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Dear Sirs

**BATH & NORTH EAST SOMERSET – DRAFT CORE STRATEGY –
SCHEDULE OF ROLLING CHANGES FOR CONSIDERATION BY THE
INSPECTOR
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 and proposed significant changes by letters dated 21 October 2011 and 13 December 2011 (enclosed) respectively. This representation is submitted in response to the additional material issued by the Council in response to ID/21 – further questions from the Inspector in respect of the Council's position on purpose built student housing.

Through responses in Core Strategy Examination documents BNES 26 and BNES 31, the Council confirm that self-contained off campus cluster flats are now included within the Housing Land Supply analysis, determining housing need across the district.

This is supported in principle by Unite, however in line with relevant government guidance and in order to ensure consistency it is considered necessary to amend the emerging Core Strategy policy. Our representations initially outline the latest relevant planning policy before referring to the Council's evidence base which supports our response.

Current Relevant Planning Policy

Relevant Policy is detailed in CgMs' letters dated 21.10.11 and 13.12.11. A summary of the most relevant policies and material considerations are referred to immediately below.

National Policy – PPS3 June 2010

- Paragraph 21 states LPAs should plan for a mix of housing on the basis of the different types of the different types of households that are likely to require housing over the plan period.
- It further states that the LPA should have particular regard to accommodation requirements of specific groups.
- Annex C 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).

CLG – Definition of general housing

- Housing research by the CLG confirms purpose built, self contained flats should be included in overall housing supply.
- This was clarified in Parliament by the Housing Minister in December 2011.

Mindful of the policy and procedural context above, the following representations regarding the Council's response to the Inspector's questions and emerging Core Strategy policy is hereby made.

Response to Proposed Amendment to Policy B5

The representation letter submitted in October 2011 on behalf of Unite highlights the demonstrable need for off-campus, purpose-built student accommodation within Bath. The Council have responded positively, acknowledging the role that universities possess within the city of Bath and confirming that off-campus purpose built student accommodation contributes to housing land supply.

This approach complies with PPS3 to provide for a mix of housing to meet identified housing need within the area and over the Core Strategy period. The Council further acknowledged that within the Report on the Examination of the Exeter City Council Core Strategy (November 2011) the Inspector confirmed that off-campus student accommodation should be counted within the housing land supply analysis. Adopted Policy CP5 of the Exeter Core Strategy therefore states that: -

"The supply of housing should meet the needs of all members of the community such that: -

...

- *Purpose built student accommodation should be provided to meet the housing need."*

By taking account of local housing needs, the Exeter City Council policy example details a sufficiently flexible Core Strategy policy, in accordance with the requirements of PPS12.

This approach reflects relevant CLG guidance which confirms purpose-built student accommodation should be identified within housing land supply. In a city

where the further education and university sector provides an integral element of housing need, this represents the most appropriate approach in determining the full range of housing need throughout the plan period.

Finally, CgMs' representation letter of 21.10.11 demonstrates the significant shortfall of student accommodation that exists within Bath, even assuming cautious growth estimates, and that this need can be met, in part, through provision of off-campus, managed accommodation. By attributing such accommodation to housing land supply analysis, it is clear that the Council have accepted this position.

Mindful of the above, and notwithstanding the proposed schedule of rolling changes which increases the overall target for housing provision to a minimum of 6000 units (including proposed 'reason for change' no 15, acknowledging the role of off campus student accommodation), there is now a clear requirement to amend emerging Policy B5 (including the Schedule of Significant Proposed Changes) which, as drafted, expressly restricts this form of housing need and therefore conflicts with the Council's stated position.

Conclusion

In line with PPS3 and the government goal of delivering a wide choice of high quality homes 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. This approach is consistent with that now adopted by the Council as the Core Strategy Examination has progressed.

Monitoring and accounting for off-campus student accommodation will ensure the emerging Core Strategy policy B5 is justified and effective, in accordance with the PPS12 definition.

Accordingly, policy B5 should be amended in accordance with our original representation, thus: -

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

A handwritten signature in black ink, consisting of several sharp peaks followed by a long, horizontal tail.

Alun Evans
Senior Associate Director

c.c. Unite Group PLC