

## Bath & North East Somerset Placemaking Plan

### COUNCIL'S RESPONSE TO ID/3: MATTER 13 – BATH'S UNIVERSITIES

#### *Issue – whether the approach to Bath's Universities is sound*

**Q1. The Strategic Housing Market Assessment upon which the CS is based assumes that the expected modest growth in the student population will be accommodated through on-campus provision (CS Policy B5). With this in mind; is it appropriate to review Section 2F of the adopted CS in isolation to general housing policies and the overall strategy for Bath?**

1. The Placemaking Plan (PMP) paragraphs 221 to 252, Policy B5, paragraphs 254 to 271, Policy SB19, paragraphs 272 to 274 and Policy SB20 sets out the spatial plan for Bath's universities and private colleges in line with following the strategic framework set out by the Core Strategy (CS).
2. The overall strategy is to enable the universities to fulfil their growth ambitions, as far as possible, without those ambitions having a negative impact on the realisation of the Council's wider strategic planning requirements for the city, nor an unacceptable impact on the University campuses or their environments, nor on the existing normal housing stock of the City. The strategy of prioritising housing & employment needs in the city (particularly in the city centre/EA) was already established in the CS and this strategy remains the same in the PMP.
3. The CS and the SHMA upon which it is based concluded that the expected modest growth in the student population will be accommodated by the planned growth of mainly on-campus new student accommodation with some additional off-campus development. This meant that the student accommodation needs generated could be met alongside the City's other objectively assessed development requirements whilst avoiding unacceptably high concentrations of student HMOs in parts of the City.
4. However, because the universities growth aspirations have now increased it may not be possible to meet the associated accommodation requirements in full without putting significant pressure on the housing stock and the demand for purpose built student accommodation in the City. It may lead to some further increase in HMOs within the city, therefore the amended Policy B5 introduces monitoring of HMO applications and provides for compensatory housing provision through the plan review process if delivery of the target of 7,000 dwellings for the city is put at risk. The response of the HMO market and any increase in student HMOs is being carefully monitored. The implications for housing supply in the city of actual recorded changes in the stock of student HMOs are most appropriately addressed through the review of the Core Strategy (see also Council's statement on Matter 2, Issue 2, BNES/PMP/0002/5).

5. The SPD accompanying the Article 4 Direction provides the current framework to manage the growth of HMOs. The Council is also reviewing the HMO SPD to address concerns about proliferation of HMOs and impact on the city. The Council may seek to control HMO growth further or make compensatory provision through the Plan review if the number of student HMOs created is significantly greater than our assumption and allowance. The review of the HMO SPD was agreed at the Council meeting in May 2016 (CD/PMP/G28 – Item 101) and is set out in the Council’s Local Development Scheme (CD/PMP/G19). This work is now underway.
6. The higher education footprint within the city needs to be managed in order to enable sufficient land to be protected and developed for normal housing. The prioritisation of other housing types could result in shortages for student accommodation against the growth aspirations of universities. Therefore, the response of the universities in terms of their future growth, as well as the response of the HMO market, will be relevant in considering the relationship between student accommodation provision and future housing supply in the city. This is most appropriately addressed through Core Strategy review when further information is available on the various factors outlined above.
7. The implications of this approach are discussed further below. But the Council considers that this approach is still within the strategy framework set by the CS particularly in Policy DW1, B1.7a and Policy B5 therefore it is appropriate and necessary to amend/update the section 2F of the CS separately.

**Q2. Is the proposed strategy justified and supported by evidence?**

8. The preamble to Policy B5, SB19 and SB20 sets out the policy justification and background evidence. The latest position on the demand and supply for accommodation for students studying at the University of Bath and Bath Spa University is set out in **the Student Numbers and Accommodation Requirements in Bath** (May 2016)(CD/PMP/B16/1). It also shows how this has been changing especially since the adoption of the Core Strategy and how this might change in the future. This paper reflects the latest discussions with the Universities with higher growth aspirations (based on the consultation comments received from the universities).
9. The amendments to the Core Strategy Policy B5 were also subject to sustainability appraisal screening (CD/PMP/G9/8) and testing (CD/PMP/G9/9).
10. The Council’s justification on the overall strategy is also set out under Matter 2 – Issue 2 – Question 1(BNES/PMP/0002/5). Therefore the Council considers that the proposed strategy is justified and supported by appropriate evidence.

**Q3. In the absence of off-campus provision for student accommodation, what impact are the recently revised growth aspirations of both the University of Bath and Bath Spa University likely to have on the objectively assessed needs for housing in Bath?**

11. The Bath SHMA addendum 1a (CD/PMP/G30) assumed that the student population would remain constant over the period to 2031 and any growth in student numbers would be accommodated in an equivalent growth in bedspaces in halls of residence, and there would be no impact on the future number of households and dwellings required. Therefore the student accommodation needs and supply have been addressed separately and in addition to the Core Strategy housing requirement.
12. It may have an impact on the supply side (discussed under Question 4) but because of the way that the SHMA deals with student numbers, the recently revised growth aspirations of the universities do not impact on the objectively assessed needs set out in the Core Strategy.

**Q4. Will policies within the Placemaking Plan be effective in ensuring that any additional increase in need for student accommodation will not reduce the supply of general housing?**

13. The cumulative growth aspirations of the Universities and the related implications for student accommodation have increased since the adoption of the CS. Table 15 of the Student Numbers and Accommodation Requirements in Bath (CD/PMP/B16/1) shows 1,349-1449 additional bedspaces to be provided between 2015 to 2021 in order to achieve the recently revised growth aspirations of both Universities. This is equivalent to 337 to 362 HMOs (at 4 beds per HMO).
14. New private educational institutions such as language schools have also signalled a desire to increase their presence in the city. Some of this is a precursor to University enrolment for international students. This is likely to put further pressure on the city's housing stock because the demand for purpose built student housing is competing with the Council's priorities of delivering housing and employment.
15. Placemaking Plan Policy B5, supplemented by specific site allocation policies, prioritises housing and economic development within the Central Areas and the Enterprise Area. As an example, the application for student accommodation (394 bed spaces) was refused at the site of the Old Gas Works, Upper Bristol Road which is within the Enterprise Area on 29<sup>th</sup> July (15/05688/FUL). It concluded that overall, proposals for off-campus student accommodation within the Enterprise Area are considered to reduce the housing numbers anticipated by the BWR SPD and as such adversely affect the realisation of the spatial strategy for the city in relation to housing. The development is therefore considered to be contrary to Policy B5 and B1 of the Core Strategy.

16. However outside these areas windfall off-campus provision could come forward without harming the overall strategy. As an example, the application for a purpose built student accommodation with 183 bedspaces was permitted at the Former St Johns School (Application number 16/01314/FUL) in June 2016. This site is outside the Enterprise Area in Bath.
17. The Council's approach is also prioritising the implementation of on-campus provision which the University of Bath will need to bring forward, particularly using the area of land removed from the Green Belt through the B&NES Local Plan (Adopted 2007). Policy SB19 (the University of Bath) provides further clarity on where new on-campus student accommodation can be built broadly reflecting the masterplan prepared by the University of Bath. As explained under Question 1, the overall strategy is to prioritise normal housing and the proposed changes to Policy B5 allow the Council to monitor the development of HMOs and for compensatory provision to be made if the achievement for 7,000 net additional dwellings for the city is at risk.
18. Whilst the Council acknowledges that this policy framework might result in the aspirations of the universities being not fully met, the Council considers that the most appropriate mechanism for addressing any shortfall in student bedspaces is through the review of the Plan with a comprehensive consideration of other planning priorities such as housing requirement and taking account of the current uncertainties set out below. (Please also see the Council responses on Matter 2 and to question 1 above.)
19. The Council is seeking to support the universities' growth and long term future in a balanced way as part of a coherent plan for the City. There is uncertainty regarding the likelihood of these higher aspirations being realised and it is worth noting the following issues which are material in setting the context for accommodation needs and considering supply. Importantly the marginal shortfall in identified supply at April 2016 must be seen in the context of a number of uncertain factors around the Universities growth aspirations:
  - The potential shortfall derives from the additional growth projections, the Placemaking Plan still provides the framework to achieve the growth level (1-3%) tested through the Core Strategy.
  - The aspirations of universities are subject to change.
  - Higher education institutions are subject to changing government policy including funding arrangements, grants from the EU and an increasingly competitive market, overseas student numbers and institutions may modify their aspirations or initiatives.
  - For the University of Bath, a higher multiplier (73.5% increasing to 77.8% by 2020 rather than 65%) is used to calculate students requiring accommodation as requested by the University of Bath.
  - For the University of Bath, fewer on-campus bedspaces are counted (1,700 bedspaces rather than 2,400) than capacity potentially available on campus.

- Summarising a snapshot of the combined position set out in the Student Numbers and Accommodation Study is difficult as there are discrepancies between publically available HESA data and the data provided by the universities. Further, Bath Spa University's plan evidence is set out in the form of Full Time Equivalents rather than actual students.
- Policy B5 is not a blanket policy on further student accommodation blocks within the city. There will be some windfall sites that are not identified for other uses in the Housing trajectory.
- The Housing Land Supply Trajectory (CD/PMP/S3) allows a small increase in the HMOs. (15 dwellings per annum)

20. Therefore the PMP polices are effective in ensuring that any additional increase in the need for student accommodation will not reduce the supply of general housing. They provide the control to refuse proposals which prejudice the provision of new housing whilst also making significant provision for university growth aspirations.

**Q5. Paragraph 17 of the CS confirms that the development of the University of Bath and Bath Spa University requires strategic policy direction in order to secure the future of each institution. Is the strategy contained in the Placemaking Plan in relation to student accommodation the most appropriate when considered against any reasonable alternatives? What alternative options have been considered to meet the more recent indications / aspirations of the universities?**

20. To identify reasonable alternatives, the Council has explored various approaches such as;
- introducing policies which allow refusal of additional teaching space when this generates student accommodation supply in excess of a certain number of HMO bedspaces (as seen in Oxford). However, this is not considered to be an appropriate tool to be deployed yet in Bath as new teaching space is not only about enabling growth but improving existing conditions; there is not an equivalent B5 policy in Oxford, and both Universities in Oxford have more land ownership options.
  - Student accommodation outside the city of Bath. The Council has consulted on development sites in Keynsham in June 2016. Possible re-use of Riverside Buildings included refurbishing the building into student accommodation. Various options were considered and tested against the Sustainability Appraisal criteria. SA report Annex C (CD/PMP/G9/5) presents two options considered for Policy SB19 (the University of Bath) - option 1 Rolls forward the 2007 Local Plan policy referencing the university wide master plan and option 2 sets out a much more specific policy. It also presents two options considered for Policy SB20 (Bath Spa University) – option 1; identify the campus as a MEDS as in the 2007 Plan and option 2; allow NPPF 89 to apply and determine PDL at the Development Management Stage.
21. The Council acknowledges that there may be a shortfall in currently identified bedspaces against estimated bedspaces to meet the aspirations of the universities. However the

provision of student accommodation cannot be considered in isolation from other planning priorities. In the context of the overall strategy, the Council considers the strategy contained in the Placemaking Plan is the most appropriate when considered against reasonable alternatives because of the higher priority placed on delivering housing and employment objectives. As explained earlier, the Council considers that the most appropriate mechanism for addressing any shortfall is through the review of the Plan with the full consideration of other planning priorities such as housing requirements.

22. The Adopted CS (see paragraph 7.05 of CD/PMP/G6) requires that the Plan will undergo an early review in parallel with those of adjoining authorities and in order to consider any unmet housing need from the Wider Bristol Housing Market Area. The CS 5 year review has now been brought forward as agreed by Council in May 2016 ( CD/PMP/G28) to consider the longer term needs (to 2036) of the Bath Housing Market Area. The CS review will be undertaken in association with preparation of the West of England Joint Spatial Plan (JSP) in accordance with the Council's Local Development Scheme (CD/PMP/G19), rolling the housing requirement forward to cover the 2016 – 2036 period and will include re-assessment of student population/accommodation issue identified above.

**Q6. Are relevant policies positively prepared, effective and consistent with national policy?**

23. The NPPF para 14 requires Local Plans to meet objectively assessed needs, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits. The Council concluded that it might not be possible to meet the full aspirations of the Universities because of the harm this would cause to other priority objectives. The policies enable the aspirations of the universities to be met as far as possible within a sustainable context and the need to deliver the full spectrum of development requirements for the city. The amendments to Policy B5 are positively prepared in prioritising homes and employment in city centre/EA within the context of the overall strategy set by the Core Strategy and that it has some flexibility built in for the decision maker to consider individual schemes.
24. The site allocation policies SB19 and SB20 have been positively prepared and effective in that it seeks to provide guidance to the University and decision maker as to those parts of the campus where there is scope for additional development and it positively directs development towards undeveloped land taken out of the GB on the University of Bath campus.
25. Therefore the Council considers that relevant policies are positively prepared, effective and consistent with national policy to enable the delivery of sustainable development for the reasons set out in the responses above.

**Q7. Is there tension between Policy SB.19 and LCR5 in relation to the safeguarding of playing fields and recreational space?**

26. The Council does not consider that there is a tension between these two policies in relation to the safeguarding of playing fields and recreational space. It is the intention of Policy SB.19 to provide a degree of flexibility to the University of Bath to enable it to meet its growth aspirations within the broader policy framework of the Placemaking Plan and the NPPF.
27. Policy LCR5 forms part of this wider policy framework and the University would need to demonstrate how any proposals 'involving the loss of open space' or 'land and buildings of value for sports and recreation' can be justified.
28. It is useful by way of background to reiterate the wording as set out in paragraph 261 of the Placemaking Plan, which states: 'The Sulis Club ... was purchased by the University after the adoption of the Local Plan, thus increasing playing pitch capacity from the 2007 baseline ... The purchase of the Sulis Club enabled the University to reduce playing pitch provision elsewhere on the non-green belt part of the main campus site if it chose to do so.'

**Q8. Is the strategy sustainable over the plan period?**

29. Only aspirations to the beginning of September 2020 have been provided in evidence from each University as it is difficult for a HE institution (or the LPA) to look beyond a 5 year time horizon with much certainty. 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. Therefore it is appropriate to review through the scheduled plan review now underway.
30. As explained under Question 5, the Council acknowledges that there may be a shortfall in currently identified supply against the student bedspaces if the aspirations of the universities are fully met, however student accommodation cannot be considered in isolation from other planning priorities and there are many uncertainties in the environment in which higher education sector needs to operate. Therefore the Council considers that the most appropriate mechanism for addressing any shortfall is through the review of the Plan through the JSP already in hand with full consideration of other planning priorities such as housing requirement.