

King's College London's comments on the draft London Plan

King's College London is one of the foremost HEIs in London and one of the fastest growing in London. The needs of its students in terms of having somewhere safe, secure, affordable and of good quality are equally as important as its standards of academics and quality of teaching and learning. As a result over recent years it has procured more student bed spaces than any other HEI in London by both its own direct development and through Nomination Agreements for PBSA developed by the private sector. The Mayor's appreciation and recognition of the contribution which the role of Higher Education plays in the London economy is therefore welcomed along with the housing needs of students being recognized for the first time as part of London's overall housing needs.

In terms of Policy H17 which deals with PBSA, King's is potentially in a unique position to comment being a developer, funder and occupier of both its own student accommodation and that provided via Nomination Agreements by the private sector. Whilst many private sector providers will object to the provision of 35% as affordable student accommodation, from a students' and HEI's point of view it is to be welcomed unless it prevents the private sector from providing PBSA. Whether the suggested rental level of approximately £160 per week is sustainable is also questionable because in order to achieve this it is likely that the remaining 65% would have to be at considerably higher levels in order for private sector developers to secure sites against other competing uses. An alternative approach would be for the basis of the affordable rents to be set as a percentage of open market rents in any particular location, thereby removing a direct political influence on rents.

Another concern with Policy H17 relates to the need for the occupation of the accommodation to be secured for students of one or more specified higher education institutions, where the accommodation is not managed or operated by a higher education institution. If this is required at planning application stage it could mean a commitment some 3-4 years before the development is capable of occupation. This is considered onerous for the majority of higher education institutions particularly smaller institutions unless the Nomination Agreement could be with an overriding institution such as the University of London acting on behalf of all HEI's in London and not simply its constituent Colleges. The earliest any commitment should be required is at the grant of a planning permission via the Section 106 Agreement. It would be more preferable to link any commitment to simply be prior to any occupation of the completed development.

Whilst the narrative around the Policy H17 encouraging boroughs to allow temporary use of the accommodation is to be welcomed in principle, there are concerns from that it will lead to more or all of development costs being subject to VAT, either because it would mean student use being less than 95% or there was a limitation on who could occupy the student accommodation. This will simply lead to an increase in rents as neither students or HEIs will be able to recover all of the VAT.

In many ways large-scale purpose built shared living, Policy H18 might better meet the need for students provided any affordable housing could be provided as discounted rental units and not involve Cash in Lieu payments

for more usual tenure affordable housing.

It is also suggested that the cycle parking standards for student housing are excessive, particularly when the residences are located within walking distance of a campus or easily accessible to public transport. Evidence shows that PBSA and HEI provided student bed spaces and campuses generally operate successfully on much lower cycle provision.

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