



Representation to Bath and North East Somerset's Local Plan Partial Update

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1 Introduction

- 1.1 Crossman Acquisitions ('CA'), part of the Crossman Group of companies has land interests across Bath and North East Somerset Council's ('the Council') authority area. CA is therefore grateful for the opportunity to submit representations to the Local Plan Partial Update ('LPPU') regulation 19 consultation.
- 1.2 CA is currently promoting a site in Bath for purpose-built student accommodation ('PBSA'). Therefore, this representation focuses on those matters contained in the LPPU that relate specifically to student development across the Council's administrative area.

2 Establishing the Need for Student Accommodation – Topic Paper: Student Accommodation

- 2.1 The National Planning Policy Framework ('the Framework') requires the size, type and tenure of housing needed for different groups in the community to be assessed and reflected in planning policies. This includes establishing the need for student accommodation. More explicit guidance is provided in the planning practice guidance at paragraph: 004 Reference ID: 67-004-20190722:

Strategic policy-making authorities need to plan for sufficient student accommodation whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus. Encouraging more dedicated student accommodation may provide low cost housing that takes pressure off the private rented sector and increases the overall housing stock. Strategic policy-making authorities are encouraged to consider options which would support both the needs of the student population as well as local residents before imposing caps or restrictions on students living outside university-provided accommodation. Local Planning Authorities will also need to engage with universities and other higher educational establishments to ensure they understand their student accommodation requirements in their area.

- 2.2 It is acknowledged that an attempt has been made by the council to establish the level of student need across the district, with this being set out in the document: *Topic Paper: Student Accommodation*. However, for the reasons set out below, the assessment undertaken in the topic paper is not considered sufficiently robust to inform emerging policy.
- 2.3 Comments on the student topic paper are as follows:

- 2.4 *Para 3.3* – states that prior to the Covid-19 pandemic the University of Bath's (UoB) objective was to increase the size of its postgraduate student population and stabilise the size of its undergraduate intake to 2015 levels. No evidence of this policy objective of the UoB has been provided and therefore its reliability is questioned. Moreover, Table 2 which sets out undergraduate growth up-to 2020/21 and which therefore includes data prior to the Covid-19 pandemic, shows year on year growth in undergraduate numbers from 2015 (aside from 2020/21 at the height of the pandemic), with the average increase per annum being 340 students. This does not suggest a policy of the UoB of stabilising the undergraduate in-take.
- 2.5 *Para 3.4* – whilst a link is provided to the UoB's latest strategy for the period 2021 – 2026, this strategy does state corroborate the topic paper's suggestion that the UoB is seeking to throttle student in-take. To be clear, there is no commentary at all within the strategy that the UoB intends to reduce the growth of its undergraduate in-take.
- 2.6 *Para 3.5* – states that 'due to the impact of Covid-19, undergraduate and postgraduate international student numbers are likely to reduce, but home student numbers may potentially increase following the 'A' level grade inflation in 2021'. No evidence has been provided to suggest that international student numbers are likely to reduce.
- 2.7 *Para 3.6* – states that 'Recognising the finite capacity of both the Campus and the City, the University has also sought to increase its postgraduate student numbers in ways that do not generate demand for residential accommodation in the B&NES area'. It is understood that no capacity assessment of the authority area as a whole or indeed the built-up area of Bath, in terms of accommodating the student population has been undertaken. Neither has any evidence been provided to corroborate this statement. It is considered that more than sufficient capacity exists in Bath, either through purpose-built student accommodation (PBSA) or houses in multiple occupation (HMOs), therefore the validity of this statement is questioned.
- 2.8 *Para 3.8* – highlights the number of individuals enrolling on distance learning courses. Whilst data on the number of distance learning students (degree apprenticeships and traditional distance learning) has been provided for the last three years, for future years a percentage estimation of the number of distance learning students has been used. It is stated that the UoB anticipates the annual growth in the number of distance learning students to be between 0% - 1.5% per annum up-to 2025/26. No evidence has been provided that this is the anticipated growth rate in distance learning up-take, although given its relatively low level it is considered

reasonable. Regardless, whilst acknowledging that it is difficult to anticipate what this level of growth will be, the assessment opts for a higher growth rate 1.5%. A number of issues are identified with this approach.

- 2.9 Firstly, it would be expected that the % growth rate would be simply applied on an annual basis to determine a trajectory in the growth of this student cohort. However, the annual growth in this cohort as shown in Table 4 ('DA and DL total') does not appear to adhere to this calculation and it is unclear how the annualised figure has been derived.
- 2.10 Secondly, and perhaps more importantly, the assessment assumes that the total number of distance learning students enrolled at the UoB will be at the expense of those students enrolled on physical courses at the university, and therefore will offset the demand for student housing need. No evidence has been provided to suggest that this is the university's objective and that it is seeking to reduce the overall number of students enrolling at the university on physical courses to be replaced with online courses. The approach taken by the assessment suggests that the overall student forecast should be reduced by 12,528 students (total of those on distance learning courses). Given the significance of this suggested discount, clear evidence needs to be provided of the university's position on this point.
- 2.11 Thirdly, when discounting the distance learning students from the overall student forecast for years 2025/26 to the end of the plan period (2029/30), for this final five-year period there is no growth in student numbers. This clearly cannot be the case.
- 2.12 Finally, the source of the overall student forecast is provided in Table 4 needs to be confirmed.
- 2.13 *Para 3.9* – suggests that only 78% of those students attending physical courses require accommodation. This has been informed by the proportion of students requiring accommodation in a single academic year (2017/18). No evidence has been provided to demonstrate that this was the level of demand for accommodation in this year. Also, to simply rely on data from a single year to inform such an important factor of student accommodation demand is not robust. Further assessment on student accommodation preference needs to be undertaken. After all, the fact that 22% of students preferred to live at home could be reflective of a shortage of PBSA.
- 2.14 *Para 4.3 and 4.4* – explains that Bath Spa University is seeking to gradually increase its student numbers from the current figure of 6,994, to 9,299 students by 2029/30. No information to

evidence this trajectory has been provided. Moreover, a multiplier of 56% has been utilised to determine what proportion of students require private accommodation. No evidence as to how this figure has been derived is provided, aside from a comment stating 'agreed with Bath Spa University'. Again, given the importance of this figure, and the major influence it has over the demand for student accommodation, it needs to be robustly evidenced.

- 2.15 *Para 5.2* – informed by the data in Table 8, states that the total student population across the two universities from 2018 to 2029 will increase by 1,932 students. This is incorrect. In 2018/19 the total student forecast was 25,771, increasing to 28,062 by 2029/30, resulting in an increase of 2,291 students. It is then stated that this equates to an additional population of 1,206 students requiring accommodation. Again, this is incorrect, as according to the table, total housing need in 2018/19 was 18,392 and by 2029/30 19,842 resulting in accommodation need of 1,450 beds.
- 2.16 *Para 5.3* – when considering the availability of student bedspaces, the assessment takes account of accommodation in PBSA, both current and planned availability (schemes with planning permission). It also assumes that those students not housed in PBSA resided in HMOs and in this regard, established a baseline HMO figure of 10,852 from the period 2018/19, although it is unclear why this year was used to establish the baseline. Regardless, using the HMO baseline of 10,852 for 2018/19 and the residual demand to be met by HMOs in 2029/30 (11,492), the assessment concludes that 640 additional student bedspaces are required (11,492 – 10,852).
- 2.17 Notwithstanding the multitude of issues identified with the assessment and how it arrived at the demand for student bedspaces (as set-out above), structuring the level of student demand against the need to maintain a baseline of HMOs is fundamentally flawed. It is a longstanding strategic objective of the council to reduce the number of HMOs across the city through the use of various policy mechanisms. Therefore, if the level of HMOs reduces, then this will require an increase in PBSA. After all, it is an accepted position of the council that increased provision of PBSA will, in time, reduce the need for HMOs.

3 Policy H2A: Purpose Built Student Accommodation

- 3.1 Given the conclusion from the student topic paper that PBSA is required to meet the needs of only 640 students, the approach of policy H2a is for new PBSA, in the first instance, to be provided on-campus. No rationale as to why PBSA needs to be delivered on campus is provided. Whilst campuses provide many of the facilities associated with academic needs, they are not

the sum total of student life. There is a wealth of services and amenities, both in terms of cultural and academic needs that are provided off-campus, and which will form an important aspect of the student experience. Therefore, it is considered that there will always be demand for off-campus PBSA. Therefore, given the declared climate emergency, and the acknowledged need to reduce CO2 emissions, it makes perfect sense to provide both on and off-campus PBSA, thereby meeting the needs of a wider range of students, within walking distance of the services and amenities they require.

- 3.2 Whilst it is acknowledged that the policy H2a does permit off-campus PBSA, this is dependent on agreeing the need for this accommodation with the universities. This approach would create an environment in which the universities could control both supply and demand and is totally unacceptable in a free market economy.

4 Conclusion

- 4.1 CA firmly objects to policy H2a. The evidence base contained in the student topic paper contains numerous errors and does not present a cohesive or sound basis to inform policy. The topic paper has applied arbitrary ratios to the number of students requiring private accommodation, has discounted circa 12,500 students from the overall student forecast on the basis that they will be offset by distance learning students, and assumes zero growth in student numbers for the UoB for the final five years of the plan period. This evidence base is considered to be fundamentally flawed.
- 4.2 As a result, policy H2a hugely underestimates the level of need for PBSA, and for no valid reason established a hierarchical approach to the location of this accommodation, prioritising on-campus delivery. Such an approach is at odds with the principles of sustainable development, in particular the established approach of providing development where it is needed, in well accessible locations. Moreover, it gifts existing academic institutions in the city total control of supply and demand, which curbs competition and is at odds with a free market economy.
- 4.3 On the basis of the above, policy H2a cannot be found sound on the basis that it is not positively prepared, justified, effective, nor consistent with national policy.