

Bath and North East Somerset Core Strategy Examination**Student housing and strategic housing supply: response to Inspector's Note ID/21
(23/1/12)****Summary:**

1. *The inclusion of student accommodation as part of local housing supply has recently been clarified and supported by DCLG. Previous 2008 DCLG advice on Strategic Housing Land Supply Assessments seemed to suggest that student flats etc off campus should not necessarily be regarded as part of the supply. However the most recent DCLG guidance has reversed the position. This has been reiterated in Parliament by the Secretary of State. Consequently the Council will be adding an additional 300 dwellings (self-contained off-campus cluster flats) to its identified housing supply from 2006. A further 120 dwellings will be added retrospectively to the period 1996-2006. The arithmetic for this is identified in paragraphs 8-9. The inclusion of this source of supply is consistent with the Council's calculation of the housing requirement. This requirement includes a generous allowance for non-economic (not job related) net-migration.*

History, Justification & Arithmetic

2. The inclusion of student accommodation in SHLAA assessments has been subject to changing advice in recent years. In 2008, published DCLG guidance¹ stated that:

Communal establishments are not counted in overall housing supply i.e. establishments providing managed residential accommodation. These cover university and college student accommodation (including self-contained flats clustered into units with 4 to 6 bedrooms), hospital staff accommodation, hostels/homes, hotels/holiday complexes, defence establishments (not married quarters) and prisons.

3. However the current definition² provided by DCLG now very clearly states that:

*Communal establishments, ie establishments providing managed residential accommodation, are not counted in overall housing supply. These cover university and college student, hospital staff accommodation, hostels/homes, hotels/holiday complexes, defence establishments (not married quarters) and prisons. **However, purpose-built (separate) homes (eg self-contained flats clustered into units with 4 to 6 bedrooms for students) should be included. Each self-contained unit should be counted as a dwelling.*** (B&NES emphasis)

¹ DCLG (2008), Regional Spatial Strategy and Local Development Framework: Core Output Indicators – Update 2/2008

² DCLG Definition of general housing terms: Dwelling

<http://www.communities.gov.uk/housing/housingresearch/housingstatistics/definitiongeneral/>

4. The Report on the Examination of the Exeter Core Strategy (22 November 2011) offers a useful recent application of the latest CLG position. Paragraph 21, written under the sub-heading of 'Five Year Land Supply', states:

*The University of Exeter owns considerable land in the City and anticipates that most future student housing needs will be met in purpose built accommodation on and off campus. The Streatham Campus Masterplan Framework SPD and Supplementary Planning Guidance [CDs100f & g] indicate increases in the provision of purpose-built student accommodation and restrictions on the conversion of family/other household units to student accommodation in selected parts of the City. The forthcoming Development Management DPD should enable the Council to refine its approach to student housing appropriately. **It is debatable whether or not the new privately developed student units should be counted towards Exeter's 5 year housing land supply. Clusters of self-contained accommodation, perhaps with individual studio units and a shared kitchen, should be counted in the housing supply, whereas communal accommodation (eg. traditional halls of residence) should not. More certainly, growing student numbers add to arguments for the plan to provide sufficient new land for housing for the next 5 years and secure the maximum housebuilding for the full plan period.***

5. The Exeter Core Strategy plans for 12,000 net additional homes against a CLG household projection of 16,000. In this context, and as advised by CLG and endorsed in the Inspector's Report to the Core Strategy, Exeter City Council will be counting cluster flats towards housing land supply.

6. The changed position received further emphasis by the Secretary of State's 5th December 2011 answer³ to a question in Parliament by Don Foster, MP:

Mr Don Foster (Bath) (LD): *Modern, purpose-built student accommodation often resembles blocks of flats. It can reduce the need for ordinary family homes to be turned into houses in multiple occupation and, sometimes, mean that HMOs can be returned to family accommodation, so in future will councils be allowed to count such flats towards the delivery of their core-strategy housing targets?*

Grant Shapps: *My right hon. Friend asks an important question, and it is true that in the past housing built for students was not included in the old-fashioned targets, which led to the lowest house building since the 1920s. I am pleased to let him know that under our new system the answer is yes, they are included, and what is more they attract the new homes bonus as well.*

³ House of Commons, Monday 5 December 2011, Oral Answers to Questions: Communities and Local Government. <http://www.publications.parliament.uk/pa/cm201011/cmhansrd/cm111205/debtext/111205-0001.htm>

7. This further clarifies that off campus student accommodation in the form of cluster flats, whether or not subject to a S106 agreement restricting occupation, should be counted as part of the local housing supply and as part of the totals in the B&NES Stage 2 Report. The ratio derived housing requirement of 12,100 of the Stage 2 Report includes a generous allowance for non-economically related housing demand migration.

8. The Council is currently able to identify that off-campus 641 bedspaces have been built since 2006 (two UNITE schemes within Twerton Riverside) and that 345 further bedspaces have outline planning permission as part of the Crest outline scheme for Western Riverside. This totals 986 bedspaces. An analysis of the latest UNITE scheme on the Lower Bristol Road shows that there we on average 3.3 bedspaces per cluster flat. This figure, applied to the total number of identified bedspaces results in about 300 cluster flats. This currently equates to 2.4% of the Councils identified housing requirement and is clearly within the scope of the allowance within that requirement for non-job employment related housing demand. When more detail layouts are prepared for the Western Riverside development the Council will revise its current estimate of number of the cluster flats that this will yield.

9. Further, when applied retrospectively to cluster flats built since 1996 a further 40 can be counted at Cleveland Buildings/Canal Wharf, 20 at Carpenter House, 30 at Thornbank Gardens, about 30 at Pulteney Court, resulting in a total of 120.