

London Higher response to the Draft London Plan

Chapter 3: Delivering the homes and neighbourhoods Londoners need

London Higher represents over 70 of London's diverse universities and specialist higher education institutions. London Higher supports the draft Plan's ambition to deliver the homes and neighbourhoods Londoners need, with students as part of that picture.

Almost 550,000 students study at London's higher education institutions. That is more people than live in any single London borough, including the largest, Croydon (with around 409,000 residents). Students make up around one in 17 people in the capital.

Students are part of London's economy and its communities. Nationally, nearly two thirds of students now do paid work during term time, and in London many work in shops, hospitality, health and care services and cultural venues. Through members' civic programmes, students volunteer in local schools, charities and voluntary groups across the capital.

Housing for students is housing for Londoners. Good, well-located student accommodation helps students from all backgrounds to study and thrive. It also eases pressure on the wider rented sector, freeing up homes for other Londoners. The plan rightly recognises students as part of London's diverse communities, and student housing as part of the city's wider housing need.

HN5 Managing specialist accommodation

London Higher warmly welcomes the positive approach to student accommodation in Policy HN5. The introduction of borough-level targets for purpose-built student accommodation (PBSA), for the first time, gives student housing a clear strategic place in London's housing plans. It recognises the contribution students and universities make to London's economy, culture and communities.

To build on this, we offer six suggestions to strengthen the plan's approach to student homes further as it is finalised and put into practice.

1. State the targets clearly as minimums.

Student numbers and demand can change faster than local plans. The draft plan does not make clear whether borough targets are minimums, and there is a risk that some boroughs treat them as a cap once they are met. The plan already describes other specialist housing targets as minimums, including for older people's housing and Gypsy and Traveller pitches. We suggest PBSA targets are described in the same way, so that well-located schemes can still come forward once a target is met.

2. Be clear how borough targets reflect universities' plans.

The London-wide evidence behind the targets, set out in the GLA's Student accommodation need: analysis and review of evidence (July 2026), is a welcome and thorough piece of work. We also welcome the aim in paragraph 3.82 to align need from higher education providers with appropriate locations, and the 30-minute travel guide in paragraph 3.71. We suggest the plan sets out more clearly how institutions' growth plans and the existing supply of student accommodation have been reflected in borough targets, so new rooms are well located for the students who need them. This is about how the London-wide figure is distributed between boroughs, not its overall level. Once distributed in this way, each

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borough target should then act as a minimum, as set out above. We suggest the supporting text commits the GLA to review the targets with universities during the plan period. We would be glad to help members share their plans, including through the Mayor's Academic Forum.

3. Set out a clear process for reviewing the London-wide targets.

Demand for student accommodation can shift quickly in response to national policy. For example, UK-EU talks have prompted discussion in the sector about fee arrangements for EU students. Any change could see EU student numbers in London return towards their 2020/21 level. EU-domiciled students at London institutions fell from almost 44,000 in 2020/21 to around 21,400 in 2024/25 (HESA, Table 28). A return to that level would mean over 20,000 more EU students in London, many of whom would need accommodation. We welcome the commitment in paragraph 3.70 to keep the targets under review. We suggest the plan sets out when and how this will happen, so that London can respond to significant changes in demand without waiting for the next full plan review.

4. Protect affordable student rooms.

Affordable rooms make it possible for students from lower-income backgrounds to study and live in London. Our members are already taking action. This academic year, UCL has 572 London Plan affordable rooms, aimed at students most affected by London's living costs. King's College London offers below-market rooms to undergraduates from households earning under £42,875 through its affordable accommodation scheme. Policy HN3 gives developers of student accommodation three options for meeting affordable housing requirements through the fast-track route. They can provide affordable student rooms on site. They can provide up to 10 per cent fewer affordable student rooms, alongside a payment towards affordable homes elsewhere. Or they can provide conventional affordable housing on site instead. We understand the aim of this flexibility. However, the second and third options could reduce the number of affordable rooms available to students. We ask that the policy makes clear this flexibility should not reduce the overall supply of affordable student rooms.

These new options may also mean some schemes provide only a small number of affordable student rooms. Each nominations agreement involves due diligence, contract negotiation, student allocation and ongoing management. Where only a few rooms are available, some universities, particularly smaller and specialist institutions, may find the work involved hard to justify. Affordable rooms could then go unused, or be allocated in less consistent ways. We suggest the GLA works with universities and providers to explore practical solutions. These might include an optional London-wide template for nominations agreements, and consistent, transparent criteria for allocating affordable rooms where no university nomination is in place.

5. Reflect course length in the affordability test.

The affordable rent benchmark is set as an annual figure, while the evidence base assumes a 38-week let. Many courses run longer for good reasons. Conservatoire and dance courses can run for 44 weeks, and many postgraduate taught and healthcare courses run for most of the year. At the same weekly rent, a room let for a longer course can fail the test when a 38-week let would pass. The benchmark of around £7,774 a year equates to about £205 a week over 38 weeks. A conservatoire room let at that same weekly rent for a 44-week course costs around £9,020 and fails the test. This can leave specialist institutions covering the gap

themselves. We suggest the test is pro-rated to the contracted let length, or that a benchmark for longer courses is developed with relevant universities and specialist institutions.

6. Support nominations agreements for standard as well as affordable rooms.

Nominations agreements help universities guarantee or prioritise rooms for first-year students and support students with particular needs. Many London institutions guarantee or prioritise accommodation for new first-year students. These include Queen Mary, the University of Greenwich and Trinity Laban, among others. Many rely on rooms in privately operated halls alongside their own. Smaller specialist institutions often depend on partner halls entirely. Trinity Laban, for example, works with a private provider to offer standard and affordable rooms. It reserves rooms for some disabled students, under-18s and care leavers. It then prioritises new students moving to London from elsewhere in the UK or overseas.

The current London Plan expects most rooms in new schemes to be covered by a nominations agreement. The draft plan applies this only to affordable rooms. This could make it harder for universities to secure the rooms they need for their guarantees and priority groups. International education is a priority sector in the London Growth Plan, and accommodation guarantees are an important part of London's offer to international students. We suggest the policy continues to encourage nominations agreements for a significant share of rooms in new schemes, where a university needs them.

We look forward to working with the GLA and boroughs, alongside our members, as the policy is finalised and put into practice. Close partnership between the GLA, boroughs and universities will be key to making the policy work well across London.

Chapter 4: Growing London's economy

London Higher welcomes the draft plan's approach to growing London's economy. London has more than 140 higher education institutions. Together, they are worth £60.9 billion a year to the economy. The capital's higher education sector generates £27 billion in economic output each year. It adds £14.8 billion in gross value added, more than the Premier League's £9.8 billion. Higher education also underpins many of the growth sectors in the London Growth Plan, including life sciences, health, frontier technologies and the creative industries. Whilst international education is recognised as a growth sector in its own right.

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1. GLE1 Sufficient and appropriate employment space.

The plan's recognition of demand for research, life sciences and other frontier innovation space is a positive step. This gives boroughs a clear basis to plan for this space, and gives universities, research institutes and their partners greater confidence to invest in it. Universities are at the heart of this demand, working with industry, the NHS and investors to turn research into new businesses and jobs. We would welcome continued support for this space close to campuses and within clusters, where it can draw most on the talent and research around it.

2. GLE5 Culture and creative industries.

London's conservatoires and specialist arts, drama, music and design institutions, and universities across the capital, train much of the talent behind London's creative industries. Many also run theatres, galleries and venues open to the public, employ artists and deliver community and creative health programmes. We support the strong focus on protecting cultural facilities and creative workspace, which should help keep these venues open and accessible for Londoners. Support for Creative Enterprise Zones will help creative businesses and graduates find space to grow. However, the policy does not currently refer to the role of education and training in sustaining London's creative workforce. We ask that conservatoires and specialist creative institutions are recognised explicitly in the policy, both as cultural venues and employers and as anchor institutions that train the next generation of creative talent.

3. GLE7 Affordable workspace.

The plan for more affordable workspace is welcome, including the recognition of links to higher education and support for start-ups. It will help new and small creative businesses find space they can afford, and keep creative practice rooted in local communities. Graduates and associate artists of London's creative institutions often continue their practice locally after their studies. We suggest recent graduates and community practitioners linked to these institutions are recognised as qualifying users of affordable creative workspace.

4. GLE8 Access to employment and skills.

We support the focus on securing good quality jobs, apprenticeships and training for Londoners through major developments. Higher and further education providers offer routes into work at every level, from technical courses and apprenticeships to degrees and postgraduate study. They work with employers to design courses that meet local skills needs, including in construction, health and other growth sectors. They also reach many of the groups the policy aims to support, including adult learners and people from under-represented backgrounds. London's higher education providers have a strong record on

social mobility, with institutions in and around the capital contributing most to social mobility in England. Whilst the policy draws on the Inclusive Talent Strategy, which sees an important role for higher and further education, it would be helpful for the supporting text to reflect the role of both explicitly.

Chapter 6: Place visions and place-based approaches

London Higher supports the draft plan's place-based approach. London's universities and specialist institutions are rooted in their local communities, from central London to the outer boroughs. As anchor institutions, they open their campuses, libraries, venues and public spaces to local people. They run free events, performances and exhibitions. They offer advice clinics and health programmes, and work with local schools to raise aspirations. Their staff and students volunteer with charities and community groups across the capital. This civic role makes them natural partners for the GLA and boroughs in shaping places that work for all Londoners.

The recognition in Box PV2 of higher, further and international education as a strategic function of the Central Activities Zone is a welcome move, as are the university locations shown in Figure 6.2. This gives education uses clear weight in planning for central London. This should help institutions protect, renew and grow the teaching, research and cultural space that draws people, talent and investment into the capital.

Policy PV4 is a welcome step. London's universities, specialist institutions and research institutes anchor many of the strategic economic clusters named in Table 6.1. They work with the NHS, industry and local communities to turn research into jobs, investment and better health. Designating these clusters in Local Plans, with clear boundaries, will give institutions and their partners greater certainty to plan and invest for the long term. Support for more specialist floorspace, including laboratory and research space, will help much-needed facilities come forward in the right places. A mix of uses, including housing, will help these locations attract and retain the talent they rely on.

We are also pleased to see the strategic economic corridors in paragraph 6.29. Recognising corridors that run across borough boundaries, and beyond London, reflects how research, skills and creative partnerships already work. It will help partners plan transport, space and skills together, and help the benefits of growth reach more communities. Members have campuses along all three corridors.

We particularly welcome the role the plan gives to both higher and further education in all these places. Universities and colleges working together can help make sure growth creates jobs and training for local people. We look forward to working with the GLA, boroughs and colleges, alongside our members, to help these places grow in ways that benefit all Londoners.