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Dear Sirs

**BATH & NORTH EAST SOMERSET – DRAFT CORE STRATEGY –
SCHEDULE OF SIGNIFICANT PROPOSED CHANGES
REPRESENTATIONS ON BEHALF OF UNITE GROUP PLC**

I write on behalf of our client, Unite Group Plc, (hereafter 'Unite') in respect of the above document.

Context to Representations

As an established student accommodation provider Unite have an on going interest in providing student accommodation across the United Kingdom. They have a proven track record and established reputation for providing well managed student accommodation throughout England, including at Lower Bristol Road in Bath and also various sites in Bristol.

Unite have not previously submitted representations to the emerging Core Strategy however it is considered that the Schedule of Significant Proposed Changes does not comply with government guidance, nor is it justified (PPS12 definition) and therefore it is not able to be considered 'sound'.

In order to demonstrate this, our representations initially refer to the latest relevant planning policy before referring to evidence base which underlines the formation of the alterations to the draft policies. Proposed changes to the consultation draft document are then suggested to ensure that when adopted the emerging Core Strategy Policy B5 can be considered 'sound'.

Current Relevant Planning Policy

National Policy – PPS3 June 2010

Planning Policy Statement 3 (PPS3), in section 9, states the Government's key policy goal is to ensure that everyone has the opportunity of living in a decent home, which they can afford, in a community where they want to live. To achieve this, the Government is seeking to ensure delivery of a wide choice of high quality homes, both affordable and market housing, to address the requirements of the community.

This is further supported in Annex C which states that Councils should consider future demographic trends and identify the accommodation requirements of specific groups such as students within a Strategic Housing Market Assessment (SHMA).

Ministerial Statement – "Planning for Growth" March 2011

A material consideration when determining planning applications and formulating planning policy, the Ministerial Statement of March 2011 should be taken into account within the final draft Core Strategy. It states: -

"Local planning authorities should therefore press ahead without delay in preparing up-to-date development plans, and should use that opportunity to be proactive in driving and supporting the growth that this country needs. They should make every effort to identify and meet the housing, business and other development needs of their areas, and respond positively to wider opportunities for growth, taking full account of relevant economic signals."

It further states that Local Authorities should (inter alia): -

- *take into account the need to maintain a flexible and responsive supply of land for key sectors, including housing;*
- *consider the range of likely economic, environmental and social benefits of proposals; including long term or indirect benefits such as increased consumer choice, more viable communities and more robust local economies (which may, where relevant, include matters such as job creation and business productivity);*

West of England Strategic Housing Market Assessment (SHMA)

The latest draft SHMA for the West of England (including Bath) concludes that based upon relatively small scale expansion of planned growth of the universities in the region 'demand for private rented accommodation is likely to remain at about current levels'. However it does not appear to address the issue of large proportions of student population living within private rented accommodation and the impact this has upon conventional housing supply.

Representations to Draft Core Strategy

It is clearly set out above that there is a requirement to ensure the needs of all sectors of housing requirement are taken into account and that this must be reflected in an up-to-date development plan. In our client's opinion the emerging Core Strategy fails to reflect the needs of the student population in Bath and prioritises conventional housing without robust justification. In doing so, the emerging Core Strategy is not justified and fails to comply with government guidance.

There are two principal issues: -

- (a) Student Accommodation Need
- (b) Impact Upon Conventional Housing Supply

In order to ensure the Core Strategy can be considered 'sound', I refer to both issues in turn.

(a) Student Accommodation Need

I hereby set out brief background to current student housing supply, referring in principal to the 'Student Numbers and Accommodation Information Paper' (draft, December 2010).¹ The Council have confirmed (Paragraph 1.1) that '*This information presents the evidence that has led to the policy approach presented in the Draft Core Strategy and its likely impact.*'

Paragraph 1.2 states: -

"The Council is mindful that the growth in student numbers in the last decade has not been accompanied by sufficient on-campus managed accommodation and that the associated expansion of the student lettings market has diminished the 'normal' housing stock of the city. This is particularly significant given the relatively small size of Bath as a host city for two universities."

Current Demand for Student Accommodation

According to the Council's analysis at 2009/10 there were 16,621 full time students in Bath, studying at the University of Bath and Bath Spa University. Allowing for a 23% reduction in the total number of University of Bath students who were registered on a full time employment placement in 2009/10, the total number of students requiring accommodation is 13,993.

Current Supply of Student Accommodation

Data for the 2009/10 confirms a total of 4,347 dedicated student bed spaces for both universities within Bath, comprising 2,342 on-campus and 952 off-campus for the University of Bath and 394 on-campus and 659 off-campus for Bath Spa University. Given the total number of students requiring accommodation (13,993), this leaves a total of 9,646 students requiring accommodation in the private rented sector (13,993-4,347). This is defined as a 'shortfall' in bed spaces (Table 3.2 of 'Student Numbers and Accommodation Information Paper').

Using the Council figure of 4.5 students per average House in Multiple Occupation (HMO), to accommodate the identified shortfall in such accommodation requires circa 2,150 separate dwelling houses across the city of Bath.

Meeting Future Demand

The 'Student Numbers and Accommodation Information Paper' accounts for projected future supply of dedicated student accommodation, having consulted with the two city universities. This equates to an additional 3,164 bed spaces by 2020/21 (2,358 for University of Bath and 806 at Bath Spa University). This will result in a total of 7,511 (4,348+3,164) dedicated university bed spaces (based upon the 2009/10 existing figure).

This will still leave 6,482 students requiring privately rented accommodation. To accommodate this number of students in HMO properties across the city would

¹ BNES Council confirmed no 'final' document was published

require approximately 1,450 dwellings, based upon the Council's evidence that each HMO accommodates on average 4.5 students.

Should student numbers remain at 2008/9 levels, the projected additional bedspaces theoretically allows the contraction of some 700 HMOs based upon the Council's evidence that each HMO accommodates on average 4.5 students. However, this is subject to the significant caveats that: (a) the projected growth of student numbers remains static and (b) the additional bed spaces will be located where students choose to live.

(a) Impact of projected growth numbers

The Draft Masterplan for the Claverton Campus demonstrates provision for an additional 2,358 bed spaces on campus to 2020. Utilising the student number growth figures provided by the Universities² demand for an additional 2,493 beds would be created at the University of Bath (based upon 2% annual growth). This clearly highlights that the additional bedspaces proposed at University of Bath are likely to be entirely taken up by the projected growth in student numbers. This results in no net increase in purpose built accommodation in this regard and the impact of students living within HMOs across the city would be neutral and the existing shortfall would not be addressed.

The additional 806 bed spaces at Bath Spa University would represent the only net increase in dedicated student accommodation in Bath to 2020. Based upon the Council's evidence that each HMO accommodates on average 4.5 students, this would result in the theoretical reduction of circa 180 HMOs across the city. However, this again fails to take account of the identified shortfall in student accommodation, as referred to above.

The Schedule of Significant Proposed Changes to the Core Strategy confirm the additional bed spaces are proposed for delivery at the Claverton and Newton Park Campuses. Mindful that both are established university campuses, the proposed alterations to the Core Strategy will therefore prejudice the ability to meet off-campus student accommodation need and have a minimal impact upon reducing reliance on HMOs, contrary to PPS3 and the Ministerial Statement.

(b) Locational preference of students

Given that the majority of HMOs within the City are located in the Oldfield Park and Westmoreland Areas, and that the significant majority of the total number of students within Bath live in these areas, it is clear that this represents the favoured destination for students. The proposed alterations to the Core Strategy will restrict delivery of student accommodation within established student locations such as these and therefore will not address the identified shortfall. In order to redress this, the proposed amendment, as outlined within the conclusion below is required.

Conclusion on Student Accommodation Need

It is thus demonstrated above that even if student numbers remain static and the additional bed space aspirations of each university are fully realised, there

² University of Bath estimated student growth between 1%- 3% per annum to 2020 and Bath Spa University assumes no growth to 2020

remains a significant shortfall of student accommodation in the city (circa 6,500 bed spaces), which requires addressing, in order to meet this identified housing need, and as required by PPS3. It is considered that this housing need can be met through managed provision of appropriate purpose built, off-campus accommodation. Furthermore, the proposed alterations to Policy BS5 specifically restrict off-campus accommodation and mindful of the identified shortfall, the additional bed spaces will not address this significant housing need.

The emerging Core Strategy prejudices the Council's ability to meet identified student accommodation need (both numerically and geographically) and therefore Policy B5 in particular cannot be considered 'sound' as it is not justified – i.e. it is not founded on a robust evidence base, nor does it reflect government guidance regarding meeting varying elements of housing need.

(b) Impact Upon Conventional Housing Supply

The BNES Annual Monitoring Report (AMR) confirms that the Council are significantly behind the rate needed to achieve the requirement for the local plan period, with delivery falling short by 962 units. Whilst this places additional pressure to ensure that the Core Strategy can deliver an adequate supply of housing, to meet the previous shortfall and to meet identified future need, this must not be accounted for at the expense of meeting other housing need (i.e. off-campus student accommodation).

Conventional housing supply can indeed be improved through the delivery of managed 'off-campus' accommodation located in the City.

It is believed that the additional text relating to 'off-campus' student accommodation has been drafted mindful of the Council's objective to redress the conventional housing supply shortfall, however a proportionate response to this is required, mindful that the lack of historic housing delivery is largely reliant upon just two significant development sites. The proposed alterations to the Core Strategy are considered an over-prescriptive and unjustified response to ensuring conventional housing delivery is prioritised.

The reliance upon HMOs to accommodate a significant proportion of the student accommodation has a significant and detrimental impact on conventional housing land supply which is acknowledged by the Council (see paragraph 1.2 of the Student Numbers and Accommodation Information Paper – above).

It is further stated within this document that: -

"In order to enable further contraction of the student letting market, additional off-campus development would be required during the next 10 years. A 300 bed space student accommodation block over four storeys could enable the release of 65 HMOs."

It is calculated that between 21 and 29 300-bed space blocks would be required to reduce the proportion of HMOs within the City by 50% (2,150 to circa 1,000). Whilst this would require land to accommodate such development, the significant release of existing dwellings from a HMO tenure outweighs any prejudicial effect of land identification for conventional housing.

It is therefore suggested that a measured and imaginative response to resolving acute student and conventional housing need within Bath is required. The

proposed alteration to the Core Strategy prejudices supply of off campus student accommodation, which if adequately managed can contribute to conventional housing need.

Conclusion and Recommended Alterations to Core Strategy

It is clear that the proposed changes to the Core Strategy cannot be considered sound as those concerning Policy B5 do not reflect government guidance and are not justified, as per the PPS12 definition. There remains a requirement at national level to address all types of housing need and this is not currently reflected within Policy B5. The figures collated by the Council and as set out above demonstrate that even assuming no growth in student numbers and accounting for planned additional provision, a significant shortfall of purpose built student accommodation across Bath exists. This will therefore continue to place significant pressure on conventional housing supply, and thereby potentially undermining the Council's strategic objective in this regard. The development of well managed, purpose built student accommodation in appropriate accessible area of the City will clearly relieve the pressure on the HMO market and thus have a positive impact on the overall supply of housing.

Mindful of the representations above, the following alterations to the relevant part of Policy B5 are made (new text **bold** and removed text ~~struck through~~): -

Off-Campus Student Accommodation

*Proposals for off-campus accommodation will be refused within the ~~Central Area, Western Corridor and on MOD land~~ **unless it is demonstrated that this is appropriately managed and purpose built and therefore assists in delivery of** where this would adversely affect the realisation of other aspects of the vision and spatial strategy for the city in relation to housing and economic development.*

I trust this is appropriate and would appreciate early dialogue with the relevant officer during consultation/examination of the Core Strategy. Please do not hesitate to contact either Matthew Roe or myself, both at this office should you have any queries.

Yours sincerely



Alun Evans
Senior Associate Director

c.c. Unite Group PLC