

BANES PLACEMAKING PLAN EXAMINATION

RESPONSE TO INSPECTORS MATTERS AND ISSUES (ID/3 – REV 1)

MATTER 13 BATH'S UNIVERSITIES

ON BEHALF OF RADSTOCK LLP (PARTICIPANT ID: 6414)

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1. 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?

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?

- 1.1 As set out in the Council’s updated student numbers and accommodation report (CD.PMP/B16/1) the new/revised combined growth aspirations can no longer be described as modest. Circumstances have changed. Whether aspired to growth is achievable depends on a number of factors, not least the supply of student accommodation either in dedicated blocks on-campus, off-campus or in HMOs.
- 1.2 The potential for this demand to affect the housing market/housing stock in Bath is acknowledged by the Council. The Article 4 Direction is partly a response to this issue, albeit its genesis had more to do with balanced neighbourhoods than macro level strategic issues around the achievement of 7,020 net additional dwellings for the city.
- 1.3 Crucially, the overall assumption in the SHMA and approach to the Core Strategy was that the student issue had to be isolated separately from an understanding of other more conventional housing needs as the need for accommodation was much more variable and policy based. In essence it was assumed that modest growth would be dealt with entirely by new dedicated bedspaces. There was effectively a target of around 3,000 student bedspaces in addition to 13,000 normal dwellings and it was argued that both were achievable. This history of this matter is presented in detail in CD.PMP/B16/1. Note that this is presented as being part of the SHMA, and thus recent changes mean that the SHMA has been updated in part.

- 1.4 The situation has moved on and the growth aspirations are greater and the need for accommodation is greater. The implications of the Council's approach in the Placemaking Plan is that the aspiration cannot be fully met in dedicated blocks. Whist, based on past experience this would see a surge in the demand for HMOs, unlike prior to July 2013, there is an Article 4 Direction that seems to be curtailing the increase in that supply. Therefore the growth aspirations are in danger of being frustrated. There will though be some additional growth in HMOs and it remains to be seen as this sector will colonise new areas of the city to the extent the Oldfield Park and its environs has been colonised (given that it is now mostly above Article 4 threshold for more additions).
- 1.5 It is appropriate to isolate the student issue and address it separately in the circumstances of Bath to its volatility – as long as there is a linking mechanism back to the overall requirement – to manage potential negative effects
- 1.6 There is such a linking mechanism – introduced now has the final clause to Policy B5, and in response to the new reality of higher growth aspirations and their potential effects. As noted by Inspector Simon Emerson in his report on the BANES Core Strategy at para 63:

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.

- 1.7 This was given effect in paragraph 1.26d of the Core Strategy, which states that
- (1.26d) The assessment of housing needs is based on two important assumptions. Firstly, the SHMA assumes that the expected modest growth in the student population at Bath's two universities will be accommodated in the planned growth of mainly on-campus new student accommodation. 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.*

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- 1.8 However, there was no linking mechanism in policy wording. This is now made good in the revisions to Policy B5. This can now be effective in ensuring that any additional increase in need for student accommodation will not reduce the supply of general housing or delivery of 7,020 dwellings for the city. However, it will only be effective if the Council acts upon it or inserts flexibility in the plan to enable it to be acted upon. The preference is to plan positively to identify sites and amend housing development boundaries when reviewing the delivery aspects of the Plan. Alternatively, flexibility to enable development outside housing development boundaries is needed.
- 1.9 We contend, as set out, in detail, in paragraph 2.24-2.34 of our Matter 2 Statement that housing land supply is in deficit in Bath already (on the Council's evidence) and that it Council acknowledges that actual and allowed for HMO losses contribute to this. The housing trajectory shows 238 losses from this source. Therefore, in respect of 1.26d and the new clause to Policy B5, this requires corrective action. We also contend that the losses are 185 greater than set out in the trajectory.