirable that some of this space should be available at ground level, or at least lower levels. As well as providing for choice and usability, this can help with wider neighbourhood integration discussed in section 2.4, above.
- 2.6.7 Management and maintenance of spaces and facilities is another aspect to quality, and this should typically be secured through a management plan (see

paragraph 2.4.8, above). This may include details of how flexible spaces and communal facilities (such as food storage and preparation space) are managed to meet different needs, and other aspects of inclusivity. To this end, a commitment to providing and sensitively allocating rooms in LGBTQ+-only cluster flats should be considered. This has proven beneficial in providing safe spaces, particularly for trans and non-binary students – though not all will wish to be accommodated in this way.

3. Aligning with need – nominations agreements

3.1 Background and purpose

- 3.1.1 Policy H15 is also concerned with aligning PBSA provision with need that is established through the wider housing evidence base. The policy intent is not to secure provision for every student needing accommodation in London. Rather, it is to secure a proportion of this need, recognising that PBSA is a specialist form of provision that is not as flexible as conventional (C3) accommodation. It is acknowledged that some conventional housing will continue to accommodate students, and in many (though not all) cases, PBSA sites may be suitable for other uses including conventional housing. Given that trends in student numbers and the appetite for PBSA have been known to vary,¹³ it is not unreasonable to manage a risk that provision could become ‘disproportionate’.
- 3.1.2 The policy’s key mechanism to secure this proportionate alignment with need is the requirement to secure most of the PBSA (including the ASA) through a nominations agreement. This is not required where the development is being built by a HEP to meet its own needs (see policy H15 supporting text, paragraph 4.15.3).
- 3.1.3 These agreements establish the right of the signatory HEP¹⁴ to allocate to their students a proportion of the PBSA in a block they don’t otherwise control. Nominees are typically international or first-year students to whom universities offer ‘accommodation guarantees’ as part of their recruitment offer.
- 3.1.4 The nominations agreement provision for the ASA reflects that HEPs are likely to have the best awareness of who to prioritise and allocate such provision, in light of overall need in their student population. In turn, the requirement to have

¹³ This can be due to, for instance, fluctuations in entry requirements for international students and wider university funding availability; the relative cost of such accommodation; and viability challenges in the wider housing sector.

¹⁴ Defined in footnote 77 to the London Plan as: ‘*an education institution that provides a designated course that has been approved by the Department for Education for higher education study which allows the student to apply for government-financed student loans. Higher education study is at qualification Level 4 or above (i.e. above A-level or equivalent) ... The Office for Students provides a register listing all the [English HEPs](#) that it officially recognises.*’

Most HEPs are universities, so this may be an alternative term used; a similar term is “higher education institution”.

a nominations agreement to cover a proportion of other bedspaces is intended to help:

- direct accommodation to locations suitably connected with institutions and ensure design meets their students' needs
- link provision to HEP recruitment plans, providing a necessary feedback loop.

3.1.5 It is anticipated that these recruitment plans are sufficiently long-term to affect the appetite to enter such agreements. Given the administration burden, and some risk involved (depending on the nature of the commercial agreement), the policy logic is that this appetite should in turn moderate the market interest in pursuing PBSA. Similarly, if a location is not well connected to any London-based institution by proximity or public transport, or the proposal is otherwise qualitatively deficient, nominations agreements may also be harder to secure. It is recognised however, that these logics are not always applicable. There can be greater conservatism on the part of HEPs regarding provision compared to the appetite of students to live in PBSA in particular locations – not least because of potential commercial liabilities involved.

3.2 Expectations – what and when?

3.2.1 The supporting text to Policy H15 (paragraph 4.15.3) sets out that nominations agreements are expected to be in place by the point of first occupation. HEPs are unlikely to enter into such agreements until plans and, indeed, construction are sufficiently advanced that they can rely on bedspaces being available when needed (e.g. for the start of a particular academic year). However, any Planning Authority will want to ensure a reasonable prospect of compliance with this policy criterion post permission.

Pre-application engagement and 'letters of comfort' with the application

3.2.2 The best way to provide assurance to the decision-maker assessing a planning application is for the developer to demonstrate engagement with one or more HEPs. This engagement should explore their interest in the scheme, and appetite to pursue further discussions towards a nominations agreement. In doing so, it is advisable to target institutions that are close or well connected to the location. To mitigate any risks of non-delivery, this engagement should have advanced sufficiently, such that ideally one or more 'letters of comfort' can be provided as early as possible in the process before the decision.¹⁵

3.2.3 Such letters should preferably include details on intended next steps (such as input to discussions on design and other ways of best meeting the institution's

¹⁵ The relevant decision being one relating to the grant of full planning permission or relevant reserved matters.

needs); and the proposal's role in meeting the institution's present and future accommodation needs. More general needs evidence is unnecessary, as strategic need is established through the policy itself and ongoing monitoring.

- 3.2.4 Consideration may also be given to whether certain charitable organisations or other collectives could act as proxies for an HEP, with appropriate provision for their costs to be defrayed. In this instance they should have demonstrably close connections with one or more HEP; and be able to set out the link with those HEPs' present and future accommodation needs. This could help address the fact that smaller institutions need a mechanism to engage with the nominations process in a way that reduces the administrative burden. Similarly, newer PBSA providers need a mechanism that is less reliant on established relationships, to enable them to diversify the market
- 3.2.5 Such proxy or 'hub' arrangements may be particularly relevant on smaller sites where the administrative burden of a nominations agreement may be disproportionate to the number of bedspaces proposed. It may also help share any demand risk across a broader student pool. This means it may be particularly suitable for wheelchair-adapted rooms (provided in line with expectations set out above) where the need from any one institution is more variable.
- 3.2.6 The London Plan team will maintain a list of bodies agreed to be acceptable proxies, in consultation with the HEP members of the Mayor's Academic Forum or other relevant HEPs. Enquiries about joining this list should be emailed to LondonPlan@london.gov.uk and an application form and assessment criteria linked to the requirements set out at paragraph 3.2.4 will be published on the GLA website. For the avoidance of doubt, commercial providers/developers and their own charities are unlikely to be acceptable proxies, given the conflict of interest implied.

S106 agreements – minimum requirements

- 3.2.7 To fulfil the policy requirements of H15, the developer should be prepared to enter into an S106 agreement as part of the permission. Some flexibility may be needed in legal agreements, given the commercial implications and timescale issues highlighted above. Therefore, the S106 agreement should require developers, as a minimum, to use reasonable endeavours to secure one or more ongoing nominations agreements by the point of first occupation. Consideration should also be given to setting out a fallback position (see below) that should also be secured within the S106 agreement.
- 3.2.8 The nominations agreement required by the legal obligation should cover (as a minimum) the majority of student bedrooms, including all the ASA. This means affordable and other bedrooms covered should total at a minimum, just over 50 per cent of the scheme's overall total. Where this calculation generates a number of bedspaces that is not whole (e.g. 180.2) it should be rounded up to the next whole bedspace (in this case, 181).

- 3.2.9 Nominations agreements should cover a reasonable period (at least one year, ideally longer); and the S106 should require continuity of coverage, for as long as the building is in use as student accommodation (see London Plan, paragraph 4.15.3). If for any reason the agreement ceases or expires, either it should be renewed; or a new agreement should be secured with another institution, to cover ongoing occupation by students in this way. For the avoidance of doubt, referral-only nominations agreements are acceptable; it is not the policy intent for HEPs to take on development risk by being obligated to fill the rooms.
- 3.2.10 As part of the monitoring process, the developer should notify the local planning authority (LPA) of a concluded nominations agreement, providing details of the HEP involved; its duration; and any fallback provisions.
- 3.2.11 Eligibility for ASA should ideally be income-assessed and accessible in principle to students in all year groups. Given that the definition is linked to the maximum maintenance loan, it is suggested that eligibility for domestic students could be linked to eligibility to access such a loan, (or other, higher levels of student support) which is assessed independently. However, this does not always identify students in need, and may not always be information that is available at the right time. Supplementary measures may also be relevant, including the extent to which parents actually provide support, or proxies such as home address ward-based measures of deprivation. Moreover, some institutions may have particular strategic approaches with their own inclusivity logic.
- 3.2.12 Nominating bodies should be able to provide an audit trail and monitoring data on request, regarding the allocation of their ASA. This should demonstrate either allocation to those in greatest need or the logic (and preferably evidence) of how their strategic approach helps support wider inclusivity.

Fallback provisions: interim ASA and cascade mechanisms

- 3.2.13 Any failure to secure a nominations agreement by point of first occupation covering the majority of bedspaces, or any other gap in coverage, should also be notified to the LPA, alongside evidence to demonstrate that reasonable endeavours have been taken to achieve one. Commercial realities mean this process will likely need to conclude about five months before the start of the academic year.
- 3.2.14 The notification allows for the LPA to be made aware of potential shifts in demand, risk or quality concerns that may be reflected in difficulty securing an agreement. This will help with ongoing housing needs assessments; and consideration of the appropriate proportion and design of student housing that should be pursued, as part of creating mixed and inclusive neighbourhoods going forward. It may also support enforcement scrutiny, where appropriate.

- 3.2.15 The evidence provided should include a timeline¹⁶ of contact with, and responses from, all HEPs that are well connected¹⁷ with the location by public transport and/or active travel, and any suitable proxies. It should also include detail showing that the provider has constructively engaged with particular HEPs' asks related to their accommodation strategy or equivalent¹⁸ – rather than simply notifying them of the opportunity. It may also be appropriate to have demonstrated to such HEPs the appetite for (their) students to live in the area, if this accounts for their lack of interest, where this can be established through survey or other data.
- 3.2.16 Where this position has been reached, the developer should be obliged to continue using reasonable endeavours to secure a policy-compliant nominations agreement for subsequent academic years. In the interim, including if a nominations agreement has only been achieved for the ASA, the S106 should secure a fallback cascade mechanism of direct let. This should be encouraged to be applied to all un-nominated and unlet market rate bedspaces, at the point of the the fallback position being engaged.¹⁹ Where this has not been anticipated and secured in the S106 agreement, it should be agreed with the LPA in writing. When using this cascade, it should be expected that an audit trail demonstrating marketing and allocation compliance can be made available on request, for enforcement purposes. A monitoring fee, payable to the LPA, should also be considered – linked to such a S106 clause being invoked.
- 3.2.17 In such a mechanism, the order of priority, from highest to lowest, would usually be as follows:
- full-time higher-education students at local (but not necessarily in-borough) HEPs (as defined by the LPA²⁰)
 - those at other London HEPs with good, sustainable transport connections to the site
 - any other higher-education student at a London HEP campus
 - as a last resort, any other higher-education student needing to reside in London.

¹⁶ The expectation is that this would demonstrate ongoing contact from the pre-application period onwards; and that the most recent contact is within six months of the expected completion date or termination.

¹⁷ It is suggested that a travel time of up to 45 minutes by public transport, or up to around 30 minutes by bike (approximately 8km) is a reasonable indicator of this.

¹⁸ This may include design specifications and rental term of tariff discounts.

¹⁹ In practice, the requirement for the 'majority' of the development bedspaces to be covered by a nominations agreement will likely provide an upper limit for this requirement. It is expected that, by this point, most if not all of the bedspaces that aren't expected to be covered by a nominations agreement (i.e. up to 49.9 per cent) will already have been let.

²⁰ This may include those in neighbouring boroughs, or others with a relationship with the area in question.

Each stage should only be engaged after a suitable time has elapsed, allowing for appropriate marketing and for all bedspaces to be let. Such a cascade provides for a temporary alignment with need – both locational and quantitative.

- 3.2.18 Whether a nominations agreement exists or not, for the avoidance of doubt, the requirement to provide ASA in line with part 4 of policy H15 remains for the lifetime of the building's use as student accommodation. The S106 agreement would be expected to secure this provision and set out an alternative allocation mechanism in the absence of a nominations agreement covering it. Such an alternative may involve a charitable organisation acting as a proxy for one or more HEP (see paragraph 3.2.5).
- 3.2.19 As a last resort, the provider may allocate the ASA to students according to need, taking into account the advice in paragraph 3.2.11 in combination with the agreed cascade. As with nominating bodies, an appropriate audit trail of the allocation strategy and its application should be made available on request.
- 3.2.20 Nominations agreements may also contain cascade mechanisms that could be invoked if the HEP has not been able to nominate to all their rooms by the end of the summer (typically by 31 August). This enables HEPs to manage the risk of unexpected downturns in demand (e.g. another pandemic or a change in visa rules). However, cooperation and collaboration to secure 'plan B' arrangements (e.g. with other nearby institutions, an over-arching body or a 'hub' organisation) are also encouraged.
- 3.2.21 Where the direct-let provisions of the cascade are invoked by the HEP, the council should be notified for monitoring purposes. If this happens two or more years in a row, and affects more than 12 per cent of the nominated rooms, there should typically be a requirement to use reasonable endeavours to secure a new nominations agreement with another London-based HEP to realign provision with need.

