

**Bath & North East Somerset
Local Plan (Core Strategy /Placemaking Plan) 2011-2029**

Partial Update

**Options Consultation
January 2021**

**Topic Paper: Purpose Built Student Accommodation
(PBSA)**

**Bath & North East
Somerset Council**

Improving People's Lives

1 Introduction

Definition of PBSA

- 1.1 Purpose Built Student Accommodation (PBSA) is accommodation built, or converted, with the specific intention of being occupied by students. Such accommodation is usually provided in the form of cluster flats with shared facilities, individual en-suite units, or studios, and relates to buildings which are not classified by planning use class, or licensing, as HMOs.
- 1.2 In Bath, recently built private PBSAs are largely studios, many of which are built on former employment sites within the city.

Current Policy Framework

- 1.3 The Council's current policy framework seeks to address student accommodation needs arising from universities' expansion, whilst not prejudicing other economic, environmental and social objectives from being achieved across the district.
- 1.4 Policy B1 in the Placemaking Plan sets out a spatial strategy for Bath, including enabling 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.
- 1.5 Policy B5 in the Core Strategy seeks to restrict off campus student accommodation in certain locations – the Central Area, the Enterprise Area and MoD land.

Preferred Approach

- 1.6 The Council's preferred approach to student housing is, in principle, that future student needs are met, where possible, in purpose-built and managed schemes, rather than the further conversion of family homes to Houses in Multiple Occupation. Longer term, there may be scope to provide enough students with suitable purpose-built accommodation, that demand for HMOs across the district may fall, allowing the potential conversion of some HMOs back into general housing use.

1.7 However, there is also a requirement to ensure that over-provision of PBSA does not occur, particularly on sites which could otherwise be used for general housing and other uses supported by the objectives of the Local Plan.

2 Issues

2.1 As discussed above, the Council's current policy framework seeks to provide student accommodation on-campus at both universities, and also facilitates provision off-campus, except in areas specified in policy B5.

2.2 A recent increase in the number of off-campus PBSA developments across the city has raised concerns that current policies are not strategically directing such development to suitable locations, leading to a rise in issues, comprising:

- Provision of PBSA on sites that could be used for general housing / employment uses.
- Potential over-provision of PBSA bed spaces.
- Over-provision of certain types of PBSA (i.e. studios).
- Provision of PBSA in locations where a high percentage of the local population is already made up of students, leading to the exacerbation of issues generally associated with these areas (e.g. noise disturbance).

2.3 Recent engagement with the Universities has specified that although there is currently uncertainty in the higher education sector due to Covid-19 and Brexit, there will likely be a continued demand for student bedspaces in Bath over the next 10 years. The University of Bath's strategy focuses on improving student experience by improving facilities, with no net increase in student numbers. Bath Spa University's strategy includes for a moderate net increase of students, up to 2029.

2.4 Other educational establishments within Bath, such as Bath College, Norland College and various language schools, may also require access to student housing.

2.5 In order to minimise the issues associated with current PBSA provision, this options appraisal explores ways in which policies could be amended or created to provide a clearer and more strategic approach to the provision of off-campus PBSA.

3 Proposed options for consultation

3.1 The options for consideration are:

- **Option 1** – Introduction of new policy H2B to restrict PBSA to allocated sites, or elsewhere in the district where need is demonstrated.
 - **Option 2** – Increase scope of policy H2 to refer to PBSA, including assessment against HMO threshold test.
 - **Option 3** – No policy change.
- 3.2 Option 1 seeks to direct the majority of PBSA development to allocated on-campus sites, except where an established need associated with an educational establishment can be demonstrated. Demonstration of need would be required in the form of a formal agreement between a developer and an education provider, confirming the number of bedspaces and accommodation type required. This option provides flexibility to educational establishments during a time of growth uncertainty, whilst restricting the development of off-campus PBSA in general across the city.
- 3.3 Option 2 seeks to restrict the development of PBSA in areas where a high concentration of Houses in Multiple Occupation already exists (as defined in the HMO SPD). This option would require PBSA developments to be assessed against the same criteria as HMOs, as set out in policy H2 of the Placemaking Plan.
- 3.4 Option 3 retains policy in its current form, allowing development of PBSA across the city, except for the areas specified in and subject to the requirements of policy B5 of the Core Strategy.

Option 1 Considerations

- 3.5 The aim of option 1 is to provide a policy which enables a controlled growth of PBSA within the district, but only to the extent required by educational establishments, to accommodate their plans.
- 3.6 An alternative option explored was to introduce a policy requirement to ensure that adequate provision of PBSA was provided alongside development of educational establishments, through the requirement that all future increases in academic floorspace resulting in increased student numbers would be matched by a corresponding increase in PBSA. The obligation would then fall on educational establishments to provide PBSA bedspaces in line with any growth strategies relating to academic floorspace. The current strategy by the University of Bath is to improve its student experience by improving facilities (e.g. library facilities), with no net increase in student numbers. A policy

requirement relating to provision of PBSA bedspaces based on increase in academic floorspace was therefore considered unreasonable.

- 3.7 It is considered more appropriate to provide flexibility to educational establishments to follow their various strategies, whilst providing the number of bed spaces required in relation to increase in student numbers. Option 1 provides this flexibility, by allowing PBSA on on-campus and non-allocated land where there is clear and demonstrable evidence of need from an educational establishment.
- 3.8 An important consideration relating to the draft policy comprises the impact that PBSA development is having on the city's stock of employment and industrial land. Evidence shows that since the start of the Local Plan period losses of industrial sites across the District have exceeded the levels set out in the Plan, and the necessary new employment development has not been realised. In addition demand for industrial space has increased and is greater than was envisaged at the time of preparing the current Local Plan, and there are limited opportunities to provide new industrial land, especially in Bath. PBSA schemes have been amongst the developments proposed on industrial land. As part of the Local Plan Partial Update, the policies relating to protection of industrial land are being strengthened, by presuming retention of non-strategic industrial land for industrial uses, unless it can be demonstrated by the applicant that the land is not needed for such uses. It is therefore important that any future PBSA policy includes consideration of impact on employment land, in line with the policy updates proposed relating to better safeguarding employment land within the district. Option 1 therefore includes policy wording relating to this consideration.
- 3.9 Dealing with the potential for an overprovision of PBSA has shaped the draft policy wording. This includes wording requiring evidence of need from educational establishments, including type of accommodation, and wording which specifies that PBSA developments must be designed in a way which would allow for conversion to general housing if not required for students in the future. Such considerations might comprise:
- Whether removal of internal walls could provide a residential layout providing general housing of a good standard;
 - Whether proposed service arrangements (i.e. heating, water) would work for a general housing layout;
 - Whether proposed window / door / corridor locations allow for various layout options to be achieved;
 - Whether external materials are of a high quality, built to last.

3.10 The impact that new PBSA developments might have on neighbouring amenity has also been considered. Option 1 does not seek to include PBSA within the concentration threshold test currently undertaken for new HMO proposals. The strategy allows for PBSA developments in areas where the HMO threshold of 10% has already been met. Reasons for not including PBSA within the threshold test include:

- PBSA is managed by a management company, which often ensures that issues commonly associated with HMOs such as waste management and lack of maintenance are dealt with internally within the scheme by the company, leading to limited complaints by residents about these issues.
- PBSA is usually provided in blocks of accommodation which are located further from other forms of residential development than HMOs (which frequently adjoin general housing stock). This lessens issues surrounding noise impact and disturbance on adjoining non-student residents, leading to limited complaints by residents about these issues.
- PBSA is often linked to an educational facility, therefore any issues with anti-social behaviour or noise can be dealt with by the educational establishment, or by the properties' management company.

3.11 Careful consideration is therefore required to explore ways in which the issues commonly associated with student housing discussed above, might be managed effectively, and controlled by management companies. The policy wording therefore requires submission of a management plan to clarify how such matters will be dealt with. This might include:

- Where residents should direct any complaints regarding noise and disturbance, and how these will be dealt with;
- Details of the facilities and arrangement for the storage and disposal of waste and recycling materials;
- Details of the proposed management of the building and how staff can be accessed in case of problems with the accommodation, including maintenance;
- How pick up / drop off will be managed at the start and end of academic terms;
- Details of access to secure cycle storage facilities; and
- Any arrangements for local community liaison through university staff and / or the management company.

Option 2 considerations

- 3.12 The aim of option 2 is to provide a policy which restricts PBSA developments in areas where high concentrations of students already live, through the inclusion of PBSA within the concentration threshold test currently used to assess applications for new HMOs.
- 3.13 This would require educational establishments to find land to meet any growth in student numbers either on land allocated for student accommodation, or on non-allocated sites not located in an area where the HMO 10% threshold limit is already met.
- 3.14 If this option is taken forward, careful consideration will need to be given to how a unit is measured in terms of calculating the number within an area. If the number of PBSA units was to be counted, for example, by studio unit, the number of units within a given area could potentially meet the 10% threshold limit with one development. This could lead to a rapid dispersal of both PBSA and HMOs to other areas of the city.

Option 3 considerations

- 3.15 Option 3 has been included to assess the scope of retaining existing policy without amendment. The main consideration for this option is whether or not the issues set out in section 2 cause sufficient harm to require a change in policy.

Pros and Cons

- 3.16 The pros and cons for each of the options are set out below.

Option 1 Introduction of new policy H2B to restrict PBSA to allocated sites, or elsewhere in the district where need is demonstrated	
Pros	Cons
<ul style="list-style-type: none"> Majority of PBSA will be located at allocated sites associated with universities, prioritising land for other uses elsewhere. Outside of allocated sites, PBSA provision based on demonstrable demand / need. Avoids potential overprovision of 	<ul style="list-style-type: none"> Does not require PBSA to be assessed against threshold tests set out in HMO SPD. This allows PBSA to be located in areas with existing higher concentrations of HMOs, potentially leading to further 'studentification' of areas where high concentrations of students already

<p>PBSA.</p> <ul style="list-style-type: none"> • Requires educational establishments to demonstrate a need for the type of accommodation proposed, so overprovision of certain accommodation types (i.e. studios) does not occur. • Allows flexibility for educational establishments (other than universities) to provide PBSA outside of allocated sites, close to their premises. 	<p>exist.</p> <ul style="list-style-type: none"> • Restricts the provision of PBSA bedspaces to the needs of educational establishments, therefore restricting the future availability of additional PBSA bedspaces to encourage movement of occupiers of HMOs to PBSA developments (therefore freeing up family housing).
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<p>Option 2 Increase scope of policy H2 to refer to PBSA, including assessment against HMO threshold test</p>	
<p>Pros</p>	<p>Cons</p>
<ul style="list-style-type: none"> • PBSA restricted in areas with existing high concentrations of HMOs. • Alleviates concerns regarding further 'studentification' of areas where high concentrations of students already exist. 	<ul style="list-style-type: none"> • May result in dispersal of both PBSA and HMOs to areas of lower HMO concentration, some of which may be unsustainable in relation to travel to educational establishments. • Limits further availability of HMOs through threshold limits being met in areas sooner - impact on certain sections of society such as young professionals and those working within service industries. • Difficult to measure number of PBSA units within threshold test, i.e. blocks, floors, bedspaces. • Potential for overprovision as PBSA development not based on need / demand or linked to specific educational establishment. • Potential for overprovision of certain types of PBSA (i.e. studios with higher rental levels).

Option 3

No policy change

Pros	Cons
<ul style="list-style-type: none">• Allows flexibility for universities and other educational facilities to meet demand for student accommodation in the majority of locations across the city.• Scope for more PBSA to be provided, encouraging students currently occupying HMOs to move to PBSA, thereby potentially freeing HMOs back up for use as general housing.	<ul style="list-style-type: none">• Potential for overprovision as PBSA development not based on need / demand or linked to specific educational establishment.• Potential for overprovision of certain types of PBSA (i.e. studios).• Potential for further 'studentification' of areas where high concentrations of students already exist.