

Purpose-built Student Accommodation London Plan Guidance

Consultation summary report

October 2024

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1 Introduction

Between 19 October 2023 and 11 January 2024, the Greater London Authority (GLA) carried out a [formal consultation](#) on the Mayor's draft Purpose-built Student Accommodation (PBSA) London Plan Guidance (LPG). This followed a period of early engagement which informed the scope and initial drafting.

Two online events were held through the consultation period for Londoners to learn more about the draft LPG and ask questions. Officers also took part in a seminar organised by Business LDN, and held meetings with Local Planning Authority (LPA) representatives and the Mayor's Academic Forum at which the draft LPG was discussed.

This report provides a summary of the consultation responses received during the consultation period via an online survey; and from submitted emails and stakeholder event comments and questions. It identifies the key issues that were raised on the draft LPG, noting the type of stakeholder raising the issue (where this was distinctive). It then sets out the GLA's response to these issues. This response has been informed by follow-up conversations with particular stakeholder groups, including the Mayor's Academic Forum and LPAs, as well as GLA development management colleagues.

The Mayor would like to thank everyone who took part for engaging with the guidance. Appendix 1 includes a breakdown of all the engagement events that were held; Appendix 2 lists consultation respondents (where this is non-personal data); and Appendix 3 reproduces the survey used in the online consultation.

1.1 Who took part?

During the consultation period over 100 people attended the events and meetings at which the LPG was discussed. The consultation page was viewed over 2,000 times, and nearly 500 people downloaded a consultation document. There were 39 consultation responses.

Information about the organisations that non-individual respondents represent has been inferred (given limited self-declaration) from survey responses and other response material, and is summarised below. There is limited data available about event attendees, other than those that came by invitation, as noted in Appendix 1. There is no detailed data available about virtual event attendees and page views. Therefore, the information on who took part likely represents only a small sample of those engaged, and does not reflect the true breadth of engagement.

Survey respondents were asked for equality monitoring information to assess how representative respondents were compared to the demographics of Londoners. However, only a limited number of responses were received, so an accurate analysis could not be made. This data has not been included in this consultation summary report.

Respondent type	Number	Percentage
Business excluding providers and developers	3	8%
PBSA providers/investors and their agents	12	31%
Other developers	2	5%
Higher education provider (HEP)	5	13%
Campaign/interest group	2	5%
LPA	12	31%
Statutory consultee/professional body	2	5%
Individual	1	3%
Total	39	Rounded numbers so sums to just over 100

2 Consultation feedback and GLA response

2.1 Summary of key issues raised

As part of the consultation on the draft guidance, respondents were asked to submit answers to a survey combining specific and more open questions through the GLA's online consultation portal. Some chose to submit emailed letter responses instead; not all of these used the survey questions as headings. This section is organised by issue, mirroring the structure of the draft LPG. Where relevant, the support for a position is indicated where this was discernible through a specific question. The summaries also incorporate relevant feedback received through the other consultation period events and subsequent engagement where they relate to the issue under discussion. Points relating to the heart of the policy are noted for future policy review; it is not the place of LPG to revisit these.

Issue 1: the role of PBSA and spatial issues of over-concentration

The draft LPG sought to clarify the narrative about the contribution of PBSA to different London Plan objectives, and thus provide clear reasons to support it in principle. It also recognised concerns about the dominance of PBSA, both spatially and in delivery pipeline terms, by providing guidance about how to assess this and possible policy responses for Local Plans.

The key matters raised:

- Providers and development interests mostly supported the role of PBSA set out in Box 1. It was also noted that PBSA could have a particular role in releasing family-sized accommodation from House in Multiple Occupation (HMO) use.
- However, there was also concern that some of the more negative potential impacts identified elsewhere in the document (notably sections 2.3 and 2.4) were overstated and more linked (if anything) to unmanaged HMO accommodation. It was also proposed that some of the policy suggestions and evidence referenced in Box 2 needed greater nuancing to avoid over-simplified approaches – contrary to the positive spirit of Policy H15, which recognises the importance of PBSA.

LPA responses were typically more sceptical about the positive roles set out in Box 1 coming to fruition. This was especially in light of recent development trends which have seen PBSA out-stripping C3 residential, and amidst acute mainstream affordable housing need.

- Various suggestions and requests for more evidence to be included in the introduction or Box 1. This includes information about the current position regarding PBSA bedspaces relative to student numbers, updating the London Plan figure, and on the spatial distribution of PBSA.

GLA response

Some amendments have been made to the draft document aiming to strike a balanced tone throughout, including to acknowledge the HMO points and the concerns about over-simplified approaches to managing distribution. Points regarding over-concentration, including as a proportion of delivery, were already in the draft guidance, but it is clarified that this is not just an inner London issue and positive planning for PBSA is encouraged. Any Local Plan policies would be subject to due process including independent examination, which provides further appropriate checks and balances. LPG is not the place to set out evidence which would rapidly date it; but improved availability of evidence at the pan-London level will be investigated as part of the London Plan review process.

Issue 2: Affordable Student Accommodation (ASA) and the balance (where relevant) with C3 affordable housing

The draft guidance sought to clarify expectations in situations of larger schemes that incorporate both C3 housing and PBSA, but cannot necessarily provide policy-compliant levels of both ASA and C3 affordable housing. It acknowledged that in some cases C3 and PBSA were both desirable; but in considering the balance between C3 affordable housing and PBSA in the context of viability constraints, ASA should be prioritised for various reasons.

The key matters raised:

Of those that answered a question on the balance, 58 per cent thought the draft LPG wording didn't strike the right balance between affordable C3 and ASA; 33 per cent thought it did; and the rest weren't sure. However, the reasons varied.

Many providers and development interests were concerned that any reference to C3 being taken to be desirable would be interpreted as a requirement, and a preference over ASA. It was suggested it would be detrimental to delivery of ASA, social inclusion, and overall viability; and would discourage specialist developers. It was also pointed out that without ASA of a sufficient amount (unspecified) they are unlikely to be able to secure nominations agreements, and hence compliance with another part of the policy. Issues of physical deliverability were also raised, given the requirement for separation of different products, with at least an impact on site efficiency.

Some responses (typically LPAs) suggested the balance should be a matter of LPA discretion based on local needs or that the suggested approach was not consistent with wider affordable housing priorities. There is also concern from some that ASA is not meeting local need. However, in discussion, there was also concern about increasing tendency for predominant provision to be studios rather than cluster flats, which was seen to be undermining wider moves to affordability.

There was also a desire from some providers and other development interests for a stronger position on Community Infrastructure Levy (CIL) relief, to encourage it rather than just noting it doesn't apply to ASA. Some also noted an issue with ASA losing value over time, given that maintenance loan rates had not increased in line with inflation. This can be a problem for asset valuation.

However, it was also noted, particularly by LPAs and others involved in development management, that most PBSA goes through the fast-track route (FTR), suggesting ASA viability is not an issue. Some recent Local Plan viability testing was also cited to this end. It was also noted that some mixed-use schemes have been able to achieve both C3 affordable and ASA at FTR-eligible levels.

GLA response

The balance of the guidance has been reviewed, and we have sought to clarify the considerations that should be covered and weighed in an officer's assessment, but not to suggest their prioritisation. These include the link with securing a nominations agreement and in alleviating family housing. This is appropriately flexible and in line with overall good growth objectives. These seek for London to build on its 'tradition of openness, equality and diversity' – which implies provision for affordable housing for newcomers (including students) as well as the existing population. This can be described as a strategic need. It is also clarified that some of each is sought in mixed-provision schemes – that it will rarely be appropriate for ASA to be entirely substituted with C3 affordable housing. This recognises, in particular, that this is the only route through which ASA can be secured.

The policy's interest in wider affordability was already highlighted in the consultation draft LPG. This has been supplemented with some additional text regarding its relevance to, and for, wider mixed and inclusive community objectives in terms of the balance between studio and cluster flat provision.

It is considered that wider CIL points are best approached through plan review and wider viability testing. Therefore, it is considered that the text that was copied over from the extant Housing SPG (which encourages this) is the most appropriate at this point.

Issue 3: accessible room provision

The draft guidance incorporated Practice Guidance that had not been consulted on; this sought levels of accessible room provision at 10-15 per cent, in line with recommended standards for serviced visitor/motel accommodation. Justification was based on: historic under-provision likely to have suppressed disabled students' take-up, and hence equality of opportunity; the use of the accommodation as visitor accommodation in summer, where need is higher; and PBSA, by definition, being more able to design-in accessibility than older private rented stock.

The key matters raised:

- Of those that answered a question about the appropriateness of the provision sought, an equal proportion supported and didn't support it; 23 per cent either weren't sure or didn't respond. Typically, LPAs supported and providers didn't.
- Providers point out that rates of disability are lower in the typical undergraduate age demographic; given the long lead-in times between sign-up and occupation, there is ample scope to ensure rooms are adapted to a student's personal needs (and they have demonstrably done this whenever asked). They note that take-up rates are very low (0.002 per cent in one provider across the country, 0.05 per cent for another); and that such rooms are less attractive to non-disabled students. This can have wider opportunity costs, given the impact on total room numbers and other costs. Most suggest 5 per cent as more appropriate with 5 per cent adaptable – or in one case, 1 per cent and 4 per cent respectively.
- LPAs were generally supportive of the principle of the position of aiming high to address historic under-provision and improve equality of opportunity. Clarification was also sought on the level of disabled parking provision to be sought, given the parking policy requirement for PBSA to be car free. There were various suggestions about further guidance and clarifications that could be made to improve detail, and consideration of other disabilities beyond those requiring wheelchair use.

GLA response

To provide suitable housing and genuine choice for London's diverse population, including disabled people, the GLA is consistently applying the policy of at least 10 per cent of new dwellings in housing development. However, the point about

underlying need in the youth demographic is considered relevant,¹ given the specialist nature of this housing, with older students being less likely to live outside of their established residence. It is noted that the British Standards good practice document advises a position of 5 per cent of provision to be wheelchair accessible (including 1 per cent with a tracked hoist) and 5 per cent adaptable. Many authorities are already adhering to this.

Recognising also that there will be wider tradeoffs with other needs (e.g. overall room numbers, ASA provision) it is considered to be more appropriate to seek this level of provision. This remains ambitious to offset under-provision in the private rental sector, and provide certainty of provision and choice for disabled students; but is more aligned with need and market realities. In addition, the justification for seeking this amount has been strengthened, with the addition of a marketing expectation to improve awareness expected to enhance its impact e.g.. The Practice Note will be withdrawn on adoption of the final LPG.

Some additional amendments have been made to the draft LPG to strengthen its advice on inclusive design, relevant to particular disabilities and impairments. These include signposting more detailed guidance and clarifying the point on disabled user parking provision.

Issue 4: design quality, functionality and inclusivity – including the absence of standards and case studies

The draft guidance provided general qualitative guidance on design quality, functionality and inclusivity, without any quantitative standards or benchmarks, indicative layouts or good practice case studies. Pre-consultation engagement suggested that this would be appropriate as standards had improved in a market-led way, and it was a fast moving/innovative sector where guidance could rapidly date.

The key matters raised:

- Two-thirds of those that responded on this issue agreed with our approach of not providing case studies and sample layouts; just over a fifth disagreed.
- LPAs, in particular, tended to seek more detailed guidance. This includes suggestions of a cross-reference to the co-living LPG quality benchmarks, or development of bespoke PBSA benchmarks, for such things as per capita levels of communal amenity space. There is concern that in the absence of these or other good-practice examples, it is hard to push up design ambition and prevent redesigns that downgrade design quality, e.g. through eroding amenity space. This is intertwined with health impact concerns following COVID-19, and with thinking about appropriate tall building design.
- Most providers (and some LPAs) agreed with the position taken in the draft guidance – though some providers pushed for nuancing of even the qualitative detail. For example, they point to case law establishing that C3 standards are

¹ Further detail is provided in the EqIA for the post-consultation draft guidance.

not applicable to PBSA, so reference to these even as a benchmark to aim towards was not supported. It was also noted that the distribution of amenity space was often a matter the nominating HEPs wanted to be able to influence, rather than being something that could be prescribed in a particular format. They also noted that design and distribution of amenities evolved over time in response to user feedback.

- There was some suggestion of additional detail that could be added in relation to fire safety, and the quality and usability of communal internal and external amenity spaces.

GLA response

The appropriateness of the qualitative emphasis of the guidance has been reviewed in light of the additional views put forward. However, it is considered that there are other means (e.g. meetings of the Association of London Borough Planning Officers), through which good practice can be shared as it emerges. Co-living, or large-scale purpose-built shared living, is a distinctive product and while it shares some similarities with PBSA, it is not always appropriate to directly read across to it. Nor is it helpful to require the reader to refer to yet another document to complete the guidance. It would require a lot of work, without evidence that design quality is consistently poor to provide more detailed quantitative benchmarks. This would delay the introduction of the guidance, which is agreed to be much needed. It has been concluded that quantitative benchmarks, case studies and other detail would not be added.

Some of the qualitative design guidance has been revised to add further detail that should help secure quality and functionality (e.g. guidance on the connections between internal and external communal amenity space, and on securing appropriate amounts of communal amenity space into the future). It has also been moderated to reflect deliverability concerns over prescriptiveness, noting the points around case law and nominating HEPs' different preferences.

Fire safety detail will be picked up in a forthcoming dedicated LPG. This will provide a consolidated source for all relevant material that needs to be considered and presented in the round, rather than in a piecemeal way through use-specific guidance.

Issue 5: Nominations Agreements – logic and expectations of what and when

The draft guidance reinforced the importance of nominations agreements covering the majority of bedspaces, by providing a detailed explanation of their expected role in moderating supply. It suggested that they should be sought in perpetuity, or at least with continual coverage. A letter of comfort, and a statement of need, at application stage were suggested to be important for the decision maker, given that the nominations agreement doesn't have to be in place until the point of first occupation.

The key matters raised:

There was concern from several industry perspectives that linking appetite for nominations and need is misguided. It was pointed out that universities can be conservative in their acceptance of new accommodation locations. If those locations are nonetheless attractive to students, they will live there in other types of housing. Equally, given that nominations agreements can involve balance sheet liability for HEPs, a low appetite for financial risk may outweigh actual need, which it is at an all-time high.

Some suggested that a needs assessment could be an alternative to nominations agreements; or that 'soft' nominations (e.g. referral only, or with scope for release past a certain date) could be clearly identified as acceptable.

It was also suggested that letters of comfort and needs statements are too onerous – at least at application stage, and especially for outline applications. They also don't reflect the fact that plots may change hands subsequently. A deferral of this recommended provision, so that it occurs before full decision stage, or removal of it entirely (allowing the legal obligation of the S106 to work as intended) were suggested.

Several providers and HEPs also noted that nominations agreements would never be agreed in perpetuity, so these will always have to be renewed at some point. This gets harder to achieve as stock gets older.

A few LPAs were concerned that ASA allocation lacks transparency or a link to local need, and suggested it shouldn't be restricted to first-years students.

GLA response

The points about the complexities of the link between need and appetite for nominations agreements have been reflected in a more nuanced explanation in the revised guidance. This is appropriate given that the guidance already acknowledges that it may not always be possible to secure nominations agreements by the point of first occupation, or continuously. Likewise, reference to nominations agreements being secured in perpetuity has been removed; and the suggested provision of a letter of comfort and needs statement has been modified to be more realistic as suggested.

In addition, in the interests of transparency, a reference to the expectation that a nominations agreement for ASA comes with an appropriate audit trail has been added. The revised guidance also clarifies that all students, in principle, should be eligible for ASA; and cites the recommendation that domestic student eligibility is tied to eligibility for the maximum maintenance loan, given that this is independently assessed and linked to the definition of ASA. However, it is also recognised that such assessments do not always fully capture need, and other approaches may also be appropriate.

It is not within the scope of the guidance to remove the requirement for a nominations agreement entirely. Individual needs assessments are also noted to lack strategic perspective and consistency of method so would be an unhelpful alternative. The policy is clear that the strategic need for PBSA is established,. However, it is clarified that 'referral only' type nominations are acceptable and in line with what was originally envisaged by the policy.² It is also noted that the draft guidance already softened the risk for HEPs, by suggesting that they also have recourse to a fallback cascade if they have insufficient students to nominate themselves.

Issue 6: Nominations Agreements – reasonable endeavours, cascade mechanisms and proxies

The draft guidance recognised the need for some flexibility around nominations agreements. It suggested accepting 'all reasonable endeavours' (rather than having an absolute requirement) to secure one on an ongoing basis, and a fallback direct-let cascade.

The key matters raised:

Increased flexibility around nominations agreements was welcomed by most respondents (apart from some a couple of LPAs who saw nominations agreements to be an essential moderating device). Many suggested the nominations-agreement element of policy is not fit for purpose, and observed that the HEP appetite for nominations agreement is drying up, except for ASA.

However, it was also flagged by one agent that this flexibility could have an unintended consequence. It was pointed out that the 16 per cent 'market' rooms subject to a nominations agreement are typically discounted to attract an HEP. As such, if there is a fallback that allows everything except the ASA to be let at full market rent, there is no incentive to pursue a nominations agreement by offering a discount. This, in turn, may enable providers to raise overall prices, and land value may increase – affecting future ability to provide affordable housing. This could create a market distortion – favouring new PBSA over existing PBSA; and further fuelling the current relative viability (and hence delivery) of PBSA compared to C3 conventional housing. It was suggested that increasing the proportion of ASA sought in the absence of a nominations agreement could remedy this.

Some respondents asked for clarification as to whether 'all reasonable endeavours' should include offering market incentives (i.e. rental discounts) or if it was simply a matter of demonstrating that relevant HEPs had been contacted.

Clarification was also sought on the proposed ability for charitable and other bodies to take on a 'proxy' role on behalf of HEPs. While this was generally welcomed in

² The policy was drawn up with and supported by the Mayor's Academic Forum, including HEPs, on the basis of establishing a greater connection with new PBSA, but not taking on development risk.

principle, more detail as to how such bodies would be defined, and their connection with assessed HEPs, was requested.

GLA response

Following further consideration concerning the legal ambiguity of the term ‘all reasonable endeavours’, the post-consultation version of the guidance has been revised to use the term ‘reasonable endeavours’. This may be regarded as a lower bar by some, but the premise of the guidance is that there are some other acceptable routes to securing the policy intent, which is where effort is best spent. Clarification has also been added regarding what should be expected in demonstrating the use of reasonable endeavours to secure a nominations agreement – so there is consistency between LPAs, and the process is sufficiently rigorous. It is suggested that this should include positively responding to HEPs’ requirements relating to, for instance, design and rental costs rather than everything being on the provider’s initial terms. This helps to reflect the policy’s concern with affordability and design quality.

The point regarding the scope for potential market distortion has been carefully considered, with further engagement undertaken. This has suggested that discounting on the 16 per cent is not universal and may be impacting the ability of schemes to proceed viably. On balance, the risk is felt to be best addressed by ensuring that the cascade mechanism is appropriately onerous (applying to all remaining unlet and un-nominated rooms) and an ongoing administrative burden for providers. The burden on LPAs is to be defrayed by payment of an additional monitoring fee. The suggested alternative of additional ASA on an interim basis was considered; however, it was concluded that this would go beyond the existing policy, introducing a new requirement. It would add excessive complexity, given there may not always be viability headroom to provide this, creating a need for viability testing and associated delay.

Further detail on likely suitable proxy arrangements has also been added, recognising that clarity is important to provide consistency and avoid gaming practices that subvert the policy intent or create market advantage. In the absence of a nominations agreement for ASA, it is also clarified that the fallback position would be for the provider to allocate according to need or an appropriate proxy indicator, with an appropriate audit trail. In doing so, full maintenance loan eligibility is recognised as an appropriate independent assessment, though it is understood this may not always be available at the right time. However, stakeholders have advised that not having a nominations agreement in place for the ASA would be highly unusual, given continued HEP appetite to take these on – given that it reflects their students’ needs.

3 Equality impacts

Equality impact concerns were raised in relation to the following:

- Some of the language was perceived to unfairly single out students as a potential source of antisocial behaviour, which could fuel prejudicial attitudes. It was suggested that it may be more appropriate to highlight the importance of providing managed, safe and secure spaces for young people who are newly independent; and better consider youth and protected characteristics that may make some students vulnerable. Specific health infrastructure needs of students were also highlighted.
- Concern that PBSA was for a young and single demographic; the guidance does not reference the needs of students who are married or have children.
- Neurodiversity and mental health, plus prayer/worship needs: suggestion that these could be better reflected in the sections on design detail.
- Trans and non-binary students: since the LPG was consulted on, a [new report](#) has been published looking at the experience of trans and non-binary students in higher education. This flags the value of offering LGBTQ+ only flats in PBSA blocks that include cluster flats, as these provide safe spaces for such students. However, it is noted that there are also disadvantages to segregation in this way.

GLA response

- As noted in section 1, the language of the document has been reviewed. Greater clarity has also been given to guidance on spaces open to the public; spaces for students and their guests; and the specific infrastructure needs of students.
- There is nothing in the guidance that would prevent PBSA being designed and managed for students who are married or have children. It is also noted that some providers allow dual occupancy of some rooms, which would be available to couples (married or unmarried). However, older students and those with families would tend to be more likely to live in conventional housing, or in dedicated PBSA that best meets their needs, typically managed by the HEP. A least one Registered Provider is also known to be operating in this space and providing access to affordable postgraduate housing.
- The guidance relating to inclusive design and management has been strengthened overall, as detailed in various sections above. This includes reference to management plans securing aspects of inclusivity such as appropriate management of flexible spaces, and awareness raising of inclusive features through advertising. It is also suggested that consideration be given to provision and sensitive allocation of LGBTQ+ only cluster flats,

recognising that not all LGBTQ+ students will want to be accommodated in this way.

The EqlA has been updated to reflect post-consultation amendments and these matters.

4 Next steps and monitoring

Consideration was given as to whether a further re-consultation, on a revised draft, would add value to the guidance. However, it was felt to be more appropriate to undertake targeted discussions with LPAs, the Mayor's Academic Forum, and some consultation respondents who had made points that required further exploration. This follow-up engagement has included operators and their agents, HEPs, LPAs, and the GLA's own planning and viability officers. As explained above, it has enabled the refinement of the document to best support policy objectives and appropriately address concerns. This engagement is detailed in Appendix 1.

Monitoring of the policy continues in line with the wider London Plan monitoring framework, and review of planning applications and decisions related to this type of housing. Ongoing engagement with stakeholders, including through the Planning for London programme and regular meetings with LPAs is another important aspect of monitoring. Together, these can inform review of the policy and supporting guidance over time. This will be particularly important to help monitor equalities impacts; and ensure that mixed and inclusive neighbourhoods objectives are being met.

Appendix 1: Consultation and engagement events

Early engagement

Roundtables

- 23 March 2023 – Mayor’s Academic Forum (22 attendees)
- 14 July 2023 – LPA discussion (10 attendees)

Consultation period engagement

Q&A webinars

- 26 October 2023 (around 25 attendees)
- 3 November 2023 (35 attendees)

Roundtables

- 2 November 2023: BusinessLDN breakfast roundtable (27 attendees from 23 organisations, including HEPs, PBSA providers and their agents)
- LPA discussion (12 attendees from 9 LPAs, plus GLA DM officers)
- 5 January 2024: Mayor’s Academic Forum Meeting (13 attendees including LPAs, HEPs, PBSA providers and agents, NUS and business groups)

Post-consultation engagement

One-to-one discussions (following up points raised in their submissions for clarification)

- 23 May 2024: British Property Federation Student Housing sub-group chair
- 13 June 2024 Affordable Accommodation for Students Ltd
- 14 June 2024: Student First Group

Roundtables

- 1 August 2024: LPA discussion (11 attendees from 10 LPAs)
- 8 August 2024: Mayor’s Academic Forum Meeting (15 organisations attended, including HEPs, LPAs, PBSA providers and agents, and business groups).

Appendix 2: Consultation respondents

- London Boroughs (LPAs):
Barking and Dagenham; Brent; Bromley; Camden; Greenwich; Islington; Kingston upon Thames; Lambeth; Lewisham; Redbridge; Richmond upon Thames; Southwark; Tower Hamlets.
- Statutory consultee/professional body:
NHS London HUDU, National Fire Chiefs' Council.
- PBSA providers/investors and their agents
Affordable Accommodation for Students Ltd; Dominus; Downing; EQT Exeter; Fusion Group; IQ Student; Jigsaw Assets; Scape; Tide; Tribe; Unite; Watkin Jones.
- Other developers
Canary Wharf Group; Earls Court Dev Co.
- Higher Education Providers:
Imperial College London; Middlesex University; University College London; University of East London; University of London.
- Campaign/interest group:
British Property Federation; BusinessLDN
- Other business
Foundation for International Education; Jane Simpson Access; Student First
- Individual (1)

Appendix 3: Survey questions

Please note there are no questions on **Section 1**.

Section 2 – Mixed and Inclusive Neighbourhoods

Do you agree with the identified roles that PBSA can have in achieving different London Plan objectives as part of mixed and inclusive neighbourhoods, as set out in Box 1 of the guidance?

2. If you have answered **no** to question 1, please explain what you think should be revised or added.
3. Does the wording at paragraph 2.5.4 of the guidance strike the appropriate balance between mainstream (C3) affordable and affordable student (ASA) housing need for the reasons given?
4. If you have answered **no** to **question 3**, please explain and suggest an alternative re-wording.
5. The guidance incorporates the GLA's Practice Note on Wheelchair Accessible and Adaptable Student Housing and gives a reasoning (at paragraph 2.5.9) for the levels sought. Do you agree with this position?
6. If you have answered **no** to **question 5**, please suggest an alternative and give your reasoning.
7. Are there likely to be any unintended consequences of any aspects of the guidance in **Section 2**?
8. If you have answered **yes** to **question 7**, please explain.
9. We have not provided any example layouts or other case studies given that designs evolve over time in response to market trends and are also linked to operator branding and innovation. Do you agree that this is the right approach?
10. If you have answered **no** to **question 9** do you have any alternative suggestions?
11. Do you have any other comments on **Section 2** (please be as specific as possible and suggest alternative wording where appropriate)?
12. Do you wish to draw our attention to any schemes or other evidence that support your points? (Please upload a document or provide a link to any relevant web-based material)

Section 3 – Aligning with need - nominations agreements

13. Do you have any views on the advice for S106 agreements to contain as a minimum, the requirement to use 'all reasonable endeavours' to secure nominations agreements?

14. If you have answered **yes** to **question 13**, please give more detail)

15. Do you have any views on the suggested cascade mechanism at paragraph 3.2.13 of the guidance?

16. If you have answered **yes** to **question 15**, please give more detail.

17. Are there likely to be any unintended consequences of any aspects of the guidance in **Section 3**?

18. If you have answered **yes** to **question 17**, please explain.

19. Do you have any other comments on **Section 3**? (please be as specific as possible and suggest alternative wording where appropriate)?

20. Do you wish to draw our attention to any S106 or nominations agreements as examples, or any other evidence that support your points? (Please upload a document or provide a link to any relevant web-based material)

General

21. Does the guidance cover an appropriate scope?

22. If you have answered **no** to **question 21**, and there are other aspects of Policy H15 or related policies that it would be helpful to cover, please explain or give more detail.

Equalities Impact Assessment (EqIA)

23. Are you aware of any additional evidence that the Greater London Authority should use to understand any potential impacts resulting from the guidance on protected groups?

24. Are you aware of any additional impacts resulting from the draft guidance that could affect those with protected characteristics?

25. Do you have any further comments on the EqIA that accompanies the draft guidance?

