

Response to BNES 31 and BNES26(in part)

The proposals to include off-campus student accommodation as part of the housing supply (BNES 31) raises a significant number of important issues that have to date not been addressed in the Council's evidence nor in the Core Strategy proposals or policy. The Council seeks to rely on previous off-campus student accommodation going back as far 1996, together with proposed new accommodation in the Bath Western Riverside Scheme, to conclude a new Housing Requirement to 2026, increasing from 11000 homes to 11500. At the same time, the Council have increased the level of supply to boost the SHLAA housing supply and to support the 5 Year Housing Supply Levels (SoCG) and reduce the pre 2006 housing backlog. These recommendations are set out in BNES 26 and are addressed below and on the separate response to BNES 26. This approach is entirely misconceived and requires the proper examination of the evidence of :

- 1.the scale of off-campus student accommodation that has been developed over this period. (1996-2011)
2. the losses of off-campus student over this period.(1996-2011)
3. what such accommodation truly represents in terms of 'bedroom clusters' that represent self contained multiple occupation homes that could go towards housing supply.
4. what future student accommodation off-campus can be reasonably expected and how this should count towards supply.

These points are amply raised by the Inspector in ID/21, alongside a number of other key issues that the Council have failed to properly address and so this submission is in part a response to the Council's submission BNES 31 and BNES 26 but also a response to ID 26.

Bath Universities and the student population

The economic, cultural and social importance of Bath's two universities can not be overstated, particularly at this time of economic difficulty. It is generally agreed that the direct economic contribution of each full time student to the city of Bath is in excess of £6000 per annum, however taking account of accommodation contributions from each student that figure will more than double. In addition the employment of qualified university staff, research and investment together with business spin-offs, all of which bring such huge economic wealth and investment to the city, means that anything that might jeopardize its continued success needs to be carefully managed.

The scale of the growth of both universities since 1996 has again been a sign of that enormous success. The paper entitled " **BATH AND ORT EAST SOMERSET CORE STRATEGY (DECEMBER 2010) STUDENT NUMBERS & ACCOMODATION INFORMATION PAPER**" is attached but does not appear in the BNES library. Nevertheless it is published on the Council's Core Strategy Website, see below:

<http://www.bathnes.gov.uk/environmentandplanning/planning/planningpolicy/localdevelopmentscheme/Pages/DraftCoreStrategyPapersandAppraisals.aspx>

The paper shows the following growth of both Universities since 1996:

	Full Time	Part Time	Total
Bath University 95-96	5690	1497	7187
Bath University 09-10	11136	2602	13738
Bath Spa University 95-96	2137	559	2696
Bath Spa University 08-09	5485	2675	8160

Full time student growth is 8,794 students (08/09/10)

All student growth is 12015 students.(08/09/10)

Uptodate figures of student population are not available (Council could provide most recent academic year2011-2012) if requested by the Inspector. We estimate that the growth in:

Full time student population to 2012 to be in excess of 9000 students.

All student population to 2012 to be in excess of 12000 students.

It is in the context of this huge student growth (1996-2011) that we should consider the Inspectors comments and in particular how the Council has determined in its assessment of housing requirement, such a large growth in student numbers.

The truth is that the Council have made no real allowance for growth in student population in the housing requirement calculations.

Depending upon how you wish to determine how increased demand due to student growth is addressed, the following is relevant:

Growth in off-campus accommodation 1996- 2011 (BNES31 para 8-9) 761 new beds.

Growth in on-campus accommodation 1996-2011 has been very little.

This means that the net increase in demand from new students at both Universities 1996-2011, despite the Council taking into account this new off-campus accommodation, is probably in the region **8239* - 11239* students.**

* The University of Bath claims 23% of their fulltime students are on placement at any time, therefore these figures can be reduced by 1300 students, resulting in a growth in demand for housing from new students 1996-2011 of atleast **6939 - 9961 .**

Claverton On- Campus Accommodation

The Local Plan 1996-2011 included provision at Bath University for extensive new on-campus student accommodation in excess of 2000 units to address their growing needs. (This accommodation included location on Green Belt land and within AONB at the Claverton Campus, with overriding need being the justification for alteration of the Green Belt and development in the AONB).

The University Information Paper states Bath University will probably grow in future at a rate of 2% per annum(substantially below the last 10 years). This will generate a requirement for a further 2493 new bedspaces and that this new on-campus accommodation will barely provide for its planned growth to 2020.ie as they say “it will just about consume its own smoke”.

The key issue is that the new on-campus accommodation at Bath University was planned to provide for the student growth during the Local Plan Period 1996-2011. It failed to do this to any degree. We know that the University grew by over 6000 students in that period. Without new purpose built accommodation, these students took up existing housing stock.

This housing requirement was not taken account of in the Local Plan and by the end of the Local Plan period, little on-campus accommodation has been provided. That also impacts on the Core Strategy both in overlapping periods, in backlog pre-2006 but also in the post 2020 period upto 2026 (or even 2027/28 if the Core Strategy is extended) . Continued growth in Bath University at the same expected rate will require a further 2,200+ bedspaces to simply “ consume its own smoke” before the end of the Core Strategy period. This growth requirement has not been allowed for in the Core Strategy either in on-campus provision, off-campus provision or in ordinary housing stock.

For the avoidance of doubt, off-campus provision at Lower Bristol Road does not contribute to Bath University as it is allocated to Bath Spa.

Bath Spa On-Campus Accommodation

The Bath Spa campus lies in Green Belt and is constrained as a consequence. Development plans for the university do not envisage anything more than a modest increase in on-campus student accommodation. The attached paper shows the relationship the Unite off-campus accommodation to Bath Spa.

In addition the University closed an off-campus accommodation at Somerset Place leading to a loss of 139 units in 2009.

Future growth in the University is not expected to be significant upto 2028.

Bath City Assessment

The Council needs to reassess the impact of the growth in student population at both Universities ,both during the periods 1996- 2006, 2006-2011/12, future growth 2011-2021 and 2021- end of the Core Strategy period. The assessment must then consider the net- provision of on-campus and off campus student housing in those periods to address growth and similarly address the backlog or shortfall through to the end of the Core Strategy period 2027/28.

Part of that assessment can include a more detailed understanding of the impact of the growing student population on the existing housing stock. This information is fully available to the Council in their Council Tax records. All properties /accommodation occupied by full time students are eligible for relief from Council Tax. The Council holds that accurate record, including how many students occupy different types or sizes of accommodation ie 3 bedroom /4 bedroom etc etc. HFT have formerly requested that information but so far it has not been supplied.

The Council's assumption is that average private housing accommodates 4.5 students. (see the attached paper). This maybe widely optimistic. More accurate information needs to be provided before the Council can start to determine the impact of student accommodation requirements on household requirements.

Off-campus Accommodation.

The Council's assessment of the existing off-campus accommodation since 2006 is inaccurate and unreliable. Banes 31 refers to the Unite cluster flats on Lower Bristol Road as 641 bedspaces which is correct. This however cannot be translated into an average of 3.3 bedspaces per cluster flat.

Information on Charlton Court, 345 bedspaces shows that cluster flats are as follows: 7 x 3 bed, 49 x 5 bed, 5 x 6 bed. The balance are single beds or studios not cluster flats. We anticipate a similar situation at Waterside Court, where the tradition of larger cluster flats exists.

We conclude that there may be as little as 100 cluster flats on the Lower Bristol Road, not the 200 units as stated.

The impact of the closure of Somerset Place (139 units) in 2009 needs to be taken into account in computing the net gain in accommodation provision.

It is accepted that the BWR outline consent provides for up to 345 bedspaces however the precise timing and deliverability of this is still uncertain. Assuming it can be taken into account in the overall housing provision to 2026/28, we suggest that the likely level of cluster flats will be approximately 70 units rather than 104 assessed by the Council.

Overall, we suggest that the Core Strategy /SHLAA could accept the additional supply of '150 cluster flats' off-campus for the period 2006-2026/28 to add to the net housing supply figures.

In accepting this proposition, the Council will need to demonstrate how it has addressed the housing requirements particularly in Bath, generated by the growing student population pre-2006, 2006-2011 and going forward (including on-campus provisions) 2011-2026/28.

It is our assessment that the demand from growth in the student population from 1996 to date has been broadly equivalent to the net additional housing stock in Bath over that same period, if affordable housing and specialist housing numbers are removed.

Further, in comparing the overall requirement for bedspaces generated by the growth in student population in Bath from 1996-2011, with the provision of equivalent bedspaces in net new housing in Bath during the same period, (less affordable and specialist housing types,) results in a substantive backlog or shortfall in bedspace or put another way, 'demand from students alone has outstripped supply of homes during this period'.

Planned future growth at Bath University will at best be met by new supply on-campus accommodation, together with an off-campus site at BWR until 2021. Thereafter, the continued growth in student accommodation will need to be accommodated by private housing as no provision is made for on or off-campus accommodation to meet this need. This has not been taken into account in the Core Strategy.

These assessments albeit worrying are conservative. They assume that students in Bath occupy private households with an average of 4.5 students per household. They assume that neither university will continue to grow at the same rate as the last 5 to 10 years and indeed that Bath Spa will suddenly cease growth altogether until 2028. The assumption is also that part-time students at either University make no demands on accommodation in Bath.

As can be deduced, the net contribution from off-campus specialist student accommodation is extremely modest during this period 2006-2026/28. A direct comparison of demand for bedspaces compared to supply of new spaces through new private housing in Bath, less 30% affordable housing, will show that even modest growth in student population going forward to 2028, will have a significant impact on net housing stock and bedspace.

The Council cannot simply state that their requirements, including a ratio of 1.39 homes to jobs takes account of the student growth.

Firstly, it does not address students in any significant way compared to the population balance between university students and non-students in Bath, approximately 1 to 4. It does not address the backlog of growth in student accommodation, pre 2006 and 2006-2011.

Because of the major population component assumed in the reduction in family size units in a city such as Bath, a disproportionate amount of the overall non-economic household growth for Banes (5000-6000 units according to the Council) will come from Bath. This has nothing to do with students but existing families and elderly and ageing population.

The Council's employment target of net additional jobs is 5700 in Bath.

This amounts to a gross figure of nearly 8000 new jobs.

There is simply no accommodation within these headline figures for addressing a growing prosperous university sector, other than at the expense of existing private housing.

The Inspector is requested to re-open the hearings to now address student accommodation matters, without which the evidence base is weak and the Core Strategy unsound. The actual requirements arising from student accommodation requirements require more careful analysis and evidence.

Attachment

BATH AND ORT EAST SOMERSET CORE STRATEGY (DECEMBER 2010) STUDENT NUMBERS & ACCOMODATION INFORMATION PAPER"