Bath and North East Somerset Local Plan

Student Numbers and Accommodation Requirements in Bath

(Part of the Strategic Housing Market Assessment)

May 2016

(Update of December 2015 –
following consultation on the Draft Placemaking Plan)

Twerton Mill, Lower Bristol Road - Photo credit Stride Treglown

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Introduction

1.1 Student housing requirements form part of the totality of the housing market in Bath and exert a considerable influence upon it. Most students that are enrolled require accommodation in the city in one form or another, and accommodation supply needs to be available if enrolment aspirations are to be achieved (excluding distance learning etc). The relationship between need and dedicated accommodation impacts upon the size of private lettings sector, the number of houses in multiple occupation, house prices, rents, the ability of would-be house buyers to compete with landlords looking to increase their portfolios, the nature of streets and neighbourhoods, and the housing stock profile of the city as a whole. In a small University town, hosting two HE institutions, that is also a World Heritage Site, almost surrounded by AONB, with a multitude of development 'asks', a contracting supply of developable land, and negligible outward growth prospects – these issues are a 'big deal'.

1.2 Policy making that directly or indirectly affects the aspirations of the University of Bath and Bath Spa University, student accommodation (and academic space) requires an evidence base to inform formulation, decision taking and monitoring.

1.3 As far as possible, planning policy should to enable the continued success of The University of Bath and Bath Spa University (as it should any other positive force) and the contribution they make to the city's identity, profile and employment base (but … within the context of achieving holistic programme for the future sustainable development of the city and the multitude of uses that need to be accommodated). On an isotropic plain, land could be deployed to enable that. However, Bath is the antithesis of such a place and has a number of competing 'asks' of its developable land supply. In respect of the Universities there are costs as well as benefits that need to be evaluated and managed.

1.4 Beyond matters of land and property, the situation is made is complex beyond the direct sphere of planning policy by sectoral policy. Higher education institutions are subject to changing government policy e.g. around the way that they are funded (which has and still is changing), and this affects their plans for the future. Due to their charitable status HE institutions are obligated to ensure that they remain sustainable and do not expose themselves to undue risk. The sector as a whole operates within very small margins, but with wide variations between institutions. The most significant risk areas relate to

- fall in home/EU student recruitment and retention in an increasingly competitive market
- failure to achieve overseas student recruitment targets

- further unanticipated public spending cuts in research and/or teaching income
- failure to effectively manage major capital investment programmes and their financial impacts
- rise in the cost of borrowing and availability of lending
- rise in staff and pension costs

1.5 Tuition fees are the main source of income and this depends on the numbers of students recruited and their domicile. In the current climate of lower public funding, HEIs are under greater pressure to generate higher surpluses in order to remain sustainable. Universities need to cover the (rising) costs of all their activities.

1.6 Returning, to direct planning related matters - there was relatively little forward planning by universities and local authorities in order to effect the expansion of dedicated student housing in response to the expansion in numbers from the late 1990's. The Universities were good at securing dedicated accommodation to enable the growth in the intake of 1st year undergraduates, but little thought was really given to the provision of dedicated follow on space for 2nd, 3rd and 4th years. With a responsive HMO sector the Universities have been generally content for this to provide follow-on accommodation space. This is a logical response from their perspective. However, if/as the Universities keep expanding, so too (in the long run) might the demand for follow-on HMO accommodation to the point where the normal housing stock of the city can become increasingly affected. More recently an Article 4 Direction (July 2013) has begun to regulate the growth in the HMO sector and this cannot be relied upon to the extent that it once was to house more 2nd, 3rd and 4th years. Security of supply is an important consideration for the Universities' and therefore greater attention will fall on dedicated accommodation options. Recent stamp duty changes (April 2016) affecting buy to let landlords may also have an effect on the growth of HMOs (perhaps a surge prior to April and a slump thereafter). Changes to sectoral and planning policy such as these can have positive or negative outcomes depending on one's perspectives and interests.

1.7 Historically the growth in student numbers has not been accompanied by a comparable increase in on-campus or off-campus managed accommodation and therefore the expansion of the (often more profitable) private student lettings market has priced out other buyers and has diminished the 'normal' housing stock of the city. The proliferation of Houses in Multiple Occupation (HMOs) in the Oldfield Park/Westmoreland area is the most visible consequence of the historic mismatch between the growth in students and managed student accommodation. There is a danger that this situation could get worse, rather than better. At best it may only be possible to slow the rate of change, or hold it at current levels. The

Article 4 Direction seems to be having an effect. This is not unique issue to Bath but is particularly significant given its relatively small size as a host city for two universities.

1.8 A town planning strategy is needed, based on an understanding of the aspirations of each university, and the overall functioning, performance and environmental quality of the city and its setting and the concerns of communities and neighbourhoods affected by HMOs and. It may not be possible for all uses to be accommodated in Bath, without consequences for others. Crucially, the Council as Local Planning Authority has no direct[1] control over the recruitment objectives of each University. There are not only UK wide objectives for HE participation to consider, but also the way that HE Institutions are funded is a driver for growth. Nevertheless, a responsible institution will not recruit students into the city at a rate that cannot be matched with additional places to live for the whole life term of study. Stories of student housing 'stress' would not be good PR in respect of further recruitment - and there are signs that, at last in respect of the University of Bath that this is beginning to emerge as an issue (at the margin) in 2015/16 and could be an issue in 2016/17. This may well be related to the effect of the Article 4 Direction on HMOs conversions.

1.9 A feedback loop is generated whereby the prospects for further accommodation supply in the context of aspired to growth, and the holistic development programme for the city may make that aspiration undeliverable without a change to policy. Such a change would itself affect the realisation of other objectives.

1.10 This paper establishes the current demand and supply for accommodation for students studying at the University of Bath and Bath Spa University, how this has been changing and how this might change in the future, based on what the LPA understands their aspirations to be. These aspirations are not set in stone and have and will change again. Further, it is difficult for an HE institution (or the LPA) to look beyond a 5 year time horizon, with much certainty, whereas strategic policy for the City is looking much further ahead. Projections can be made into the longer term but the factors establishing trends can and have changed, meaning the future may not be like the past.

1.11 For each university the evidence base presents information concerning the growth in student numbers since the mid-1990s; the current demand for student accommodation; the supply of managed accommodation (on-campus and off-campus), and the consequent size of students lettings market.

[1] Although the Development Plan can indirectly have an affect e.g. prioritisation of uses in strategy, land allocations uses, Article 4 Directions re HMOs

1.12 It then considers how these relationships might change having regard to current planning policy, extant planning permissions, emerging proposals for bedspaces, the aspirations of each institution for on-campus development and aspirations in relation future student numbers.

University of Bath

University of Bath – Enrolment of Core Students

2.1 **Table 1** and **Figure 1** set out how the number of core students enrolled at the University of Bath has increased since 1994/95. For the 2015/16 academic year total enrolment was 16,419

Table 1: University of Bath Student Numbers 1994/95 – 2014/15

Year	Undergraduate		Postgraduate				Total FT	Total PT	Total All
			Taught		Research				
	FT	PT	FT	PT	FT	PT			
1994/95	4,656	0	449	1,086	379	206	5,484	1,292	6,776
1995/96	4,865	0	411	1,310	414	187	5,690	1,497	7,187
1996/97	4,876	0	533	1,730	443	170	5,852	1,900	7,752
1997/98	4,977	0	609	1,684	482	240	6,068	1,924	7,992
1998/99	5,222	0	643	1,750	422	196	6,287	1,946	8,233
1999/00	5,641	9	746	1,965	421	228	6,808	2,202	9,010
2000/01	6,086	36	678	2,147	420	243	7,184	2,426	9,610
2001/02	6,599	977	781	1,194	430	224	7,810	2,395	10,205
2002/03	7,147	1,450	874	735	447	269	8,468	2,454	10,922
2003/04	7,494	1,365	831	793	503	288	8,828	2,446	11,274
2004/05	7,844	1,052	979	1,068	536	316	9,359	2,436	11,795
2005/06	8,099	1,222	901	1,144	554	315	9,554	2,681	12,235
2006/07	8,430	363	952	1,078	564	317	9,946	1,758	11,704
2007/08	8,751	277	943	1,844	595	360	10,289	2,481	12,770
2008/09	8,968	321	971	1,749	647	314	10,586	2,384	12,970
2009/10	9,394	369	1,060	1,896	682	337	11,136	2,602	13,738
2010/11	9,589	385	1,325	2,153	721	392	11,635	2,930	14,565
2011/12	10,029	350	1,263	2,098	738	424	12,030	2,872	14,902
2012/13	9,812	297	1,230	2,213	795	405	11,837	2,915	14,752
2013/14	10,350	217	1,226	2,122	780	401	12,356	2,740	15,096
2014/15	11,122	87	1,103	1,997	814	425	13,039	2,509	15,548
2015/16	12,002	95	1,262	1,744	844	472	14,108	2,311	16,419

Source: 1994/95 - 2010/11 http://www.bath.ac.uk/student-records/statistics

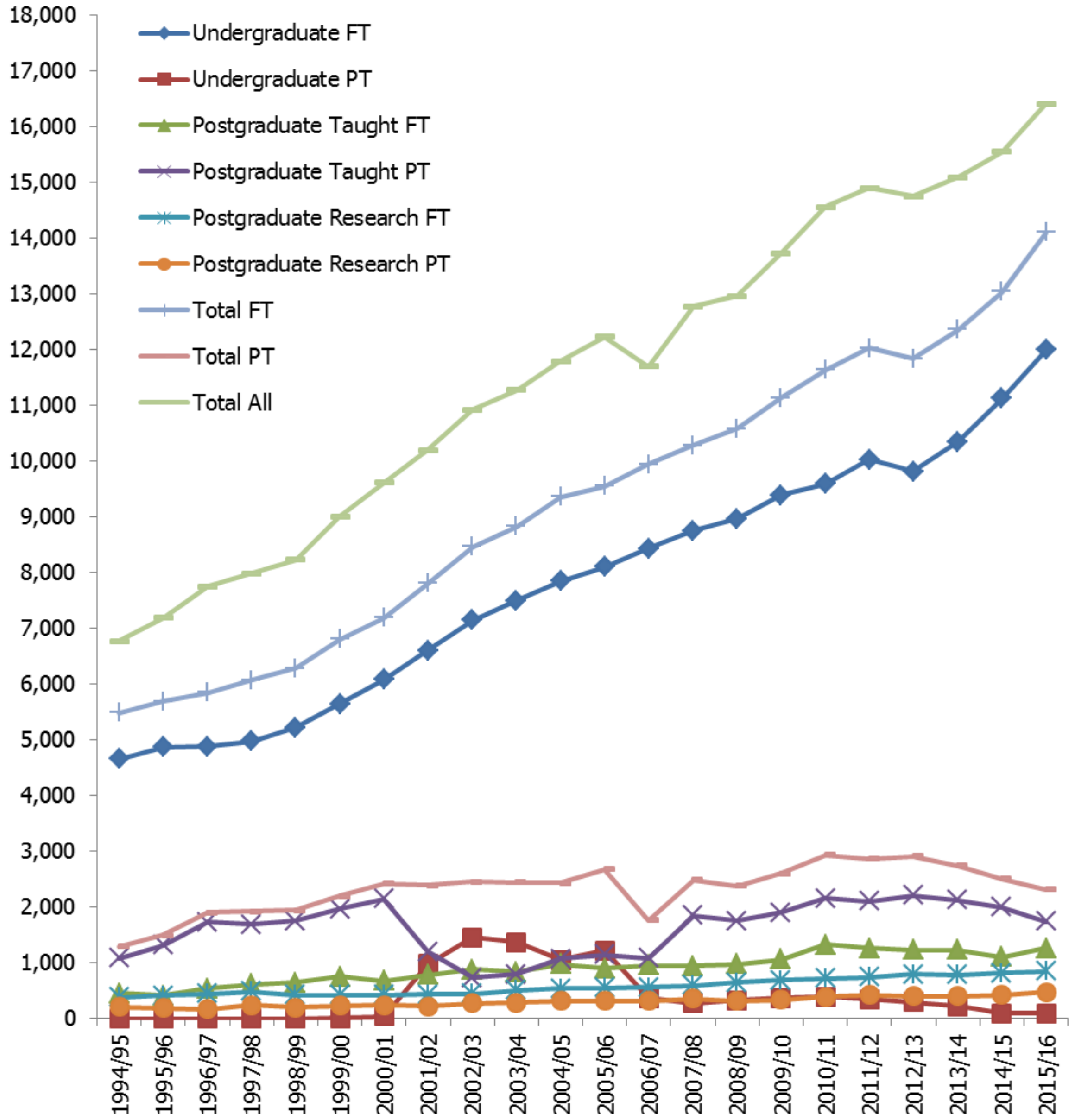
Note: Table 1 summarises the numbers of core students studying at, or in association with, the University of Bath in each academic year at the snapshot date of 1 December. It is at this date that early returns from Universities are made to the Higher Education Funding Councils. The overall total of students given in these tables is the number of those with active registrations at the census date; it excludes all students whose registration was in suspense, and those research students who, having completed their research, were writing-up their theses either with reduced supervision or without supervision. This figure excludes visiting students and staff registered as students. For 2014/15 these totalled 300 and this source of supply generally hovers around this number each year

Archived HESA figures for this period.UoB & HESA website data superseded by PMP representations									
Year	**Undergraduate**		**Postgraduate**				**Total FT**	**Total PT**	**Total All**
			Taught		**Research**				
	FT	**PT**	**FT**	**PT**	**FT**	**PT**			
2012/13	10,242	297	1,230	2,213	795	405	12,267	2,915	15,182
2013/14	10,547	217	1,226	2,122	780	401	12,553	2,740	15,293
2014/15	11,219	87	1,103	1,997	814	425	13,136	2,509	15,645

Source: 2011/12 - 2015-16 University of Bath representations on BANES Placemaking Plan (2016). There seems to be a summing error in the representations as the total for 12/13-14/15 does not equal the sum of the components. This error (if it is one) is not carried forward into Table 1. There is no issue with the figures for 2015/16.

Note: figures are not directly comparable between sources due to 'accountancy' changes. From 2011/12 the figures for full-time undergraduates exclude the reduction in the number of franchised student numbers being taught.

Figure 1: University of Bath Student Numbers 1994/95 – 2015/16



2.2 **Figure 2a** shows the growth rate each year for **total enrolment**. It also illustrates that that the long term compound annual rate of growth for total enrolment has been 4.3%, whereas the most recent 5 year and 3 year rate has been 2.4% and 3.6% . **Figure 2b** shows the comparable figures for **full-time undergraduates** (the main source of students) are 4.6% (long term), 4.6% (same) for the last 5 years and 6.9% for the last 3 years.

Figure 2a Total Enrolment – Annual and Compound Rates of Growth (%)

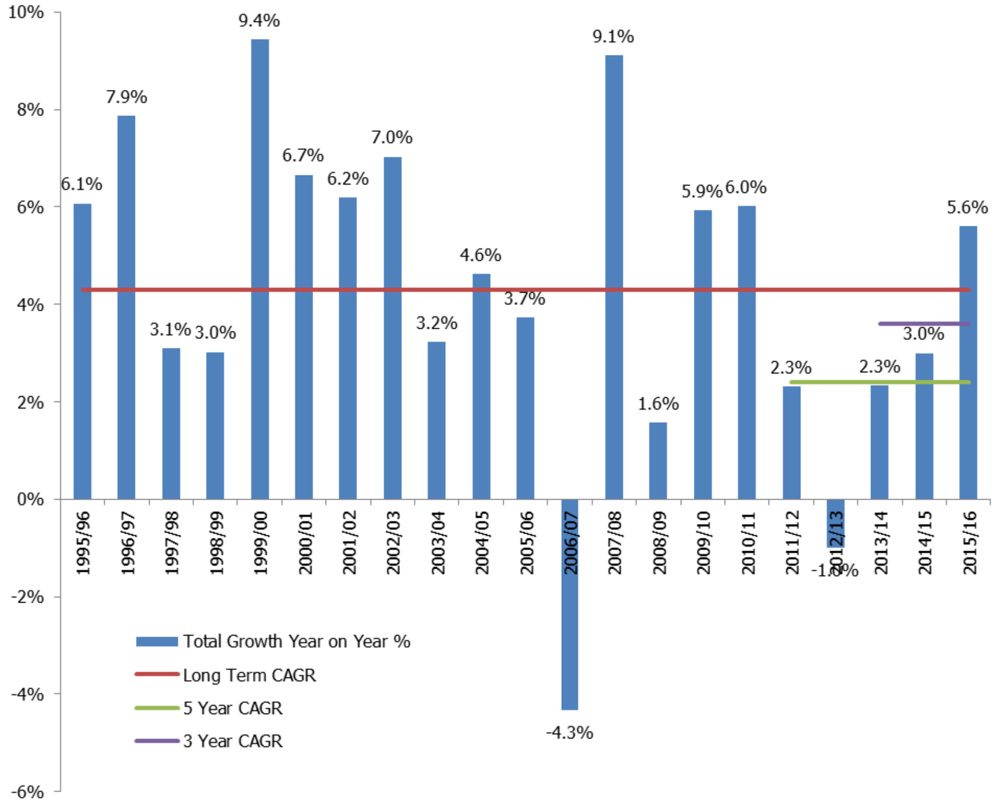
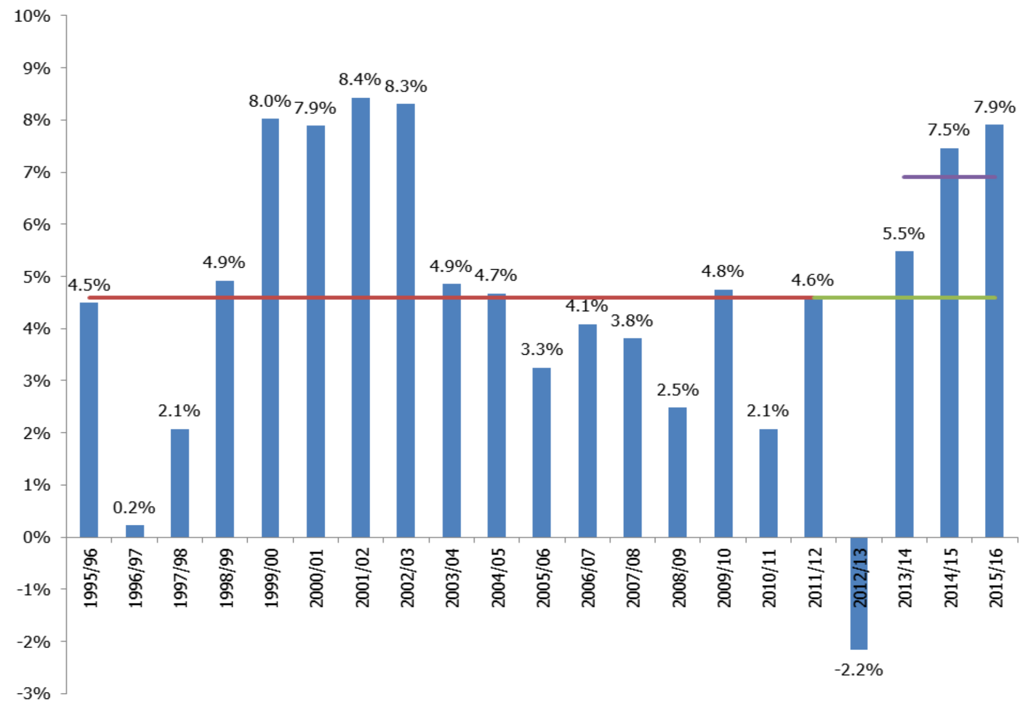
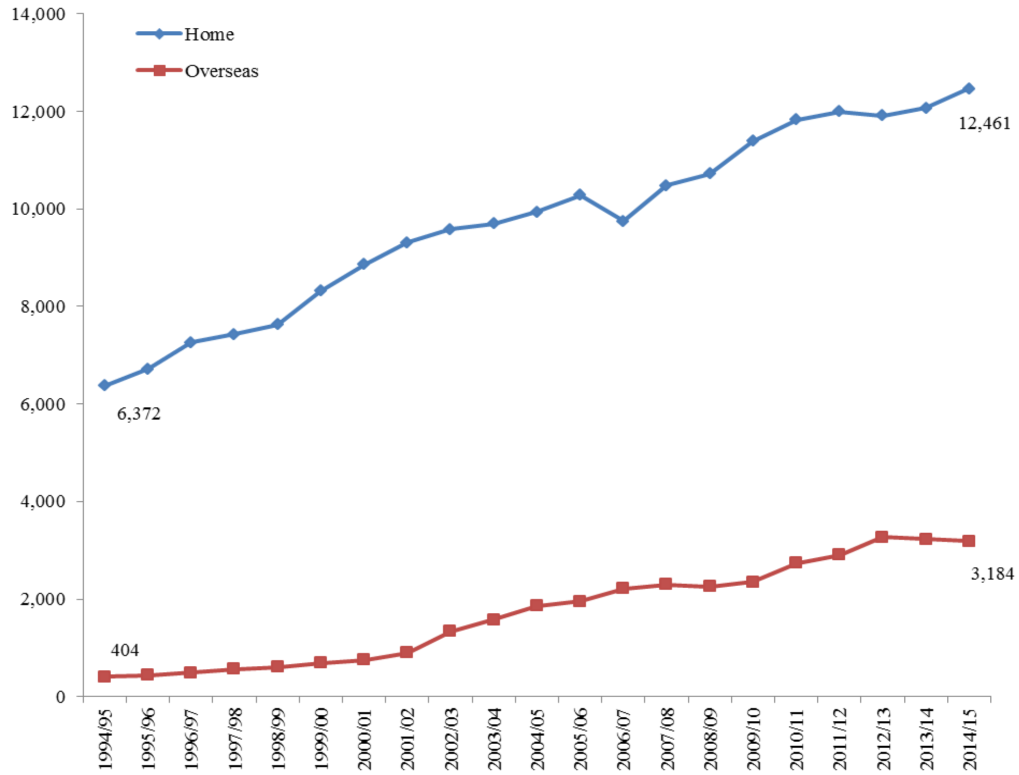


Figure 2b Undergraduate Enrolment – Annual and Compound Rates of Growth (%)



2.3 The growth in enrolment has been due to both domestic and overseas sources. Overseas numbers have increased from 5% of total enrolment in 1994/95 to around 20%. The Council understands that University of Bath does not see the international share rising much further, if at all, although numbers may of course increase.

Figure 3: University of Bath - Fee Paying Status



Note: Data not yet available for 2015/16

University of Bath: Demand for Living Accommodation 2011/12 -2015/16

2.4 Not all students enrolled at the University of Bath live within the city during term time. As well as distance learners, there are always a number of 3rd year undergraduates on a placement year. Further, of those students that do live in the city, not all are in need of managed or other shared accommodation within HMOs. For example, some students e.g. mature part-time students will rent without sharing or are owner occupiers.

2.5 At the time of the examination of Core Strategy in 2013/14, the analysis in Appendix 1 was used to calculate how the number of University of Bath students requiring managed or shared accommodation in Bath could be derived from total enrolment figures using address and mode of study data held by the student records office. The available data did not permit absolute precision but the analysis concluded that 65% of total enrolment was a reasonable assumption.

2.6 For the year after the beginning of the plan period (2012/13) when total enrolment (based on the representations to the Placemaking Plan was 14,572, this multiplier generated a modelled need for 9,589 bedspaces, and applied to 2015/16 total enrolment of 16,419 it generates an updated modelled need for 10,672 bedspaces. This is a change of 1,083 bedspaces since 2012/13. Ideally the base date for analysis would be 2011/12 but the overall figure for 2011/12 (in Table 1) is calculated on a different basis to that for 2012/13 (in Table 1) and the LPA is not sure what a comparable figure might be. Previously (in the Dec 2015 version of this Report) a figure of 14,000 was used for 2011/12 but that might be a bit on the low side. If 14,500 was used then it would make small difference to the overall level of change. The bedspace increase since 2011/12 would increase to 1,247.

2.7 In more recent discussions with the University (July 2015, since updated in March 2016) on future forecasts an alternative approach was presented by the University. This was to simply regard full-time undergraduates on campus (i.e. not on placement) and full time taught and researching postgraduates as being in accommodation need. No further adjustment has been made to account for these types of students living at home within Bath or in the non-HMO private rented sector in Bath or living outside Bath. It is assumed that this method remains valid re the March 2016 data. The LPA is not aware that the University routinely undertakes a more forensic/refined yearly analysis of where and how all of its students are living, but this is not an exact science and the approach used generates a reasonable picture of the situation, upon which to base plan-making.

2.8 Using 14,500 as working estimate for total enrolment for 2011/12 and applying a multiplier for *students requiring accommodation* of 73.5% the effect of the new approach (see Table 2c) increases the baseline need figure to **10,657** bedspaces at 2011/12 (up 1,232 from 9,425 using the 65% multiplier). For 2015/16 the multiplier has been increased to 75.7% and need has increased to **12,429** bedspaces (up 1,757 from 10,672 using the 65% multiplier).

2.9 Therefore the new method gives a change of 1,757 bedspaces being needed since 2011/12, whereas the old method generated a need for 1,247, and the difference between these numbers is 510.

University of Bath: Supply of Student Accommodation 2011/12 –15/16

2.10 At the start of the Plan period in 2011 the University had a supply of 2,452 study bedrooms on its Claverton Campus. Elsewhere in the city it directly maintained 895 study bedrooms, resulting in a total stock of 3,347. Since 2011 a further 704 bedspaces (The Quads) have been built on-campus, increasing campus supply to 3,156 and overall supply to 4,051. Whilst there have been no increases in University of Bath managed accommodation in the city, there have been a number of unaffiliated private sector developments that are available to any student, whatever institution they attend. It is not possible to state how many University of Bath students have secured bedrooms in these developments (and this figure will change each year). Therefore an assumption is made that each set of students claim a half share of the available bedrooms. This brings total supply to 4,144 for 2015/16. The Council will monitor whether nomination agreements are put in place in respect of any current free to market accommodation or that which is under construction.

2.11 From 2016/17 it is likely that 169 units at James Street West will be exclusive to the University of Bath for at least 5 years. That supply does not feature in the tables that follow, which assess the situation for the 2015/16 academic year.

Table 2a: University of Bath Study Bedrooms

Accommodation	**Beds**	**Location**
Westwood	632	Campus
Eastwood	559	Campus
Norwood House	139	Campus
Brednon Court	126	Campus
Polden Court	125	Campus
Osborne House	34	Campus
Marlborough and Solsbury Court (2003)	463	Campus
Woodland Court (2008)	349	Campus
The Quads (2014)	704	Campus
Campus Sub Total	***3,156***	***Campus***
John Wood Court, Avon Street	176	City
John Wood, Main Building	61	City
Carpenter House, Broad Quay	133	City
Pulteney Court, Pulteney Road	133	City
Thornbank Gardens	217	City
Clevelands Buildings, Sydney Wharf	154	City
Canal Wharf, Sydney Wharf	21	City

UoB City Sub Total	***895***	***City***
Other City Sub-total available in 2015/16	***90***[2]	***City***
Total	**4,144**	**Bath**

2.12 Based on the original assumptions set out in paragraph 2.5, the supply identified in Table 2a was able to cater for 34.9% of need in 2011 and 38.8% in 2015/16. Table 2b show that under the original assumptions bedspace demand has increased by 1,083, the number of available bedspaces has increased by 797. This means that unmet need would have increased by around 286. That is around 70 HMOs.

Table 2b Demand and supply ('Core Strategy' original assumptions)

	2011/12	2015/16	Change
Total Students	14,500	16,419	-1,919
Demand (65%)	9,589	10,672	+1,083
Supply	3,347	4,144	+797
Supply as % of Demand	34.9%	38.8%	3.9%
Residual #	6,242	6,528	-286

2.13 However, based on the new assumptions set out in paragraph 2.7, the supply identified in Table 2a was able to cater for 31.4% of need in 2011 and 33.2% in 2015/16. Further, whereas bedspace demand has increased by 1,772, the number of University controlled bedspaces had increased by 967. This generates an increased in the demand for HMO bedrooms of 967.

Table 2c Demand and supply ('Placemaking Plan' new assumptions)

	2011/12	2015/16	Change
Total Students	14,500	16,419	-1,919
Demand (73.5% rising to 75.6%)	10,657	12,429	+1,772
Supply	3,347	4,144	+967
Supply as % of Demand	31.4%	33.3%	+1.9%
Deficit #	7,310	8,285	+975

2.14 Analysis of available properties in Bath on studepad.co.uk reveals that a reasonable assumption for the average size of a student HMO is 4 people. On the basis of the modelled approach taken in table 2c it follows that there should be about 2,071 HMOs in Bath in 2015/16 catering for students at the University of Bath. That equates to about 5% of the total dwelling stock of the city at 2015/16 (40,000). The growth in students (+975) equates

[2] See page x for further details of each development

to a need for 243 new HMOS for Bath Uni students (2011/12) – perhaps tempered by non-student HMOs becoming student HMOs and HMOs switching between Bath Spa and University of Bath students.

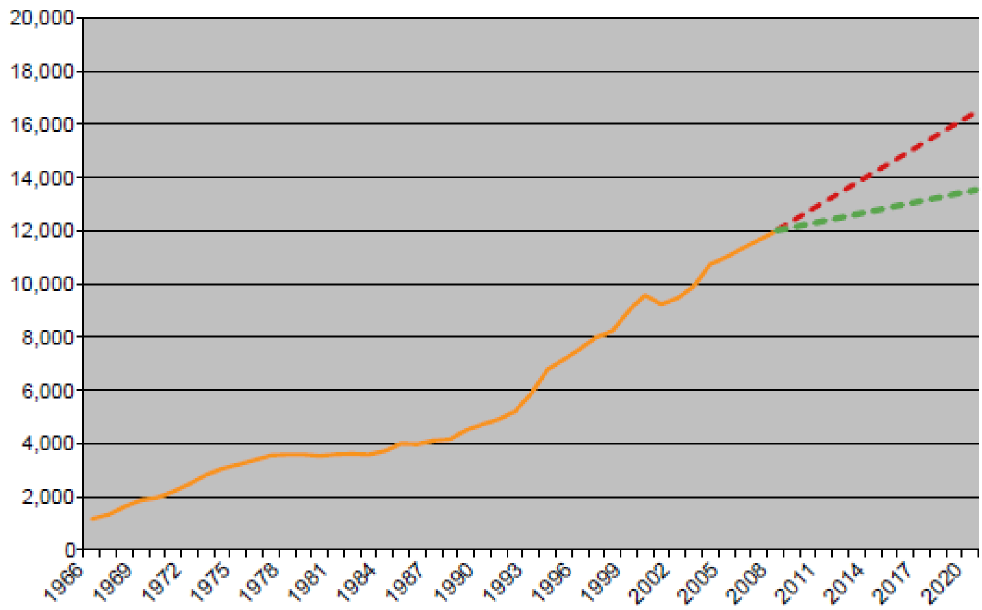
Current and Historic Forecasts of Growth to 2020 and beyond

2.15 Having established historic changes in students numbers since 1994, and modelled the demand and supply situation at the start of the plan period (2011/12) and the latest available position (2015/16). The next stage of analysis is to set these positions a wider context of various forecasting assumptions that have been made (both historic and current). This section sets out the history of forecasting student numbers for the University of Bath. It begins with the vision for long term change to 2020 and 2026 that was set out in the 2009 masterplan, and then presents updates made in 2012/14 and subsequent information received in 2015 and 2016. It may seem like overkill to document the history of forecasting but it usefully place the most recent/current numbers in context and enables an audit trail between Core Strategy examination assumptions and new Placemaking Plan examination assumptions. In time when the Development Plan is adopted (as proposed to be updated) much of the historic analysis can be archived for the sake of brevity.

The 2009 Masterplan

2.16 The 2009 masterplan contains the graph reproduced here as Figure 4. This forecasted growth in enrolment (in the form of full time equivalents rather than actual students) to 2020/21. The red line represents 3% per annum growth to 2020/21 and the green line 1% per annum growth to 2020/21. This shows there were around 12,000 FTEs and that the assumption was for growth of just under 2,000 FTEs to a little over 4,000 FTEs.

Figure 4: Forecast Growth in FTE to 2020 (2009 Master plan)



2.17 The University of Bath has since published two 'summary updates' to the 2009 masterplan (in 2012 and 2014) to reflect development on-campus and tweaks to its estate strategy. These updates also reflect on the forecasts of student numbers made in the original 2009 master plan.

2012 Masterplan Summary Update

2.18 In respect of student growth the 2012 masterplan stated that:

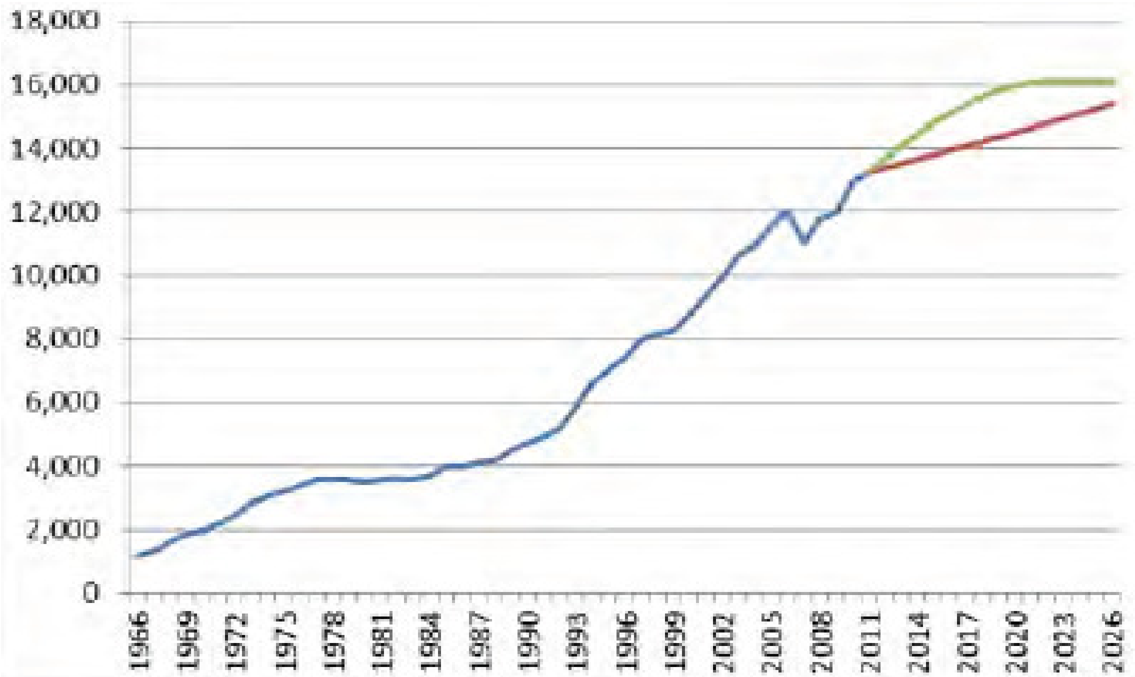
> *"The average annual growth in student numbers over the past ten years has been around 4% per annum* [see Council's corroboration in figs 2a and 2b above]*. This has been fuelled by Government policy to raise participation rates in Higher Education and by the popularity of the University with prospective students. It is not expected that the University will continue to grow at historic rates in the period to 2026, but accurately predicting future growth and development needs over such a long period of time is very difficult, particularly in light of the changing policy and economic context within which Higher Education is provided in the UK.*
>
> *Indeed many of the determining factors are outside the direct control of the University. The Higher Education Funding Council for England (HEFCE) determines the number of UK and EU students that the University can recruit*[3]*, and there is very high demand for those places from excellently qualified students.*
>
> *The 2009 Masterplan Report outlined scenarios of predicted growth of between 1% and 3% per annum to 2020. Since 2009 actual growth has exceeded that in response to Government priorities, and the current student roll is approximately 500 students above those predictions. However, the University expects growth to reduce in coming years (as a result of the changes in student funding and continuing national and global economic pressures), and that will bring student numbers back within the 1-3% long term growth scenario to 2026.*

2.19 The 2012 summary update also included the graph reproduced in this document as Figure 5 (updating the one presented in the original 2009 master plan i.e. Figure 4). Figure 5 shows that, on its best assumptions the University anticipated that it would reach between 15,000-16,000 FTEs by at least 2026, or maybe/more likely earlier.

[3] This is no longer a the case as on December 5th 2013, Government announced the cap on the number of UK and EU-domiciled undergraduates that English HE institutions may recruitment would be relaxed in 2014/15 and abolished in 2015/16.

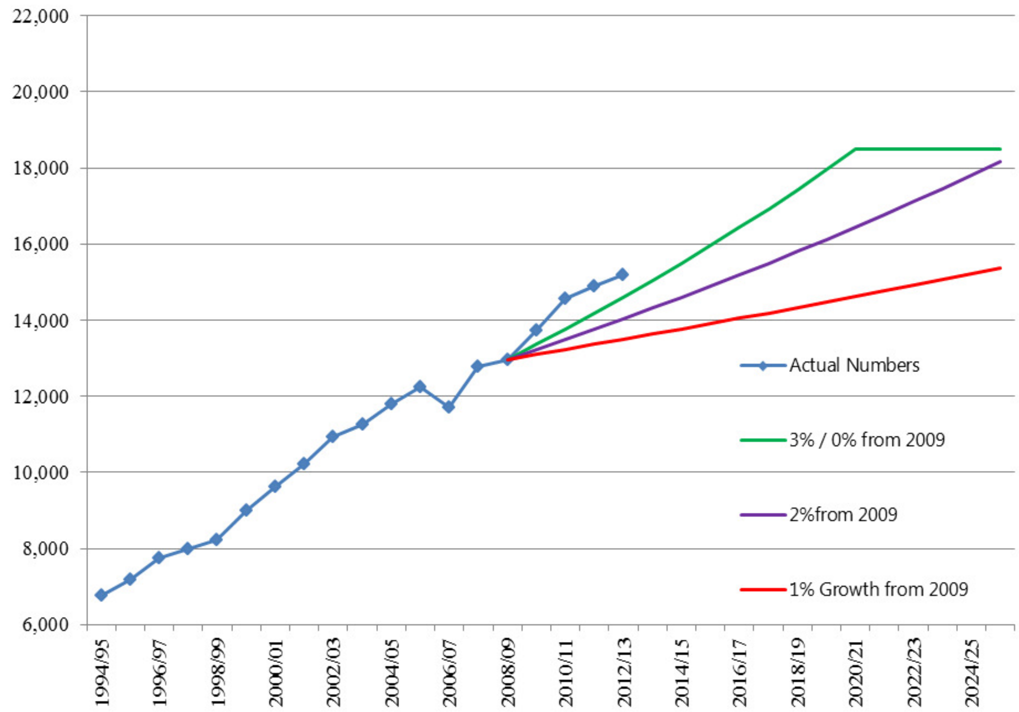
2.20 In Figure 5 the red line represents 1% growth per annum from 2009 to 2026 and the green line represents 3% growth per annum to 2020/2021 and a stable population thereafter. It is important to understand that Figure 5 is based of FTEs (full time equivalents) whereas the data presented in Table 1, Table1A and Figure 4 is for total students, broken down by mode of study (part time or full time). Therefore one is not quite comparing apples with apples at this stage.

Figure 5: University of Bath, 2012 Update to Forecast Growth to 2026 (Full Time Equivalents)



2.21 This report has adapted Figure 5 to produce Figure 6 (based on total student numbers, rather than FTEs) using the total enrolment data in Figure 1. It sets out December snapshot data from 1994/95 (blue line with markers) and forecast change from the beginning of the 2009/10 academic year, based on the scenarios shown in Figure 5 (of 1% or 3% followed by stability). A 2% scenario is also presented (which over the long term is the same as the 3% followed by stability).

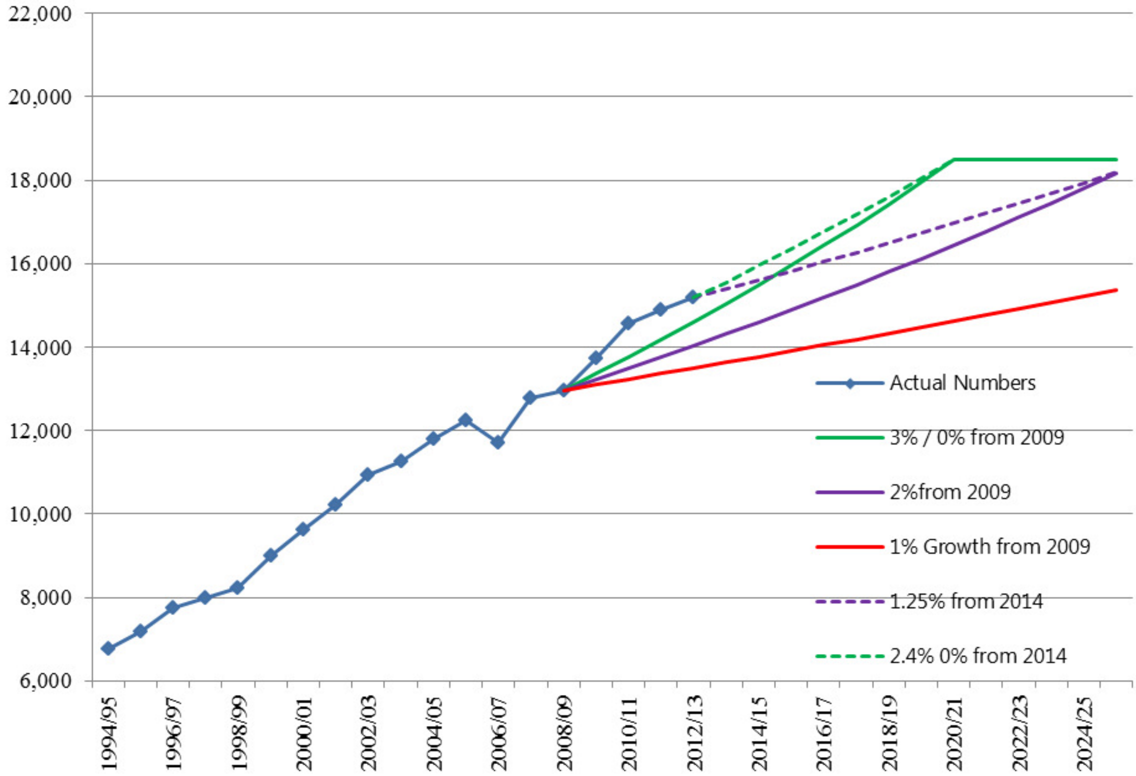
Figure 6 - adaptation of Figure 5 based on total student numbers (using December snapshot data)



2.22 **Figure 6** shows that at the time of the 2012 Summary Update, actual growth (based on December 2012 snapshot data for 2012/13) was indeed running ahead of the original 2009 masterplan projections, as acknowledged by the University (see para 2.18). However, the University expected the FTE student population to fall within the projected numerical range set by Figure 5 over the longer term. This equates to the top end of the range shown in Figure 6 of around 18,500.

2.23 Therefore, for the size of the University to fall within the range envisaged in **Figures 5 and 6,** average annual growth from 2013/14 would have to be as shown in **Figure 7** as dashed green and purple lines i.e. not more than 1.4% (to achieve the 2009-based 2% outcome) or 2.4% to 2021, followed by stability (to achieve the 2009-based 3% outcome to 2020, followed by stability).

Figure 7 Implied growth trajectories from 2013/14 if original 2009 forecasts to be met.



2.24 Drawing on the Universities forecasts in the 2012 summary update, total enrolment (actual students) were estimated increase to about 18,200-18,500 against the figure at the start of the plan period of 14,900 (2011). This would have resulted in an increase of about 3,300-3,600 actual students.

2.25 In terms of additional bedspaces needed, and applying the original 65% multiplier (in place at the time of the Core Strategy Examination), this resulted in a likely increase in demand from 9,685 bedrooms in 2011 to 12,025 bedrooms in 2026 (or more likely earlier i.e. by around 2020 depending on the growth curve). This was an overall net change of up to 2,340 bedrooms.

2.26 THAT WAS THE ASSUMPTION AT THE EXAMINIATION OF THE CORE STRATEGY – and that finding needs to 'parked' for future reference in relation to benchmarking any change to the evidence.

2014 Master Summary Update

2.27 This update said nothing additional in respect of student numbers that had not already been stated in the 2012 update.

July 2015 Forecasts (received in informal discussions) and March 2016 Forecasts (submitted as part of representations on Draft Placemaking Plan)

2.28 In July 2015 the University produced updated growth forecasts/aspirations, since superseded by a further set that accompanied representations on the Draft Placemaking Plan (reproduced in Table 3). The July 2015 version was very much a working draft[4] which has matured/been refined and thus the focus here is on the March 2016 version. Both sets are comparable re the overall level of change, but there are one or two differences e.g. many more taught post-graduates in the March 2016 version.

2.29 The forecasts are base dated at 2012/13 and run until 2020/21. They show the total student population increasing from 14,752 to 19,000 (an increase of 4,248 or 29%).

2.30 **Table 3** relates to the period 2012/13 onwards rather than 2011/12 onwards (which is the important date for Plan monitoring purposes). In paragraph 2.6 the Council made a working assumption that the 2011/12 revised baseline was 14,500 for total students and Table 3 has therefore been amended to generate a forecast of change for the whole decade.

2.31 A revised additional demand figure of 4,578 is 2,238 more students in need that the 2,340 envisaged during the preparation of the Core Strategy as set out in paragraph 2.25. This additional demand derives from twin factors; stronger growth aspirations than previously envisaged, but also the effect of the new higher housing demand multiplier and the fact that this is forecast to increase over the period, rather than remain static

2.32 Had the original 65% multiplier remained in force as a constant throughout the forecasting period, the change in demand in Table 3 would have been 2,925 rather than 4,578. That is 1,653 less than 4,578, yet 575 more than the 2,350 identified during the Core Strategy process.

2.33 **Figure 8a** plots the forecasts in **Table 3** against previous forecasts. The black line with square markers represents the March 2016 forecast (and revised actual numbers since 2012/13, adjusted by the Council for 2011/12) . It equates to a compound annual average growth rate of 4.2% (the long term historic rate). Based on the latest forecasts, the growth aspiration is not set to flatten out any time soon but to continue its historic long term trend of

[4] see appendix 6

over 4% per annum and exceed the 3% upper end forecast that was made in 2009. What will happen after 2020/21 (if the aspiration is met) is as interesting as what will happen to that point? This is, however, more speculative territory. Higher Education Institutions do not undertake financial planning (which is intimately related to student numbers this far into the future).

2.34 However **Figure 8b** sets out some longer term speculative assumptions, based on:

- Extrapolating the March 2016 forecast onwards from 2020/21 to 2028/29 at 4% and 3% per annum.
- Extrapolating the March 2016 forecast onwards from 2020/21 to 2028/29 by 500 students per annum (which works out about at 2.4% per annum, compound)
- A liner projection of growth since 1995/96

2.35 This exercise generates a fan of possibilities from 22,000+ to 2028/29 (liner projection) to 23,000 (500pa), 24,000 (3% pa) and 26,000 (4%pa) assuming the short term aspiration to 2020/21 is reached. Somewhere between 22,000 and 24,000 students (perhaps more) does not seem improbable as an aspiration to 2028/29 given the history of the University. Whether it is deliverable is a quite a different matter that relates not only to town planning matters but to a host of other variables, from visa restrictions, to funding arrangements, tuition fee changes , international competition, and land. Whilst the University might not currently need to look forward to 2029, the Development Plan does need to have an eye to the more distant future.

Table 3 March 2016 Forecasts

	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21		Change from 12/13	Change from 11/12
UNDERGRADUATES													
Full-time		9,812	10,350	11,122	12,002	12,650	13,100	13,250	13,350	13,400		**3,588**	
Part-time		297	217	87	95	100	100	100	100	100		**-197**	
Total UG		**10,109**	**10,567**	**11,209**	**12,097**	**12,750**	**13,200**	**13,350**	**13,450**	**13,500**		**3,391**	
Total FT UG on campus %		0.876	0.878	0.869	0.872	0.865	0.874	0.877	0.876	0.876		**0**	
Total FT UG on campus #		8,595	9,087	9,665	10,466	10,942	11,449	11,620	11,695	11,738		**3,143**	
TAUGHT POSTGRADUATES													
Full Time		1,230	1,226	1,103	1,262	1,320	1,430	1,630	1,830	2,200		**970**	
Part Time		2,213	2,122	1,997	1,744	1,600	1,600	1,650	1,700	1,700		**-513**	
RESEARCH POSTGRADUATES													
Full Time		795	780	814	844	886	930	980	1,030	1,080		**285**	
Part Time		405	401	425	472	470	470	480	500	520		**115**	
Total student population	14,500	14,752	15,096	15,548	16,419	17,026	17,630	18,090	18,510	19,000		**4,248**	**4,500**
Total students requiring accomodation* #	10,440	10,620	11,093	11,582	12,572	13,148	13,809	14,230	14,555	15,018		**4,398**	**4,578**
Total students requiring accomodation* %	72%	72.0%	73.5%	74.5%	76.6%	77.2%	78.3%	78.7%	78.6%	79.0%			
Difference (requiring accomodation)		180	473	489	990	577	661	421	324	464			
Sum Difference (requiring accomodation)		180	653	1,142	2,132	2,708	3,369	3,790	4,115	4,578			

Note: the total student population figures for earlier years is greater than presented by the UoB in its Placemaking Plan representations as the totals in those representation appear to have mistakenly not include PT undergraduates. This is a minor point but may cause some confusion for the most observant readers.

Figure 8a: July 2015 enrolment forecast (black line) set against previous forecasts

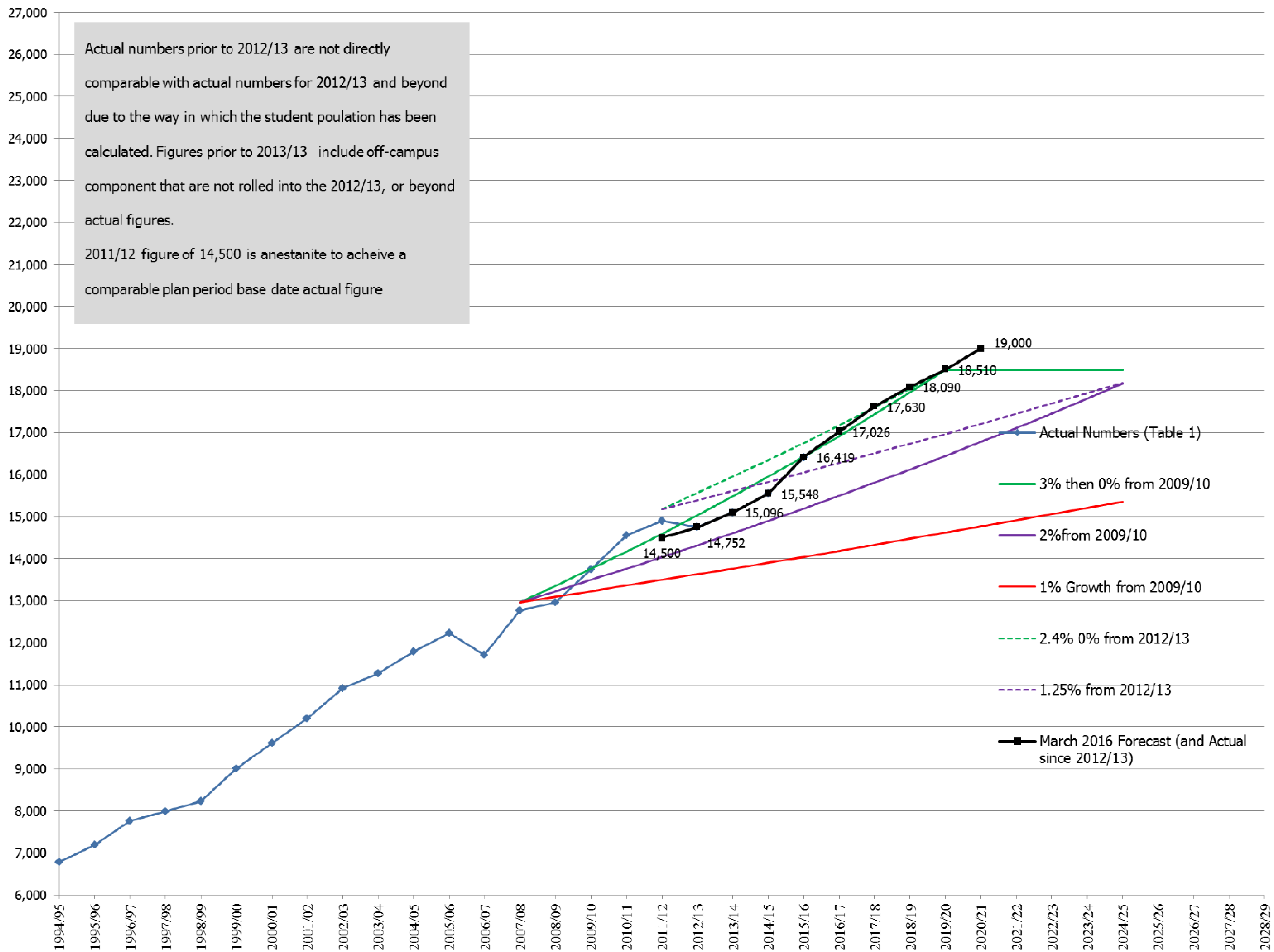
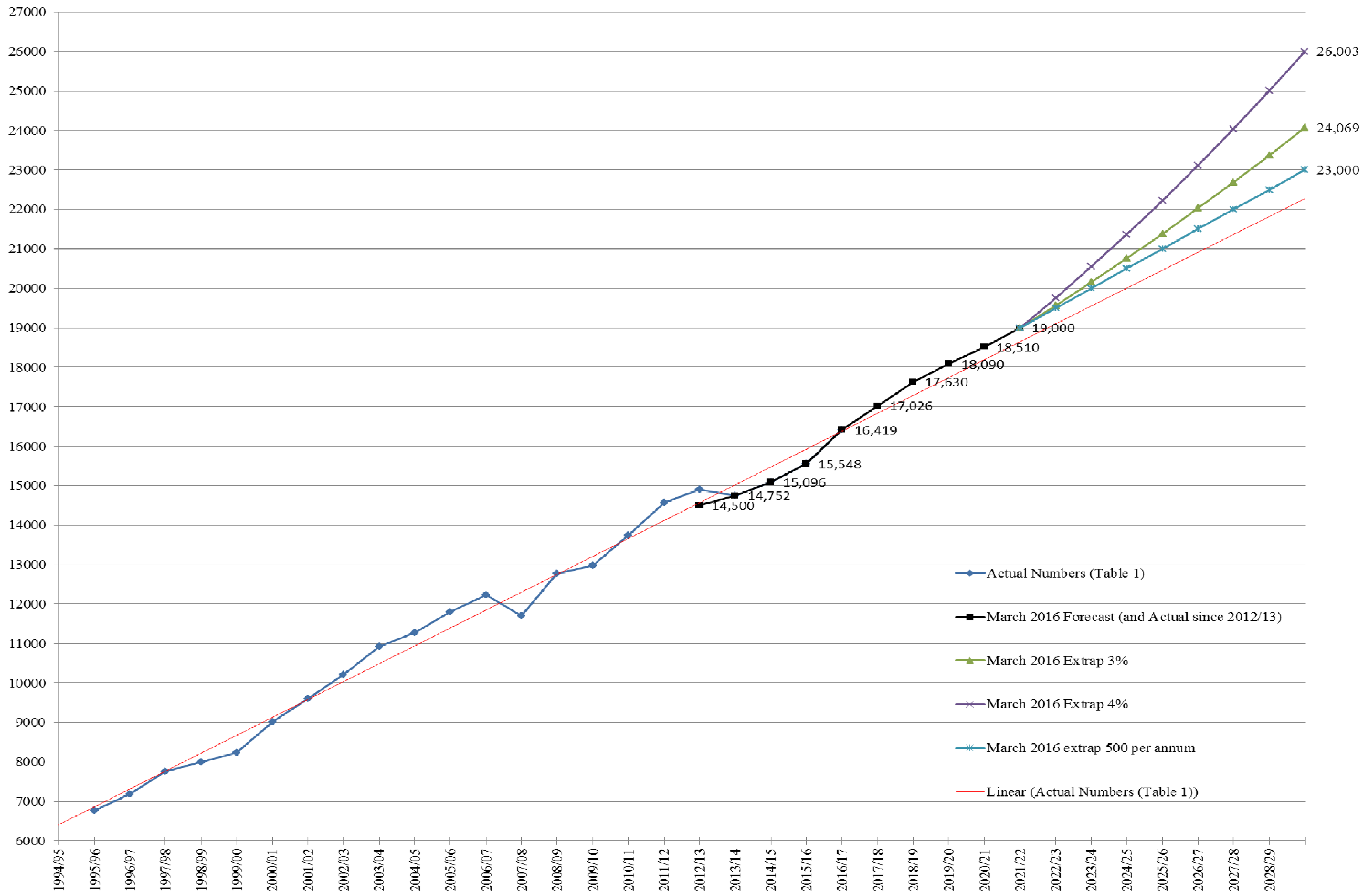


Figure 8b: Speculative longer term projections to 2029



Matching Forecast Accommodation Demand with Supply to 2020/21

2.36 This section sets out the position as thought in 2012-2014 (to retain an audit trail re the assumptions in place during the Core Strategy process), followed by an updated 2016 version, based on revised growth aspiration data (Table 3a).

Position in 2012-14 (Core Strategy Process)

2.37 **Table 4** shows what was considered to be most likely growth trajectory in 2012-14 (taking into account what was supposed about non-affiliated in-city supply). This trajectory was one where the University of Bath reached its (then) anticipated future size sooner rather than later (represented by the green lines in Figure 8a). This does not mean that the University stated that it was going to cap itself indefinitely, rather it simply represents the upper limit of its potential size to a time horizon of its choosing. The trajectory in Table 4 is based on the original accommodation multiplier of 0.65, which has now changed

2.38 The 2009 masterplan (including subsequent updates) was said to be able to increase the number of bed spaces on-campus by 2,400[5] on the land identified for development (which was not all the non-green belt land at its disposal). This would have doubled the number of on-campus bedspaces from 2,452 to 4,852. Assuming a constant supply 895 off-campus bed spaces being maintained directly by UOB, and a share of additional private sector non-affiliated accommodation (of 263[6]), this would have resulted in a total supply of 6,010.

2.39 Overall, the on-campus capacity was sufficient to be able to meet the originally identified demand for 2,330 bedrooms (see para 2.25). However, it was unlikely that this capacity was wholly deliverable to 2020/21. There was an expectation that whilst the Claverton campus should and could be the focus for the majority of new bedrooms to 2020/21 (i.e. the Quads contributing 704 and further phases contributing about 1,000), there would be a need for some further in-city development to supplement supply this to tune of around 626 bedspaces (reducing to 363 once now non-affiliated in-city supply of 263 was taking into account). If extra in-city supply did not materialize then HMO growth (of around 157 dwellings, reducing to 91 once non-affiliated supply is taking into account) would present the sole option. It was also considered that this in-city supply was 'out there' and could be permitted without prejudicing the realisation other strategic objectives for the city. However, the potential sites that were 'on the radar' at the time were ultimately secured by Bath Spa University, which, as set out in Section 3 has shifted from a strategy of consolidation to growth, which has 'put a

[5] Note this assumption is revised in the 2016 update (see para 2.44 onwards)
[6] Since capable of refinement re James Street West

spanner in the works' of the assumption that only UoB would generate more accommodation needs and that these needs could be met on and off-campus without affecting the holistic programme of development for the city.

2.40 Table 4 shows that if the need for HMOs were to have grown and if this took place, that, in theory, this could almost be made good (an even reversed in the longer term, if the University population was to stabilise after 2020/21 and if the much of or the full quantum of on-campus accommodation capacity identified within the master plan was delivered. This is though quite a theoretical proposition as once a house is converted to HMO within the city, the subsequent availability of further dedicated managed accommodation at the Claverton campus may not cause students to switch to this as their preferred accommodation option (there are lifestyle, student experience and cost factors to take into account). Further the University would logically only build further phases if thought that it was necessary for more growth (not to redress any growth in HMOS since 2011/12).

2.41 The forecast rise in the HMO index to 2020/21 was 'relatively' minor (at less than 10 dwellings er annum) in the context of the annualised target for Bath (390 dwellings per annum). Nevertheless, as an alternative to relying on the HMO supply to 2020/12, the identified shortfall in the growth of accommodation to 2020/21 could have been sourced off-campus in new accommodation blocks. That was thought to be achievable given the planning applications on the radar (and assuming that Bath Spa was not going to grow). In the event Bath Spa's plans changed and it secured some of the development that otherwise might have been available to students of the University of Bath.

2.42 In addition to these observations, there was a risk that too much off-campus delivery between 2011/12 and 2020/21 (i.e. more than around 363 bedrooms available to UoB students) could have harmed the implementation of all of the next on-campus phases of 1,000 bedrooms to 2020/21. There was also some risk that short term off-campus solutions (dedicated or in HMOs) would undermine the full delivery of on-campus capacity during the plan period. If accommodation needs were met off-campus to a significant degree there was considered to be no incentive for the University to build on campus. Whilst off-campus solutions in the short term may have affected the implementation on the on-campus strategy for the whole plan period, there was nevertheless a case for meeting the demand arising at 2020/21, by 2020/21 with dedicated accommodation, thereby reducing the reliance on HMO growth, and the need for replacement housing provision.

2.43 Finally, there was a separate but associated, and important risk to the delivery of the other land uses if dedicated student accommodation blocks were to claim too many sites in the city.

University of Bath - Demand and Supply for Student Accommodation 2011-2026 (2012 conclusions)

Table 4: Showing December snapshot growth to 2013/14 followed by a 2.4% growth per annum projection to 2021, with stability thereafter

	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26		2011-20/21	2011-26
Total Students	14,902	15,182	15,660	16,036	16,421	16,815	17,218	17,632	18,055	18,488	18,488	18,488	18,488	18,488	18,488		3,586	3,586
Total annual growth		*280*	*478*	*376*	*385*	*394*	*404*	*413*	*423*	*433*	*0*	*0*	*0*	*0*	*0*			
Housing Need in Bath (65%)	**9,686**	**9,868**	**10,179**	**10,423**	**10,673**	**10,930**	**11,192**	**11,461**	**11,736**	**12,016**	**12,016**	**12,016**	**12,016**	**12,016**	**12,016**		2,330	2,330
Need annual growth		182	311	244	250	256	262	269	275	281	0	0	0	0	0	master plan horizon		
Uni Beds On campus	2,452	2,452	2,452	3,156	3,156	3,156	3,406	3,406	3,406	4,156	4,156	4,156	4,852	4,852	4,852		1,704	2,400
Uni Beds Off campus	895	895	895	895	895	895	895	895	895	895	895	895	895	895	895		0	0
Uni Beds Total	3,347	3,347	3,347	4,051	4,051	4,051	4,301	4,301	4,301	5,051	5,051	5,051	5,747	5,747	5,747		1,704	2,400
Non-affiliated Private Accommodation	0	0	0	24	88	224	263	263	263	263	263	263	263	263	263		263	263
All beds total	3,347	3,347	3,347	4,075	4,139	4,275	4,564	4,564	4,564	5,314	5,314	5,314	6,010	6,010	6,010		1,967	2,663
Residual Private Sector Beds Demand	6,339	6,521	6,832	6,348	6,534	6,655	6,628	6,897	7,172	6,702	6,702	6,702	6,006	6,006	6,006		363	-333
Residual Private Beds Change compared to 2011/12		182	493	9	195	315	289	557	832	363	363	363	-333	-333	-333		363	-332
Student HMOs needed	1,585	1,630	1,708	1,587	1,634	1,664	1,657	1,724	1,793	1,676	1,676	1,676	1,502	1,502	1,502		91	-83
Change in HMOs compared to 2011		46	123	2	49	79	72	139	208	91	91	91	-83	-83	-83		91	-83
HMO Index	100	102.9	107.8	100.1	103.1	105.0	104.6	108.8	113.1	105.7	105.7	105.7	94.7	94.7	94.7		5.7	-5.3

*2.4% per annum from 2013/14 produces the same result as 3% per annum from 2009

Updated Position in 2016 for the period 2011/12 - 2020/21 and to 2028/29

Assessment to 2020/21

2.44 The first 704 bedspaces within the 2009 masterplan (The Quads') were completed in time for the 2014/15 academic year. However, discussions with the University in July 2015 suggested than the remaining capacity on the residential areas identified in the masterplan (2014 summary update) was not probably not more than around 1,000 (allowing for the fact that much the floorspace capacity identified will be for teaching and other academic purposes). The capacity is probably nearer 1,700 (including The Quads) rather than 2,400 when looking at the 2014 master plan update. Crucially, this finding relates solely to the areas identified in that master plan current masterplan – not all developable non-green belt land.

2.45 Thus, the 704 bedrooms built on-campus to date, the 1,000 that could be built to 2020/21, the 169 secured at James Street West, plus 178[7] private sector bedrooms that have been built or permitted in the city, can be taken into account against the aspired to need for of 4,125 bedrooms (*previously 4,723 in the Dec 2015 version of this report*) between 2011/12 and 2020/21, reducing this to 2,158 *(previously 2,672 – albeit with a different assumption re James Street West which has since been secured exclusively by UoB)*

2.46 That residual number equates to an increase in the demand for HMOs of around 540 *(previously 668)* unless there are also extensions to current HMOs if the University was to achieve its aspirations. This is unless additional sources of dedicated supply can be secured in the city (beyond that already built or permitted). Such additional dedicated supply will though have an opportunity cost that <u>may</u> not be acceptable as developable land becomes an ever scarcer and valuable resource. The Core Strategy (by Policy B5) prioritises the accommodation of other uses within the Enterprise Area (normal housing, offices and is proposed to be amended to include industrial and retail) and on this basis the Placemaking Plan does not allocate any land for student accommodation here due to the cost to the delivery of these other uses. Nevertheless there is always scope for windfall potential to come forward on sites not identified and earmarked/reserved within the Placemaking Plan. Such supply is though likely to be limited and Bath Spa University or its students and others e.g. language schools (i.e. Kaplin) will compete in the land market for it. Further, if the housing land supply picture for Bath were to deteriorate it might require that sites where there was some flexibility re their use to be allocated for 'normal' residential development. The 2015/16 HEELA identifies some 'stress' in the housing land supply situation for Bath.

[7] See Table 10

2.47 Moreover, there can be no guarantee that HMOs will be able to grow at the necessary rate given the Article 4 Direction (which can be changed in its application via the accompanying SPD). A number of streets are now above the SPD threshold, the headroom for growth in adjoining areas is limited, and it is uncertain whether this sector would colonise new areas (different house types, frequency of coming to market and different prices points), at all or at the required rate. Current trends suggest that it won't respond as required to achieve the aspirations even if the 'ask' of it were reduced by further as yet unaccounted for dedicated accommodation. Further, Bath Spa's growing numbers and aspirations will compete for what becomes available. This supply constraint generates a feedback loop in relation to the published aspiration to grow by x by date y.

2.48 Crucially, the Council's view is that the accommodation capacity identified within the University's 2014 masterplan update does not represent the maximum capacity of the Universities land holdings as the masterplan capacity focuses on areas around the core of the existing estate. There is more (undeveloped) land that the University controls, most notably land removed from the Green Belt in 2007 (which has yet to receive any master planning attention re development). This land resource would enable the University to provide for more of the needs that it would generate in meeting its aspirations and would enable it to grow without negative impacts on the realisation of other uses within the city or effect the mix of the current housing stock further. However, it seems unlikely that such additional capacity would be built out by 2020/21 (on past rates of development) in addition to the 1,000 bedrooms already identified between now and 2020. Therefore it may take longer for the University to reach its 2020/21 aspiration based on it's current model of financing and building its own accommodation on campus and other supply constraints.

<u>Assessment beyond 2020/21 to 2028/29</u>

2.49 This is more speculative territory and is clearly dependent on what happens to 2021/21 in light of the preceding analysis. Table 5b is the continuation of Table 5a and is based on the green line in Figure 8b (3% growth form 2020/21) to illustrate the sort of additional requirements that could arise <u>if</u> aspirations to 2021 were achieved and <u>if</u> a subsequent new aspiration was put in place that continued the long term trend (or thereabouts) . On that basis a figure of around 23,000-24,000 would result from a 2020/21 baseline of 19,000 (if that baseline was achieved)

2.50 Table 5b shows the implications of 24,000 students by 2029 (i.e. 5,000 more enrolled stuents than in 2020/21 and a need for 3,700 more bedrooms post 2020/21). It also assumes no further dedicated accommodation provision to that achieved in Table 5a. In reality there may be scope for further supply (less so in the city re Core Strategy Policy B5 and more so on-campus (albeit perhaps only to address the aspiration to 2020/21 either by that date or later on). Yet further aspiration beyond the numbers for 2021, that lead to housing demand in Bath, may not be able to be accommodated in yet further dedicated accommodation blocks in-city or on the main part of the campus. Green Belt land elsewhere within the estate (i.e. Sulis Club) would inevitably come under scrutiny. A wholly HMO led strategy for longer term growth would require 928 dwellings and, <u>if</u> the market were able to respond that would see students displace non-students within the city to a very significant degree, which brings the Article 4 Direction and it application to the fore again. Therefore a higher proportion of students may need to be housed on University that has historically been the case, if aspirations are to be met.

Table 5a University of Bath, Demand and Supply for Student Accommodation 2011/12-2020/21 (2016 conclusions)

Table 5a assumes no further dedicated accommodation provision on-campus or in-city to that already accounted for by 2020/21. The resultant number of further bedspaces required is 2,384 which equate to 598 more HMOS. If more dedicated accommodation provision is secured then the picture would change to a degree 2020/21. Such unconfirmed potential is set out at paragraph 4.3

Academic Year	**2011/12**	**2012/13**	**2013/14**	**2014/15**	**2015/16**	**2016/17**	**2017/18**	**2018/19**	**2019/20**	**2020/21**	**11/12 - 20/21**
Total Students	14,500	14,752	15,096	15,548	16,419	17,026	17,630	18,090	18,510	19,000	**4,500**
Total annual growth		*252*	*344*	*452*	*871*	*607*	*604*	*460*	*420*	*710*	
Housing Need in Bath % of Total Students	73.5%	73.5%	74.6%	74.9%	75.7%	75.6%	76.7%	77.2%	77.5%	77.8%	**0**
Student Housing Need in Bath	*10,657*	10,837	11,256	11,650	12,426	12,880	13,520	13,968	14,339	14,782	**4,125**
Need annual growth		*180*	*419*	*394*	*776*	*454*	*640*	*448*	*371*	*619*	
Uni Beds On campus	2,452	2,452	2,452	3,156	3,156	3,156	3,446	3,446	3,446	4,156	**1,704**
Uni Beds Off campus	895	895	895	895	895	1,064	1,064	1,064	1,064	1,064	**169**
Uni Bed Total	**3,347**	**3,347**	**3,347**	**4,051**	**4,051**	**4,220**	**4,510**	**4,510**	**4,510**	**5,220**	**1,873**
Non-affiliated Private Accmodation	0	0	0	24	88	139	178	178	178	178	**178**
All Beds Total	**3,347**	**3,347**	**3,347**	**4,075**	**4,139**	**4,359**	**4,688**	**4,688**	**4,688**	**5,314**	**1,967**
Residual Private Sector Beds Demand	7,310	7,490	7,909	7,575	8,287	8,521	8,832	9,280	9,651	9,468	**2,158**
Equivalent Student HMOs needed	1,828	1,873	1,977	1,894	2,072	2,130	2,208	2,320	2,413	2,367	**540**
Cumulative Change in beds needed	0	180	599	265	977	1,211	1,522	1,970	2,341	2,158	
Cumulative Change in HMOs needed		45	150	66	244	303	380	492	585	540	**540**

Uni Beds off-campus increase in 2016/17 due to nomination agreement 169 at James Street West (north of Sainsbury's).

Non-affiliated private accommodation increases year on year due to: half of the Quasar Building (24 in 2014/15), half of the townhouse bedrooms at Twerton Mill (30), half of 1-3 Westgate Buildings (14) & half of Widcombe Social Club (20) = 64 for 2015/16, half of Brougham Hayes (51 in 2016/17) and half of James Street (39 in 2017/18)

Table 5b University of Bath, Demand and Supply for Student Accommodation 2020/21/2028/29 (2016 conclusions)

Academic Year	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29		11/12 - 20/21
Total Students	19,000	19,570	20,157	20,762	21,385	22,026	22,687	23,368	24,069		**5,069**
Total annual growth		*570*	*587*	*605*	*623*	*642*	*661*	*681*	*701*		
Houisng Need in Bath	15,013	15,225	15,682	16,153	16,637	17,136	17,650	18,180	18,725		**3,712**
Need annual growth		*212*	*457*	*470*	*485*	*499*	*514*	*530*	*545*		
Housing Need in Bath % of Total Students	77.8%	77.8%	77.8%	77.8%	77.8%	77.8%	77.8%	77.8%	77.8%		**0**
Uni Beds On campus	4,156	4,156	4,156	4,156	4,156	4,156	4,156	4,156	4,156		**0**
Uni Beds Off campus	1,064	1,064	1,064	1,064	1,064	1,064	1,064	1,064	1,064		**0**
Uni Bed Total	**5,220**	**5,220**	**5,220**	**5,220**	**5,220**	**5,220**	**5,220**	**5,220**	**5,220**		**0**
Non-affiliated Private Accmodation	178	178	178	178	178	178	178	178	178		**0**
All Beds Total	5,314	5,314	5,314	5,314	5,314	5,314	5,314	5,314	5,314		**0**
Residual Private Sector Beds Demand	9,699	9,911	10,368	10,839	11,323	11,822	12,336	12,866	13,411		**3,712**
Equivalent Student HMOs needed	2,425	2,478	2,592	2,710	2,831	2,956	3,084	3,216	3,353		**928**

Bath Spa University

Growth in Enrolment

3.1 **Table 6** and **Figure 9** set out how the number of student enrolments at Bath Spa University has increased since the mid 1990's. For the 2015/16 academic year there were a total of 8,282 enrolments. Numbers peaked in 2010/11 but declined by about 1,760 to 2014/15 due to a reduction in part-time enrolment, particularly in respect of postgraduates. For 2015/16 there has been a leap in full-time undergraduates and total students[8]. Around 85% of enrolment is related to full-time modes of study (up from 66% in 2006/07). The split between full-time and part-time enrolment (in association with other factors impacts on the need for student accommodation). This is explored in paragraph 3.5.

[8] Perhaps in response to the relaxation of the recruitment cap prior to its removal in 2015/16

Table 6: Bath Spa University - Student Numbers (HESA)

	Undergraduate			Postgraduate					
	FT	PT	Total	FT	PT	Total	Tot FT	Tot PT	Total
1995/96	1,937	219	2,156	200	340	540	**2,137**	**559**	**2,696**
1996/97	1,997	60	2,057	225	747	972	**2,222**	**807**	**3,029**
1997/98	2,144	76	2,220	264	847	1,111	**2,408**	**923**	**3,331**
1998/99	2,201	75	2,276	325	764	1,089	**2,526**	**839**	**3,365**
1999/00	2,370	150	2,520	440	800	1,240	**2,810**	**950**	**3,760**
2000/01	2,695	260	2,955	515	810	1,325	**3,210**	**1,070**	**4,280**
2001/02	2,945	295	3,240	515	730	1,245	**3,460**	**1,025**	**4,485**
2002/03	3,220	270	3,490	630	585	1,215	**3,850**	**855**	**4,705**
2003/04	3,660	375	4,035	730	1,060	1,790	**4,390**	**1,435**	**5,825**
2004/05	3,870	305	4,175	770	1,335	2,105	**4,640**	**1,640**	**6,280**
2005/06	3,925	370	4,295	725	1,575	2,300	**4,650**	**1,945**	**6,595**
2006/07	4,105	400	4,505	615	1,990	2,605	**4,720**	**2,390**	**7,110**
2007/08	4,360	525	4,885	655	1,935	2,590	**5,015**	**2,460**	**7,475**
2008/09	4,775	595	5,370	710	2,080	2,790	**5,485**	**2,675**	**8,160**
2009/10	5,120	510	5,630	735	2,435	3,170	**5,855**	**2,945**	**8,800**
2010/11	5,285	410	5,695	680	2,595	3,275	**5,965**	**3,005**	**8,970**
2011/12	5,375	340	5,715	670	2,170	2,840	**6,045**	**2,510**	**8,555**
2012/13	5,120	245	5,365	810	1,690	2,500	**5,930**	**1,935**	**7,865**
2013/14	5,100	120	5,220	895	1,095	1,990	**5,995**	**1,215**	**7,210**
2014/15	5,214	89	5,303*	1,096	980#	2,076	**6,310**	**1,069**	**7,379**
2015/16									

* of which 465 were franchised students studying at other institutions

mostly postgrads of which around half are employed teachers taking professional development courses) run from Corsham Court, Wilts

Highlighted figures include franchised students whereas the data in Table 6a (provided in representations to the Draft Placemaking Plan does not.

Figure 9: Bath Spa University - Student Numbers 1995/96 – 2015/16

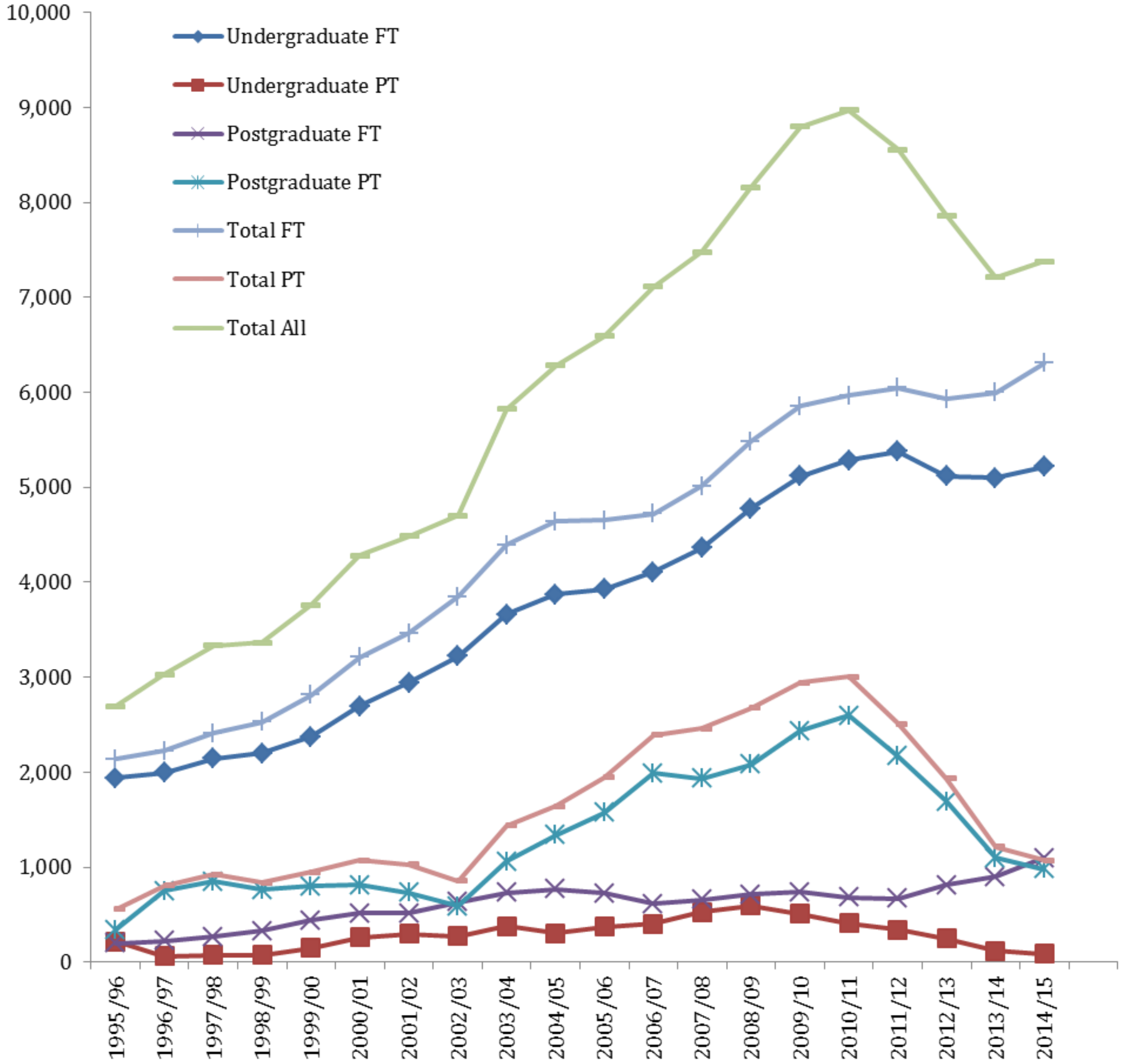


Table 6a: Alternative BSU Figures from 2012/13 submitted in Representation to Draft Placemaking Plan (March 2016)

Total Students										
		Undergraduates		Postgraduates				Totals		
		First Degree		Taught		Research				
		Full Time	Part Time	Full Time	Part Time	Full Time	Part Time	Full Time	Part Time	
2011/12	Total							0	0	
	Year 1							0	0	
	Other Years							0	0	
2012/13	Total	4533	98	805	1563	10	96	**5348**	**1757**	**7105**
	Year 1	1513	17					1513	17	
	Other Yea	3020	81	805	1563	10	96	3835	1740	
2013/14	Total	4614	83	915	937	22	90	**5551**	**1110**	**6661**
	Year 1	1634	17					1634	17	
	Other Yea	2980	66	915	937	22	90	3917	1093	
2014/15	Total	4741	80	1120	827	20	76	**5881**	**983**	**6864**
	Year 1	1846	16					1846	16	
	Other Yea	2895	64	1120	827	20	76	4035	967	
2015/16	Total	5257	66	1155	828	34	60	**6446**	**954**	**7400**
	Year 1	2109	6					2109	6	
	Other Yea	3148	60	1155	828	34	60	4337	948	
Change		724	-32	350	-735	24	-36	1098	-803	295

The totals are different to those shown in Table 6a for the years 2012/13 to 2014/15 as franchised students have probably been removed. This is probably the most reliable data set to use but it does not go back to 2011/12 and is not directly comparable with long term trend HESA data.

Bath Spa University - Demand and Supply for Living Accommodation (2011/12 - 15/16)

3.2 Until recently and following the Council's assumption for Bath Spa had been that the number of full-time students was reasonable proxy for the number of students requiring accommodation. The term proxy was used as whilst some full-time students would not be in need of accommodation in the city it was likely that some part-time students would be. However, whereas full-time students accounted for 66% of total enrolment in 2010/11 (the peak of enrolment), they now represent 85%. This accentuates the importance of getting this assumption right. An alternative assumption would have been to use full-time undergraduate students as a proxy for the number of students requiring accommodation the city. Whereas full-time undergraduates represented 59% (5,375) of total enrolment in 2010/11 they now represent 73% (6,078). Therefore this was also a variable and moving figure.

3.3 The Council asked Bath Spa University to look very closely at this issue and it has done so. A detailed assessment of term time address for 2015/16 has been submitted as part the Universities representations on the Draft Placemaking Plan. The outcome of that work is set out below in Table 6b (reproduced from data accompanying their PMP representations)

Table 6b: *Proportion of students in each mode of study requiring either a bedspace in a dedicated block or HMO in 2015/16*

		Undergraduates		Postgraduates			
		Taught		Taught		Research	
2015/16	**Total**	**Full Time**	**Part Time**	**Full Time**	**Part Time**	**Full Time**	**Part Time**
	Year 1	80%	33%				
	Other Years	70%	32%	25%	3%	3%	3%

3.4 *For 2015/16 these multipliers, when applied to actual numbers meant that overall, 57% of students were in need of a bedspace in the city either in a dedicated block or in HMOs. This overall figure is variable based on the number of students in each mode of study in any given year. 57% might appear to be quite low but having regard to the detailed evidence, the figure is reliable.*

3.5 In 2011/12 Bath Spa University maintained or had agreements in place for 1,103 bedrooms (on and off campus). For the 2014/15 academic year 'The Gardens' were opened on-campus, increasing this stock to 1,664 bedrooms and in 2015/16 Twerton Mill opened (266 further bedrooms[9]). In addition there have been a number of unaffiliated private sector developments that are available to any student, whatever institution they attend. It is not possible to state how many Bath Spa students have secured bedrooms in these developments (and this figure will change each year). Therefore an assumption is made that each set of students claim a half share of the available bedrooms (178 to BSU)[10]. This increases supply for Bath Spa at 2014/15 to 1,904.

[9] There are actually 227 rooms but the remainder (61 studios) were not taken up by BSU and are therefore available to any student

[10] Bath Spa is not keen for this final element of supply to be apportioned to meeting its needs due to lack of security of supply – but students will live there; they won't remain empty

Table 7a: Bath Spa University Study Bedrooms 2015/16

Owner	Accommodation	Beds	Location
BSU	Lakeside	311*	Newton Park Campus
BSU	The Gardens (2014)	561	Newton Park Campus
BSU	***Campus sub total***	***872***	
Private	Waterside Court, Lower Bristol Road (2004)	316	City
Private	Charlton Court, Lower Bristol Road (2009)	295	City
BSU	Bankside, Lansdown	43	City
BSU	Reserved for Tutors	-6	City
Private	Homestay Units	13	City
Private	Twerton Mill (2015/16)	277	City
	Bath Spa/Unite City sub-total	**938**	
	ALL SUB-TOTAL	**1,810**	
	Other City sub-total (post 2011)	**178**	City
	TOTAL	**1,987**	

* This figure was 388 in 2011/12 but has since been reduced due to the development of The Commons

BSU owned

BSU reject this figure as a contributor to their needs. The Council disagrees

2.51 Green Park Road (461) will come on-stream in 2016/17 and further boost supply for that academic year and beyond.

2.52 The student numbers data that BSU submitted as representations on the Draft Placemaking Plan begins at 2012/13, not 2011/12. Further, the total figure for 2012/13 in that documentation is 7,105, whereas the HESA data in Table 5 for that year7,865. It may well be that the new data does not include franchised UG students. The LPA has to make a decision on the baseline. Given that the 2012/13 figures do not match it is reluctant to baseline using the earlier 2011/12 HESA figures. The 2011/12 HESA figure of 8,555 does not appear to square with the figure of 7,105 for 2012/13. Although different years are being quoted there may have been some reduction between years due to a contraction in part-time students– the extent of the reduction when looking at these two figures seems too great to be reliable The most robust figure seems to be the 2012/13 figure submitted as part of Placemaking Plan representations of 7,105. This is not ideal re the 2011/12 base date for the Plan but is the best the LPA s to work with. Therefore for Plan monitoring only change since 2012/13 can even be reliably monitored at present. A 2011/12 assumption was made for UoB but the LPA is unsure what to do re BSU and will assume that 7,015 is also the 2011/12 figure.

2.53 If 57.1% is used as the current multiplier and 50.7%[11] is used as the 2012/13 multiplier then Table 7b shows that the supply identified in Table 7a was able to cater for 30.6% of need in 2011 and 47% in 2014/15. Whereas bed space demand has increased by 623, the number of bedspaces has increased by 884. This means that unmet need will have decreased by around 261 beds (equating to 65 HMOs). Whilst Green Park House (461) will generate further bedspaces in 206/17, there will also be more student need, of a similar amount and this Table will be reviewed next year to take these changes into account.

2.54 The residual bedspace figures to around 624 HMOs in 2012/13 and 559 in 2015/16. Therefore in theory, BSU has reduced its footprint re HMOs. These are likely to have transferred to Bath Uni students, whose need for HMO bedspace has increased during this time

Table 7b Demand and Supply between 2012/13 and 2015/16

	2012/13	**2015/16**	**Change**
Total Students	7,105*	7,400*	+385
Demand (50.7% then 57.1%)	3,602	4,225	+623
Supply	1,103	1,987	+884
Supply as % of Demand	30.6%	47%	+16.4%
Residual	2,499	2,238	-261

*Draft PMP reps figures from Table 5b, not Table 5 HESA figures.

[11] The % figure is different due to the application of the %s in Table 6b to actual numbers for 2012/13

Bath Spa University – past and curre7105/nt growth plans

2010 Strategic Framework and Newton Park Master Plan

3.6 In 2010 Bath Spa University prepared a Strategic Framework to identify its academic and accommodation deficiencies and requirements and aspirations for the future. This also set out development potential and proposals for each of the sites that it occupies. This led to the production of a Development Framework and subsequent Campus Masterplan for the period 2010-2030 which set out three phases of development. The masterplan was written, and planning applications were submitted (in 2010 and 2012) on the premise of the stabilisation of student numbers. This was of course before Governments announcement on relaxing and then removing cap on recruitment was made. The first two phases have since been implemented.

Phase 1 relates to **The Commons Building**, which involved the redevelopment of 2,300 m^2 of administrative space and student accommodation (82 bedrooms) within in the northern part of the campus to achieve 8,500 m^2 of academic space (net increase of around 6,200 sq.m.).This was permitted in August 2011 and completed opened in June 2014 (ref: 10/04747/FUL).

Phase 2 – relates to **561 student bedrooms** (net change of 479) to the south of the campus (opened September 2014) and the associated removal, replacement or disposal of unsympathetic buildings and facilities to enhance the significance of heritage assets (ref: 12/02141/FUL).

Phase 3 - **Residential redevelopment** (at the north of the campus), an intended future phase that will largely **replace the existing stock** with perhaps only a modest net gain. For now though 1:1 replacement is assumed. There may be some flux to supply in the future as old stock is demolished and new stock replaces it.

2014 Indications of growth in international students (Shorelight/ Bath Spa Global)

3.7 In 2014 information was released in respect of a significant new programme to grow enrolment. In the first part of 2014 it was announced that Bath Spa had embarked on a programme to attract 2,000 international students (mostly from the US) in association with 'Shorelight Education'. Subsequently, following a request for clarification from the LPA, the Director of International Relations identified that a reasonable assumption would be about 500 international students in the 5 years from 2014/15, rising to up to 1,000 international students in the years following, and that these would be net additional students rather than replacing domestic students. Up to this point there was no direct indication of any increase from domestic sources.

2015 (March and July) Representations and supplementary data in respect of the Placemaking Plan Options Consultation

Student Numbers

3.8 Figures 10 and 11 set out Baths' Spa aspirations for growth as expressed between March and July 2015. This includes the Bath Spa Global Project. Some 4,391 more FTEs were aspired to from 2011 and 3,815 from 2014/15. This was a significant uplift in annual growth in relation to past. The split between full time and part time mode of study wasn't given and thus it was difficult to assess (solely from this data) the accommodation needs that this aspiration could generate.

Figure 10 Growth aspirations (total) submitted as part of Placemaking Plan Options Consultation

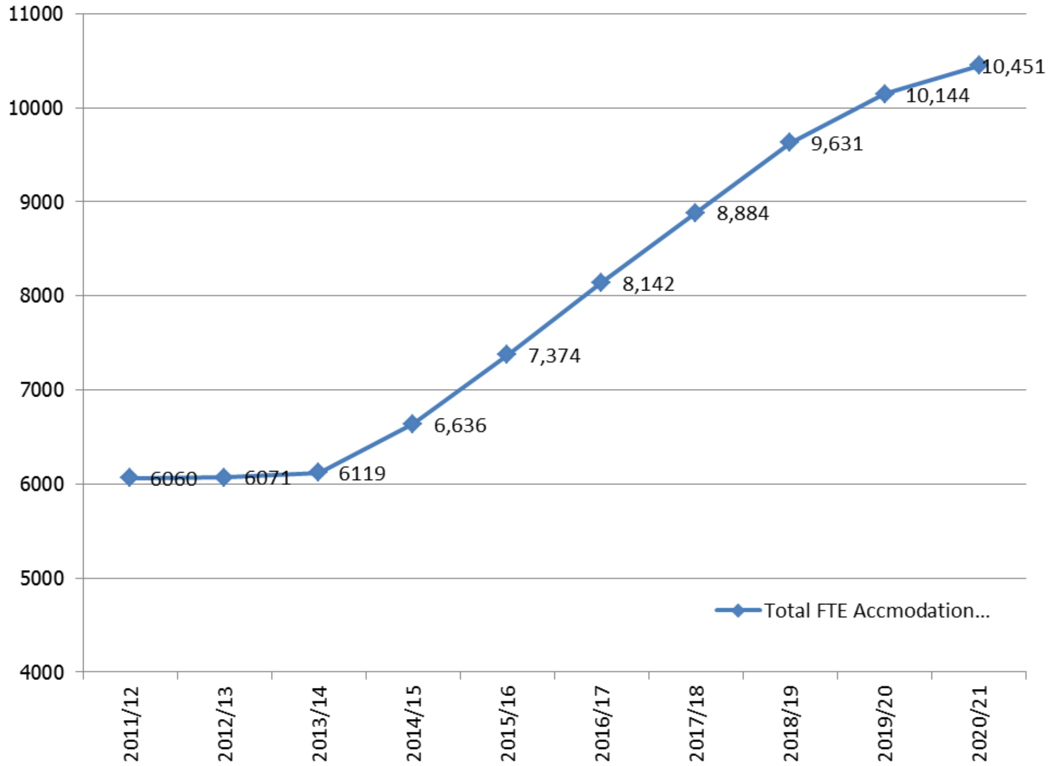
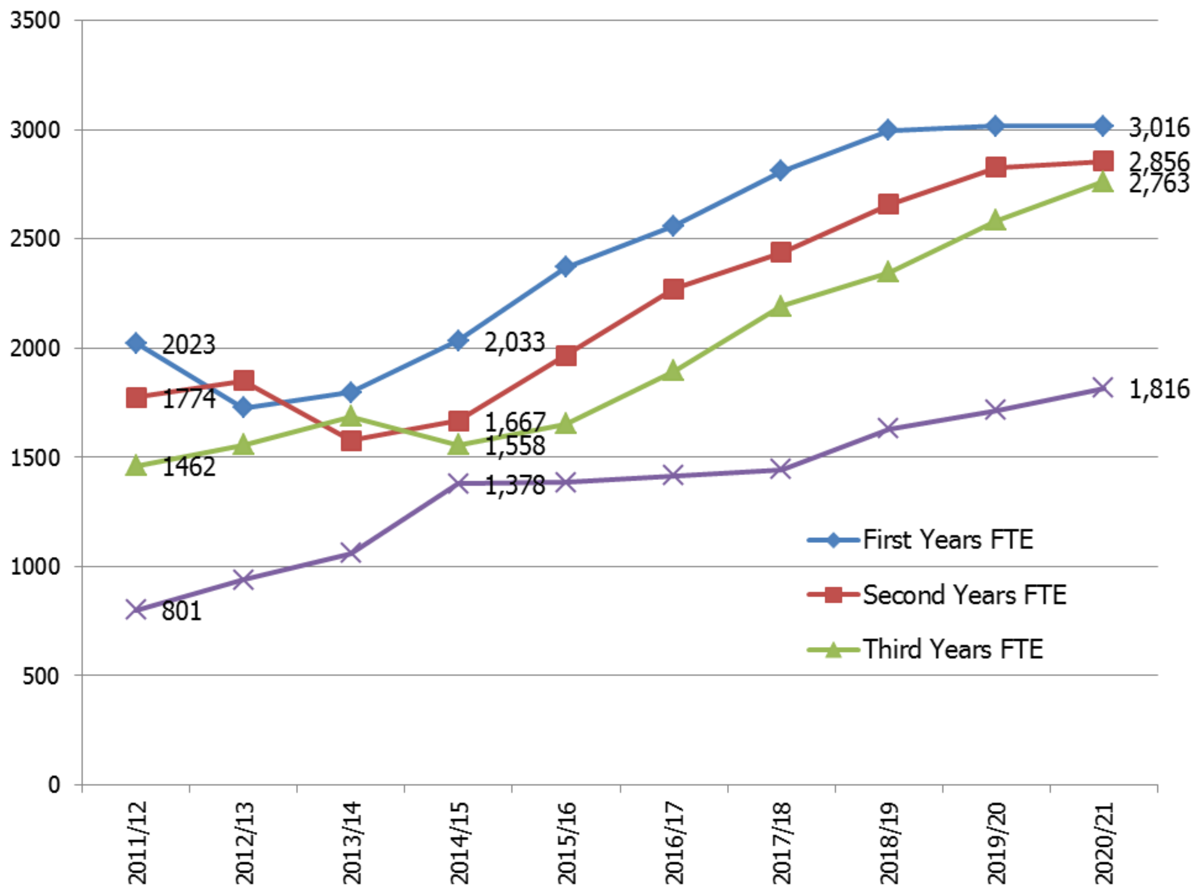


Figure 11 Growth aspirations (by year group) submitted as part of Placemaking Plan Options Consultation



Accommodation Needs

3.9 Also included in the representations was a table setting out the requirement for student accommodation based on the above numbers, except that it is slightly false in that it focused on the accommodation that was needed to enable first year growth rather than all growth. This is set out in Table 8. It is not clear if this was FTEs or actual students. The Council suspected that it was for actual students. It shows that priority (first year) housing requirements would increase by 1,005 from 2014/15 to 2020/21 but that this will have taken place by 2018/19, as there is no increase in in-take after 2018/19. The data has no row for full-time Domestic and EU postgraduates (c.1000) and thus seemed to assume that students not being taught in Bath (i.e. at Corsham) wouldn;t generate housing needs in Bath.

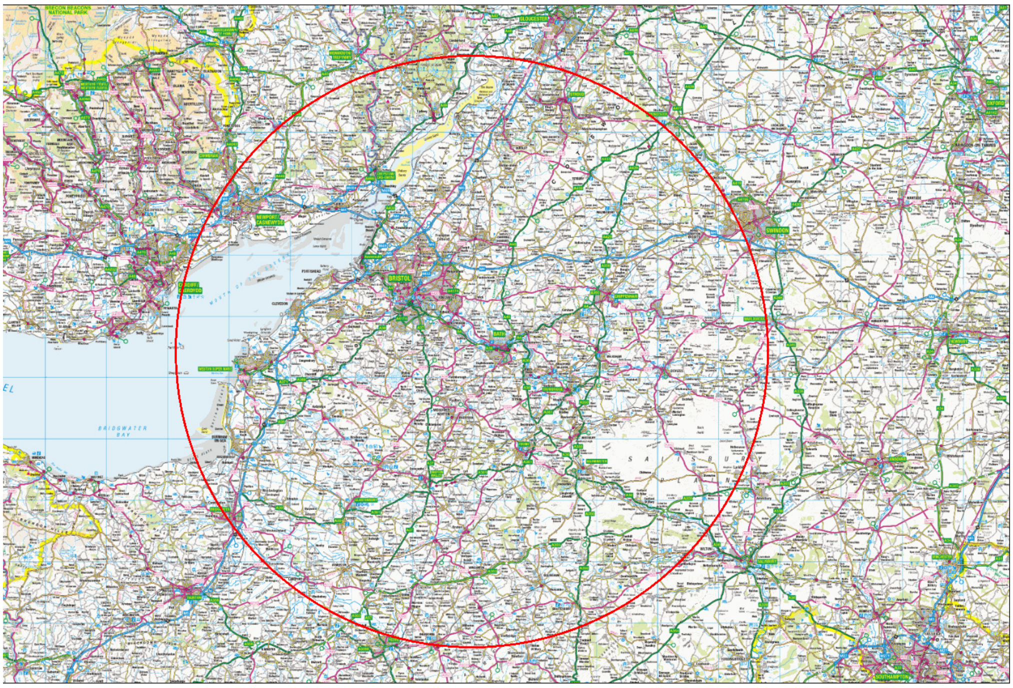
3.10 Total needs are of course greater than first year needs. The increasing intake of Home and EU undergraduate students taught in Bath was 403 by 2018/19, but this would have generated a total of three times that by 2020/21 as the students move through their three years of study. Total change in need was therefore more likely to be 1,209. Likewise the increase in 120 overseas undergraduates would have generated a need for 360 bedspaces by

2020/21. Postgraduate courses are normally one year and thus the overseas increase to 30 does not need further multiplication. There was apparent absence of any current or increasing need for Home & EU postgraduates even though there were around 1,000 FT and 1,000 PT registrations. The Bath Spa Global Projectwas understood to be a three year mode of study and therefore the 486 figure at 2018/19 would need to be multiplied by 3 to generate a total demand figure for 2020/21 of 1,458.

3.11 On this basis Table 8 generated a total need for 3,057 more bedspaces between 2014/15 and 2020/21.

3.12 The numbers produced in the Table 8 show the total required if all first year students applied and are eligible for BSU controlled accommodation. The University will not allow first year students to be allocated BSU accommodation if their home address is within a 30 mile radius of the Campus.

Figure 12: 30 mile radius around Newton Park Campus



3.13 In 2014/15 the University allocated 1,558 beds, 30 of which were acquired through private landlords. According to BSU *Therefore 633 students* (presumably first years i.e. 29% of first years excluding Home EU undergrads) *either did not require BSU controlled accommodation or were not eligible.* BSU states that *if the number of students not eligible (633) remains constant the table* (Table 8) *does identify with the acquisition of Green Park House and the* *agreement with Twerton Mills the University will still require as a minimum an additional 270 bed spaces for first years by September 2020*[12]*.*

3.14 The use of the word as a minimum is important here, as just because first year students are not eligible within 30 miles, is does not mean that they will choose to live at home in or outside Bath. They may simply look for accommodation options in the HMO sector in Bath from year 1, rather than from year 2.

<u>December 2015</u>

3.15 The University indicated that the Bath Spa Global aspiration has either been curtailed (or the aspiration is the same but it is not thought to be deliverable to the level wished for). If this is so, it is important as it will relate to full-time study assumptions and consequent accommodation needs in Bath.

<u>March 2016: New Data in Placemaking Plan Representations</u>

3.16 The data accompanying BSU's March 2016 Draft PMP representations has been partially presented in Table 6a but is now fully reproduced as Table 9. This shows that overall change is projected to be 3,637, with most of that still to take place. 770+ FT undergrads have already been recruited since 2012/13 but another 2,200 are aspired to by 2020/21. The recovery of taught PT postgraduate numbers is also a target (but this is a low generator of accommodation needs and there is little net growth on 2012/13 following dip in the years following). Therefore the overall aspiration is still strong but has dipped a bit since Placemaking Plan options stage, probably due to a tempering of expectations re the Shorelight Project.

3.17 The data concludes at 2020/21 but the world will probably (and hopefully) keep turning and the University will not aspire to stand still. If one were to project forward from 10,792 in 2020/21 by just 1% per annum one would still generate another 900 students to 2028/29. At 2% one generates 1,850 more students. These are low per annum % growth figures compared to the trend and aspiration to 2020/21. Higher growth rates of 3% or 4% would generate 2,900 to 4,000 more students. The aspired to growth rate between 2012/13 to 2020/21 is around 4%

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[12] Acknowledgement that these blocks were ultimately secured too enable growth – not to improve the existing situation (whatever the immediate/short term effect).

Table 8: Year 1 Accommodation Needs 2014/15 – 2020/21 (March 2015)

	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21		Change
YR1 Home and EU Undergraduates	1,907	2,150	2,150	2,230	2,310	2,310	2,310		403
Undergraduates taught at other colleges	-170	-170	-170	-170	-170	-170	-170		0
Total Home EU & YR 1 intake at BSU campuses	1,737	1,980	1,980	2,060	2,140	2,140	2,140		403
YR1 Overseas Undergraduates	100	120	160	180	200	220	220		120
Overseas Postgraduates	320	320	320	320	330	340	350		30
Total YR1 Overseas and Postgraduates	420	440	480	500	530	560	570		150
YR1 Bath Spa Global	34	100	250	400	486	486	486		452
TOTAL (YEAR 1) DEMAND	**2,191**	**2,520**	**2,710**	**2,960**	**3,156**	**3,186**	**3,196**		**1,005**
~~TOTAL BSU BEDS*~~	~~1,558~~	~~1,835~~	~~2,296~~	~~2,296~~	~~2,296~~	~~2,296~~	~~2,296~~		~~738~~
~~Year 1 GAP~~	~~-633~~	~~-685~~	~~-414~~	~~-664~~	~~-860~~	~~-890~~	~~-900~~		~~-267~~

The supply data is struck out of this section of the report deals with primarily projections of accommodation demand rather than supply. Nevertheless the whole table (including supply) is presented show what was submitted as a representation to the Placemaking Plan Options consultation.

Whilst the BSU controlled bed numbers are correct there is no row to represent the non-affiliated bedspaces that will be built from 2014/15

Table 9: Bath Spa - March 2016 Current & Forecast (aspired to) Student Numbers

		Undergraduates		Postgraduates				Totals		All
		Taught		Taught		Research				
		Full Time	Part Time	Full Time	Part Time	Full Time	Part Time	Full Time	Part Time	
2011/12	**Total**							0	0	
	Year 1							0	0	
	Other Years							0	0	
2012/13	**Total**	4533	98	805	1563	10	96	**5348**	**1757**	**7105**
	Year 1	1513	17					1513	17	
	Other Years	3020	81	805	1563	10	96	3835	1740	
2013/14	**Total**	4614	83	915	937	22	90	**5551**	**1110**	**6661**
	Year 1	1634	17					1634	17	
	Other Years	2980	66	915	937	22	90	3917	1093	
2014/15	**Total**	4741	80	1120	827	20	76	**5881**	**983**	**6864**
	Year 1	1846	16					1846	16	
	Other Years	2895	64	1120	827	20	76	4035	967	
2015/16	**Total**	5257	66	1155	828	34	60	**6446**	**954**	**7400**
	Year 1	2109	6					2109	6	
	Other Years	3148	60	1155	828	34	60	4337	948	
2016/17	**Total**	6078	67	967	1087	22	61	**7067**	**1215**	**8282**
	Year 1	2396	17					2396	17	
	Other Years	3682	50	967	1087	22	61	4671	1198	
2017/18	**Total**	6659	67	1043	1226	22	77	**7724**	**1370**	**9094**
	Year 1	2454	21					2454	21	
	Other Years	4205	46	1043	1226	22	77	5270	1349	
2018/19	**Total**	7047	80	1118	1394	22	112	**8187**	**1586**	**9773**
	Year 1	2562	21					2562	21	
	Other Years	4485	59	1118	1394	22	112	5625	1565	
2019/20	**Total**	7275	95	1183	1556	22	152	**8480**	**1803**	**10283**
	Year 1	2633	21					2633	21	
	Other Years	4642	74	1183	1556	22	152	5847	1782	
2020/21	**Total**	7483	106	1251	1692	22	188	**8756**	**1986**	**10742**
	Year 1	2669	21					2669	21	
	Other Years	4814	85	1251	1692	22	188	6087	1965	
Change 12/13-15/16		**724**	**-32**	**350**	**-735**	**24**	**-36**	**1,098**	**-803**	**295**
Change 12/13-20/21		**2,950**	**8**	**446**	**129**	**12**	**92**	**3,408**	**229**	**3,637**
Change 15/16-20/21		**2,226**	**40**	**96**	**864**	**-12**	**128**	**2,310**	**1,032**	**3,342**

Forecasts of Demand and Supply

Core Strategy Assumptions

3.18 Prior to setting out current observations it is reiterated that at the time of the Core Strategy, zero growth was assumed and therefore the (then known) 561 (gross) and (480) net on-campus bedrooms re the development of the Gardens would have had a net positive effect on the demand for HMOs to the tune of around 120.

Place-making Plan Options Assumptions (2015)

3.19 These converted the then student projections (Fig.10) into students in housing need in Bath by using total FT or FT undergraduates as a proxy for needs. Other assumptions converting FTE data in actual student numbers were made. The December 2015 version of this Report contained a series of tables and analysis that is now completely superseded by the Draft Placemaking Plan representations (Table 6b and Table 9). Previous analysis has been stripped out of this (May 2016) version of this Report.

Current Assumptions – Draft Placemaking Plan 7 its Examination (2016

3.20 Table 10 – shows what happens when the assumptions in Table 6b (on % of students requiring accommodation for each mode of study) are applied to the total actual and aspired to student numbers in Table 9. In a nutshell the need grows from:

- 51% of 7,105 students in 2012/13 (3,607) to,
- 55% of 10,742 students in 2020/21 (5,909)

3.21 Therefore whilst student growth is 3,637, bedroom need growth is 2,302. On this journey the % multiplier peaks at 58% in 2016/17 and then falls back to 55%.

3.22 The next step is to plot the need figures in Table 10 alongside built, and under construction/permitted supply that is definitely or could be available to BSU students.

Table 10: BSU Student requiring accommodation in Bath

Number derived from applying Table 6b (on % of students requiring accommodation) to the total number of students in Table 9

		Undergraduates		Postgraduates				Totals		All	% of Total
		Taught		Taught		Research					
		Full Time	Part Time	Full Time	Part Time	Full Time	Part Time	Full Time	Part Time		
2011/12	**Total**							0	0		
	Year 1							0	0		
	Other Years							0	0		
2012/13	**Total**	**3324**	**32**	**201**	**47**	**0**	**3**	**3526**	**81**	**3607**	**51%**
	Year 1	1210	6					1210	6	1216	
	Other Yea	2114	26	201	47	0	3	2316	76	2391	
2013/14	**Total**	**3393**	**27**	**229**	**28**	**1**	**3**	3623	58	**3680**	**55%**
	Year 1	1307	6					1307	6	1313	
	Other Yea	2086	21	229	28	1	3	2315	52	2367	
2014/15	**Total**	**3503**	69	280	25	1	2	**3784**	**96**	**3880**	**57%**
	Year 1	1477	5					1477	5	1482	
	Other Yea	2027	64	280	25	1	2	2307	91	2398	
2015/16	**Total**	**3891**	**21**	**289**	**25**	**1**	**2**	**4181**	**48**	**4228**	**57%**
	Year 1	1687	2					1687	2	1689	
	Other Yea	2204	19	289	25	1	2	2493	46	2539	
2016/17	**Total**	**4494**	**22**	**242**	**33**	**1**	**2**	**4737**	**56**	**4793**	**58%**
	Year 1	1917	6					1917	6	1922	
	Other Yea	2577	16	242	33	1	2	2820	50	2870	
2017/18	**Total**	**4907**	**22**	**261**	**37**	**1**	2	**5168**	**61**	**5229**	**57%**
	Year 1	1963	7					1963	7	1970	
	Other Yea	2944	15	261	37	1	2	3205	54	3259	
2018/19	**Total**	**5189**	26	280	42	1	3	**5469**	**71**	**5540**	**57%**
	Year 1	2050	7					2050	7	2057	
	Other Yea	3140	19	280	42	1	3	3420	64	3484	
2019/20	**Total**	**5356**	31	296	47	1	5	**5652**	**82**	**5734**	**56%**
	Year 1	2106	7					2106	7	2113	
	Other Yea	3249	24	296	47	1	5	3546	75	3621	
2020/21	**Total**	**5505**	34	313	51	1	6	**5818**	**91**	**5909**	**55%**
	Year 1	2135	7					2135	7	2142	
	Other Yea	3370	27	313	51	1	6	3683	84	3767	

Analysis

3.23 Table 11 shows that BSU has been consuming its own smoke of late to extent that the balance of extra need and extra dedicated bedspaces generates a modelled reduction in the need for HMOs for Bath Spa students to the tune of about 60 between 2012/13 and 2015/16. For the 20167/17 the capacity generated by Green park House (461) coming on stream will be taken up with growth in demand for that year (565), and it won't quite do the whole job.

3.24 For the whole assessment period the growth in need is 2,302, the growth in bedspaces is 1,400 and the shortfall is therefore currently 902. The need from 2015/16 is 1,681. Beds are set to increase by 551. That means that the shortfall to 2020/21 is 1,130. Therefore having 'released' [13] some HMOs – BSU will need them back unless other sources of supply are found.

3.25 Post 2020/21 (if the aspiration to that date is achieved) the University is unlikely to aspire to stand still. At growth of 1% -20% per annum, on current assumption the additional need would be 500-1,000 further bedspaces.

[13] Theoretically

Table 11: Bath Spa University, Demand and Supply for Student Accommodation 2012/13 – 2020/21 with additional commentary to 2028/29

Table 5a assumes no further dedicated accommodation provision on-campus or in-city to that already accounted for by 2020/21. The resultant number of further bedspaces required is 902 which equate to 226 more HMOs. If more dedicated accommodation provision is secured then the picture would change to a degree 2020/21. Such unconfirmed potential is set out at paragraph 4.3

Since 2012/13 this modelled approach shows a reduction in the need for HMOs of 68-53, but that could reverse in future years, if there is growth and their ae no more dedicated blocks. The average annual need for HMOs from 2016/17 is around 56 (in the absence of any other supply). On current 'Article 4' trends that market won't yield that much supply and what it does yield will be competed for by UoB students.

	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	Change	2021/22 -2028/29
Total Students in Accmodation Need		3607	3,680	3,880	4,228	4,793	5,229	5,540	5,734	5,909	2,302	This is left blank as there is no data. In 3.16 it was postulated that overall numbers could increase from 10,792 by around 900-1800 at 1% to 2% per annum growth to 11,692-12,592. If 55% was applied to this range the need would be 6,430-6,925. That would generate a further need to that shown for 2020/21 of 521-1,016. higher growth rates of 3% pa pr 4% pa would generate additoanl need of 1,500+ - 2,000+
Growth in need			*73*	*200*	*348*	*565*	*436*	*311*	*194*	*175*		
Uni Beds On campus		388	388	872	872	872	872	872	872	872	484	
Uni Beds Off campus		661	661	661	938	1,399	1,399	1,399	1,399	1,399	738	
Uni Beds Total		**1,049**	**1,049**	**1,533**	**1,810**	**2,271**	**2,271**	**2,271**	**2,271**	**2,271**	1,222	
Non-affiliated accomodation share		0	0	24	88	139	178	178	178	178	178	
Total Beds		**1,049**	**1,049**	**1,557**	**1,898**	**2,410**	**2,449**	**2,449**	**2,449**	**2,449**	1,400	
Residual Bedrooms Needed		2,558	2,631	2,323	2,330	2,383	2,780	3,091	3,285	3,460	902	
Student HMOs needed		640	658	581	583	596	695	773	821	865	226	
Yearly change in HMO Demand		640	18	-77	2	13	99	78	49	44		
Cumualtive change in HMO Demand		-9	9	-68	-66	-53	47	124	173	217		
HMO Index		100.0	102.9	90.8	91.1	93.2	108.7	120.8	128.4	135.3	35	

Off-campus sources of supply

4.1 In addition to the programmes of development on each campus, off-campus managed accommodation blocks have been built/converted or are permitted via other providers

Table 12: Off-campus accommodation development since 2011/12

Development	Beds	Notes
Green Park House	461	Permitted May 2014. **Bath Spa** has exclusivity. Under Construction
Twerton Mill	266	Permitted April 2014. (266 in studio/cluster flats and 61 in 10 townhouses) **Bath Spa** has exclusivity re the 266 studio/cluster flats. Complete 2015/16
Sub-total	**727**	**Bath Spa Only**
James Street West	169	Under Construction Bath Uni nomination agreement from 2016/17
Brougham Hayes	100	Under Construction (Previously consent for 44 affordable flats!)
1-3 James Street West	78	Under Construction
Twerton Mill (residual)	61	Permitted April 2014. Completed 2015/16
The Quasar Building	48	Converted 2011/12
Widcombe Social Club	40	Permitted November 2013. Now Completed. Part of a mixed use retail, social club and student housing scheme
1-3 Westgate Buildings	29	Permitted February 2014 Complete 2015/16
Sub-total	**525**	**Assume 169 at James Street West is for the University of Bath and that the residual is split evenly between students as both Unis (178 each)**

4.2 There is uncertainty about the implementation of the BWR capacity of 375 by 2021, or at all. The land is not available for development (if it ever truly was).

Planning Applications and Pre-application enquiries

4.3 The following sites are 'on the radar' as former planning applications, current applications and current pre-application enquiry's

Withdrawn Planning Applications

- 14/03977/OUT redevelopment of Hartwells, Upper Bristol Road for **264** student bedspaces. The site is not within the Enterprise Area but is proposed to be allocated in Draft Placemaking Plan for non-student housing.

Current Planning Applications

- 16/01314/FUL - Redevelopment of former St John's School following demolition of former school building including refurbishment of 33/34 Pulteney Road in order to build around **180** student bedrooms, occasional event parking and associated landscaping. The site is not within the Enterprise Area

- 15/05688/FUL - Site of Old Gas Works, Upper Bristol Road **404** bedspaces. Planning application likely to be refused re Enterprise Area Conflicts re Policy B5 and spurious viability evidence re the ability of the site to deliver normal housing.

Pre-Application Sites

- Wansdyke Business Centre **c.100.** Not within the Enterprise Area.
- Pickfords **c.100.** Not within the Enterprise Area.
- Rear of Argos **c.100** (Enterprise Area but only 14 dwellings permitted. Limited opportunity cost. More than likely ok but urban design testing may bring the number down quite a bit.

The Combined Picture for Bath

5.1 In this section the findings for each University are merged together provide a comprehensive view of current student numbers, future aspirations, accommodation needs arising, the available supply of dedicated space (current and forthcoming) and residual needs

Total Growth in Enrolment (HESA – and not adjusted by PMP Representations)

5.2 The latest year for which there are publically accessible 'industry standard' HESA figures for both Universities is 2014/15. This report has presented some more recent figures for 2015/16 and indeed some alternative figures since 2012/13, but the following is presented to provide a broad indication of combined change. It is not relied upon re current future combined demand and supply analysis. The most recent alternative figures generate 23,768 students overall for 2015/16

Table 12: Total Student Numbers

	Undergraduate			Postgraduate			Total FT	Total PT	Total All
	FT	PT	Total	FT	PT	Total			
1995/96	6,802	219	7,021	1,025	1,837	2,862	**7,827**	**2,056**	**9,883**
1996/97	6,873	60	6,933	1,201	2,647	3,848	**8,074**	**2,707**	**10,781**
1997/98	7,121	76	7,197	1,355	2,771	4,126	**8,476**	**2,847**	**11,323**
1998/99	7,423	75	7,498	1,390	2,710	4,100	**8,813**	**2,785**	**11,598**
1999/00	8,011	159	8,170	1,607	2,993	4,600	**9,618**	**3,152**	**12,770**
2000/01	8,781	296	9,077	1,613	3,200	4,813	**10,394**	**3,496**	**13,890**
2001/02	9,544	1,272	10,816	1,726	2,148	3,874	**11,270**	**3,420**	**14,690**
2002/03	10,367	1,720	12,087	1,951	1,589	3,540	**12,318**	**3,309**	**15,627**
2003/04	11,154	1,740	12,894	2,064	2,141	4,205	**13,218**	**3,881**	**17,099**
2004/05	11,714	1,357	13,071	2,285	2,719	5,004	**13,999**	**4,076**	**18,075**
2005/06	12,024	1,592	13,616	2,180	3,034	5,214	**14,204**	**4,626**	**18,830**
2006/07	12,535	763	13,298	2,131	3,385	5,516	**14,666**	**4,148**	**18,814**
2007/08	13,111	802	13,913	2,193	4,139	6,332	**15,304**	**4,941**	**20,245**
2008/09	13,743	916	14,659	2,328	4,143	6,471	**16,071**	**5,059**	**21,130**
2009/10	14,514	879	15,393	2,477	4,668	7,145	**16,991**	**5,547**	**22,538**
2010/11	14,874	795	15,669	2,726	5,140	7,866	**17,600**	**5,935**	**23,535**
2011/12	15,404	690	16,094	2,671	4,692	7,363	**18,075**	**5,382**	**23,457**
2012/13	15,362	542	15,904	2,835	4,308	7,143	**18,197**	**4,850**	**23,047**
2013/14	15,647	337	15,984	2,901	3,618	6,519	**18,548**	**3,955**	**22,503**
2014/15	16,433	176	16,609	3,013	3,402	6,415	**19,446**	**3,578**	**23,024**

5.3 Table 12 and Figure 13 set out how the number of students has been increasing. For the 2014/15 academic year there were a total of 23,047 enrolled students. There were about 16,400 undergraduates (71%) and 6,400 postgraduates (29%) 19,500 students (79%) were studying on full-time courses (HESA)

5.4 The vertical line in Figure 13 represents the beginning of the Development Plan Period (Core Strategy period). There has been a contraction of around 500 enrolled students since 2011/12, but more significantly from an accommodation needs perspective is that full-time enrolment is up nearly 2,000 in the last 4 years, with undergraduate enrolment up around 1,600. It has risen further in 2015/16.

Figure 13: Total Student Numbers (based on HESA)

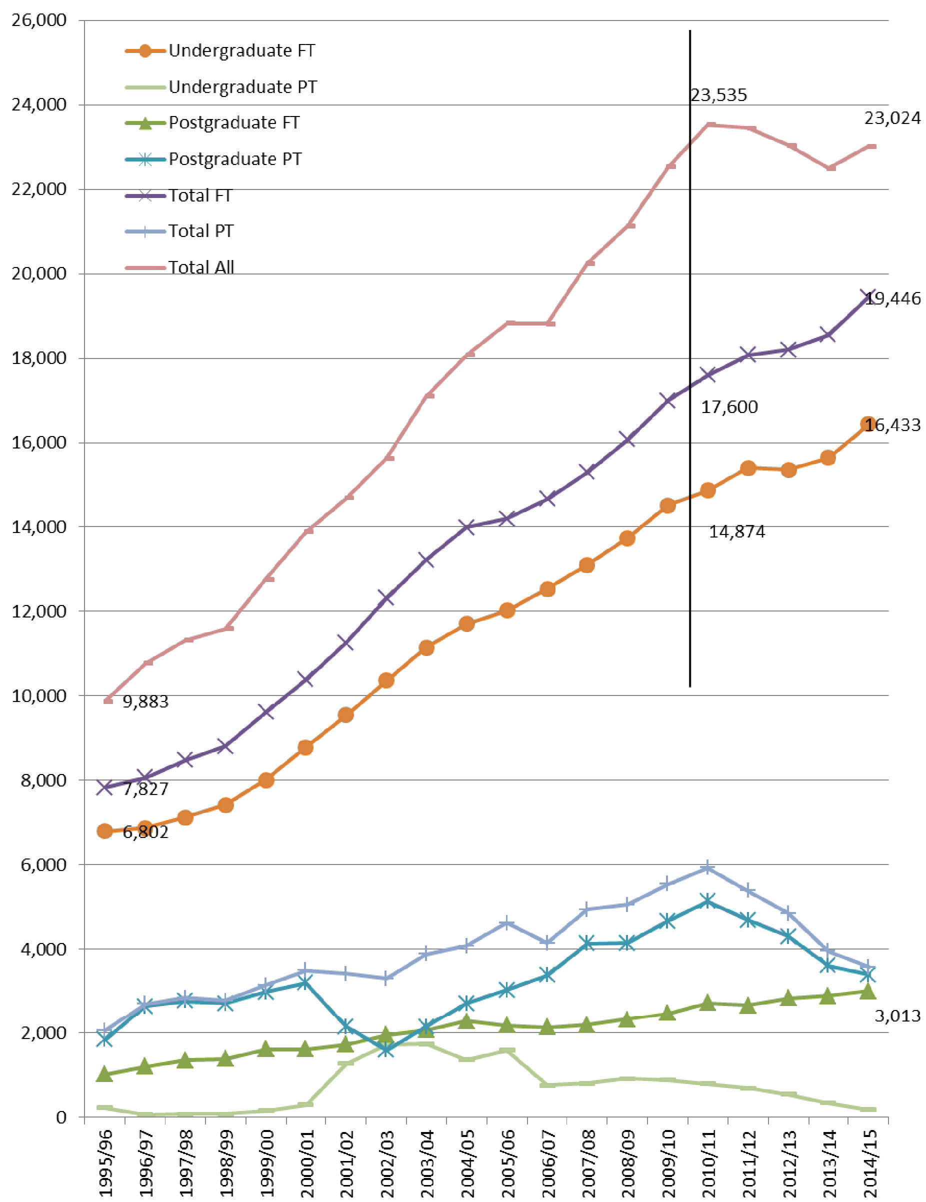


Table 13: Total combined Growth in Enrolment since 2012/13 (revised numbers using PMP Representations)

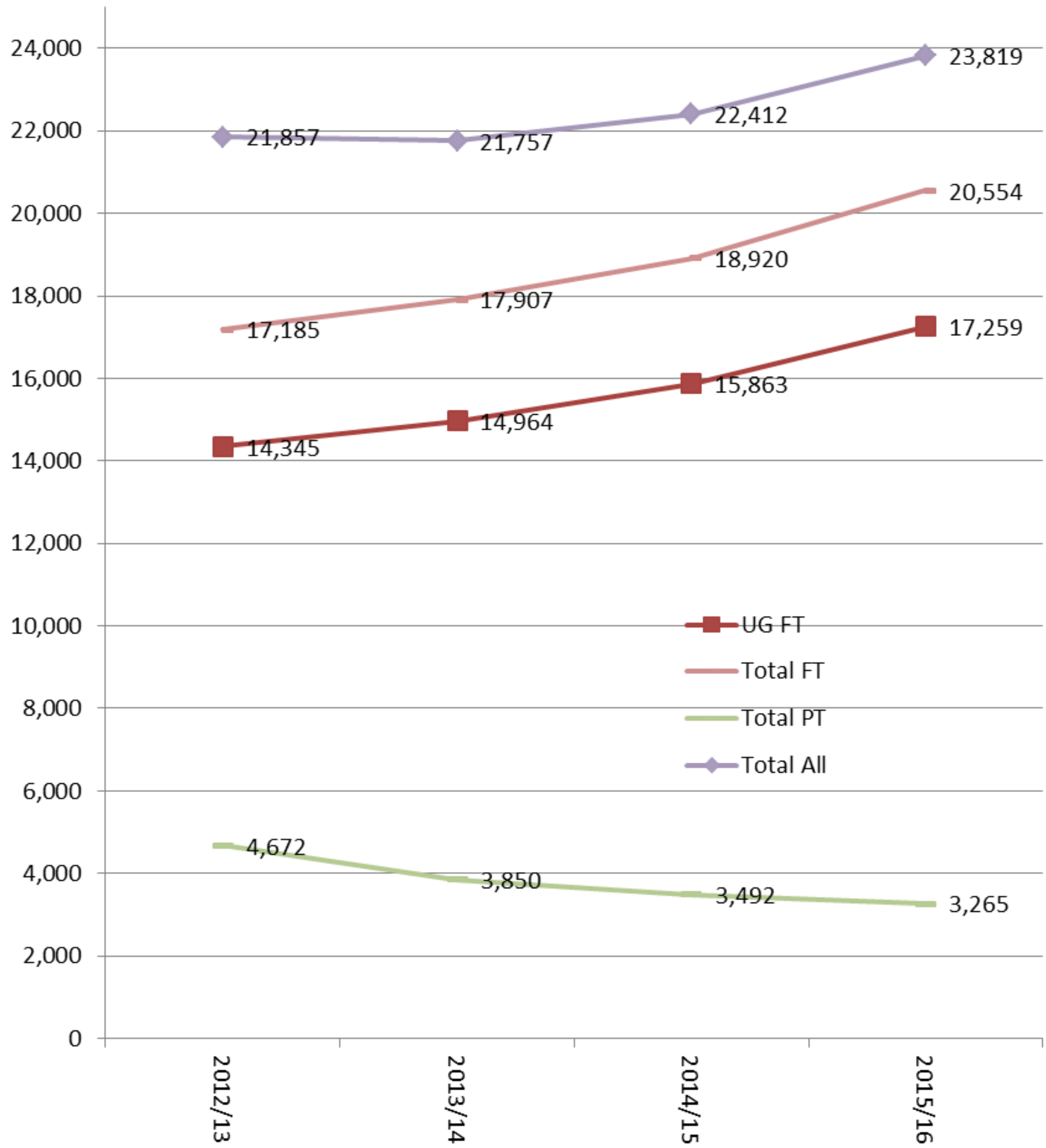
Univeristy of Bath									
	Undergraduate		Postgrad- Taught		Post-grad Research		Total FT	Total PT	Total All
	FT	PT	FT	PT	FT	PT			
2012/13	9,812	297	1230	2213	795	405	**11,837**	**2915**	**14,752**
2013/14	10,350	217	1226	2122	780	401	**12,356**	**2740**	**15,096**
2014/15	11,122	87	1103	1997	814	425	**13,039**	**2509**	**15,548**
2015/16	12,002	95	1262	1744	844	472	**14,108**	**2311**	**16,419**

Bath Spa University									
	Undergraduate		Postgrad- Taught		Post-grad Research		Total FT	Total PT	Total All
	FT	PT	FT	PT	FT	PT			
2012/13	4,533	98	805	1,563	10	96	**5,348**	**1,757**	**7,105**
2013/14	4,614	83	915	937	22	90	**5,551**	**1,110**	**6,661**
2014/15	4,741	80	1,120	827	20	76	**5,881**	**983**	**6,864**
2015/16	5,257	66	1,155	828	34	60	**6,446**	**954**	**7,400**

Combined									
	UG FT	UG PT	PGT FT	PGT PT	PGR FT	PGR PT	Total FT	Total PT	Total All
2012/13	14,345	395	2,035	3,776	805	501	17,185	4,672	**21,857**
2013/14	14,964	300	2,141	3,059	802	491	17,907	3,850	**21,757**
2014/15	15,863	167	2,223	2,824	834	501	18,920	3,492	**22,412**
2015/16	17,259	161	2,417	2,572	878	532	20,554	3,265	**23,819**
Change	**2,914**	**-234**	**382**	**-1,204**	**73**	**31**	**3,369**	**-1,407**	**1,962**

5.5 Table 13 as presented in Figure 14 shows that whilst total numbers have increased by around 2,000, underlying FT growth is around 3,350 and PT contraction of around 1,400. Of the FT growth, 2,900 relates to undergraduates – the biggest generator of housing need.

Figure 14: Revised enrolled students data for 2012/13 to 2015/16



The Demand for, and Supply of, Student Accommodation

5.6 **Table 14 shows** that to 2015/16 the modelled need has increased by 2,390 bedsapces to 16,654 and available beds have increase by 1,643, to 6,039. This leaves an overall residual demand of 10,615 and a residual demand increase of 747, which equates to around 187 HMOs. Monitoring shows that since July 2013 (when the article 4 Direction was made) that there have been around 80 student HMOs in a newly regulated market. Therefore for the modelled demand of 187 to square with changes of uses a further 100 HMOs would have been needed in the 2 years or so prior to July 2013 (in an unregulated context). That does not seem implausible and given the large numbers involved lends some credence to the modelled approach under taken. The proportion of that in need, housed in dedicated accommodation has improved from 30.8% to 36.3%, nevertheless residual HMO demand has itself increased.

5.7 This overview does mask the individual performance of both institutions

5.8 The final column of Table 14 shows that for the whole decade, once everything is taken into account, and in the absence of any further dedicated accommodation, that if the aspirations set out were to be realised, there would be a need for 2,976 more HMOs bedspaces and 774 HMOs between 2011/12 and 2020/21. Broadly speaking UoB accounts for around 2/3 of that and Bath Spa 1/3. These numbers are high but much reduced from the December 2015 version of this report due to the much lower 'multiplier' for BSU i.e. around 50% and slightly tempered growth aspiration from both Universities. However, the focus of attention is now really the post 2015/16 period- as this is the current baseline.

5.9 The penultimate column of Table 14 shows that from 2015/16, once everything is taken into account and in the absence of any further dedicated accommodation, if the aspirations set out were to be realised, there would be a need for a further 2,229 HMOs bedspaces in a further 557 HMOS to 2020/21. This assumes that the imbalance to the start of 2015/16 (i.e. the 187 HMOs) is not 'redressed' with further conventional housing supply, but is instead redressed with more dedicated accommodation (in the hope that this would release the 187 affected HMOS art t at later date! Alternatively, and perhaps more realistically, the Plan could accept that change (and compensate Baths housing stock - if possible, and ideally at or very close to Bath). That would leave just[14] 2,229 HMOS bedspaces post 2015/16 to find if aspirations are to be met.

[14] As opposed to a further 2,229 bedsapces

5.10 There have been around 15-20 student HMOs permitted per annum since the Article 4 Direction came into force in July 2013 . The actual amount of amount of HMO change is 30-40 per annum but half of HMOs have been found to not be Council tax except, thus showing that this element of supply is filling a need in the non-student market.

5.11 Further in-city accommodation blocks would reduce the reliance on potentially unrealistic levels of HMO growth i.e. in addition to that which might come forward in line with recent trends. To support the Universities, more land in the city could be given over to dedicated accommodation blocks but in most cases there would be an unacceptable effect re Policy B5 of the Core Strategy – which only allows student accommodation if it would not harm the realisation of the objectives for other uses. A number of windfall sites are evident as pre-apps outside the Enterprise Area (see para 4.3) or are within the EA but would not conflict with Policy B5. Whereas previously the non-Enterprise Area windfall sites offered land that wasn't needed for other objectives it is now the case that Bath is nearly 400 housing units short of the Plan's spatial distribution to Bath 7,000. This 300 in party accounted for by the assumption that student HMOs will continue at around 15 per annum to 2029 and that these are seen as a loss to be compensated for[15]. This assumption was not in the housing trajectory on the adoption of the Core Strategy as there was no monitoring data on the trends at that time. Ideally (from a conventional housing perspective) the 'potential ok' pre-app sites and application sites in 4.3 would now become normal housing sites to fill the 400 'gap' – but they are outside the EA and are not proposed for residential allocation in the Draft PMP.

5.12 This narrative means that the right hand column below reflects the 'reality' of what is needed as once an student HMO is generated by the market (in the current market) it stays as an HMO i.e. the 187 that have been generated since 2011/12 won't be reversed thus should ideally be compensated for.

Table 15

	2011/12-20/21#	**2015/16-20/21***
Residual beds	2,976	2,229
Residual HMO equivalent	774	576
Market trends for student HMOs post Article 4 to 2020/21 only	75-100	75-100
Equivalent bedspaces generated	300-400	300-400
New residual beds	2,576 - 2,676	1,829-1,929

[15] The other key factor is the pushing back of part of Bath Western Riverside (280 units) beyond the plan period) due to the effect on not counting any unsecured land in the 5 year land supply and the need to maintain realistic annual rates of delivery thereafter.

Beds from potentially suitable windfall sites in para 4.3	480	480
New residual beds to be found	2,096-2196	1,349-1,449

No compensatory housing provision (187 estimate) for 2011/12-15/16

*Assuming new student HMOs to 2015/16 are replaced with compensatory conventional housing supply (187 estimates).

Potentially suitable windfall sites include 180 at St Johns School and 300 at the three sites listed as pre-apps in paragraph 4.3

5.13 On this basis , although each University may be able to claim a share of new HMOs, and new windfall sites, it is likely that neither will secure what is required to meet aspirations to 2020/21

5.14 In theory, The University of Bath may be able to do more to influence its aspirations to 2020/21 – given the nature of and policies affecting its estate. But, it seems unlikely that it could deliver more than 1,000 new bedspaces on campus to this point and these are already accounted in Table 14 and therefore prior (in thinking) to Table 15. Land that was removed from the Green Belt in 2006 could be utilised by the University to enable it to reach its aspirations to 2020/21 shortly after 2020/21.

5.15 For comprehensiveness Table 15 identifies speculative additional requirements post 2020/21 if aspirations to 2020/21 were to be achieved. It may take longer to achieve those aspirations and only if additional on-campus capacity is utilised by UoB.

Table 14 The Current and Forecast Demand for Student Accommodation vs current and Forecast Supply (less potential further sites set out at 4.3)

Row	Factor	2011/12	2012/13	2013/14	2014/15	2015/16	Change 11/12-15/16	2016/17	2017/18	2018/19	2019/20	2020/21	Change 11/12 - 20/21	Change 15/16 - 20/21	2021/22 -2028/29
1	Bath Uni Housing Need	10,657	10,837	11,256	11,650	12,426	1,769	12,880	13,520	13,968	14,339	14,782	4,125	2,356	Clearly, as set out in the sections on each University there is potential for further significant change (or at least an aspiration for change) to 2028/29. If UoB were to carry on at around 3% then the total number of enrolled students would hit around 24,000, the need figure would hit around 18,700, with the additional beds needed on top of 2020/21 being 3,712 or around 928 HMOs. If one adds 1-2% growth BSU the bedspace figure would increase by another 500-1000 and the HMOs needed 130-260.
2	Bath Spa Housing Need	3,607	3,607	3,680	3,880	4,228	621	4,793	5,229	5,540	5,734	5,909	2,302	1,681	
3	**Total Housing Need**	**14,264**	**14,444**	**14,936**	**15,530**	**16,654**	**2,390**	**17,673**	**18,749**	**19,508**	**20,073**	**20,691**	**6,427**	**4,037**	
4	**Bath Uni on-campus**	2,452	2,452	2,452	3,156	3,156	704	3,156	3,446	3,446	3,446	4,156	1,704	1,000	
5	**Bath Spa on-campus**	388	388	388	872	872	484	872	872	872	872	872	484	0	
6	**Total on-campus**	**2,840**	**2,840**	**2,840**	**4,028**	**4,028**	**1,188**	**4,028**	**4,318**	**4,318**	**4,318**	**5,028**	**2,188**	**1,000**	
7	**Bath Uni off-campus**	895	895	895	895	895	0	1,064	1,064	1,064	1,064	1,064	169	169	
8	**Bath Spa off-campus**	661	661	661	661	938	277	1,399	1,399	1,399	1,399	1,399	738	461	
9	**Uni Beds off-campus**	**1,556**	**1,556**	**1,556**	**1,556**	**1,833**	**277**	**2,463**	**2,463**	**2,463**	**2,463**	**2,463**	**907**	**630**	
10	**Non-affiliated Private Accmodation**	**0**	**48**	**48**	**117**	**178**	**178**	**278**	**356**	**356**	**356**	**356**	**356**	**178**	
11	*Quasar Building*		*48*	*48*	*48*	*48*	*48*	*48*	*48*	*48*	*48*	*48*		*0*	
12	*1-3 Westgate Buildings*				*29*	*29*	*29*	*29*	*29*	*29*	*29*	*29*		*0*	
13	*Widcombe Social Club*				*40*	*40*	*40*	*40*	*40*	*40*	*40*	*40*		*0*	
14	*Twerton Mill*					*61*	*61*	*61*	*61*	*61*	*61*	*61*		*0*	
15	*Brougham Hayes*						*0*	*100*	*100*	*100*	*100*	*100*		*100*	
17	*1-3 James Street*						*0*		*78*	*78*	*78*	*78*		*78*	
18	**Beds Total**	**4,396**	**4,444**	**4,444**	**5,701**	**6,039**	**1,643**	**6,769**	**7,137**	**7,137**	**7,137**	**7,847**	**3,451**	**1,808**	
19	*Beds as % of Demand*	*30.8%*	*30.8%*	*29.8%*	*36.7%*	*36.3%*	*5.4%*	*38.3%*	*38.1%*	*36.6%*	*35.6%*	*37.9%*			
20	Residual HMO Beds Demand	9,868	10,000	10,492	9,829	10,615	747	10,904	11,612	12,371	12,936	12,844	**2,976**	**2,229**	
21	Cumulative HMOs Beds Demand Change	0	132	624	-39	747	747	1,036	1,744	2,503	3,068	2,976			
22	Residual Student HMOs needed	2,467	2,500	2,623	2,457	2,654	187	2,726	2,903	3,093	3,234	3,211	**744**	**557**	
23	Cumulative HMOs Change		33	156	-10	187	187	259	436	626	767	744			
24	HMO Index	100.0%	101.3%	106.3%	99.6%	107.6%	7.6%	110.5%	117.7%	125.4%	131.1%	130.2%			

* note: additional windfall supply from paragraph 4.3 could generate further accommodation supply

Conclusions

5.16 The evidence for plan-making and town management boils down to a question of what spare developable capacity remains the in the city and on-campus to enable student accommodation to in turn enable the Universities to achieve their aspirations. That capacity relates to the room for more dedicated blocks and scope for further HMO growth (within the regulatory framework of the Article 4 Direction, the scope of the market to increase at the required rate, and in new areas below the Article 4 threshold). There is of course an opportunity cost to both elements. As stated at the beginning of this report, accommodation is needed to enable enrolment. It may be that aspirations are modified based on what accommodation is realistically deliverable within the regulatory planning framework. Other factors may also affect enrolment. The cap could return with the same surprise with which it was removed.

5.17 Policy B5 of the Core Strategy prioritises uses other than student accommodation blocks in key areas of the city that are going to change during the plan period. It's not blanket ban, but given the tightness of land supply it will severely limit the acceptability future dedicated blocks. (Council tax exempt) HMO conversions via planning permission generate a need for compensatory normal housing provision - but that is unlikely to be at Bath to any significant degree - although the Duchy of Cornwall (prompting land to the west of Twerton) would disagree, and the Sulis Down landowner of the allocated land at Sulis Down believes that site can no more than the minimum of 300 that the housing trajectory currently budgets for. The replacement of housing away from Bath is less socially and economically sustainable than retention in Bath or replacement at Bath, it is also less environmentally sustainable from a transportation perspective. Nevertheless there are high profile heritage constraints affecting land on the edge of Bath.

5.18 Communities with low levels of HMOs or emerging moderate levels will be concerned about potential growth. There may be a need to review the A4 Direction (in-principle and its thresholds) at regular intervals and explore refinements. For example where an area is at 3% it may be that not more than 5-10% growth should be permitted rather than allowing up to 25%. The current 25% is generous compared to other places. Or, alternatively where some pockets of residential streets are significantly above 25% (for historic reasons), that surplus could be accounted for used to offset capacity neighbouring areas that are under threshold (so that a bigger area became the unit of analysis). At present surplus above threshold play no offsetting role. Appendix 4 shows current concentrations of HMOs. Purple areas are at or above threshold. The implication of the approach floated would be to 'delete/remove' the headroom capacity available in some of the neighbouring areas below threshold. Such options would be favoured by some parties but not others. With Policy B5 in place the higher education sector, for one, would be further impacted by such an amendment. There is also a non-student HMO sector to consider. Some may favour a loosening of the A4

Direction (that would potentially increase supply and concentration in current hotspots and potentially reduce the incidence of spread). That would be beneficial to landlords and the Universities, but not so if you live in or around a current hotspot, and likely not conducive to the retention of mixed communities. That is a matter to be considered beyond, but linked to the Placemaking Plan. The justification or the current Article 4 direction is currently about mixed communities in streets, but the strategic issues relating to the housing stock of the city (a unique city) are also relevant.

5.19 Finally, the University of Bath is able to boost accommodation supply by virtue of land that was removed from the Green Belt in 2007. This has not received much/any attention for this use in respect of development identified within the masterplan that followed the retraction of the Green Belt. Assuming it was to be programmed for development, the rate of development would have a bearing on accommodation supply. It may take some time to bring forward any potential / phases identified. (esp if the University were to build itself). It may be unwilling to relinquish control for the sake of more rapid development. Its charitable status may also have an impact on the legitimacy of any partnership development options re accommodation.

Appendix 1: Determining Housing need from total enrolment for the University of Bath (old approach)

- Total student enrolment at the University of Bath is about 15,500

- Of these, 1,200 students are on distance learning courses, 1,700 are on their sandwich year, 50 are studying overseas and a further 50 are classed as dormant i.e. left within the first term. This totals 3,000.

- Of the 1,700 on their sandwich year, 400 maintain a BA postcode and are perhaps on placement in Bath or the sub-region.

- This means that the total number of students who can initially be discounted as needing accommodation within a BA postcode in 2012/13 is about 2,600.

- Therefore, from this initial filter, 12,900 students are likely to require accommodation within a BA postcode. These can be subdivided as follows.

Group 1	400 sandwich students on placement but living within a BA postcode
Group 2	4,340 sandwich students who are not currently on their placement year who are full time on campus
Group 3	6,465 non-sandwich course students who are full-time on campus
Group 4	1,760 who are part-timeon campus

- An analysis of the term time postcodes of groups 2-4 reveals that 9,330 have a BA postcode, 1,700 have a non BA postcode and 1,450 have an international address or no postcode. The later is assumed as the home addresses international students who indeed do live in a BA postcode during term time.

- Together with Group 1, Groups 2-4 yield about 11,200 students in need of accommodation in a BA postcode. Of these, just 50 live at home with parents within a BA postcode, leaving 11,050.

- A more significant trend is home ownership or a long term tenancy amongst students. 1,781 are classed as homeowners or people that rent long term. About 800 of these are undergraduates and 1,000 are postgraduates. The undergraduate figure seems surprising on first inspection but may reflect investments in the housing market from the families of students (particularly overseas students). These are likely be shared dwellings of some sort and so the 800 undergraduates are not discounted from a residual housing need figure, but the 1,000 post graduates who state that they are homeowners or long term renters are discounted.

- Once postgraduate home owners/long term renters are discounted the figure of 11,050 reduces to 10,050 students. This is **65%** of the total enrolment for 2012/13 and this ratio will be used for projections. We will monitor this at each plan review.

Appendix 2 Paragraphs 54-65 of the Core Strategy Inspector's Report (June 2014)

Students

59. The PPG (*How should local planning authorities deal with student housing?)* indicates that all student accommodation can be included in the housing requirement based on the amount of accommodation it releases in the housing market. The Council's treatment of student housing needs and the provision of student accommodation has changed several times during the course of the Examination. The PPG does not make it a requirement to include student housing as part of housing supply, but it is essential for the assumptions about student demand for accommodation and its supply to be clear and to be monitored in case those assumptions do not hold true for the plan period.

60. The *Draft SHMA Update* 2013 had not included students at all in the projections, but the *Addendums* do include a student population within the projections, the size of which is assumed to remain constant (*Addendum 1a*, paragraph 14). This assumption is based on the Council's conclusions from its *Student Numbers and Accommodation Requirements Evidence Base* July 2013 (published with BNES/43). This updated a similar paper from 2010 (CD6/D1). The 2013 paper draws on the advice provided to the Council by the two universities within the district - Bath University and Bath Spa University - regarding their future plans for students and accommodation.

61. Bath University's known plans do not extend over the full plan period, but project either 1% or 3% growth for part of the period. It is continuing to plan for additional accommodation on the campus. Bath Spa University is assuming no future growth in students, but plans to add a further 600 beds on campus. Overall, the Council concludes that if Bath Spa does not expand and Bath University grows by only 1% pa and all the accommodation plans are realised, then students should not add to housing pressures over the plan period and that between 250-575 houses in multiple occupation could be released from student use and returned to the general housing market. But it has not relied on any such releases as a contribution to supply.

62. Clearly there are uncertainties. The universities might grow more than currently planned, particularly given the lifting of the Government's cap on university places – albeit that Bath University's growth may not have been influenced by the cap because of its high entrance requirements. Post-hearing comments on the PPG on behalf of Unite Group PLC refer to Bath Spa's plans to significantly increase its proportion of overseas students, but it is not clear whether this would represent an increase in students overall or simply a higher proportion of overseas students. In addition, the delivery of on-campus accommodation for both universities has been slower than originally intended and similar delays might occur.

63. There is some leeway for these factors to change without significantly affecting the general housing market. Nevertheless, the assumption underpinning this element of the SHMA of no net increase in demand from students on the general housing market is a crucial one. It is essential that this assumption is made explicit in the plan and reassessed at future plan reviews so that any additional pressures on the housing market can be identified and taken into account. I have added wording in **MM8** and **MM134** to make this clear.

64. Bath spatial strategy policy B1.7 refers to additional on-campus accommodation enabling a growth in student numbers and/or a shrinkage of the private student lettings market, whereas the assumption by the Council is for limited growth in numbers and no need for expansion of the private letting market. Accordingly this text needs to be amended to reflect this position (**MM23** in part). With this change, the plan would leave off-campus purpose-built student accommodation to be determined on its merits other than in the Central Area and Western Corridor (Enterprise Area) where policy B5 indicates that such proposals would be refused if they would adversely affect the realisation of other aspects of the vision and spatial strategy. This approach is reasonable given the other priorities for these areas which cover only a small part of the City. In any case, avoiding additional student pressures in the housing market is part of the underlying strategy which the Council would need to take into account in determining whether any proposals conflicted with this policy. A growing need for such off-campus accommodation would be a matter to address in a review of the plan.

Appendix 3 Key Core Strategy Extracts

Para1.26d

The assessment of housing needs is based on two important assumptions. Firstly, the Council assumes that the expected limited growth in the student population at Bath's two universities will be accommodated in the planned growth of mainly on-campus new student accommodation, which can be supplemented by new off campus accommodated where appropriate. If the provision of purpose-built student accommodation does not keep up with the growth in the resident student population, more market housing will be needed because of the pressure on the private letting market. Secondly, the SHMA assumes that the contribution to the provision of affordable housing needs from private rented accommodation where occupiers are receiving housing benefit will continue at a similar scale in the future. If this contribution were to significantly fall, the need for new affordable housing would increase.

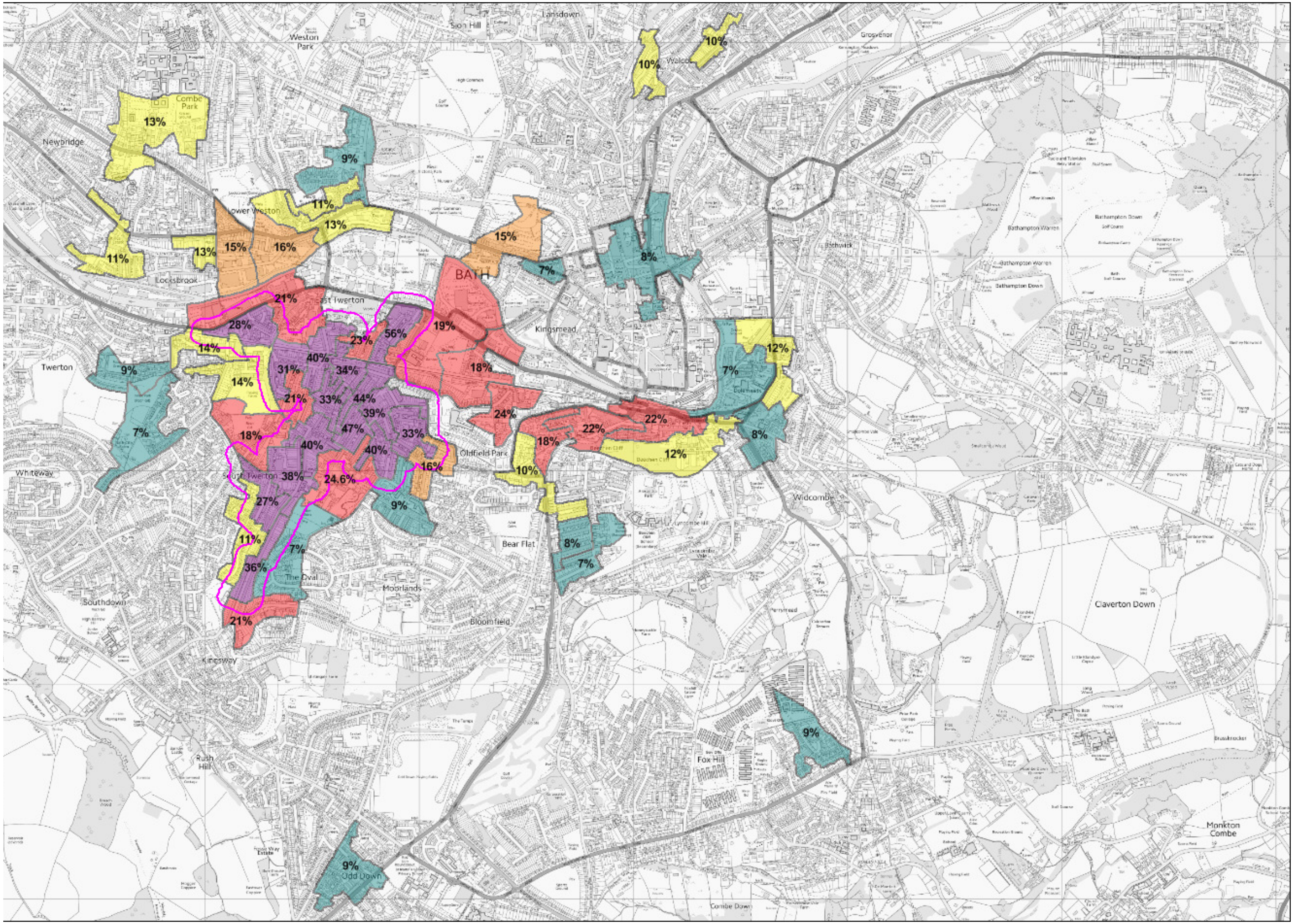
Policy B1(7a)

Enable the provision of additional on-campus student bed spaces at the University of Bath and at Bath Spa University, and new off-campus student accommodation subject to policy B5, thereby facilitating growth in the overall number of students whilst avoiding growth of the student lettings market.

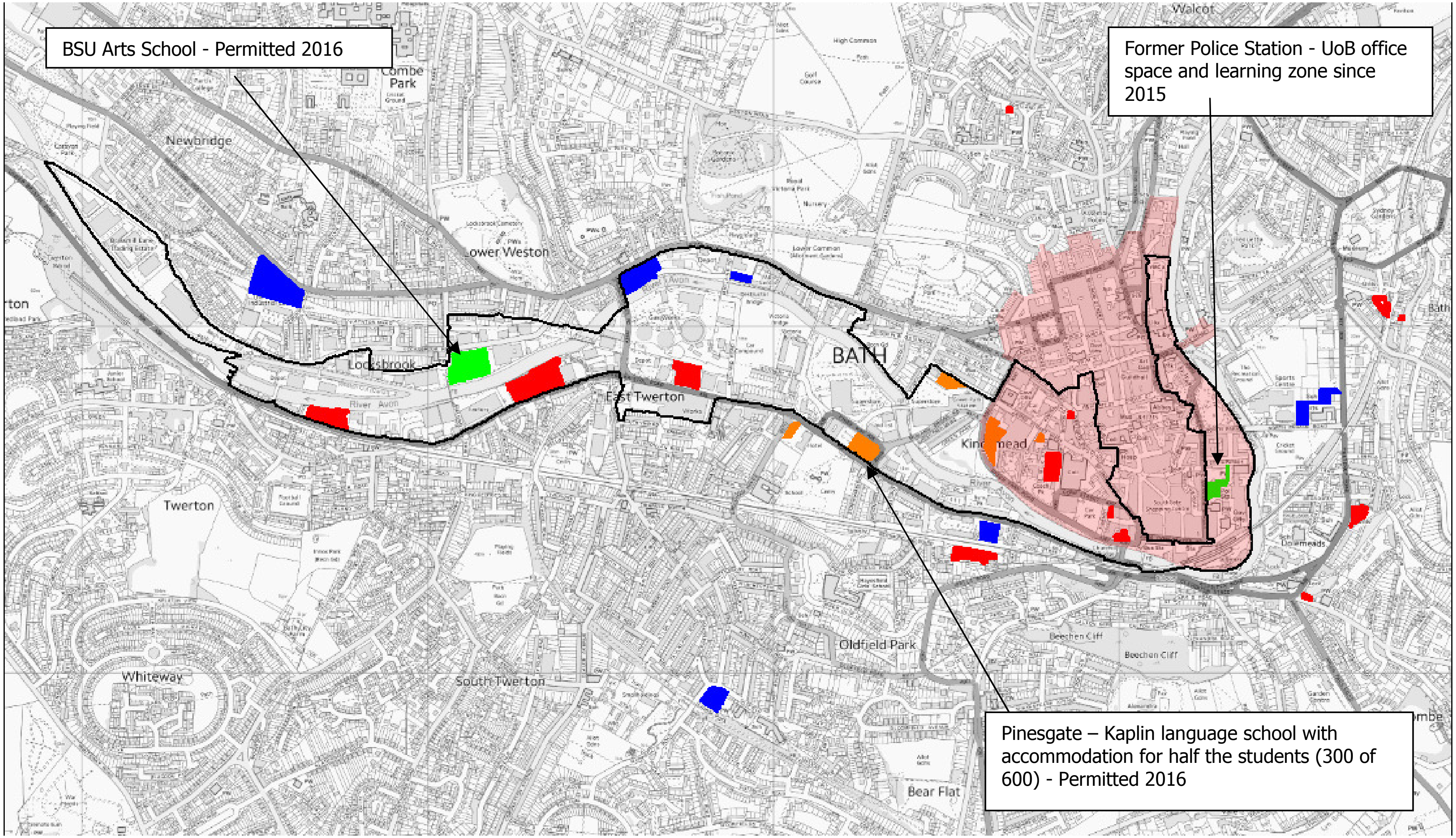
Policy B5 re Off-Campus Student Accommodation

Proposals for off-campus student accommodation will be refused within the Central Area, the Enterprise Area and on MoD land 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.

Appendix 4 HMO Concentrations (December 2015)



Appendix 5: Footprint of built (red), permitted/under construction (orange) and developer promoted (blue) off-campus student accommodation.



Appendix 6: UoB July 2015 draft Forecasts (superseded by March 2016)

	11/12	12/13	13/14	14/15	15/16	16/17	17/18	18/19	19/20	20/21	Change from 12/13	Change from 11/12
UNDERGRADUATES												
UG Intake	?	2,833	3,140	3,473	3,508	3,676	3,876	4,076	4,276	4,476	**1,643**	
Year on year change			*307*	*333*	*35*	*168*	*200*	*200*	*200*	*200*		
Total UG	?	9,812	10,350	11,122	11,845	12,564	13,166	13,635	14,242	14,952	**5,140**	
Year on year change			*538*	*772*	*723*	*719*	*602*	*469*	*607*	*710*		
Total UG on campus #	?	8,594	9,088	9,668	10,331	10,870	11,507	11,961	12,477	13,096	**4,502**	
Year on year change			*494*	*580*	*663*	*539*	*637*	*454*	*516*	*619*		
Total UG on campus %	?	87.6%	87.8%	86.9%	87.2%	86.5%	87.4%	87.7%	87.6%	87.6%	**0**	
TAUGHT POSTGRADUATES												
Full Time	?	1,230	1,226	1,103	1,103	1,103	1,103	1,103	1,103	1,103	**-127**	
Part Time	?	2,213	2,122	1,997	1,997	1,997	1,997	1,997	1,997	1,997	**-216**	
RESEARCH POSTGRADUATES												
Full Time	?	795	780	814	814	814	814	814	814	814	**19**	
Part Time	?	405	401	425	425	425	425	425	425	425	**20**	
Student population	14,000*	14,455	14,879	15,461	16,184	16,903	17,505	17,974	18,581	19,291	**4,836**	**5,291***
Students requiring accommodation* #	10,290*	10,619	11,094	11,585	12,248	12,787	13,424	13,878	14,394	15,013	**4,394**	**4,723***
Students requiring accommodation* %	73.5%*	73.5%	74.6%	74.9%	75.7%	75.6%	76.7%	77.2%	77.5%	77.8%		
Difference (requiring accommodation)		329*	*475*	*491*	*663*	*539*	*637*	*454*	*516*	*619*		