

LONDON BOROUGH OF WANDSWORTH LOCAL PLAN PARTIAL REVIEW
(WLPPR)

INDEPENDENT EXAMINATION IN PUBLIC

WRITTEN STATEMENT MAIN MATTER 4:
Policy LP28: Purpose Built Student Accommodation

TUESDAY 4 NOVEMBER 2025

COUNCIL RESPONSES TO MAIN MATTER 4

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Abbreviations

BLV – Benchmark Land Value

BNPP – BNP Paribas Real Estate

CIL – Community Infrastructure Levy

GDV – Gross Development Value

GIA – Gross Internal Area

GLA – Greater London Authority

HBP – Housing Background Paper (2025)

HEP – Higher Education Provider

HESA – Higher Education Statistics Agency

HNA – Housing Needs Assessment (2024)

LSPBSL – Large-Scale Purpose-Built Shared Living

NPPF – National Planning Policy Framework (December 2023)

PBSA – Purpose Built Student Accommodation

PiL – Payment in Lieu

RICS – Royal Institute of Chartered Surveyors

SOCG – Statement of Common Ground

WLPPR – Wandsworth Local Plan Partial Review

WPVA – Whole Plan Viability Assessment (2024)

Question 4.1 - Are the requirements for PBSA set out in Policy LP28 justified by appropriate available evidence, having regard to national guidance, and local context, and is it in ‘general conformity’ with the London Plan?

Yes, Policy LP28 is justified by appropriate evidence and reflects national policy and guidance.

Policy LP28 sets out the requirements for building Purpose Built Student Accommodation (PBSA) in the Borough. Compared to the adopted Policy LP28 on PBSA in the Wandsworth Local Plan (2023-2038), LP28 of the WLPPR directs PBSA to sites which are not allocated, identified or otherwise suitable for conventional housing¹. In addition to requiring an affordable student housing provision as set out in London Plan Policy H15, part A.3 of LP28 also requires PBSA developments to make a financial contribution towards conventional affordable housing that is equivalent to what is required by Policy LP23 on Affordable Housing. Where PBSA is proposed, the aspiration of the policy is that PBSA schemes do not lead to the overconcentration of single-person dwellings at a neighbourhood level, which is defined within the glossary within the adopted Local Plan. The policy also seeks to ensure that PBSA schemes contribute positively to local communities, with facilities provided for student residents made available to the wider community where public access would not lead to any unreasonable safeguarding issues for students.

Safeguarding land appropriate for conventional housing and requiring financial contributions from PBSA developments toward affordable housing provision is justified by the Borough’s significant and urgent housing need. As identified by the Housing Needs Assessment (HNA) 2024 (**SD020**), the Housing Background Paper (HBP) 2025 (**SD013**), and detailed by the Council’s Written Statement to Main Matter 2, many residents living in Wandsworth are experiencing severe affordability constraints which make market housing inaccessible to them. The HNA identifies an extremely high need for affordable housing in Wandsworth, showing that up to 23,601 of the Borough’s supply of 26,315 homes by 2038 may need to be affordable to meet local needs. This represents around 90% of all new homes expected to be built in Wandsworth during this period. Of the affordable homes required, up to 17,233 would need to be social rented, which is equivalent to 1,148 per annum.

The priority of LP28 is to ensure that new PBSA schemes support the Council’s objective of responding to the significant housing needs of the Borough. At present, PBSA schemes are not required to contribute towards conventional affordable housing and in many cases come forward on sites which would have been suitable for conventional housing. With significant pressures on the availability of land for

¹ The Publication version of the WLPPR refers to sites “which are not suitable for conventional housing”. To aid in interpretation, the Council has recommended modification M28/1 (See Appendix) to modify this wording to reflect the wording stated here.

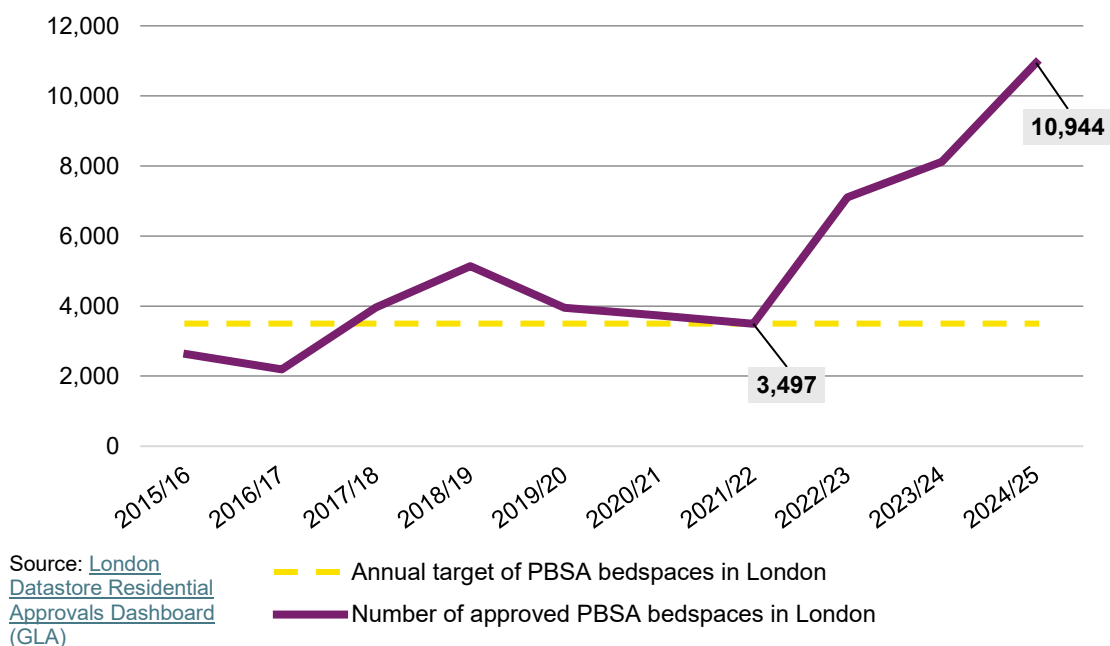
genuinely affordable housing within the Borough, the over-provision of PBSA schemes in any one area can, therefore, have a direct and significantly detrimental impact on conventional and affordable housing supply. The Council's observation has been that prevailing market economics and policy conditions have made PBSA schemes relatively more attractive than conventional housing. This is largely due to the fact that PBSA schemes tend to attract high rents, are nil rated in the adopted Wandsworth Community Infrastructure Levy (CIL) Charging Schedule, and are currently subject to less stringent affordable housing policies, effectively incentivising developers to prioritise building PBSA to achieve higher rates of profit at the expense of providing much needed homes for local residents. As a consequence, there is a growing risk that new PBSA developments will continue to displace conventional housing, driving affordable housing delivery further away from the Mayor's 50% strategic London-wide target.

The problem is compounded by the approach taken by the London Plan which does not identify a disaggregated Borough-level need or target for PBSA bedspaces and instead treats the need as being 'pan London'. Unlike the approach taken for other forms of housing, paragraph 4.15.2 of the London Plan states that London has an overall strategic need "for 3,500 PBSA bed spaces to be provided annually over the Plan period". This requirement is based on the 2017 Strategic Housing Needs Assessment which is now eight years old and relies on data collected prior to the publishing of the document. The existing policy approach has made it difficult to arrive at sensible policy decisions over the level of contribution that a Borough like Wandsworth ought to make to meeting London's need for PBSA. This is particularly true as demand for PBSA in Wandsworth is typically driven by the attractiveness of the Borough to young people and not by proximity to Higher Education Providers (HEPs) with accommodation needs. During 2025, two large PBSA schemes² have already received planning permission in Wandsworth which will provide 1,162 student bedspaces, making up 34% of the London-wide annual target. One of these development proposals, the Booker Cash&Carry PBSA scheme (ref: 2022/1835), also came forward on a site that had an extant permission for 307 conventional residential units. The increasing prevalence of PBSA schemes in Wandsworth corresponds to the experience of other local authorities across London which have seen a steady growth in the number of approvals for PBSA bedspaces. In 2024/25, London saw a record of 10,944 bedspaces approved – over three times its annual target (Figure 1). Equally this has been seen in Wandsworth on sites such as the Booker Cash&Carry PBSA scheme, where a previously approved scheme for conventional housing, was replaced by a student housing scheme.

² Booker Cash & Carry (ref: 2022/1835) Appeal allowed 06/06/2025 and 2 Armoury Way (ref: 2024/3497) Approved 20/08/2025

The HNA, at Paragraph 5.66, identifies that, in the absence of an apportioned local target, apportioning the London Plan’s annual target on the basis of existing student populations would suggest that Wandsworth should meet 2% of London’s need. This equates to around 70 bedspaces a year. It is clear that recent supply in Wandsworth is significantly exceeding this figure.

Figure 1: PBSA approvals in London

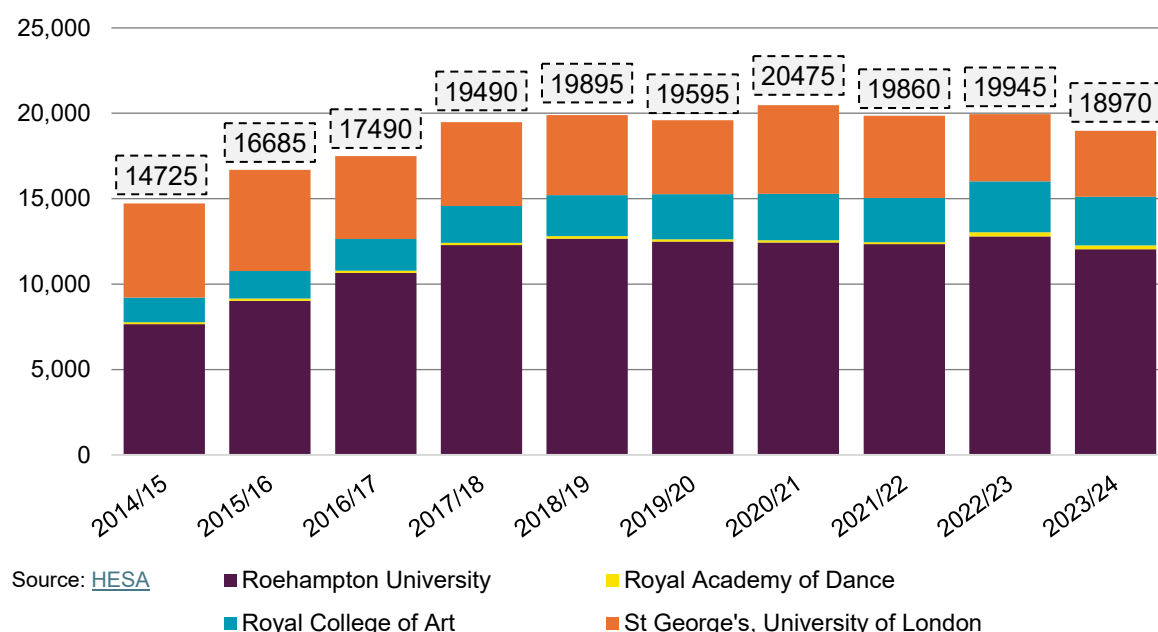


The concern about the oversupply of PBSA schemes in local areas is also recognised in the Mayor’s *Consultation on the next London Plan* which states that too many PBSA schemes “have the potential to crowd-out general needs and family housing [and] if unmanaged, they can alter the character of an area given their intense occupation” (paragraph 2.18).

Beyond the increasing oversupply of PBSA schemes across London, the Council considers its position to safeguard land for conventional housing justified based on the limited need for extra PBSA bedspaces tied to HEPs within the Borough. As stated in the HBP, the Council’s previous engagement with local HEPs has suggested that there is limited to nil short-term need for additional PBSA in association with any of the HEPs within its boundary. Wandsworth is home to four HEPs, the largest two of which are University of Roehampton and St. George’s University, which recently merged with City. The number of higher education students in the four HEPs based in Wandsworth has plateaued since the 2017/18 academic year, with only minimal changes to student numbers seen since this time. According to the latest publicly available data from the Higher Education Statistics Agency (HESA), the number of students in Wandsworth HEPs is the lowest it has

been since 2016/17. In 2023/24, there were 18,970 higher education students in Wandsworth HEPs – down 8% compared to the peak in 2020/2021 (Figure 2).

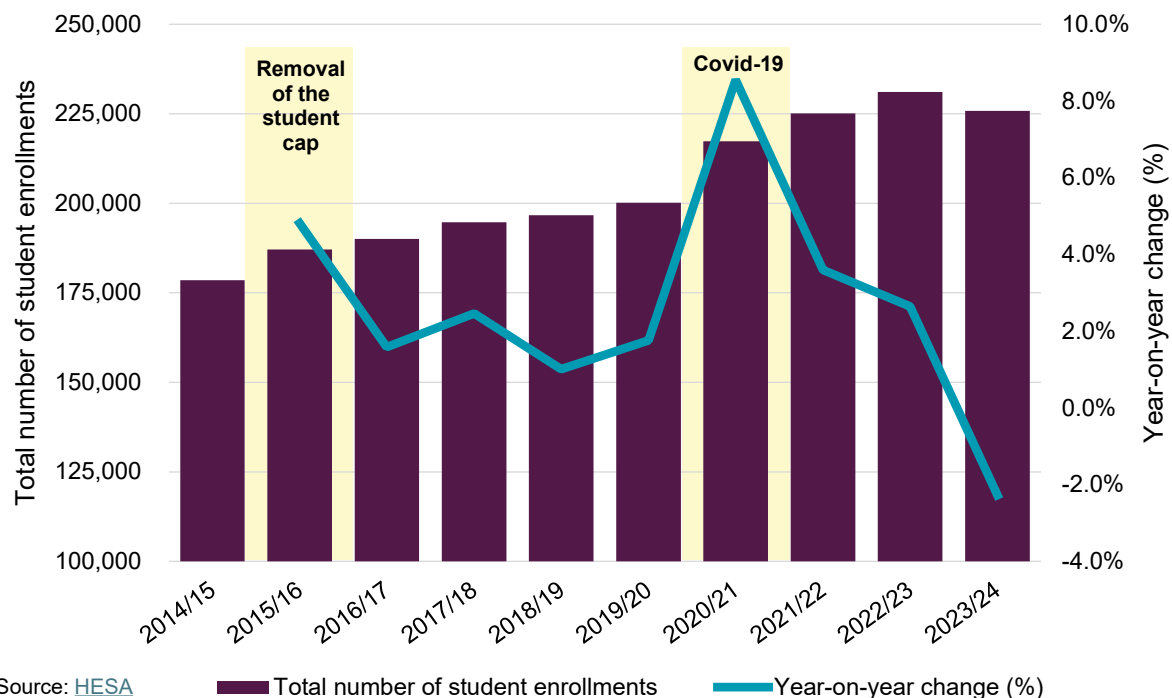
Figure 2: Number of higher education students in Wandsworth HEPs



The plateaued student numbers at local HEPs explain why, in recent years, the Borough has seen a growing number of PBSA schemes come forward that have no ties to the HEPs located within Wandsworth. Instead, most schemes predominantly provide short-term housing for students who are attracted to the amenities of the Borough but attend universities in other Boroughs, including some that are relatively distant from the PBSA sites. While the Council acknowledges that there are a number of universities in London that are within reasonable commuting distance from Wandsworth (considered 45-minutes as per accepted methodology in most assessments), current projections do not indicate a significant increase in student numbers at those institutions. Over the past decade, the 12³ HEPs within 45-minute commuting distance of Wandsworth have experienced moderate growth in student numbers, averaging at 2.7% year-on-year growth (Figure 3). In the past 3 years, however, the growth in student numbers has notably slowed. During the 2023/24 academic year, the total number of students in the 12 HEPs within commuting distance from Wandsworth decreased by 2.3%.

³ Roehampton, St George's, Kingston, KCL, Imperial, LSE, UAL, LSBU, UCL, Westminster, Royal Academy of Dance, Royal College of Art

Figure 3: Student numbers in the 12 HEPs within 45min commuting distance from Wandsworth



The changes in the growth and decline in student numbers in the past decade can be mostly explained by regulatory and demographic changes. From 2015/16 onwards, student number growth was largely driven by the removal of the student cap that set limits to how many students universities could enrol. The rate of student number growth peaked in 2020/21 when a larger cohort of people started their studies due to the increased number of 18-year-olds in the UK population and a larger intake of international students in the aftermath of the global pandemic. Importantly, the recent regulatory changes to visa rules for international students and their ability to bring dependants have significantly contributed to the downward trend in student numbers. Considering that several governments have now committed to reducing net migration which includes international students, the Council does not foresee significant growth in the demand for PBSA in the Borough over the Plan period. As a result, the Council considers that Policy LP28 proposes appropriate and justified measures to regulate the supply and location of PBSA schemes based on the most recent evidence of the local and London-wide context.

In circumstances where a PBSA scheme is proposed at an appropriate location, part A.6 of LP28 establishes a sequential requirement for PBSA schemes to demonstrate priority towards meeting the needs of local HEPs. This is to ensure that PBSA proposals seek out opportunities to serve the Borough's student population and complement local educational infrastructure. In line with Policy H15 of the London Plan, LP28 also establishes that PBSA schemes which accommodate students at

HEPs outside of Wandsworth would be acceptable if they are proposed at an appropriate location and within practical travel distance of the Borough.

The approach taken in LP28 follows national guidance as set out in paragraph 63 of the NPPF (Dec 2023) which requires that planning policies reflect the different sizes, types and tenures of housing needed for different groups in the community, including students and those who require affordable housing. Points 4, 5, 7, 9 and 10 in part A of the WLPPR version of LP28 are nearly identical to points 2, 3, 4, 5 and 6 in part A of the version of LP28 in the 2023 Local Plan. The Council's view is that the proposed changes to Policy LP28 are necessary to better manage the supply and location of PBSA in the Borough and ensure that PBSA schemes contribute to meeting the more pressing need for conventional housing (particularly affordable). The proposal to safeguard land that will be critical in meeting the more severe and urgent need for conventional housing is in line with a similar provision in the existing Policy LP29 (Housing with Shared Facilities) which was found to be a sound and justified approach as part of the 2023 Local Plan.

Part A.8 of the policy aims to ensure PBSA developments contribute to local needs and wider public benefits by making new facilities included in PBSA available to the community. The Council notes some representors raised a concern that safeguarding considerations would not allow them to make certain facilities provided by PBSA schemes available to the general public. The Council considers that it is realistic for some types of facilities to be accessible to both occupants and the wider public. For example, wider benefits were secured as part of a previous Large-Scale Purpose-Built Shared Living development (LSBPSL) in Wandsworth at Trewint Street (ref: 2019/1083), which provided a café/restaurant accessible to the public and bookable workspace, which is available to occupants and the public to use (with a charge associated for external users in relation to the bookable workspace). This example demonstrates how the provision of amenities to the wider public is achievable in practice. However, in response to the representations, the Council has recommended a modification (**M28/5**, see Appendix) for the Inspector to consider which would clarify that making facilities available to the wider community would be subject to feasibility.

It is the Council's view that Policy LP28 is also in general conformity with the London Plan. Part A.3 requires PBSA schemes to include affordable student housing provision as set out in London Plan Policy H15. In their consultation response at Regulation 19 stage, the GLA confirmed that "the Mayor does not object to the requirement for financial contributions towards conventional C3 affordable housing" from PBSA schemes, indicating a shift in position compared to the previous guidance set out in paragraph 4.15.14 of the London Plan which advises against this requirement. The change in the GLA's policy position is also recognised in the *Consultation on the next London Plan*, which suggests that the new London Plan

could help balance provision for different needs by ensuring that student housing contributes to wider affordable housing provision (paragraph 2.18). The Mayor's representation at the Regulation 19 stage further raised that "there should be provision allowing schemes to follow the FTR if they provide affordable student accommodation in line with Policy H15". In response, the Council has suggested a modification (**M28/4**, See Appendix) to the supporting text in paragraph 17.45 which clarifies that developments must provide a fully compliant contribution to both affordable student housing and conventional affordable housing to be eligible for the Fast Track Route set out in Policy LP23 (Affordable Housing).

With respect to general conformity, the Mayor's representation at the Regulation 19 stage identified one small area where the Mayor was concerned that Policy LP28 may not be in general conformity with the London Plan, stating that when requiring financial contributions towards C3 affordable housing, Policy H15 of the London Plan (2021) states that affordable student housing should be sought in the first place. As specified in paragraph 17.43 and clarified in the suggested modification **M28/4** (see Appendix), the Council's view is that where a development cannot viably provide a policy-compliant contribution towards both affordable student housing and conventional affordable housing, developments will be expected to first maximise their contribution towards conventional C3 affordable housing. Following this, any surplus above reaching full policy-compliance to C3 conventional affordable housing should be used to then maximise their contribution towards affordable student housing. The Council considers this position justified due to the significant and urgent need for conventional affordable housing as previously detailed. At the time of writing, a Statement of Common Ground (SOCG) with the GLA is being agreed, which establishes that, subject to those matters set out within the GLA's formal representation, both parties are satisfied that the principle of seeking conventional affordable housing from Purpose-Built Student Accommodation, in addition to affordable student accommodation, is in general conformity with the London Plan. The SOCG also establishes that save for those matters set out in the GLA's formal representation, both parties are satisfied that all other provisions within draft Policy LP28 are in general conformity with the London Plan.

Question 4.2 - Are the requirements for PBSA set out in Policy LP28 positively prepared 'in a way that is aspirational but deliverable'?

Policy LP28 has been prepared positively in a way that is aspirational and deliverable, as informed by the Council's detailed evidence base that includes the Housing Needs Assessment (HNA) 2024 (**SD020**), the Housing Background Paper (HBP) 2025 (**SD013**), the Whole Plan Viability Assessment (WPVA) 2024 (**SD022**) (WPVA) and the Addendum to WPVA: Site Testing 2025 (**SD043**). The HNA and HBP identify a significant and urgent need for affordable housing in the Borough,

especially for social rented housing, and demonstrate the wider imperatives for aspirational policies to meet those needs.

Policy LP28 has been shown to be deliverable through the detailed viability testing as part of the WPVA and supplementary Site Testing. These assessments were carried out by BNP Paribas Real Estate (BNPP), who are highly experienced consultants with extensive knowledge of the London development market. The viability testing followed the Planning Practice Guidance (PPG) and RICS' best practice, with the approach and assumptions subject to engagement with stakeholders in the development industry. Further information on the justification for the approach taken in these assessments can be found in the BNPP reports and the HBP. Detailed responses to representations which raised concerns with the approach to these assessments can be found in Appendix F to the Regulation 19 Statement of Consultation (**SD010a**).

As per the PPG, the WPVA assessed the viability of a range of site typologies that are commonly found in the Borough. In total, 48 typologies were tested including 2 PBSA site typologies. These were Site 41, which included 100 units at a high density, and Site 42, which included 100 units at a medium density. The viability of the site typologies was assessed against four Benchmark Land Values (BLV) based on four different existing uses: offices, secondary retail, industrial and open land. Except for open land, all BLVs included a 20% premium for the landowner. Both PBSA sites assumed an average Gross Internal Area (GIA) of 38 square metres per unit and made an allowance for a 15% developer profit. Besides all of the normal policy requirements, the PBSA site typologies also included the requirement of all PBSA schemes to provide 35% of student bedrooms as affordable student housing as part of the testing and reflected the nil CIL rate for the Borough CIL.

Based on the appraisal model in Appendix 8 of the WPVA, the testing determined that 99% of PBSA site tests could viably provide a financial contribution towards conventional affordable housing equivalent to at least 45% at a 70/30 tenure split. Furthermore, the WPVA also showed that 97% of the PBSA tests could viably provide a financial contribution equivalent to at least 50% of affordable housing. As a result, the WPVA concluded that it is viable for PBSA schemes in Wandsworth to both provide 35% of student bedrooms as affordable student housing as well as make a financial contribution equivalent to at least 45% of conventional affordable housing.

The Council also requested BNPP to test six specific sites as part of the supplementary Site Testing 2025 (**SD043**). The specifics of these sites were based on site allocations in the adopted Local Plan, sites modelled after past completions and sites included within the Local Plan housing pipeline (see Authority Monitoring Report (**SD029**)). In order to assess the realistic nature of the emerging policy, Site Number 2 was modelled as a PBSA scheme on currently vacant designated

industrial land based on the specifics of a recent application. The BLV of this site was £1.43m inclusive of a 20% premium to the landowner. The site was modelled as two variants. Site 2.1 provided 425 student bedrooms (including 50% of the bedrooms provided as affordable student) and a payment in lieu (PiL) equivalent to 50% of habitable rooms provided as affordable housing at a 70/30 tenure split. Site 2.2 provided 212 student bedrooms (including 50% of the bedrooms provided as affordable student) as well as the on-site provision of 57 C3 affordable units at a 70/30 tenure split. It is important to note that the specific site in question was on designated industrial land, which meant that the provision of 50% of affordable student bedrooms would apply in line with the London Plan. The additional requirement for a 50% contribution towards conventional affordable housing, however, reflects the proposed requirements of Policy LP28. It was possible to test Site 2.2 as a scenario in which the conventional affordable housing could be provided onsite, as the existing layout of the application site proposes PBSA across two separate blocks, allowing BNPP to test the second block as conventional affordable housing. The PBSA scheme (ref: 2022/1835) referenced above was permitted as an analogous scenario, as the proposal included affordable student accommodation and onsite conventional affordable housing in a separate block with a total provision of 43% affordable housing by dwelling and 40% by habitable room, even without the proposed policy basis.

The Site Testing concluded that the PBSA scheme on Site Number 2 could viably accommodate both the requirement to provide 50% of student bedrooms as affordable student accommodation and a PiL equivalent to 50% of C3 affordable housing. Furthermore, the site could also viably meet the 50% affordable student accommodation requirement alongside the on-site delivery of 50% C3 affordable housing. Importantly, both variants of Site 2 were shown to be viable under conservative assumptions, including a 49-week tenancy period and a weekly rent of £295. For comparison, the Urbanest PBSA development at Palmerston Court in Nine Elms typically uses 51-week contracts, with en-suite rooms starting at a weekly rent of £395, showing the outputs are not determined on the margins of viability and would be realistic to deliver.

In the interests of deliverability, the Council has allowed for the contribution to conventional affordable housing to be in the form of a Payment in Lieu. This avoids any apparent inconsistency with the clause in the policy which directs PBSA to sites which are not allocated, identified or suitable for conventional housing. This also aligns with both the existing and proposed approaches to affordable housing from LSBPSL schemes (Policy LP29). However, in response to representations, a suggested modification (**M28/2**, see Appendix) acknowledges that, in some exceptional circumstances, it may be appropriate to deliver conventional affordable housing on-site in a separate block, which as per the supplementary Site Testing and

the example included on the PBSA scheme (ref: 2022/1835), would remain viable and realistic to deliver.

Question 4.3 - Is the Policy clearly defined and unambiguous so that it is evident how a decision maker should react to development proposals?

Yes, Policy LP28 consists of a clear and unambiguous set of criteria that a decision maker can assess a development proposal against. It follows a similar format to London Plan Policy H15 and clearly sets out the Council's planning policy with regards to PBSA schemes. The policy is structured into two parts with detailed or conditional requirements clarified in the supporting text.

Part A of Policy LP28 outlines the requirements that a PBSA scheme must meet in order to be supported. It clearly states that PBSA developments should be proposed on sites that are not suitable for conventional housing and must include a financial contribution towards conventional affordable housing, equivalent to the levels specified in Local Plan Policy LP23. Paragraph 17.43 of the supporting text further clarifies that this financial contribution should be calculated based on the difference between the Gross Development Value (GDV) of the scheme including the relevant policy requirement for affordable habitable rooms, and the GDV of the scheme with no affordable habitable rooms provided, which aligns with the methodology for calculating a Payment in Lieu within the Affordable Housing and Viability London Plan Guidance (2017). Paragraph 17.44 adds that, in exceptional circumstances where a PBSA development is considered appropriate on a site suitable for conventional housing, the equivalent level of affordable housing required by Policy LP23 may instead be delivered as a separate block on-site as part of the overall scheme.

Part B of LP28 sets out the conditions that a development proposal needs to fulfil in order for the loss of existing student accommodation to be permitted.

A small number of representations have raised matters within Policy LP28 that they consider requiring additional clarification, including:

- Interpretation of 'site which is not suitable for conventional housing' at Part A.1;
- Clarification on how the affordable housing requirements within the policy would support the Fast Track Route set out in Policy LP23 and the London Plan.

In response, the Council has suggested a small number of modifications, as detailed in the appendix, which propose to add or amend wording to the supporting

text to define terms used in the policy or provide greater clarity as to how specific circumstances will be considered.

Modifications **M28/1** and **M28/2** (see Appendix) provide more specific tests for establishing the suitability of sites for Purpose-Built Student Accommodation. Part A.1 specifies that PBSA schemes should be proposed on sites which are not allocated, identified or otherwise suitable for conventional housing. Paragraph 17.45 further clarifies that the Council will generally resist proposals to develop PBSA on sites, or within area strategies, where this would harm the ability for the envisaged quantum of conventional housing to come forward. As such, the Council will have regard to specific site allocation and area strategy policies, and its published housing trajectory, when applying this part of the policy.

Paragraph 17.43 includes a modification (**M28/04**, see Appendix) for the Inspector to consider which sets out the requirements for PBSA schemes to be eligible for the Fast Track Route. The proposed modification states that developments must provide a fully compliant contribution to both conventional affordable housing and affordable student housing to be eligible for the Fast Track Route set out in Policy LP23. Where a development cannot viably provide a policy-compliant contribution towards both conventional affordable housing and affordable student housing, applicants must provide viability evidence in line with Policy LP23. To aid interpretation, paragraph 17.43 also specifies that developments will be expected to first maximise their contribution towards conventional affordable housing, and any surplus above reaching full policy-compliance to conventional affordable housing should be used to then maximise their contribution towards affordable student housing, providing a clear cascade within LP23 for decision makers and applicants to apply.

Question 4.4 - Does Policy LP28 allow developments to follow the FTR? If not, what justification is there for doing so?

Yes, development proposals providing a policy-compliant level of affordable student housing as required by London Plan Policy H15 and policy-compliant level of affordable conventional housing would be eligible for the Fast Track Route based on the thresholds set in Policy LP23 for consistency.

The Council has recommended a potential modification (**M28/4**, see Appendix) to paragraph 17.43 in the supporting text for the Inspector to consider which makes the relationship between the policy and the Fast Track Route clearer.

Appendix: Table of Proposed Modifications

Details taken from the Schedule of Proposed Modifications suggested by the Council (April 2025) (SD015)

Mod Ref	Policy Ref	Policy or Paragraph Number	Response Reference	Proposed Modification	Reason for Modification
M28/1	LP28 (Purpose Built Student Accommodation)	Part A.1.	Watkin Jones (REP009); VSM (NCGM) Ltd. (REP115); Downing (REP024); Battersea Society (REP105); Mr Peter Carpenter (REP016); Leonie Charmes (REP022); Ballymore Group (REP107)	Is proposed on a site which is not allocated, identified or otherwise suitable for conventional housing	In response to representations, this modification would clarify the interpretation of Policy LP28 with respect to Part A.1., to provide more specific tests for establishing the suitability of sites for Purpose-Built Student Accommodation. Corresponding modifications are proposed to the supporting text to provide additional clarity over the justification and interpretation of Part A.1.
M28/2		Paragraph 17.44		In exceptional circumstances where a student housing development is considered appropriate proposed on a site which is suitable for could accommodate some conventional housing, the equivalent level of affordable housing as required by Policy LP23 should may instead be provided as a separate block on the site as part of the scheme and phased accordingly	
M28/3		Paragraph 17.45		Proposals for new student accommodation which will prioritise supporting HEPs (Higher Education Providers) located within Wandsworth will be accepted on sites that are not allocated, identified or otherwise suitable for conventional housing, such as a site located within an existing HEP campus, where conventional housing would be inappropriate. To avoid undermining the Council's ability to meet its need for conventional housing, the Council will generally resist proposals to develop PBSA on sites, or within area strategies, where this would harm the ability for the envisaged quantum of conventional housing to come forward. The Council will have regard to specific site allocation and area strategy policies, and its published housing trajectory, in applying this part of the policy.	

London Borough of Wandsworth
Main Matter 4 – Policy LP28: Purpose Built Student Accommodation

M28/4	LP28 (Purpose Built Student Accommodation)	Paragraph 17.43	Watkin Jones (REP009); VSM (NCGM) Ltd. (REP115); Downing (REP024); Greater London Authority (REP108); Leonie Charmes (REP022); TfL Places For London (REP087)	The financial contribution should be calculated on the basis of the difference between the Gross Development Value including the relevant policy requirement of affordable habitable rooms, and the Gross Development Value of the scheme with no affordable habitable rooms provided, subject to viability. <u>Developments must provide a fully compliant contribution to both affordable student housing and conventional affordable housing to be eligible for the Fast Track Route set out in Policy LP23 (Affordable Housing). Where a development cannot viably provide a policy-compliant contribution towards both affordable student housing and conventional affordable housing, applicants must provide viability evidence in line with Policy LP23. Developments will be expected to first maximise their contribution towards conventional affordable housing, and any surplus above reaching full policy-compliance to conventional affordable housing should be used to then maximise their contribution towards affordable student housing. More guidance will be set out in the Affordable Housing SPD and any successor document. Proposals for student accommodation should ensure that this financial contribution is prioritised</u>	In response to representations, this modification would clarify how the affordable housing requirements within the policy would support the Fast Track Route set out in Policy LP23 and the London Plan, and provide additional clarity on the Council will interpret the policy where developments cannot viably provide a fully policy-compliant contribution towards both affordable student housing and conventional affordable housing. In particular, the modification would establish a clearer prioritisation between the two which will improve the policy's effectiveness.
M28/5	LP28 (Purpose Built Student Accommodation)	Part A.8.	Downing (REP024); Leonie Charmes (REP022)	8. Can make facilities provided for student residents available to the wider community, <u>where feasible</u>, particularly where there is an acknowledged shortfall in such provision within the neighbourhood;	In response to representations, this modification would clarify Part A.8. of the policy to make clearer that making facilities available to the wider community will be subject to feasibility, acknowledging a concern raised by some representors that safeguarding considerations restrict the ability to make certain facilities available to the public.