

The main points I would like to bring up today are as follows:

1. The cap received by Holmes is 980 students for 2025. This represents an 88% cut on our official capacity of 8800. This is illogical. We have 13,000 square metres of space on long leases.
2. At no time have we been consulted about the consequences of implementing the caps. Setting a date for 1 January 2025 does not allow for planning. It is illogical. It is impossible to run a higher education institution without long-term planning.
3. If this cap becomes a reality, we will be forced to shed numerous staff. Who will inform our staff about the reasons for losing their jobs?
4. The cap will stifle innovation. We will not be able to develop new degrees or progress our research centre.
5. The reference year for the private sector is 2023, which was the bottom of the cycle for Holmes. The reference year for the public sector is 2019, which was a boom year. Why are the reference years different? How can taking arbitrary points in time be fair to all players.

The caps are not reasonable and should fall under the Administration Decisions (Judicial Review) Act 1977 as the sudden notification is a breach of the rules of natural justice in that it we have not been consulted and we have not been treated without bias

The Bill needs to be delayed and proper consultation must occur with individual providers. The implementation of Ministerial Direction 107 and the doubling of the visa application fee have already severely reduced student numbers for 2025. The capping should be deferred to 2026 after detailed consultation with the private sector.