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Submitted via email to B&NES Council and Ian Kemp (Programme Officer)

Dear Mr Philip Lewis ,

Examination Hearing Statement – Bath & North East Somerset Local Plan Partial Update – Bath Spa University

Matter 5 – Policy H2A: Purpose Built Student Accommodation

CBRE is instructed by Bath Spa University (hereafter referred to as ‘BSU’) in respect of their interests within the Bath and North Somerset (‘B&NES’) Local Plan Partial Update (hereafter referred to as ‘the Plan’). With specific reference to the proposed allocations/ policies within the Plan their particular interest includes specific focus on the following policies:

- Policy SB22 Locksbrook Creative Industry Hub;
- Policy SB24 Sion Hill; and,
- Policy H2A: Purpose Built Student Accommodation.

This statement is one of two submitted in relation to the examination proceedings and responds to Matter 5, Issue: Are the individual policies clear, justified and consistent with national policy, and will they be effective.

Policy H2A: Purpose built student accommodation

Question.115 Is the assessment of the accommodation needs for students undertaken for the Plan robust?

Question .116 Is the Plan positively prepared in terms of meeting the accommodation needs of students and would it be effective in meeting the identified housing need of students in the plan period?

BSU’s growth strategy will see a moderate net increase of students, with student numbers forecast to increase from 7,222 (2019/2020) to 9,299 by 2029/2030 (Student Accommodation Topic Paper 2021 – CD-SD036). This is forecast to create a housing need of 5,207 for BSU by 2029/2030 based on a multiplier of 56%. BSU has a higher proportion of students living at home and part time students, and as a result a lower multiplier (approximately 56%) is used to calculate the student population requirements for the university.

We consider the assessment of need to be robust, having been informed by BSU’s own growth strategy and the combined forecast demand for student accommodation. The University commits to working with the LPA to provide updated forecast information on an annual basis. The residual demand across the two universities is forecast to increase to 11,492 bedspaces by 2029/2030. This creates a net shortfall of 640 bedspaces to meet the demand for both universities (Student Accommodation Topic Paper 2021 – CD-SD036).



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Policy H2A will be effective in promoting PBSA and ensures that accommodation will be directed to the most appropriate locations with good links to the established campuses. We would encourage B&NES to ensure that student accommodation remains a priority in terms of housing delivery, meeting the recognised shortfall in student housing across the plan period.

BSU will continue to inform the application of Policy H2A and is committed to providing B&NES with updated growth projects yearly, supporting the preparation of the new Local Plan. In addition, BSU will continue to promote an on-campus approach to delivering new student accommodation, creating walkable campus environments, and easing the pressure on the demand for HMOs within Bath.

Q.117 What is the justification for the policy requirement that need for additional student accommodation of the type and in the location proposed, should be evidenced by a formal agreement between the developer and a relevant education provider for the supply of bed spaces created by the development, and would it be effective?

With the lack of available land within Bath there are known competing land use priorities. The introduction of a nominations process for proposed student accommodation on non-allocated sites is supported by BSU, as it limits speculative PBSA development and ensures the specific needs of the educational institutions are met, including the location of the accommodation.

The policy wording will help ensure that development is responding to growing demand forecasts and that the Universities are informing the need for new accommodation in the right locations. BSU will work collaboratively with providers to allow PBSA to be delivered across updated plan.

Q.118 What is meant by 'the internal design, layout and size of accommodation and facilities are of an appropriate standard' in criterion b)vi)?

BSU considers this aspect of the proposed policy could be picked up as part of the nomination agreement through collaboration between the Universities, providers, and developers and application process, and therefore this element of the policy could be removed.

There is a current misalignment, where developers seek to develop a greater proportion of single units, whereas BSU's need based on student demand is on cluster flat arrangements which promote an engaging environment for students. The internal design arrangements should be discussed in detail at the planning application stage and detailed through the agreement of the developer and education institution.

Summary

BSU is generally supportive of the principles and wording set out within Policy H2A. We trust that this statement assists in progressing Local Plan Partial Update EiP hearings and that comments within this letter and the agreed SoCG will now be considered in full.

We would be grateful if the Programme Officer could confirm receipt of this statement.

Yours sincerely,



Hannah Blunstone

Director

For and on behalf of CBRE Ltd

cc. Mr Paul Fox – PVC Finance & Infrastructure - BSU
Mr Richard Jordon – Director of Estates and Services - BSU