

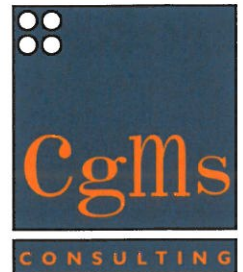
**BNES/ISSUE 2  
SUB MATTER: BATH SPATIAL AREA  
OTHER BATH MATTERS: UNIVERSITIES  
QUESTION 6.7  
ON BEHALF OF UNITE GROUP  
RESPONDENCE REFERENCE 2562**

**BY EMAIL AND POST (chris.banks@zen.co.uk)**

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13 December 2011

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**

Unite have previously submitted representations to the emerging Core Strategy by letter dated 21 October 2011 (enclosed). This representation is submitted in response to Question 6.7 of the Core Strategy Examination Inspector's main matters and questions:

*"Question 6.7 – Is there a need to accommodate/facilitate additional off-campus, purpose built student accommodation? Does the provision of such accommodation have positive outcomes for the wider housing market and, if so, should these be acknowledged in the plan? Are there opportunities for such provision without reducing general housing provision? Are PCs 47 and PC49 justified and required to make the plan sound?"*

Our representations initially outline the latest relevant planning policy before referring to an evidence base which supports our response.

**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. Mindful of the policy context above, the following representations in response to the Inspector’s questions is hereby made.

**Response to Question 6.7**

*Is there a need to accommodate/facilitate additional off-campus, purpose built student accommodation?*

The representation letter submitted in October 2011 on behalf of Unite highlights the demonstrable need for off-campus, purpose-built student accommodation within Bath. Please refer to this letter for analysis of this issue.

*Does the provision of such accommodation have positive outcomes for the wider housing market and, if so, should these be acknowledged in the plan?*



### Outcomes for Wider Housing Market

In response to this question, it is demonstrated immediately below that the provision of off-campus, purpose-built student accommodation does have a significant positive outcome for the wider housing market in Bath.

Research published in "Studentification": A guide to opportunities challenges and practice identifies that Local authorities could usefully initiate action to include student accommodation in their local housing strategies. In our opinion this would ensure compliance with government guidance in this regard. It further states that the introduction of Local Development Frameworks in England may provide opportunities for local government to tighten up strategic thinking about student housing and related issues.

Within Bath, it is acknowledged by the Council in the Student Numbers and Accommodation Information Paper (draft 2010) that there is a reliance upon HMOs to accommodate a significant proportion of the student accommodation which has a significant and detrimental impact on conventional housing availability. There is a recognised shortfall between student numbers and dedicated student accommodation.

The number of HMOs in the city, creates an associated problem for 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 963 units.

It is considered that conventional housing supply can be improved through the delivery of managed 'off-campus' student accommodation located in the city. By increasing the amount of available purpose built student housing, more students will choose this for accommodation, and consequently releasing HMOs back in to the general housing market. This would have a significant positive impact upon local market housing provision within the city, by providing a net increase in conventional dwelling supply. It is considered that the provision of off campus student accommodation will address local market housing need rather than catering for an increase in students.

This is reinforced by the latest draft SHMA for the West of England (including Bath) which 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*'. Purpose built student accommodation will therefore predominantly provide for existing students who currently live in conventional housing and consequently general housing market stock will be freed up.

#### Reference Within Emerging Core Strategy

Mindful that the Student Numbers and Accommodation Information Paper, the BNES Annual Monitoring Report, and the latest draft SHMA all highlight the positive role which purpose-built student accommodation can have within the city and the current constraint on conventional housing land supply, it is considered necessary that this issue is highlighted in the emerging Bath Core Strategy. This would ensure that it would be justified and effective, as defined at Paragraph 4.52 of Planning Policy Statement 12 (PPS12).

The most appropriate manner in which to do this is to ensure that off-campus, purpose-built student accommodation provision/supply is monitored as part of

overall housing need within the emerging Core Strategy. This is referred to in further detail immediately below.

*Are there opportunities for such provision without reducing general housing provision?*

In line with PPS3 and the government goal of delivering a wide choice of high quality homes (both affordable and market housing) to address the requirements of the wider community, it is considered that the emerging Bath Core Strategy should recognise that purpose built student housing offers a significant and positive contribution to housing supply in Bath and should therefore form part of identified housing need analysis, including housing targets and land supply.

By adopting this method, student housing schemes would help contribute to the Council's housing objectives and would not result in a reduction in general housing provision.

Also no net loss of conventional residential accommodation would occur through provision of purpose built student accommodation, on the basis this would be provided on sites that do not currently comprise conventional housing.

### **Conclusion**

As referred to above, there is a requirement to monitor off campus, purpose-built student housing accommodation need as part of overall housing need. This will ensure the emerging Core Strategy policy B5 is justified and effective, in accordance with the PPS12 definition. Therefore, PC47 should be amended as detailed in our representation letter dated 21 October 2011.

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



**Joanne Gladstone**  
**Planner**

Enclosed Representation Letter submitted 21.10.2011

c.c. Unite Group PLC