

Examination of B&NES Placemaking Plan

Matter 13 – Bath’s Universities

Issue – Whether the approach to Bath’s Universities is sound

Representor: Federation of Bath Residents’ Associations (FoBRA)

Representor Reference Number: 102

August 2016

Summary

1. At the time of the public consultation, the Universities’ section of the Draft Placemaking Plan (PMP) was (and remains) informed by the December 2015 B&NES Student Numbers and Accommodation Requirements Information Paper (CD/PMP/B16) which has since been superseded by the May 2016 revision¹ (CD/PMP/B16/1).
2. This FoBRA statement (a) briefly summarises FoBRA’s previous representations and concerns, (b) addresses the new information contained within the May 2016 Information Paper and within University of Bath’s PMP representations and (c) addresses the Inspector’s questions relating to Matter 13 – Whether the approach to Bath’s Universities is sound.

Summary of FoBRA’s PMP Representations and Concerns

3. FoBRA submitted seven representations relevant to the Draft PMP’s section on Bath’s Universities. In summary, these raise the following issues:
 - (a) Bath already experiences severe ‘studentification’ but lacks a dedicated Student Housing Strategy, despite a reference in PMP Vol.1 to the need for one, to include inter alia an expanded Policy B5, a review of Policy SB19 and a modified Article 4 Direction Supplementary Planning Document [Representations 102/3, 102/5, 102/11, 102/15 & 102/16];
 - (b) A discrepancy of 700 exists between the PMP and the University of Bath’s extant Masterplan regarding the remaining capacity of the Claverton Down campus to provide new student bed spaces [Representation 102/12]; and
 - (c) The PMP fails to identify a supply of specific deliverable sites sufficient to provide five years’ worth of student housing as required by the National Planning Policy Framework (NPPF) para.47 [Representation 102/13].
4. FoBRA has long been pressing B&NES to develop a workable Student Housing Strategy. B&NES’ refusal to do so (confirmed at PMP Vol.2, para.234) has resulted in the confused and seemingly intractable situation regarding the supply and demand for student accommodation in Bath.
5. In an uncertain world the universities are understandably reluctant to predict student numbers more than about 5 years ahead, and even this relatively near horizon has produced wildly different forecasts over the past 3 years¹.

¹ Four editions of B&NES’ Information Paper “Student Numbers and Accommodation Requirements” between 2013 and 2016.

6. The most recent forecast (CD/PMP/B16/1 dated May 2016) suggests that within 4 years demand for student accommodation in Bath is likely to exceed supply by around 1,900 bed spaces (see below). The PMP must be considered unsound while it offers no clear solution to this imminent shortfall and is only able to speculate on how demand might change over the subsequent years of the Plan period.
7. The universities traditionally provide accommodation for a minority of students since the majority prefer to live independently in town after their first year. This continues to result in demand for private sector student accommodation increasing with the consistent annual increase in total numbers.
8. Further, both campuses are tightly constrained by Green Belt and AONB protections and, in the case of UoB, there has recently emerged² a claimed need for priority to be given for the few remaining developable areas within the Claverton Down campus to provide non-residential floor space (i.e. for teaching, research & administration) at the expense of student bed spaces.
9. Student HMOs in Bath are estimated to number about 2,800, representing 7 per cent of the city's total dwellings stock, and have already created severely unbalanced communities, for example in Oldfield Park, and deprive the LPA of an estimated £3.8m in Council Tax income annually³.
10. Any further significant increase in HMO numbers will exacerbate the problem and, combined with the recent (and continuing) proliferation of purpose built student accommodation blocks within the city, will additionally threaten the achievement of Government housing targets.
11. FoBRA considers that the seemingly intractable situation in Bath so obviously demands the production of a joined-up Student Housing Strategy, decoupled from but informing the PMP, that defines a workable balance between student numbers, sustainable levels of campus accommodation, HMOs and purpose built accommodation blocks to solve not only the imminent short term student housing crisis discussed above but also how the student housing challenge would be addressed in the longer term (i.e. the Plan period), depending on whether future demand continues to rise, stabilises or falls.
12. FoBRA believes that the notion that unlimited numbers of students are allowed to live wherever they like (i.e. on campus or in the city) should be challenged. As long as students (through their landlords) can take advantage of the privilege of not paying Council Tax, residents (through the LPA) should be able to say when the number living in the city in the private sector (mainly HMOs) is enough, and the remainder must live in university-managed accommodation. This, after all, is what the City of Oxford has said to its universities⁴ through its Core Strategy:

“The Oxford Local Plan 2001-2016 (adopted November 2005) set a target for each university that the number of full-time students living in Oxford in accommodation not provided by their university or college did not exceed 3,500 in the academic years up to 2008 and 3,000 after that date. The Oxford Core Strategy 2026 (adopted March 2011) rolls forward the same target of 3,000 for each university. Both universities have worked hard to reduce the number of students living outside university provided accommodation. This is in order to reduce the resulting pressure on the housing market.”
13. Other UK university locations, with a smaller proportion of students per head of population and more development opportunities than Bath, have implemented student housing strategies that work. FoBRA contends that the PMP will remain unsound until Bath has one.

² University of Bath PMP Representations 0304-24 & 0304-25.

³ The Bath Chronicle, 4th August 2016.

⁴ https://www.oxford.gov.uk/download/downloads/id/2182/student_numbers_in_oxford_report_april_2012.pdf

The Updated (May 2016) Student Numbers and Accommodation Requirements Information Paper CD/PMP/B16/1

14. CD/PMP/B16/1 was produced after the public consultation period.
15. Please refer to Table 1 below. With almost 24,000 enrolments at two universities, students already comprise a quarter of Bath's population. Latest forecasts⁵ suggest that within four years student numbers could rise to 30,000 - almost one third of the population. Neither university has forecast numbers beyond 2020/21. It is currently estimated that about 16,700 students currently require accommodation in the Bath area, rising by 4,000 within 4 years. The universities traditionally provide about one-third of total student accommodation need, on and off-campus, which means that residual demand for beds is likely to rise from about 10,600 currently to 13,400 by 2020/21.
16. Current residual demand for student beds is largely met by the private sector in around 2,650 HMOs – about 6.6% of the 40,000 total dwellings stock of the city. B&NES suggests¹ that, following market trends post-Article 4 Direction, it is reasonable to expect the number of HMOs to rise by up to 100 by 2020/21, and for approximately 480 more students to be housed in 'windfall' private sector accommodation blocks (PSABs).
17. This means that, within 4 years, approximately 1,900 additional students will need to be accommodated beyond those likely to be housed in either planned university accommodation, HMOs or PSABs.
18. The Draft Placemaking Plan (PMP) offers no site-specific solution for the Bath Spa University (BSU) contribution to this total, and simply encourages the University of Bath (UoB) to build more student accommodation on that part of the Claverton Down Campus that no longer sits in the Green Belt - but remains within the Cotswolds AONB.
19. Neither solution complies with national planning policy:
 - The National Planning Policy Framework (NPPF) requires LPAs to:
 - positively seek opportunities to meet the development needs of their area; Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change (NPPF para.14);
 - identify a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements (para.47); and
 - include an assessment of scope for developing elsewhere outside the AONB or meeting the need in some other way when considering major development within an AONB (para.116).
 - The Countryside & Rights of Way Act 2000, requires that a planning authority must take steps to accomplish the purpose of conserving and enhancing the natural beauty of an AONB (section 84(4) & 85(1)).
20. The Draft PMP meets none of these requirements. Indeed, the University of Bath, in its PMP Representations 0304-24 & 0304-25, considers that the requirement to seek to enhance the AONB is "unduly onerous and should be deleted" and that there is an "inevitable need for some environmental sacrifices". FoBRA strongly disagrees.

⁵ B&NES 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). Core Document CD/PMP/B16/1.

	2015/16	2020/21	Change over 5 yrs
UoB Total Students (CD/PMP/B16/1 - Table 5a)	16,419	19,000	2,581
BSU Total Students (Table 9)	7,400	10,742	3,342
Combined Total Students	23,819	29,742	5,923
Total students as proportion of 94,000 population	25%	32%	
UoB students needing accommodation (Table 5a)	12,426	14,782	2,356
BSU students needing accommodation (Table 11)	4,228	5,909	1,681
Combined students needing accommodation	16,654	20,691	4,037
% of Total students needing accommodation	70%	70%	
No. of UoB-managed beds (Table 5a*)	4,051	4,660	609
No. of BSU-managed beds (Table 11)	1,810	2,271	461
Combined No. of university-managed beds	5,861	6,931	1,070
No. of UoB students in PSABs (Table 5a)	88	178	90
No. of BSU students in PSABs (Table 11)	88	178	90
Combined No. of students in PSABs	176	356	180
Residual UoB bed demand	8,287	9,944	1,657
Residual BSU bed demand	2,330	3,460	1,130
Residual Total bed demand	10,617	13,404	2,787
Less: Up to 100 additional HMOs (Table 15)			-400
Less: Approx. 480 new PSAB bedspaces (Table 15)			-480
Net Increase in Residual bed demand			1,907

Table 1 – Figures taken from Core Document CD/PMP/B16/1

(UoB=University of Bath, BSU=Bath Spa University, PSAB=Private Sector Accommodation Block)

*Table 5a gives UoB-managed beds as 5,220 in 2020/21. This has been reduced to 4,660 here to reflect UoB PMP Representation 0304-25 (no more than 440 campus bedspaces planned, not 1,000)

21. Regarding the third sub-bullet point above (assessment of scope for developing outside an AONB), for UoB the PMP fails to address a fundamental mismatch between (a) the University's extant campus Masterplan (2014 update – CD/PMP/B19) which identifies scope to provide a further 1,700⁶ student bedspaces within the non-AONB campus, (b) B&NES' Information Paper CD/PMP/B16/1 which accepts unquestionably UoB's unsubstantiated assertion that this number has since reduced to 1,000 and (c) UoB's PMP Representation 0304-25 which further seeks to reduce this number to 440 – for the whole campus. No explanation is given as to why the extant UoB campus Masterplan is unachievable.
22. B&NES has not questioned UoB's preference to expand onto sensitive AONB land (at B&NES' suggestion) rather than intensify its core campus as detailed in its extant campus Masterplan, and FoBRA repeats its assertion that scope has been clearly demonstrated to provide up to at least 1,700 more student bedspaces on the non-AONB part of the Claverton Down campus rather than the 440

⁶ That is 2,400 minus 700 recently completed (The Quads).

claimed by UoB and assumed in Table 1 above. The difference of 1,260 would more than cater for UoB's contribution to the 1,907 total bedspace shortfall in Table 1.

23. Whether, of course, UoB would wish to risk providing a substantially higher proportion of its students with campus accommodation is another matter when demand from the majority of students is to live 'in town'. This would be a matter for the essential Student Housing Strategy sought by FoBRA for so long.
24. In support of FoBRA's long-standing call for B&NES to develop urgently a dedicated Student Housing Strategy, Appendix 1 lists a catalogue of reasons why FoBRA believes such a document is critical to understand and control the supply and demand of student accommodation within Bath – an issue which is acknowledged (at PMP Vol.2, para.221) to be “one of the most high profile issues affecting Bath”.

FoBRA's Response to the Inspector's Matter 13 Questions (listed at Appendix 2)

Question 1

- Q1.1 No. The Strategic Housing Market Assessment (SHMA) referred to above was informed by the July 2013 version of the B&NES' Student Numbers and Accommodation Requirements Information Paper which has since been superseded a number of times. That document (on p.16) assumed that the University of Bath (UoB) would develop a further 2,400 campus bed spaces by 2026, in line with its campus Masterplan⁷ (which remains extant), and that these, combined with Bath Spa University's development plans, could result in hundreds of HMOs reverting to non-student use.
- Q1.2 The December 2015 version of the Information Paper (CD/PMP/B16), being the latest available at the time of the PMP consultation, paints a very different picture, including an unsubstantiated UoB claim that its campus can now support 700 fewer bed spaces. The conclusion was that there was now more likely to be demand for hundreds more HMOs over the Plan period.
- Q1.3 The Information Paper was again revised (after the public consultation period) in May 2016 (CD/PMP/B16/1) to reflect the universities' modified growth aspirations, but again concluded (at Table 14) that, assuming the 700 fewer bed spaces on the UoB campus, there could still be a demand for hundreds more HMOs, as early as 2020/21, but that this undesirable situation could be mitigated if UoB was able to utilise sensitive land that was removed from the Green Belt (but remains within the Cotswolds AONB).
- Q1.4 However, in its PMP representation 0304/258, UoB claims that any future development of that part of the campus that formerly formed part of the Green Belt would have to be dedicated to over 50,000 sq.m of non-residential floorspace in preference to student bed spaces and that the future bedspace capacity of the whole campus has now reduced further – from 2,400 to 1,700 to now only 1,140. (700 The Quads, 290 Polden Corner, 150 Lacrosse Field).
- Q1.5 Thus, even if it were possible for the UoB to encroach significantly into the Cotswolds AONB (by no means certain under NPPF rules and the subject of strong opposition in other PMP representations), its preference to provide over 50,000 sq.m of non-residential floorspace there would mean that, either way, the potential demand for hundreds more HMOs identified in CD/PMP/B16/1 would increase by hundreds more.
- Q1.6 Section 2F of the adopted Core Strategy (Bath's Universities, pp.70-71) states that:
- "The development of new academic space and student accommodation are matters that require policy direction in the Core Strategy." (para.2.37);
 - "The approach of the Core Strategy is to enable the realisation of a better balance between the aspirations of each university, the concerns of communities and the overall functioning, performance and environmental quality of the city and its setting." (para.2.38);
 - "It is anticipated that this policy will enable the delivery of new on-campus study bedrooms to 2020/21 at a rate which broadly matches the growth of the student population. Based on estimated forecasts of growth, it will enable a modest increase in the student population (compared to rates experienced since 1997), enable all first years to be offered a place in managed accommodation, and potentially lead to a small contraction of the student lettings market". (para.2.39);

⁷ Core Document CD/PMP/B19.

⁸ Supporting Information 2.pdf, para.47: "The attached campus plan, with our latest campus capacity assessment, identifies zones capable of delivering up to 51,600 m² of non-residential GIA plus 440 bedrooms, subject to planning approval. This assessment covers all areas on the campus, including the land taken out of the green belt." [GIA = Gross Internal Area]

- “It is envisaged that this approach could mean that 2012/13 levels of HMOs will represent the high watermark within the city”.(para.2.40);
- “Growth beyond 2020 will require additional on and off campus capacity to be identified”. (para.2.41).

Q1.7 In the light of the conclusions of the latest (May 2016) version of the Student Numbers and Accommodation Requirements Information Paper, exacerbated by the University of Bath’s claim that its whole campus can now support the development of only another 440 student bed spaces, it is clear that Section 2F of the adopted Core Strategy is significantly out of date and needs comprehensive review. With Bath’s university student population (24,000) already accounting for a quarter of the city’s population (94,000) during term time and student HMOs already accounting for almost seven per cent of the total dwelling stock of the city, this review should not be carried out in isolation to general housing policies and the overall housing strategy for Bath due to the identified potential need for hundreds more HMOs over the Plan period in the absence of campus capacity and restrictions on purpose-built accommodation blocks in the city.

Question 2

- Q2.1 Not at all, since the evidence is inconsistent and unreliable.
- Q2.2 As explained in the answer to Q1 above, UoB now claims that its whole campus can only support a further 440 student bedspaces, compared with 1,700 in its extant campus Masterplan (and assumed by the SHMA) and 1,000 in Information Paper CD/PMP/B16 (and hence in the Draft PMP).
- Q2.3 FoBRA contends that UoB should be required to explain why the long-standing provisions of its extant Masterplan, supplemented by decked parking if necessary, are now deemed unachievable.

Question 3

- Q3.1 The PMP states (Vol.2, para.233) that the current size of Bath’s student HMO sector is already a cause for concern and that any significant increase in HMO numbers would put the achievement of 7,000 net additional dwellings at risk and put considerable pressure on the 5-year housing land supply for the District (para.246).
- Q3.2 Table 1 above (which reflects the May 2016 Information Paper CD/PMP/B16/1, modified as discussed) predicts that within four years there is likely to be a shortfall of 1,907 student bedspaces.
- Q3.3 No solution is offered in the case of Bath Spa University. B&NES repeatedly suggests in the PMP that the University of Bath should utilise that sensitive part of the campus that was removed from the Green Belt to accommodate its contribution to this shortfall but the University has signalled in its representations 0304-24 & 0304-25 that, should it be successful in acquiring planning permission to develop this sensitive land (which remains in the Cotswolds AONB), it would use every part of it for ‘essential’ non-residential floorspace to the exclusion of student bedspaces. Additionally, any major development of that type within the sensitive AONB has no guarantee of obtaining planning consent, given the proximity to residential areas and the ‘highest level of protection’ afforded to AONBs by the NPPF.
- Q3.4 The recently revised growth aspirations of both universities are therefore likely to have a significant impact on the objectively assessed needs for housing in Bath, particularly in the context of a predicted total university population of almost 30,000 students approaching a third of the resident population by 2020/21.

Question 4

- Q4.1 No. FoBRA has argued in its PMP representations that:
- Policy B5 should be significantly expanded;
 - Policy SB19 is inappropriate for AONBs;
 - the Article 4 Direction SPD should be reviewed; and
 - UoB should base its future development on its extant campus Masterplan.
- Q4.2 All such policies and strategies should be incorporated into a dedicated Student Housing Strategy.

Question 5

- Q5.1 No. None. FoBRA stands by its previous PMP representations regarding the urgent need for a dedicated Student Housing Strategy. This has been consistently rejected by B&NES and no reasonable alternative options considered. A catalogue of reasons for developing such a Strategy is attached at Appendix 1.

Question 6

- Q6.1 No. Although the scale of the student accommodation problem may have reduced with the May 2016 issue of the Information Paper Ref. CD/PMP/B16/1, the arguments presented previously by FoBRA suggesting that the relevant policies are neither justified, positively prepared, effective nor consistent with national policy still stand.

Question 7

- Q7.1 Yes. FoBRA concurs with the comprehensive response to this question provided by its member Beech Avenue Residents' Association (BARA), which shows how Policies LCR5 (which seeks to safeguard against the loss of recreational space) and SB19 (which encourages UoB major development on sports pitches within an AONB) conflict. No replacement of lost recreational space of at least equivalent quality, quantity and community value is proposed as required by Policy LCR5.
- Q7.2 Further, FoBRA concurs with BARA's further response to this question which demonstrates how UoB's claims regarding the quantity and location of campus real estate necessary for its future needs for both student accommodation and non-residential floorspace are fundamentally flawed.

Question 8

- Q8.1 No. Neither university is prepared to forecast student numbers beyond 2020/21. The numbers proposed by B&NES between 2021/22 and 2028/29 (e.g. in CD/PMP/B16/1 Table 5b) are highly speculative and therefore cannot be relied upon. The Student Housing Strategy called for by FoBRA should cater for a range of future bed demand scenarios across the Plan period.

Appendix 1

Factors supporting the urgent need for a Student Housing Strategy for Bath

- Bath hosts one of the highest proportions of students per head of population in the UK (24,000/94,000 = 25%). Many other university towns and cities (most with less severe 'studentification' issues than Bath) have found it necessary to devise (and benefit from) a dedicated Student Housing Strategy;
- The whole city of Bath (including the UoB campus) is a World Heritage Site and hosts two highly-successful universities whose campuses are tightly constrained by Green Belt and AONB designations;
- The universities are unwilling to predict student numbers beyond about 5 years and even that is uncertain given the potential effects of Brexit;
- Potential student numbers in the PMP beyond 2020/21 are unreliable being pure speculation on the part of the LPA. There is a likelihood (unquantified) that future teaching provision will be delivered by novel off-campus methods that would reduce pressure on student accommodation (and non-residential floorspace);
- There is no formal linkage between the universities' aspirations for growth and any commitment to provide student accommodation. During rapid expansion over the years the universities have had (and continue to have) little incentive to provide accommodation for more than about a quarter of total students;
- The majority of students prefer to live independently in town so demand for private sector accommodation rises in proportion to total student numbers;
- 1,900 HE students could be without accommodation in Bath as soon as 2020.
- For hundreds of BSU students the PMP offers no solution;
- For UoB, and contrary to the NPPF, the PMP (Policy SB19) encourages major development on the Cotswolds AONB (i.e. outer campus land that was removed from the Green Belt) since it believes that the core campus is incapable of providing more than 1,000 further student bedspaces. The NPPF affords AONBs and National Parks the 'highest protection';
- The potential of UoB's campus for further student accommodation is totally confused, ranging from 1,700 (in the extant campus Masterplan – and more if decked parking is employed as suggested in the PMP) to just 440 in UoB's PMP representations;
- In its response to the Draft PMP (against Policy B5), the UoB claims that:
'The original Masterplan (2009-2020) identified the need for 2,400 bedrooms and 60,000m² of academic space by 2020. Since 2009, 34,300m² of non-residential and 700 beds [The Quads] have been delivered, leaving a residual need for 26,000m² of non-residential and 1,700 beds.'
However, the Masterplan 2014 Summary Update (CD/PMP/B19) clearly states (at p.6 under 'Accommodation Requirements') that:
'The Masterplan, therefore, looks to 2026 [not 2020], and includes provision for 60,000m² of academic and administrative space and 2,400 new study bedrooms.'

So, as recently as 2014, UoB was content for its expansion aspirations in terms of both non-residential floorspace and student accommodation to extend over the period to 2026. It seems

that the opportunity to claim more real estate afforded by the PMP process has led UoB to attempt to accelerate and increase its additional non-residential floorspace requirement at the expense of providing significantly fewer student bed spaces and threatening unnecessary development within the Cotswolds AONB.

- UoB seems to be averse to implementing its agreed campus Masterplan, no explanation being given as to why it is now claimed to have become unachievable. This approach contravenes PMP Policy SB19, General Development Principle (b) which states that “in all circumstances, development should optimise the efficient use of developable land within the [UoB] campus to maximise its floorspace”;
- UoB’s claimed need for further non-residential floorspace (teaching, research, administration) appears to be overstated by over 50,000sq.m;
- UoB dismisses the concept of multi-storey (decked) parking which would free up even more areas of the core campus and suggests that environmental sacrifices have to be made;
- Student HMOs in Bath number over 2,800, comprising seven per cent of the total housing stock, depriving the LPA of £3.8million of Council Tax income per annum and causing severely unbalanced communities in areas like Oldfield Park/Westmoreland. As is the case in Oxford, consideration should be given to restricting the number of students who can choose to live in Bath in the private rented sector.
- Without tighter controls on HMOs and purpose-built student accommodation blocks there is a real risk that the level of demand for private sector student accommodation will affect the delivery of Government housing targets. ‘Compensatory provision’ is mentioned in the PMP but is undefined. Article 4 Direction thresholds are in particular need of review. Policy B5 envisages some control of accommodation blocks but restricts this to the relatively small Central and Enterprise areas of Bath only. Why not the whole of Bath?
- Policy SB19, General Development Principle (a) states that University of Bath campus development should cater for the accommodation needs of all first year students and a ‘major’ share of students in their subsequent years. A Student Housing Strategy should define likely demand from first year students and a better definition than ‘major’ for subsequent years (25%, 40%, 51%?). Historically, and for the foreseeable future, UoB provides campus bedspaces for about a quarter of total student accommodation need (e.g. 3,156 beds for 12,426 demand in 2015/16) and has indicated no intention to increase this proportion. If only 440 more bedspaces are provided by 2020/21 (as suggested by UoB in its PMP representations), just 24% of demand (14,782) will be satisfied on campus;
- Clarification is required regarding UoB accommodation demand. Not all enrolled students 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. At the time of the examination of Core Strategy the analysis concluded that 65% of total enrolment was a reasonable assumption to calculate the number of UoB students requiring managed or shared accommodation in Bath. More recently, an alternative approach is suggested by UoB, i.e. 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 (approximately three quarters of total students). This results in a demand of about 78% of total enrolment. Clearly, it is important to know and use the most realistic method.

Appendix 2

Examination of B&NES Placemaking Plan

Matter 13 – Bath’s Universities

Issue – Whether the approach to Bath’s Universities is sound

Inspector’s Questions

- 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?**
- Q2. Is the proposed strategy justified and supported by 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?**
- 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?**
- 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?**
- Q6. Are relevant policies positively prepared, effective and consistent with national policy?**
- Q7. Is there tension between Policy SB.19 and LCR5 in relation to the safeguarding of playing fields and recreational space?**
- Q8. Is the strategy sustainable over the plan period?**