

Democratic Services

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Date: 15th September 2014

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To: All Members of the Housing and Major Projects Policy Development and Scrutiny Panel

Councillor Eleanor Jackson

Councillor Steve Hedges

Councillor Brian Simmons

Councillor Gerry Curran

Councillor June Player

Councillor David Veale

Cabinet Member for Sustainable Development: Councillor Ben Stevens

Cabinet Member for Homes & Planning: Councillor Tim Ball

Chief Executive and other appropriate officers

Press and Public

Dear Member

Housing and Major Projects Policy Development and Scrutiny Panel: Tuesday, 23rd September, 2014

You are invited to attend a meeting of the **Housing and Major Projects Policy Development and Scrutiny Panel**, to be held on **Tuesday, 23rd September, 2014 at 5.30 pm** in the **Council Chamber - Guildhall, Bath**.

The agenda is set out overleaf.

Yours sincerely



Mark Durnford
for Chief Executive

If you need to access this agenda or any of the supporting reports in an alternative accessible format please contact Democratic Services or the relevant report author whose details are listed at the end of each report.

This Agenda and all accompanying reports are printed on recycled paper

NOTES:

- 1. Inspection of Papers:** Any person wishing to inspect minutes, reports, or a list of the background papers relating to any item on this Agenda should contact Mark Durnford who is available by telephoning Bath 01225 394458 or by calling at the Guildhall Bath (during normal office hours).
- 2. Public Speaking at Meetings:** The Council has a scheme to encourage the public to make their views known at meetings. They may make a statement relevant to what the meeting has power to do. They may also present a petition or a deputation on behalf of a group. Advance notice is required not less than two full working days before the meeting (this means that for meetings held on Wednesdays notice must be received in Democratic Services by 4.30pm the previous Friday)

The public may also ask a question to which a written answer will be given. Questions must be submitted in writing to Democratic Services at least two full working days in advance of the meeting (this means that for meetings held on Wednesdays, notice must be received in Democratic Services by 4.30pm the previous Friday). If an answer cannot be prepared in time for the meeting it will be sent out within five days afterwards. Further details of the scheme can be obtained by contacting Mark Durnford as above.

- 3. Details of Decisions taken at this meeting** can be found in the minutes which will be published as soon as possible after the meeting, and also circulated with the agenda for the next meeting. In the meantime details can be obtained by contacting Mark Durnford as above.

Appendices to reports are available for inspection as follows:-

Public Access points - Riverside - Keynsham, Guildhall - Bath, Hollies - Midsomer Norton, and Bath Central, Keynsham and Midsomer Norton public libraries.

For Councillors and Officers papers may be inspected via Political Group Research Assistants and Group Rooms/Members' Rooms.

- 4. Recording at Meetings:-**

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- 5. Attendance Register:** Members should sign the Register which will be circulated at the meeting.

6. THE APPENDED SUPPORTING DOCUMENTS ARE IDENTIFIED BY AGENDA ITEM NUMBER.

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**Housing and Major Projects Policy Development and Scrutiny Panel - Tuesday, 23rd
September, 2014**

at 5.30 pm in the Council Chamber - Guildhall, Bath

A G E N D A

1. WELCOME AND INTRODUCTIONS

2. EMERGENCY EVACUATION PROCEDURE

The Chair will draw attention to the emergency evacuation procedure as set out under Note 6.

3. APOLOGIES FOR ABSENCE AND SUBSTITUTIONS

4. DECLARATIONS OF INTEREST

At this point in the meeting declarations of interest are received from Members in any of the agenda items under consideration at the meeting. Members are asked to indicate:

(a) The agenda item number in which they have an interest to declare.

(b) The nature of their interest.

(c) Whether their interest is **a disclosable pecuniary interest** or **an other interest**,
(as defined in Part 2, A and B of the Code of Conduct and Rules for Registration of Interests)

Any Member who needs to clarify any matters relating to the declaration of interests is recommended to seek advice from the Council's Monitoring Officer or a member of his staff before the meeting to expedite dealing with the item during the meeting.

5. TO ANNOUNCE ANY URGENT BUSINESS AGREED BY THE CHAIRMAN

6. ITEMS FROM THE PUBLIC OR COUNCILLORS - TO RECEIVE DEPUTATIONS, STATEMENTS, PETITIONS OR QUESTIONS RELATING TO THE BUSINESS OF THIS MEETING

At the time of publication no notifications had been received.

7. MINUTES (Pages 7 - 12)

8. CABINET MEMBER UPDATE

The Cabinet Member(s) will update the Panel on any relevant issues. Panel members may ask questions.

9. RADSTOCK & WESTFIELD - PROJECTS UPDATE (Pages 13 - 16)

This report provides an update on various development sites in Radstock & Westfield.

10. STUDENT ACCOMMODATION (Pages 17 - 72)

At its July 2014 meeting the Panel requested a paper to outline the Council's approach to planning for the growth of students, more specifically their housing needs. The Panel is aware of the Council Article 4 Direction in respect of controlling the growth HMOs in Bath but would like further information in relation to enabling dedicated accommodation.

11. LOWER BRISTOL ROAD GYPSIES & TRAVELLERS SITE

The Panel will receive a verbal update on this item from the Head of Housing.

12. GYPSIES & TRAVELLERS ALLOCATIONS POLICY (Pages 73 - 104)

13. EMPTY PROPERTY INITIATIVE UPDATE (Pages 105 - 110)

In January 2013 the Council formally adopted an updated Empty Property Policy. This policy articulates the Council's twin track approach of providing encouragement and assistance to all owners of empty properties to help bring their properties back into use whilst at the same time seeking to select high priority empty properties for bespoke assistance and potentially enforcement action. The purpose of this report is to update the Panel on the progress made with implementing this policy.

14. PANEL WORKPLAN (Pages 111 - 114)

This report presents the latest workplan for the Panel.

The Committee Administrator for this meeting is Mark Durnford who can be contacted on 01225 394458.

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BATH AND NORTH EAST SOMERSET COUNCIL

HOUSING AND MAJOR PROJECTS POLICY DEVELOPMENT AND SCRUTINY PANEL

Tuesday, 29th July, 2014

Present:- Councillors Eleanor Jackson (Chair), Steve Hedges (Vice-Chair), Brian Simmons and June Player

12 WELCOME AND INTRODUCTIONS

The Chair welcomed everyone to the meeting.

13 EMERGENCY EVACUATION PROCEDURE

The Chair drew attention to the emergency evacuation procedure.

14 APOLOGIES FOR ABSENCE AND SUBSTITUTIONS

Councillor Tim Ball (Cabinet Member for Homes and Planning) sent his apologies to the Panel.

15 DECLARATIONS OF INTEREST

Councillor Steve Hedges declared an 'other interest' as his son works for Curo.

16 TO ANNOUNCE ANY URGENT BUSINESS AGREED BY THE CHAIRMAN

There was none.

17 ITEMS FROM THE PUBLIC OR COUNCILLORS - TO RECEIVE DEPUTATIONS, STATEMENTS, PETITIONS OR QUESTIONS RELATING TO THE BUSINESS OF THIS MEETING

David Redgewell – South West Transport Network made a statement to the Panel. He stated his concern over the Southgate development in that while the toilets had been brought back into use, the café was still not open and there appears to be no CCTV in action. He asked that an officer be put in place to be responsible for queries on this issue. He stated that he would like to see Southgate finished and working. He went on to speak about economic regeneration work in Radstock and Midsomer Norton and asked that transport issues should form part of such plans. He asked for joined up thinking on major projects and that transport issues be fully dovetailed.

The Chair stated that she felt these issues could be taken to the Planning Transport and Environment or Economic and Community Policy Development Panels.

Councillor Simmons asked that the statement be sent to the Cabinet Member for Transport.

This was agreed by the Panel.

18 MINUTES - 27TH MAY 2014

The Panel confirmed the minutes of the previous meeting as a true record and they were duly signed by the Chair.

19 CABINET MEMBER UPDATE

Housing Services Update – The Head of Housing introduced this item in the absence of Councillor Ball.

Panel members received a written update on current issues (*a copy of the update is on the website attached to the relevant item on the agenda*). Councillor Simmons asked that Cabinet Members attend Panel meetings so that Panel members can ask questions – other Panel members agreed.

Councillor Hedges asked how many empty homes had been brought back into use in the last 3 years. The officer stated that 89 had been brought back into use over the last year. He did not know the exact figure for 3 years but felt it was broadly similar figure. Regarding a question from Councillor Hedges on compulsory purchase, the officer responded that this process was only just starting and would be concluded in this financial year.

Councillor Player asked if gardens fell under the 'Additional Licensing Scheme'. The officer replied that the Council only had minimal influence in this area. He explained that the Act was not designed for gardens but to ensure that tenant's facilities are adequate and safe. He gave his support around improving the appearance of gardens and stated that his department can contact landlords if problem gardens are reported to them. Councillor Jackson stated that there can be similar problems with gardens in private residences; she explained that there had been use of a compulsory garden clearance order in her area.

There was some discussion around fire regulations in HMO (Houses of multiple occupation) properties. The Chair congratulated officers on bringing properties into use that had been found in a dangerous state.

Councillor Hedges commended the team on their work in the area of bespoke housing solutions (*Housing adaptations for special needs*). There was some discussion around expensive adaptations made to houses and how these houses are used in the future. The officer explained that when adaptations are made, exit strategies are designed in for the property. He explained that there is not a simple resolution to this issue but that significant adaptations only related to a few properties. He stated that stair lifts are the most common adaptation and they are easily removed. He stated that adapted properties get put through the normal system but people are made aware of the adaptations in a property.

Councillor Jackson referred to a site visit to a Gypsy and Traveller site in Bristol and thanked officers for arranging this. The officer updated the Panel on the families still on the Lower Bristol Road site and explained that they had moved to another site today and that bailiffs would be going in tomorrow to remove remaining caravans.

Development, Regeneration and Project Delivery Update Tim Hewitt – Regeneration Team Manager answered questions on this paper in the absence of Councillor Stevens.

Panel members received a written update on current issues (*a copy of the update is on the website attached to the relevant item on the agenda*).

Councillor Jackson asked that Radstock be put back on the list. She also asked why Radstock and Westfield Economic Forum had been abolished. The officer explained that the group had been wrapped up to make way for a more general development advisory group with a broader remit for which the terms of reference were currently being drafted. Councillor Jackson stated that such a decision should not have been announced out of the blue and without consultation.

Councillor Simmons asked about rumours that the ventilation system in the Keynsham development were not working. The officer stated that he would check with John Folly as there were no officers present to answer this query.

Councillor Jackson asked about the roof of the Guildhall, the officer stated that there would be a reply at the next meeting.

Councillor Hedges asked that his thanks be passed on to officers regarding Odd Down 3G Pitch.

Councillor Jackson mentioned that the real time information at bus stops in Midsomer Norton and Radstock is not triggered by all buses. Councillor Hedges mentioned that this was also the case with a bus stop in Newbridge.

20 COUNCIL STRATEGIC RIVER GROUP

Tim Hewitt – Regeneration Team Manager introduced the report.

Councillor Jackson referred to the Task and Finish Group mentioned on page 17 where it is stated that recommendations would be progressed by the Autumn, she stated that she was not happy with the lack of progress on this. The officer explained that there would be more impetus when the river co-ordinator is in post.

Councillor Simmons asked if floating plastic pontoons had been considered. The officer explained that all options are being considered with the river corridor funding and partnership working.

Councillor Jackson stated that the information on comparisons with other authorities is very useful.

There was some discussion around vandal proof life belts, Councillor Player asked how they are accessed. The officer explained that there are examples around the country of life belts in emergency lockers that can be unlocked via a phone call and a code. The officer agreed to give some examples of how this would work at a future meeting.

Councillor Hedges stated that the report did not ask the Panel to comment or note. The Chair asked for a clearer cover report next time and no print smaller than 12point.

21 MIDSOMER NORTON - PROJECTS UPDATE

Jonathan Medlin – Senior Development Officer introduced the report.

Councillor Jackson asked if there were any plans for improving North Road access/plans to improve the bus service as the Stones Cross roundabout is perilous. She stated that she was also concerned about a series of planning applications resulting in a loss of retail sites in favour of flats and asked the officers view. The officer stated that it is hard to protect retail but that improvements outlined in the report will strengthen it. Regarding access, he explained that if there was a supermarket on South Road, this would improve access as there would have to be road improvements and money towards improvements in the access.

Councillor Jackson asked about Radstock Road depot and if there are any plans for development. The officer said he had no update on this and would report back.

22 ANNUAL HOUSING REPORT

Graham Sabourn – Head of Housing gave a presentation to the Panel (*a copy of the presentation slides are attached to the relevant item on the agenda on the Council website*). The presentation covered key facts including some of the following:

- Customers receiving help and advice
- Households housed
- Average cost for a 2 bed property
- Developing new homes
- Improving old homes
- Regulating the private rented sector
- Allocating social housing
- Helping homeless households
- Creating Independence
- Excellent Customer Service

The Panel thanked the officer and his team for their hard work.

23 PANEL WORKPLAN

The Panel noted the future workplan.

Councillor Jackson asked for a report student accommodation to cover the following:

- Is the Council is providing enough through the planning system – to include information on the total need and how the university plans to house their students.
- Why students blocks *are* only for first year students
- Information on post graduate accommodation

The Head of Housing said that he would speak to planning colleagues to see if there is scope for them to bring a paper to the panel on this.

The meeting ended at 7.45 pm

Chair(person)

Date Confirmed and Signed

Prepared by Democratic Services

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Bath & North East Somerset Council	
MEETING	Housing and Major Projects Policy Development & Scrutiny Panel
MEETING DATE:	23 September 2014
TITLE:	Radstock & Westfield Development – Development update
WARD:	Radstock & Westfield
AN OPEN PUBLIC ITEM	
List of attachments to this report: None	

1 THE ISSUE

- 1.1 This paper provides an update on various development sites in Radstock & Westfield.

2 RECOMMENDATION

- 2.1 Housing & Major Projects Policy Development & Scrutiny Panel is asked to note the progress on Radstock & Westfield sites and the proposed steering group ‘Radstock & Westfield Development Advisory Group’.

3 RESOURCE IMPLICATIONS (FINANCE, PROPERTY, PEOPLE)

- 3.1 There are no direct resource implications arising from this report. Projects referred to within the report which are being delivered by the Council have approved capital budgets; as further individual projects are progressed they will be subject to the normal Council decision making processes for any budgetary approval.

4 STATUTORY CONSIDERATIONS AND BASIS FOR PROPOSAL

- 4.1 The development of sites within Radstock & Westfield is guided by the Council’s agreed planning policy framework.
- 4.2 All development schemes are / will be the subject of detailed planning applications for consideration of the Council as the Local Planning Authority. Decisions will therefore be taken in accordance with the appropriate statutory and regulatory guidance in due course.

5 THE REPORT

Planning Policy

- 5.1 The Core Strategy sets out the Council's vision for the wider Somer Valley area, and for Radstock.
- 5.2 The adopted Core Strategy sets out the Council's five year housing land supply is especially useful for the Somer Valley. It demonstrates that greenfield sites outside the housing development boundary are not required to provide a 5 year housing supply in the area.
- 5.3 Policy SV3 sets out the Strategic Policy for Radstock Town Centre and includes the diagram below:



- 5.4 The Placemaking plan will identify key measures required to achieve the ambition. The Core Strategy (including the placemaking principles in Policy SV3) set the context for the Placemaking Plan:
- a: Protect and enhance heritage assets: The built form should retain its historical and architectural value and development should attempt to integrate these features and carefully consider materials appropriate to the locality and building style.
 - b: Ensure that linkages to green spaces and sustainable transport routes are prioritised.
 - c: Protect and enhance areas of visual significance and views to open landscape, in light of their close relationship with the history of the town.
 - d: Protect and enhance the green infrastructure of the town centre associated with the river, particularly to help counterbalance the negative effect of traffic.
 - e: Establish greater provision for pedestrians and cyclists in the town centre including secured cycle parking facilities.
 - f: Secure a high quality of building design, townscape and public realm.
 - g: Improve connectivity between the core shopping area, community amenity areas including the library, Victoria Hall, Radstock Museum and key car parks.
 - h: Secure a more balanced mix of retail by supporting independent retailers (including those supporting cultural activities such as arts and crafts), leisure, tourist and commercial uses.
- 5.5 The Council is working with the Town Council on developing a more specific vision / objectives for the town centre that will then form the framework for

considering the future use of / development form on the potential development opportunities.

- 5.6 The Placemaking Plan will allocate key sites in the centre of Radstock and set out the design / placemaking principles for the development of these sites. The sites are likely to include: Charltons, Rymans, the library, Coombend, Old School, Norton Radstock College and St Peter's Factory site (remainder of Local Plan allocation).
- 5.7 It will also consider and identify the infrastructure requirements to support the development of the town centre: employment space, health, community facilities, parking, highways, cycle provision, education, ecology, to ensure the necessary infrastructure is funded and delivered in a timely manner to support new development.

Key Sites Update

- 5.8 Former Railway Land, Radstock – Outline Planning Consent granted in June '14, which included detailed planning consent for the B&NES highway works. Highway works began at the end of July. Work from now until Christmas will focus on building the link road and new roundabout on Frome Road. After Christmas work will focus on the changes to The Street and Fortescue Road. Scheduled to be completed Summer '15.
- 5.9 Former Railway Land, Radstock – Area 2. Reserved matters consent granted in June '14 and precommencement conditions are in the process of being discharged. Linden have begun site set up and ground preparation.
- 5.10 Wessex Water works – final phase of sewerage improvement works underway on Fortescue Road. Work started on site on 4 August and will be completed by the end of November. Fortescue Road will be closed to through traffic from the beginning of October – end November. Wessex Water run a financial compensation scheme for local traders who are affected by the road closure.
- 5.11 Parking – the town centre recently lost the use of the informal car park behind Victoria Hall and a number of short stay spaces at the front of Victoria Hall due to the development of the former railway land. Therefore the Council is looking to expand the car park to the rear of the library. A planning application for change of use is currently being prepared. In addition, a traffic regulation order process has begun to implement a 5 hour parking restriction in Waterloo Road and the Library car park to ensure there is parking available for shoppers and visitors. Library relocation Following the consultation process, the move of the library is to be taken forward with detailed designs being undertaken. The lease terms are largely agreed but with the expectation that some amendments may be required to deal with the specific issues that might arise from the detailed design process. A programme is being worked-up, but is somewhat constrained by the opening of the new Library/One-Stop-Shop in Keynsham.
- 5.12 Old Bakery, Curo – 13 affordable units, to be completed March 15.
- 5.13 Westhill Garages, Curo – 10 affordable units, to be completed March 15.

Consultation

- 5.14 It is proposed that the Council establishes the Radstock & Westfield Development Advisory Group. The purpose is to ensure that locally elected members (ward members and representatives from the town council) are kept informed on all key developments that take place within the Radstock and Westfield Wards and to provide a clear process of engagement with the local community to avoid duplication and improve communication. This does not replace any statutory consultation required as part of the planning and transportation statutory process.
- 5.15 The group will provide an advisory role to Bath & North East Somerset Council, offering comment and feedback on a range of topics and issues relating to physical developments and improvements in Radstock & Westfield.
- 5.16 The outcome of discussions will then be reported to the Somer Valley Forum.
- 5.17 The group will input into the Placemaking Plans and help shape the Radstock & Westfield Implementation plan that will identify potential funding opportunities, infrastructure requirements, development opportunities.
- 5.18 The Placemaking Plans will also report to the Local Development Framework Steering Group.

6 RATIONALE

- 6.1 The report is for noting.

7 OTHER OPTIONS CONSIDERED

- 7.1 None.

8 CONSULTATION

- 8.1 Planning policy, Housing, Property.

9 RISK MANAGEMENT

- 9.1 A risk assessment related to the issue and recommendations has been undertaken, in compliance with the Council's decision making risk management guidance.

Contact person	<i>Emily Price 01225 396553</i>
Background papers	
Please contact the report author if you need to access this report in an alternative format	

Bath & North East Somerset Council	
MEETING/ DECISION MAKER:	Housing and Major Projects Scrutiny Panel
MEETING/ DECISION DATE:	23 September 2014
TITLE:	Planning for Student Accommodation Needs
WARD:	All Bath Wards
AN OPEN PUBLIC ITEM	
<p>List of attachments to this report:</p> <p>A1. Student Numbers and Accommodation Paper (part of the Strategic Housing Market Assessment)</p> <p>A2. Recent planning policy advice in relation to application for student accommodation in the in the city centre</p>	

1 THE ISSUE

- 1.1 At its July 2014 meeting the Panel requested a paper to outline the Council's approach to planning for the growth of students, more specifically their housing needs. The Panel is aware of the Council Article 4 Direction in respect of controlling the growth HMOs in Bath but would like further information in relation to enabling dedicated accommodation.

2 RECOMMENDATION

- 2.1 That the panel notes that the statutory planning policy approach to this issue is embedded within the Council's Core Strategy (adopted July 10th 2014) and that this will inform decision making on planning applications for new student accommodation

3 RESOURCE IMPLICATIONS (FINANCE, PROPERTY, PEOPLE)

- 3.1 There are no resource implications beyond that which have already been subject to scrutiny as part of the Core Strategy process.

4 STATUTORY CONSIDERATIONS AND BASIS FOR PROPOSAL

- 4.1 There is no proposal. This report and is for information only.

5 THE REPORT

- 5.1 A great deal of research and analysis is set out in Appendix 1. We pull out the main issues here. This covering Report should also be read alongside Appendix 2 which sets out a very recent planning policy consultation response to two planning applications for student accommodation in the city centre.
- 5.2 Historically the growth of students enrolled in higher education in Bath has outpaced the provision of new accommodation for those students. This was especially the case from the late 1990s to 2011. Some 7% of the total housing stock of the city of 40,000 (2011) is likely to be occupied as student related HMOs. That is about 2,800 units of accommodation.
- 5.3 The strategy for the future is to hold this number constant whilst delivering a further 7,000 dwellings at Bath. This will result in a net reduction of the share of the housing stock that is occupied as such HMOs.
- 5.4 The strategy is not to reduce the number of student related HMOs. The reason for this is that it would require land to deal with both the future growth of students and the past imbalance. To deal with the past imbalance in a meaningful way would have a significant opportunity cost. The additional sites would be taken out of the potential supply for normal housing/affordable housing and employment space.
- 5.5 The level of Green Belt release recommended by the Inspector and now adopted in the Core Strategy is consistent with the quantitative strategy for student accommodation. If he had thought it sound to achieve a greater level of student accommodation provision more brownfield sites would have been needed to achieve this, which means less normal housing and greater level of Green Belt release to compensate.
- 5.6 Whilst there is an argument that building student accommodation over and above that which is necessary to accommodate growth (from 2011) would release HMOs back to the normal housing stock, thus compensating for the additional sites uses, it is not as simple as that. Three key observations are that
- (1) any housing released would be market housing, not affordable housing (although they may be at the more affordable end of the market). Conversely the sites used for student accommodation, that could have yielded some affordable housing, won't, as student accommodation is not subject to affordable housing requirement on site or as a contributions to off-site provision
 - (2) landlords may accept under occupation or fill the vacant bed space with a non-students
 - (3) landlord will change the business plan from wholly student HMOS to wholly non-student HMOs.
- 5.7 Geographically / spatially the Core Strategy seeks to meet the demand for additional accommodation mainly on campus, with the city itself playing a supplementary role when necessary and where appropriate. There is a high risk that if too much off-campus accommodation is provided, it will act as a disincentive for the University of Bath to build additional phases of

accommodation on campus where the impacts are less in terms of the opportunity cost.

- 5.8 The demand from private providers is mostly focused within the Enterprise Area (EA) and on its periphery on the best bus links. At present private sector student accommodation is the most lucrative form of property investment in the city. It provides the best returns for those seeking a revenue stream.
- 5.9 There is a now presumption against student accommodation in the Enterprise Area as set out below.

Core Strategy Policy B5

- 5.10 Outside of the EA each scheme will be considered on its merits.
- 5.11 However, there may be locations within the EA that are acceptable for student accommodation and places outside it that are not. It depends on the opportunity cost (which, outside the EA is more defensible as a reason for refusal if the site is allocated for another use). In all circumstance it also depends on the scale of the scheme and its impact on the implementation of further on-campus phases.
- 5.12 The key information to extract from Appendix 1 is shown below

Demand

- Growth in demand of **3,200** 2011- 2021 with stabilisation thereafter to 2029

Confirmed Supply

- *561 units coming on stream at Newton Park this academic year*
- *704 coming on stream at Claverton Down this academic year*
- 48 units at the Quasar Building
- 327 units under construction at Twerton Mill
- 461 under construction at Green Park House
- 40 units under construction at Widcombe Social club
- 29 units permitted at 1-3 Westgate buildings

This is a total of 2,170 implying a residual need of 1,030 residual to 2021

- 5.13 All of these sites were permitted before the Core Strategy was adopted during a period statutory policy flux and extreme vulnerability. Some of these may have been resisted (or would have been resistible) had the CS been in place.

Other Supply

- 5.14 At Claverton Down the 704 units that have been built form part of an allocation of about 2,000 that has been identified in the Local Plan, leaving a residual capacity of 1,300. 2,400 units are actually promoted by the University at Claverton Down within their estates plan (residual capacity of 1,696).
- 5.15 Based on the frequency and quantity of recent past phases of on-campus development in 2003, 2008 and 2013 we estimate that, realistically, not more than 800-850 could come forward by 2021 as part of a second phase. It would be difficult to defend more than that assumption at the moment. That would represent about half of the residual capacity of 1,696.
- 5.16 Once we add that to the supply to 2021 we arrive at a figure of **2970-3,020**. We assume that these 800-850 units will and can come forward but the Council must work with the University to ensure the delivery this and more if possible.

This results in a residual need of about 180-250

- 5.17 There is no additional capacity at Newton Park (Bath Spa) for additional accommodation although there is programme to replace about 400 aging units on a 1:1 basis at part of phase 3 of the estate plan.
- 5.18 Based on the analysis above we are able to countenance, at present, up to about 200-250 more in city units. Permitting more than that would harm the implementation of the next 800-850 units on campus and skew the spatial strategy for dealing with growth. This is reflected in the advice to Development Management contained within Appendix 2.

Source of supply for final residual of 250

- 5.19 There are a number of planning applications (736 units) and pre-apps* (507) in the system play at the moment.
- James Street West, 190 bedspaces
 - 1-3 James Street West, 115 bedspaces.
 - Hartwells, Upper Bristol Road, 431 bedspaces
 - *Transport Depot, Brougham Hayes, 103 bedspaces.
 - *Site of Old Gas Works, Upper Bristol Road, 404 bedspaces.
- 5.20 Clearly there is more in-city capacity that is needed in the context of the strategy. To permit more than about 250 additional in-city would have consequences for the implementation of phase 2 on campus at Claverton Down and this would upset the delivery of spatial strategy. There would also be an opportunity cost on the affected sites. There is already some prospect that the final phase of capacity at Claverton Down might not be built, based on current demand/ growth assumptions. The figures list above should not be read as being acceptable in urban design terms. Applications aer being assessed and this may reveal the height scale and massing is not

appropriate. Therefore each site might have the potential to yield less than is stated above.

- 5.21 Effectively, the two large sites permitted before the Core Strategy was adopted (Green Park and Twerton Mill, listed at 5.12) may be replacing some of the capacity available at Claverton Down. It is not quite as simple as that though as the timeliness of delivery matters. It is no good having lots of potential on campus that won't come forward for many years.
- 5.22 In addition to all of the above, 375 bedspaces were permitted in 2006 as part of the Crest outline application for BWR, and before all of the sites listed in 5.9 and 5.16 were on the radar. The market has changed significantly since 2006. It is by no means certain that this permitted development will come forward. There are many instances of commercial schemes being permitted but not implemented. We are not aware of operator interest on this specific site. We do not budget for these units coming forward before 2021. They may not come forward at all and the land could revert back to pure residential use. We could not defend these units as being deliverable in the next 5 years at planning appeal in relation to the sites listed in 5.16.

Conclusion

- 5.23 The planning policy framework has been established in the Core Strategy and is now being implemented. Planning policy is to provide new accommodation at the same rate as new needs are generated, and to hold student related HMOs at 2011 levels (but not to reduce those levels). There is a role for both on-campus and in-city student accommodation in achieving this. The majority of needs should be met on campus. Permitting a level of off-campus accommodation that might seek to reduce the number of HMOs has an opportunity cost. There is also no guarantee that there would be a reduction on HMOs. Further, permitting too much in city accommodation would not encourage the University of Bath to build further phases of accommodation on-campus. Planning policy seeks to stop a situation arising whereby on-campus and is left undeveloped whilst valuable city centre and Enterprise Area sites are lost as potential housing and employment sites.

6 RATIONALE

- 6.1 The recommendation is to note the existing situation and the Council's recently adopted, statutory planning policy.

7 OTHER OPTIONS CONSIDERED

- 7.1 This is covered in 5.4-5.5

8 CONSULTATION

- 8.1 The Council's approach to student accommodation has been through statutory plan-making consultation processes and has been and tested at independent examination.

9 RISK MANAGEMENT

- 9.1 A risk assessment related to the issue and recommendations has been undertaken, in compliance with the Council's decision making risk management guidance.

9.2 This covered the Core Strategy as a whole.

Contact person	<i>Richard Walker 01225 477515</i>
Background papers	<i>List here any background papers not included with this report, and where/how they are available for inspection.</i>
Please contact the report author if you need to access this report in an alternative format	

Bath and North East Somerset Local Plan

Student Numbers and Accommodation Requirements 2011-2029

(Part of the Strategic Housing Market Assessment)

August 2014



Bath Spa University, Newton Park Campus

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Introduction

- 1.1 Student housing requirements are part of the totality of the housing market in Bath and exert a considerable influence upon it. Students need to be housed and the relationship between dedicated accommodation and the number of students impacts upon the private lettings sector and houses in multiple occupation.
- 1.2 The provision of student accommodation (and academic space) is a matter that requires an evidence base to inform policy making and decision taking.
- 1.3 The Council seeks to enable the continued success of The University of Bath and Bath Spa University and the contribution they make to the city's identity, profile and employment base.
- 1.4 There was relatively little forward planning by universities and local authorities from in order to manage the expansion of student housing in response to expansion from the late 1990s
- 1.5 Historically, the growth in student numbers has not been accompanied by a comparable increase in on-campus or off-campus managed accommodation and that the associated expansion of the lucrative private student lettings market has priced out other buyers and has diminished the 'normal' housing stock of the city. This is not unique to Bath but is particularly significant given its relatively small size as a host city for two universities. The proliferation of Houses in Multiple Occupation (HMOs) in the Oldfield Park/Westmoreland area is the most visible consequence of the historic mismatch between the growth in students and managed student accommodation.
- 1.6 A strategy is needed that enables a reasonable balance between the aspirations of each university, the concerns of communities affected by HMOs and the overall functioning, performance and environmental quality of the city and its setting.
- 1.7 This paper establishes the current demand and supply for accommodation for students studying at the University of Bath and Bath Spa University and how this might change in the future.
- 1.8 For each university the evidence base presents information concerning the growth in student numbers since the mid 1990s; the current demand for student

accommodation; the supply of managed accommodation (on-campus and off-campus), and the size of students lettings market.

- 1.9 It then considers how these relationships might change having regard to current planning policy, extant planning permissions, emerging proposals for bedspaces, the aspirations of each institution for on-campus development and their expectations in relation future student numbers

Headline Strategic Conclusions

- a) Out of a total dwelling stock of 39,000 in 2011, it is estimated that 2,833 were occupied as student HMOs (7%), housing about 11,300 students.
- b) The long term planning strategy is to hold the number of HMOs at 2011 levels and increase the overall housing stock of the city to 46,000 by 2029. That will mean student HMOs will account for 6% of the stock, a small net reduction.
- c) The Universities housing needs are forecast to grow by 3,200 by 2021 and stabilise thereafter to 2029. To keep the number of HMOs at 2011 levels, new dedicated accommodation will need to be provided. The strategy is to achieve this mainly on-campus, with supplementary off-campus provision being allowed where appropriate.
- d) The strategy is not to reduce the actual number of HMOs, because of the consequences for land supply for other uses.
- e) The forecasts in this document show that whilst the Universities can 'consume their own smoke' during the plan period, it is unlikely that the residential capacity identified at Claverton Down will come forward at the required rate and Bath Spa hasn't quite got enough on-campus capacity. There will be a need for some additional off-campus development. Much of what is likely to be needed off-campus has already been permitted (before the Core Strategy was adopted). There may be scope for a little more (about 200 units to 2021). Too much off-campus development will disincentivize the University of Bath to build further accommodation phases, in a timely manner, on-campus.
- f) Further, whilst lots of supplementary bedspaces might result in a reduction in demand for bedspaces in student HMOs (assuming Bath Uni does indeed build on-campus), and might lead to landlords seeking other tenants or selling part of their portfolio, this will be market housing. It will not be affordable housing

(although it might be relatively affordable market housing). Conversely if large sites in the city are used for general needs housing rather than student housing, the Council can secure a mix of tenures on the site. The need for this balancing act is particularly acute in Bath, given the negligible prospects for outward expansion. Again, the strategy for student HMOs is stabilisation, not contraction.

- g) At the extreme even if there was an intention to have a bedspace for each student in need, this simply would not materialise in the real world. This is because the need for a bed space somewhere isn't the same as the demand for a bed space in a dedicated accommodation block. The majority of undergraduates 'demand' an HMO living experience after their first year of study. There is therefore only so much 'institutional' accommodation (public or private, on or off-campus) that will be demanded/consumed – if HMOs are available.

The University of Bath – Growth in Enrolment

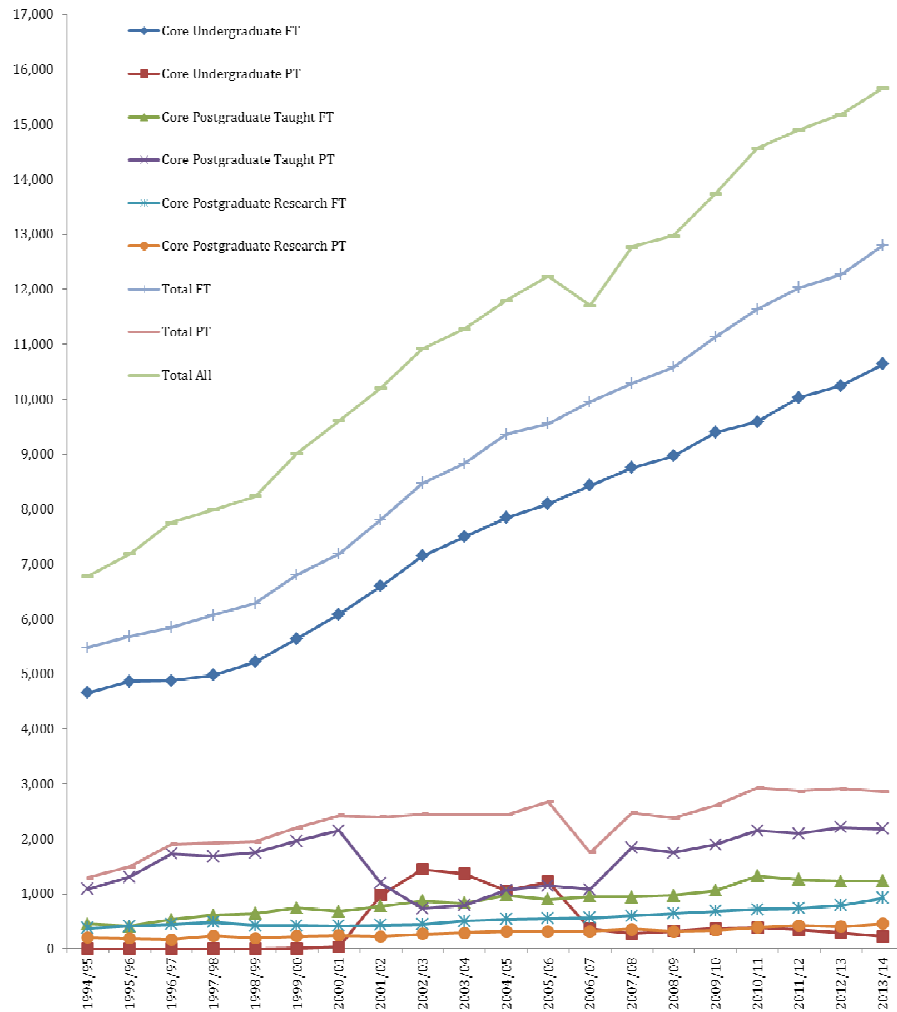
2.1 Table 1 and Figure 1 sets out how the number of students enrolled at the University of Bath has increased during the last 20 years. For the 2013/14 academic year total enrolment was 15,660, up from 6,776 in 1994/95.

Table 1: University of Bath Student Numbers 1994/95 - 2013/14

Year	Undergraduate		Postgraduate				Total FT	Total PT	Total All
	FT	PT	Taught		Research				
			FT	PT	FT	PT			
1994/95	4,656	0	449	1,086	379	206	5,484	1,292	6,776
1995/96	4,865	0	411	1,310	414	187	5,690	1,497	7,187
1996/97	4,876	0	533	1,730	443	170	5,852	1,900	7,752
1997/98	4,977	0	609	1,684	482	240	6,068	1,924	7,992
1998/99	5,222	0	643	1,750	422	196	6,287	1,946	8,233
1999/00	5,641	9	746	1,965	421	228	6,808	2,202	9,010
2000/01	6,086	36	678	2,147	420	243	7,184	2,426	9,610
2001/02	6,599	977	781	1,194	430	224	7,810	2,395	10,205
2002/03	7,147	1,450	874	735	447	269	8,468	2,454	10,922
2003/04	7,494	1,365	831	793	503	288	8,828	2,446	11,274
2004/05	7,844	1,052	979	1,068	536	316	9,359	2,436	11,795
2005/06	8,099	1,222	901	1,144	554	315	9,554	2,681	12,235
2006/07	8,430	363	952	1,078	564	317	9,946	1,758	11,704
2007/08	8,751	277	943	1,844	595	360	10,289	2,481	12,770
2008/09	8,968	321	971	1,749	647	314	10,586	2,384	12,970
2009/10	9,394	369	1,060	1,896	682	337	11,136	2,602	13,738
2010/11	9,589	385	1,325	2,153	721	392	11,635	2,930	14,565
2011/12	10,029	350	1,263	2,098	738	424	12,030	2,872	14,902
2012/13	10,242	297	1,230	2,213	795	405	12,267	2,915	15,182
2013/14	10,638	221	1,235	2,182	928	456	12,801	2,859	15,660

Note: these figures exclude visiting students. For 2013/14 these increase the total enrolment by 304 to 15,964

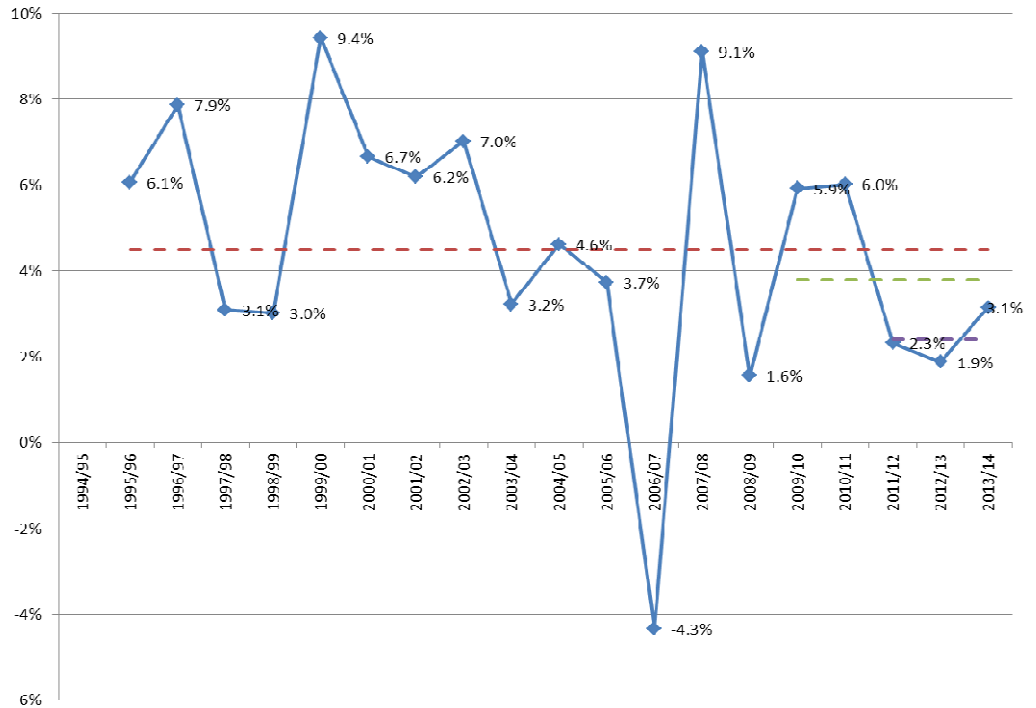
Figure 1: University of Bath Student Numbers 1994/95 – 2013/14



2.2 Figure 2 shows the growth rate each year for **total enrolment**. It also illustrates that that the long term compound annual rate of growth for total enrolment has been 4.34%, whereas the most recent 5 year and 3 year rate has been 3.8% and 2.4%. Although not shown graphically, the comparable figure for undergraduates are 4.4% (long term) and 3.5% (for both the last 5 and 3 years).

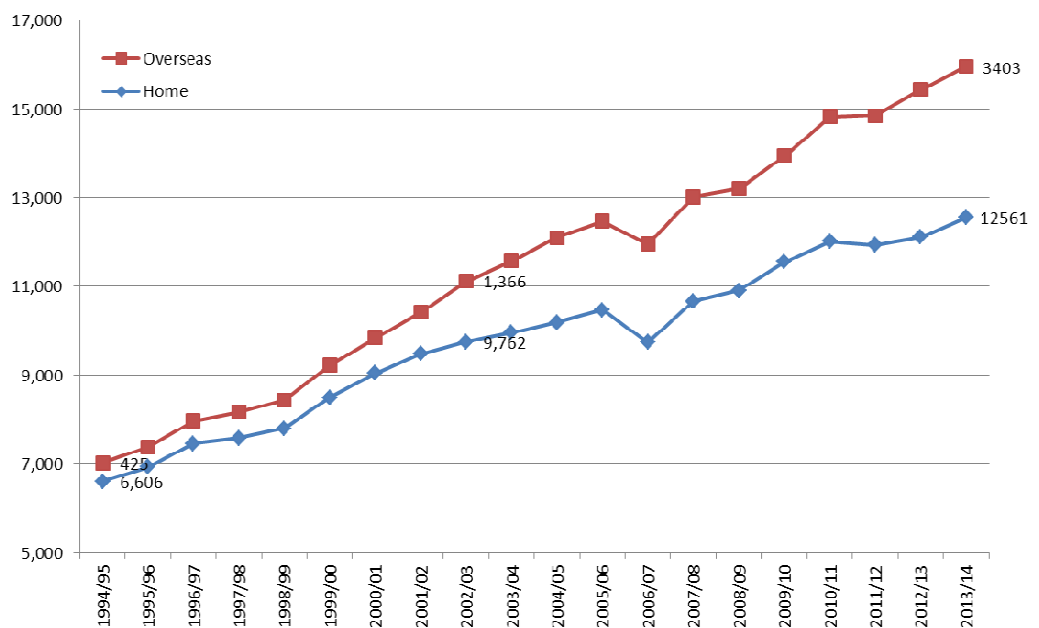
2.3 The contraction in enrolment in 2006/07 was due to the culling of part-time undergraduate courses/places. This can be seen in Table 1

Figure 2a Total Enrolment – Annual and Compound Rates of Growth (%)



2.4 Growth in student numbers has been due to both domestic and overseas sources, the later now account for 21.3% of total enrolment, up from 5% in 1994/95 and 12.3% in 2002/03. The Council understands that University of Bath does not see the international share rising much further, if at all.

Figure 3: University of Bath - Fee Paying Status



The University of Bath – Current Demand for Living Accommodation

- 2.5 Not all students that are enrolled at the University of Bath are present and living within the city during term time. Further, of those that do, not all in need of managed or other shared accommodation. For example, some students e.g. mature part-time students, rent without sharing or are owner occupiers. The analysis in **Appendix 1** shows how the number of students requiring managed or shared accommodation in Bath has been derived from the total enrolment figures using address and mode of study data held by the student records office.
- 2.6 It concludes that 65% of total enrolment is a reasonable assumption to use to estimate the number of students requiring managed or shared accommodation within Bath during term time. For 2013/14 (total enrolment of 15,600) this generated an estimated need for 10,179 bed spaces and this is forecast to rise to 10,423 for 2014/15.

University of Bath - Current Supply of Student Accommodation

- 2.7 It is estimated that the University of Bath will generate a need for 10,423 bed spaces in 2014/15. From the beginning of that academic year the University will have 3,156 study bedrooms at its Claverton Campus. This includes 704 bed spaces under construction on campus (planning application reference: 12/03055/FUL).
- 2.8 Elsewhere in the city the University maintains 895 study bedrooms, resulting in a total stock of 4,051.

Table 2: University of Bath Study Bedrooms

Accommodation	Beds	Location
Westwood	632	Claverton Campus
Eastwood	559	Claverton Campus
Norwood House	139	Claverton Campus
Brednon Court	126	Claverton Campus
Polden Court	125	Claverton Campus
Osborne House	34	Claverton Campus
Marlborough and Solsbury Court (2003)	463	Claverton Campus
Woodland Court (2008)	349	Claverton Campus
The Quads (2014)	704	Claverton Campus

<i>Campus Sub Total</i>	3,156	<i>Claverton Campus</i>
John Wood Court, Avon Street	176	City
John Wood, Main Building	61	City
Carpenter House, Broad Quay	133	City
Pulteney Court, Pulteney Road	133	City
Thornbank Gardens	217	City
Clevelands Buildings, Sydney Wharf	154	City
Canal Wharf, Sydney Wharf	21	City
City Sub Total	895	City
Total	4,051	Bath

- 2.9 The stock of managed accommodation is forecast to be able to cater for nearly 39% of the total estimated need for accommodation for the 2013/academic term, leaving about 6,370 students to find accommodation in the private rented sector. Analysis of available properties in Bath on studepad.co.uk reveals that the average size of a student HMO is 4 people. It follows that there will be about 1,600 HMOs in Bath that cater for students at the University of Bath. That is about 4% of the total stock of dwellings within the city.

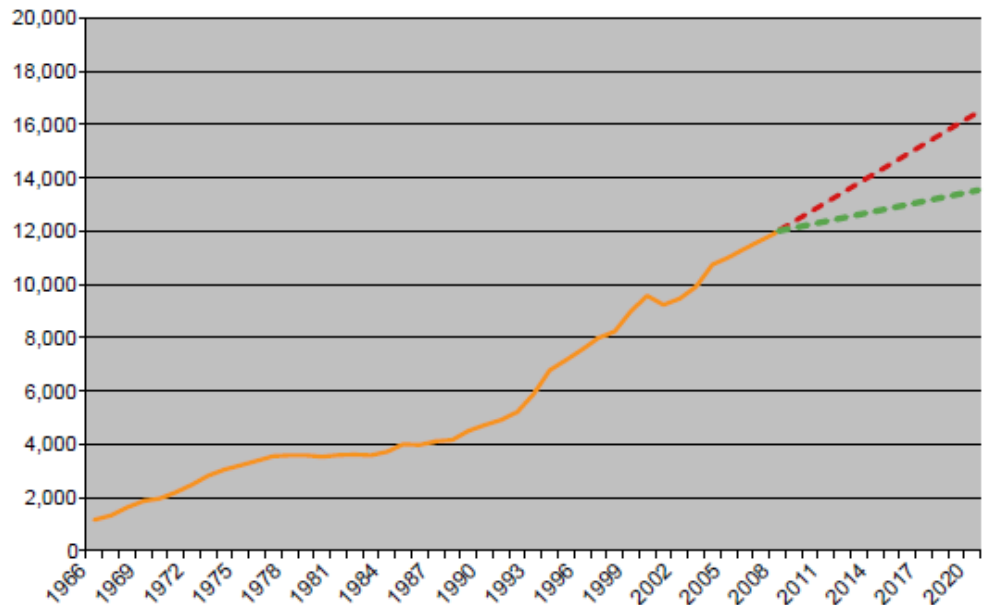
Future Plans for the Claverton Campus in respect of living accommodation

- 2.10 The University of Bath has an estate master plan for Claverton Campus that now runs from 2009 to 2026¹. Previously it ran from 2009-2020. It sets out some assumptions in respect of future student numbers. The masterplan has no planning status as an SPD, but has been prepared as a requirement Local Plan policy GDS.1/B11.
- 2.11 The original 2009 master plan contains the graph shown overleaf (Figure 4), which forecasts growth in enrolment. The red line represents 3% per annum to 2020 and the green line 1% per annum. Also identified was a need for 2,400 bedspaces and a target to build these on-campus by 2020. At the time that this document was written there was no expectation of or reliance on private off-campus providers providing any of this space.
- 2.12 The University has published two 'summary updates' to the master plan (in 2012 and 2014) to reflect actual change on the ground and tweaks to its estate strategy. These updates also reflect on the forecasts of student numbers made in the original

¹ <http://www.bath.ac.uk/estates/projects/masterplan/>

2009 master plan. Whilst the 2014 update can be read in isolation, it is not intended to replace the 2009 master plan or the 2102 summary update as it is fundamentally based on the evidence and proposals based therein. It is more a record of an important point in time in the further evolution and development of the University campus.

Figure 4: Forecast Growth to 2020 (Full Time Equivalents)



Note: this shows FTEs (full time equivalents, not total enrolment)

2.13 In respect of future growth the 2012 update to the master plan stated that:

“The average annual growth in student numbers over the past ten years has been around 4% per annum [see Council’s corroboration in figs 2a and 2b above]. This has been fuelled by Government policy to raise participation rates in Higher Education and by the popularity of the University with prospective students. It is not expected that the University will continue to grow at historic rates in the period to 2026, but accurately predicting future growth and development needs over such a long period of time is very difficult, particularly in light of the changing policy and economic context within which Higher Education is provided in the UK.

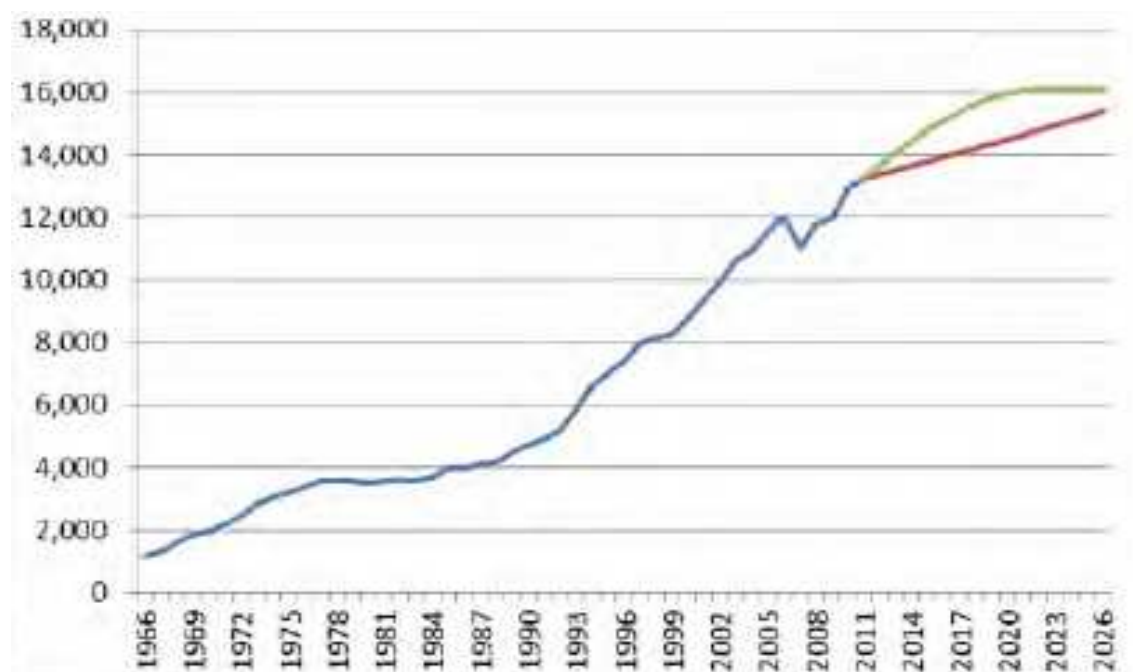
Indeed many of the determining factors are outside the direct control of the University. The Higher Education Funding Council for England (HEFCE) determines the number of UK and EU students that the University can recruit, and there is very high demand for those places from excellently qualified students.

The 2009 Masterplan Report outlined scenarios of predicted growth of between 1 and 3% per annum to 2020. Since 2009 actual growth has exceeded that in response to Government priorities, and the current student roll is approximately 500 students above those predictions. However, the University expects growth to reduce in coming years (as a result of the changes in student funding and continuing national and global economic pressures), and that will bring student numbers back within the 1-3% long term growth scenario to 2026.

2.14 The 2012 summary update also included Figure 5 (updating the one presented in the original 2009 master plan i.e. figure 4). Figure 5 shows that, on its best assumptions that the University anticipates that it will reach between 15,000-16,000 FTEs by at least 2026, maybe earlier.

2.15 This time the red line represents 1% growth per annum from 2009 and the green line represents 3% growth per annum to the end of 2021, and a stable population thereafter. It is import to understand that Figure 4 is based of FTEs (full time equivalents) whereas the data presented in Table 1 and Figure 4 is for total students, broken down by mode of study (part time or full time).

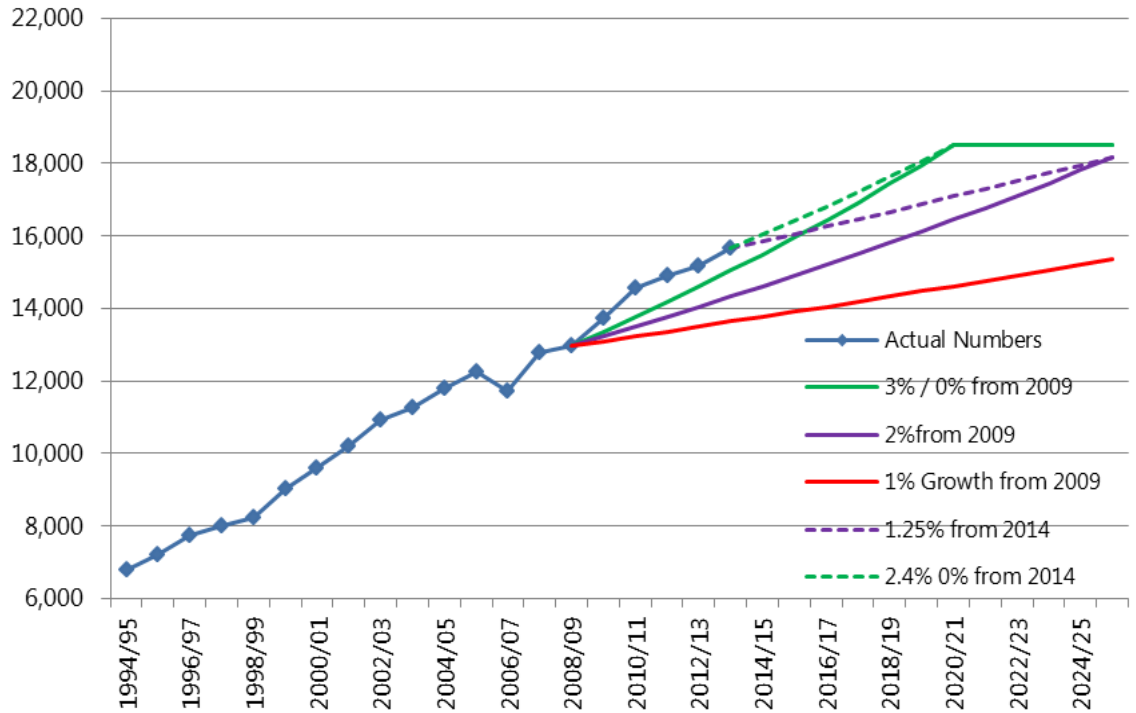
Figure 5: University of Bath, Forecast Growth to 2026 (Full Time Equivalents)



2.16 The Council has adapted Figure 5 to produce Figure 6 (based on total student numbers, rather than FTEs). It sets out actual change from 1994/95 (blue line with markers) and forecast change from the beginning of the 2009/10 academic year,

based on the scenarios shown in Figure 4 (1% or 3% followed by stability) and a 2% scenario (which over the long term is the same as the 3% followed by stability). These are shown as solid red, purple and green lines.

Figure 6 - adaptation of Figure 5 based on total student numbers



2.17 Actual growth is running ahead of the projections, as acknowledged by the University (see para 2.13) but is expected to fall within the projected numerical range set by figure 5 over the longer term. Figure 6 shows that the 1% scenario already looks unrealistic given that enrolment in 2013/14 was above the projected figure for 2026. Consequently the 1% scenario plays no further part in the Council's subsequent analysis.

2.18 For the size of the University to fall within the range envisaged at 2026, in the 2012 update to the master plan, average annual growth from 2014/15 would have to be not more than 1.25% (to achieve the 2009-based 2% outcome) or 2.4% to 2021, followed by stability (to achieve the 2009-based 3% followed by stability outcome). These are shown as dashed green and purple lines.

2.19 The future is uncertain, but drawing on the Universities published aspirations, total enrolment will increase to about 18,200-18,500 in the longer term from the Core Strategy/ Development Plan periods base figure of 14,900 in 2011. This is an increase of about 3,300-3,500.

- 2.20 In terms of additional bedspaces needed, and applying the current 65% assumption, this results a likely increase in demand from 9,685 in 2011 to 11,830-12,025 in 2026. This is an overall net change of 2,145-2,340.
- 2.21 Against his background the master plan can increase the number of bed spaces on campus by 2,400 between 2009 and 2026. This would double the number of on campus bed space from 2,427 to 4,827 alongside the existing 942 off campus bed spaces, would result in a total supply of 5,642. The first 704 new bed spaces of the 2,400 are under construction and will be ready for occupation for the 2014/15 academic year.
- 2.22 The University of Bath is only likely to build new bedspaces on campus to enable future its future growth. It is unlikely to build to redress what some might perceive as being an historic over reliance on HMOs.
- 2.23 Against this background the University of Bath will be mindful of off-campus development activity in deciding whether or not to develop its land on-campus for student accommodation. There is a high risk that if too much accommodation is provided -campus, by other providers, there will no incentive for the University to build on-campus. A situation could conceivably arise where in-city land is used for student accommodation rather than other uses, whilst on-campus land remains undeveloped yet unavailable/unsuitable for the other uses that might otherwise have come forward in-city.
- 2.24 This is a situation the Development Plan seeks to avoid. However the Council is mindful that not all the identified capacity for further residential space may be able to come forward in the short to medium term. The 2014 summary update identifies two areas for the next phases on residential accommodation. These are zone (7) adjacent Polden Court and zone (8) north of the Medical Centre. The capacity of this area has not been identified by the University. It is likely to be not less than half of the residual amount relating to the capacity of 2,400 i.e. $850 (2400-704)/2$.
- 2.25 Table 3 (page 13) presents the implications of predicted growth from 2014-26 in respect of the dashed projection lines in Figure 5. Against the growth in student numbers, the growth the demand for bed spaces is set out, alongside a potential development programme on-campus. The implications for the stock of HMOs in the city is also set out each year and into the long term. The development programme will be affected by what happens elsewhere in the city. Discussion follows at 2.26

Table 3: University of Bath, Demand and Supply for Student Accommodation 2011-2026

3a: Showing actual growth to 2013/14 followed by 2.4% growth per annum projection to 2021, with stability thereafter

	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2011-21	2021/22	2022/23	2023/24	2024/25	2025/26	2011-26
Total Students	14,902	15,182	15,660	16,036	16,421	16,815	17,218	17,632	18,055	18,488	3,586	18,488	18,488	18,488	18,488	18,488	3,586
<i>Total annual growth</i>		280	478	376	385	394	404	413	423	433		0	0	0	0	0	
Housing Need in Bath (65%)	9,686	9,868	10,179	10,423	10,673	10,930	11,192	11,461	11,736	12,017	2,331	12,017	12,017	12,017	12,017	12,017	2,331
<i>Need annual growth</i>		182	311	244	250	256	262	269	275	282		0	0	0	0	0	
Uni Beds On campus (extra 2400 to 2009-2026)	2,452	2,452	2,452	3,156	3,156	3,156	3,156	3,156	4,006	4,006	1,554	4,006	4,006	4,856	4,856	4,856	2,404
Uni Beds Off campus	895	895	895	895	895	895	895	895	895	895		895	895	895	895	895	
Uni Beds Total	3,347	3,347	3,347	4,051	4,051	4,051	4,051	4,051	4,901	4,901	1,554	4,901	4,901	5,751	5,751	5,751	2,404
Residual Private Sector Beds Demand	6,339	6,521	6,832	6,372	6,622	6,879	7,141	7,410	6,835	7,116	777	7,116	7,116	6,266	6,266	6,266	-73
<i>Residual Prv Beds Change from 2011</i>		182	493	33	283	539	802	1,070	495	777		777	777	-73	-73	-73	
Student HMOs needed 2.4%	1,585	1,630	1,708	1,593	1,656	1,720	1,785	1,852	1,709	1,779	194	1,779	1,779	1,567	1,567	1,567	-18
Change in HMOs from 2011		46	123	8	71	135	200	268	124	194		194	194	-18	-18	-18	
HMO Index	100	102.9	107.8	100.5	104.5	108.5	112.6	116.9	107.8	112.3	12	112.3	112.3	98.8	98.8	98.8	-1.2

master plan horizon

3b: Showing actual growth to 2013/14 followed by 1.25% growth per annum projection to 2026

	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2011-21	2021/22	2022/23	2023/24	2024/25	2025/26	2011-26
Total Students	14,902	15,182	15,660	15,856	16,054	16,255	16,458	16,664	16,872	17,083	2,181	17,296	17,512	17,731	17,953	18,177	3,275
<i>Total annual growth</i>		280	478	196	198	201	203	206	208	211		214	216	219	222	224	
Housing Need in Bath (65%)	9,686	9,868	10,179	10,306	10,435	10,566	10,698	10,831	10,967	11,104	1,417	11,243	11,383	11,525	11,669	11,815	2,129
<i>Need annual growth</i>		182	311	127	129	130	132	134	135	137		139	141	142	144	146	
Uni Beds On campus (extra 2400 to 2009-2026)	2,452	2,452	2,452	3,156	3,156	3,156	3,156	3,156	4,006	4,006	1,554	4,006	4,006	4,856	4,856	4,856	2,404
Uni Beds Off campus	895	895	895	895	895	895	895	895	895	895		895	895	895	895	895	0
Uni Beds Total	3,347	3,347	3,347	4,051	4,051	4,051	4,051	4,051	4,901	4,901	1,554	4,901	4,901	5,751	5,751	5,751	2,404
Residual Private Sector Beds Demand	6,339	6,521	6,832	6,255	6,384	6,515	6,647	6,780	6,066	6,203	-137	6,342	6,482	5,774	5,918	6,064	-275
<i>Residual Prv Beds Change from 2011</i>		182	493	-84	45	175	307	441	-274	-137		2	143	-565	-421	-275	
Student HMOs needed 1.25%	1,585	1,630	1,708	1,564	1,596	1,629	1,662	1,695	1,516	1,551	-34	1,585	1,621	1,444	1,480	1,516	-69
Change in HMOs from 2011		46	123	-21	11	44	77	110	-68	-34		1	36	-141	-105	-69	
HMO Index	100	102.9	107.8	98.7	100.7	102.8	104.8	107.0	95.7	97.8	-2.2	100.0	102.3	91.1	93.4	95.7	-4.3

master plan horizon

Analysis of Table 3b (Forecasts of Demand and Supply)

- 2.26 **Table 3a** perhaps shows the most likely growth trajectory, one where the University reaches its anticipated future size sooner rather than later. Table 3a shows that during the masterplan period the University has identified sufficient residential capacity, on-campus to meet its forecast needs. Because 3a is an accelerated growth pathway, there is a greater need for accommodation in the short term to supplement 'The Quads'. There is no specific indication yet as to the timetable for delivering a further residential project, although the 2014 summary update to the master plan indicates where this would take place (ref 2.24)
- 2.27 'The Quads' will accommodate the additional demand arising up to the end of 2014/15 academic year. The modelled figures show that there will be only 8 more HMOs at the end of this year.
- 2.28 From 2011-21 about 2,331 beds are forecast to be needed. Against this table 3a, highlights (in blue bold text), that 704 have been built and that a further 850 bedspaces could come forward by end of that period (if half the residual capacity identified in the campus master plan is delivered²). There is a shortfall for that period of 777 bedspaces (194 HMOs). Ultimately, table 3a shows this could be made good in the longer term, as the University population stabilises and if full quantum of accommodation with the master plan is delivered.
- 2.29 Alternatively, the shortfall could be dealt with in the short term, off-campus, but there is a risk that this would undermine the full delivery of on-campus capacity during the plan period. If accommodation needs are met off-campus there is no incentive for the University to build on campus. Too much off-campus delivery between now and 2021 could even harm the implementation of the second on-campus phase.
- 2.30 The forecast rise in the HMO index in the short term is relatively minor in the context of existing stock of student related HMOs, the total number of dwellings in the city and the 7,000 net additional dwellings planned for the city over the plan period, of which 4,220 are forecast to be completed between 2011/12 and 2018/19.
- 2.31 Further, as stated the Core Strategy Inspector's Report (para 63) there is some leeway for the growth of the Universities and the growth of accommodation not to 'sync' each year without significantly affecting the general housing market. This is so

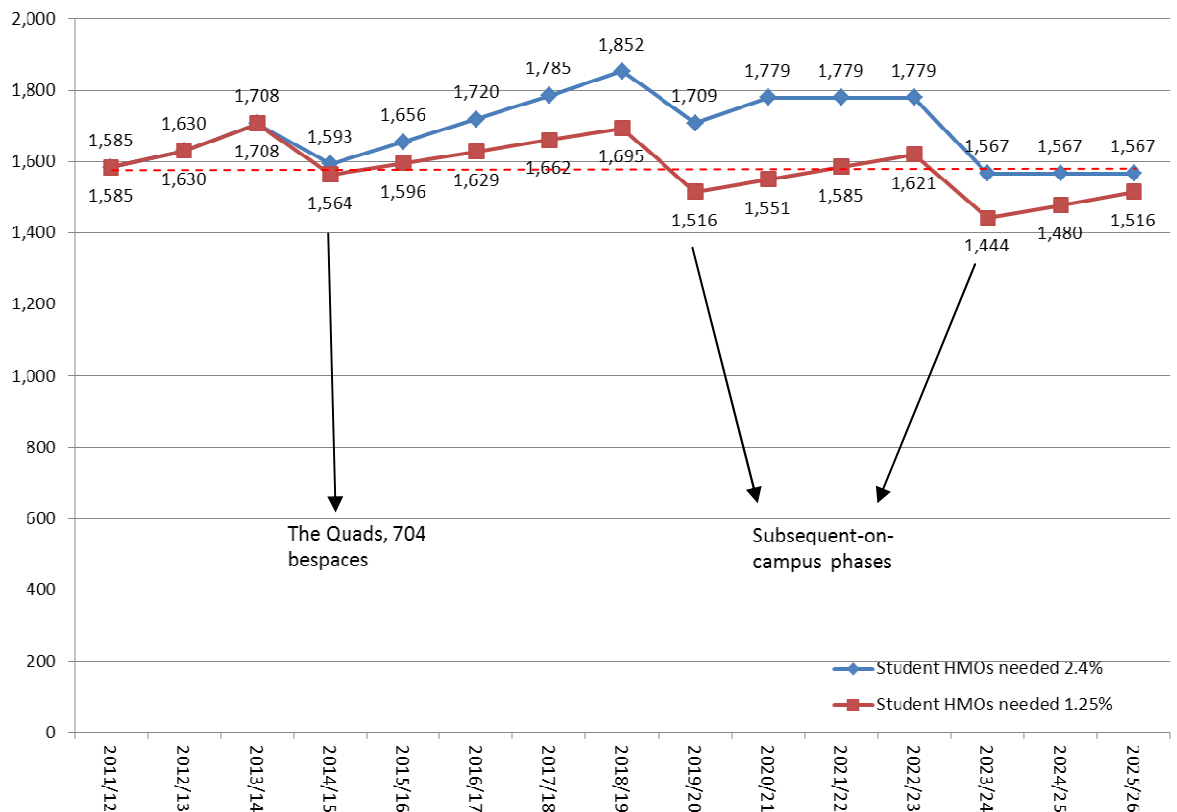
² this being 2,400 less 704/ divided by 2).

long as there is a programme for new accommodation to be completed soon after. Off-campus solutions in the short term may affect the implementation on the on-campus strategy for the plan period. Nevertheless, there is also a case for meeting the demand arising at 2021, by 2021.

2.32 **Table 3b.** The overall picture presented in Table 3b is not all that different to 3a. The University grows marginally less and takes 5 more years to get to that point. However, the picture to 2021 is quite different. Rather than a 777 bedspace shortfall there is a 137 surplus and a net difference of 914 (228 HMOs). If the second wave of accommodation is built then there is a negligible reduction in the need for HMOs (34). Whether there would be an actual reduction would depend on the decisions of landlords

2.33 Figure 7 shows, for both scenarios, how the modelled stock of HMOs might change over time, benchmarked against the existing stock at 2011, forecast growth and the anticipated 'pulses' on development on campus.

Figure 7: Number of HMOs implied as a result on the pace of on-campus delivery.



2.34 this indicates that there may well be a role for an appropriate amount of supplementary off-campus accommodation by 2021, although this might have implications for the delivery of final phase of off-campus accommodation.

Bath Spa University

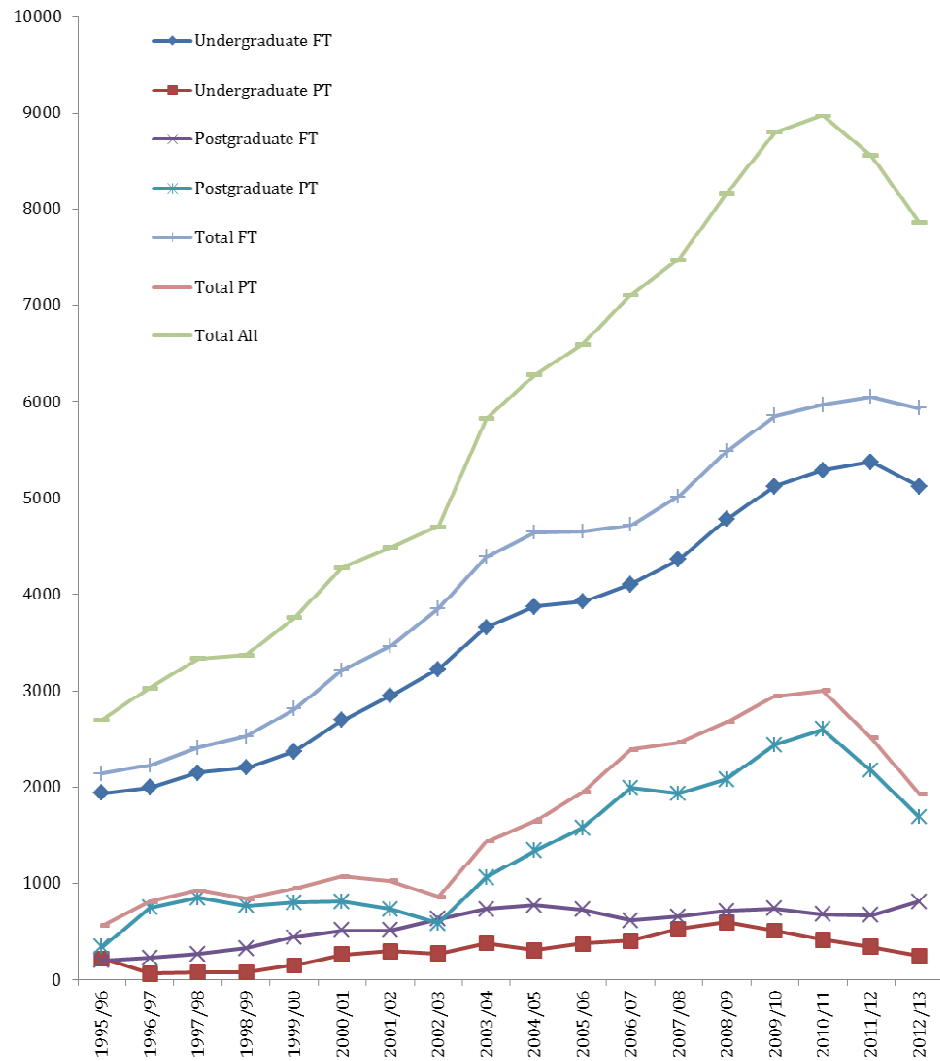
Bath Spa University – Growth in Enrolment

3.1 Table 4 and Figure 8 set out how the number of students enrolled at Bath Spa University has been increasing. For the 2012/13 academic year there were a total of 7,865 students. Of these, 5,930 (75%) were studying on full-time courses. The long term compound annual growth rate has been about 6%, but for the last 5 years it has been 1% and for the last 3 years -3.7%. Numbers peaked in 2009/10 but have declined by about 1,000 since then, due in particular, to a reduction in part-time enrolment. Full time enrolment has been relatively steady recently (hovering between 5,855 and 6,045 for the last four years).

Table 4: Bath Spa University - Student Numbers (HESA)

	Undergraduate			Postgraduate			Total FT	Total PT	Total All
	FT	PT	Total	FT	PT	Total			
1995/96	1937	219	2156	200	340	540	2137	559	2696
1996/97	1997	60	2057	225	747	972	2222	807	3029
1997/98	2144	76	2220	264	847	1111	2408	923	3331
1998/99	2201	75	2276	325	764	1089	2526	839	3365
1999/00	2370	150	2520	440	800	1240	2810	950	3760
2000/01	2695	260	2955	515	810	1325	3210	1070	4280
2001/02	2945	295	3240	515	730	1245	3460	1025	4485
2002/03	3220	270	3490	630	585	1215	3850	855	4705
2003/04	3660	375	4035	730	1060	1790	4390	1435	5825
2004/05	3870	305	4175	770	1335	2105	4640	1640	6280
2005/06	3925	370	4295	725	1575	2300	4650	1945	6595
2006/07	4105	400	4505	615	1990	2605	4720	2390	7110
2007/08	4360	525	4885	655	1935	2590	5015	2460	7475
2008/09	4775	595	5370	710	2080	2790	5485	2675	8160
2009/10	5120	510	5630	735	2435	3170	5855	2945	8800
2010/11	5285	410	5695	680	2595	3275	5965	3005	8970
2011/12	5375	340	5715	670	2170	2840	6045	2510	8555
2012/13	5120	245	5365	810	1690	2500	5930	1935	7865
2013/14									

Figure 8: Bath Spa University - Student Numbers 1995/96 – 2012/13



Bath Spa University - Current Demand for Living Accommodation

3.2 There is less data available than for the University of Bath in respect of the proportion of total students requiring accommodation in the city. The Council's assumption for Bath Spa is that all full-time students require accommodation and that part-time students do not³. This means that, currently, 75% of those enrolled require such accommodation compared to 65% at The University of Bath. Part of the reason for this difference will be due to the greater number of students enrolled on full-time sandwich courses at the University of Bath. For the 2013/15 full-time enrolment was 5,930 and it is projected to increase to 6,180 in 2014/15

³ in reality some full-time students won't and some part-time students will, but assume these cancel each other out.

Bath Spa University - The Current Supply of Student Accommodation

- 3.3 Bath Spa maintains or leases 1,053 units of managed accommodation (on and off campus) as follows.
- Newton Park Campus, (394 units)
 - Waterside Court, Lower Bristol Road (316 units)
 - Charlton Court, Lower Bristol Road (300 units)
 - Bankside, Lansdown (43 units),
 - There are a further 50 Homestay units which are attractive to overseas students.
- 3.4 The number of bedspaces will increase to 1,614 at the beginning of the 2014/15 academic year as Phase II of the Newton Park masterplan plan is completed. This will deliver 561 bedspaces at the south of the campus (see para 3.6).
- 3.5 Overall, in 2014/15 about it is estimated that there will be 6,180 full time students. If 1,614 can meet their needs in dedicated accommodation, it follows that 4,566 cannot. These students will need to source accommodation in the private rented sector (equivalent to about 1,140 HMOs). That is about 3% of the total stock of dwellings in the city.

Bath Spa University – Recent Projects and Future Plans

- 3.6 In 2010 Bath Spa University prepared a Strategic Framework to identify its academic and accommodation deficiencies and requirements and aspirations for the future. This also set out development potential and proposals for each of the sites that it occupies. This led to the production of a Development Framework and subsequent Campus Masterplan for the period 2010-2030. This set out three phases of development.

Phase 1 – Redevelopment to achieve new academic space (Opened July 2014, ref: 10/04747/FUL)

Phase 2 - Residential Development (at the south of the campus, under construction) and the removal, replacement or disposal of unsympathetic buildings and facilities to enhance the significance of heritage assets. This is under construction and will compete in September 2014. (ref: 12/02141/FUL)

Phase 3 - Residential redevelopment (at the north of the campus), an intended future phase that will largely replace the existing stock with perhaps only a modest net gain. There are currently 394 bedspaces here and this might increase to 450. This would increase the total number of bedspaces on campus to 1,000. For now though we assume 1:1 replacement.

- 3.7 Although the masterplan was written in anticipation of a stabilisation of student numbers, Bath Spa has recently embarked on a programme to attract international students (from the US). Reports in the Local Press of 2,000 more students are considered to be somewhat off the mark. The Director of International Relations has identified that a reasonable assumption would be about 500 units in the 5 years from 2014/15 with 40 in year 1. The maximum plan is for up to 1,000 students. These would be net additional students rather than replacing domestic students. We budget for these by 2021. It may take a little longer but any overestimate guards against an underestimate will regard to zero growth from domestic students to this date. We wait to see how enrolment at Bath Spa responds to the removal of the student cap imposed by government. Of course Bath Spa may be somewhat restricted by teaching space, staff and timetabling issues. We will continue to monitor changes.

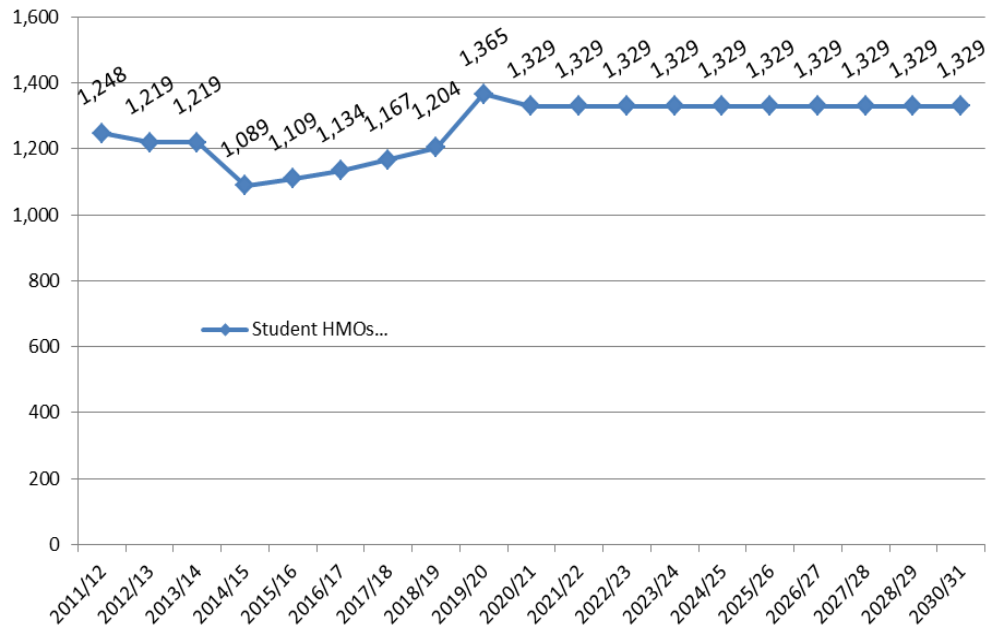
Forecasts of Demand and Supply: Analysis of Table 5

- 3.8 Table 5 sets out the impact of the above. It assumes a further 1,000 students over the ten years from 2014/15 (the new international component), and stabilisation thereafter. It assumes that all of these new students will need accommodation. Because there has been a reduction in students since 2011, the net effect of the 1000 international students is just over 300 (total enrolment) and 885 (full time).
- 3.9 The University has recently added a further 561 bedspaces on campus (blue bold) and there may be some flux in the future as old stock is demolished and new stock replaces it (blue bold). This will be temporary and does not signal a further additional need for bedspaces off-campus over and above the overall additional need that is forecast.
- 3.10 Once the University has secured its new international component and has delivered its final phase of campus redevelopment a shortfall of bedspaces to additional demand is projected of 324 to 2023/24, which is equivalent to 80 HMOs. This will change a little if the final phase delivers a small net gain in on-campus bed spaces.

Table 5: Bath Spa University, Demand and Supply for Student Accommodation

	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2030/31	Change 11-31
Total Students	8,555	7,865	7,865	7,905	7,985	8,085	8,215	8,365	8,615	8,865	8,865	8,865	8,865	8,865	8,865	8,865	8,865	8,865	8,865	310
<i>Total annual growth</i>		-690	0	40	80	100	130	150	250	250	0	0	0	0	0	0	0	0	0	
Full Time	6,045	5,930	5,930	5,970	6,085	6,200	6,315	6,430	6,530	6,630	6,730	6,830	6,930	6,930	6,930	6,930	6,930	6,930	6,930	885
Part Time	2,510	1,935	1,935	1,935	1,935	1,935	1,935	1,935	1,935	1,935	1,935	1,935	1,935	1,935	1,935	1,935	1,935	1,935	1,935	-575
Housing Need (100% of Full Time)	6,045	5,930	5,930	5,970	6,085	6,200	6,315	6,430	6,530	6,630	6,730	6,830	6,930	6,930	6,930	6,930	6,930	6,930	6,930	885
Uni Beds On campus	394	394	394	955	955	955	955	955	561	955	955	955	955	955	955	955	955	955	955	561
Uni Beds Off campus	659	659	659	659	659	659	659	659	659	659	659	659	659	659	659	659	659	659	659	
Beds Total	1,053	1,053	1,053	1,614	1,614	1,614	1,614	1,614	1,220	1,614	1,614	1,614	1,614	1,614	1,614	1,614	1,614	1,614	1,614	561
Residual Private Sector Beds Demand	4,992	4,877	4,877	4,356	4,471	4,586	4,701	4,816	5,310	5,016	5,116	5,216	5,316	5,316	5,316	5,316	5,316	5,316	5,316	324
<i>Residual Prv Beds Change from 2011</i>		-115	-115	-636	-521	-406	-291	-176	318	24	124	224	324	324	324	324	324	324	324	
Student HMOs needed	1,248	1,219	1,219	1,089	1,118	1,147	1,175	1,204	1,328	1,254	1,279	1,304	1,329	1,329	1,329	1,329	1,329	1,329	1,329	81
<i>Change in HMOs from 2011</i>		-29	-29	-159	-130	-102	-73	-44	80	6	31	56	81	81	81	81	81	81	81	
HMO Index	100.0	97.7	97.7	87.3	89.6	91.9	94.2	96.5	106.4	100.5	102.5	104.5	106.5	106.5	106.5	106.5	106.5	106.5	106.5	6.5

Figure 9: Impact of Future demand and on-campus deliverable supply on HMO numbers



Off-campus sources of supply

- 4.1 In addition to the programmes of development on each campus the Council anticipates that some large additional off-campus managed accommodation will be built by other providers.

Completions

- 4.2 Completed off-campus accommodation blocks since 2011 comprise [‘The Quasar Building’](#), adjoining Avon Street Car Park (48 bedspaces).

Permissions

- 4.3 There are currently 1,232 off-campus units on five sites that have permission. There is a high degree of confidence that the first four sites will be completed by 2021 and that these will yield 857 units (905 including the Quasar building). There is more uncertainty about the implementation of the BWR capacity of 375 by 2021, or at all. It was applied for and permitted and outline in 2006 but the developments since then, and those to follow might result in a different outcome as the quality of provision in the city changes. These sites play the supplementary role for off-campus development that is identified in 1.26d and Core Strategy Policy (B1.7a). They were all permitted before the Core Strategy was adopted.
- **Twerton Mill:** In April 2014 planning permission was granted for 327 bedrooms (266 in studio/cluster flats and 61 in 10 townhouses (13/01876/EFUL).
 - **Green Park House:** in May 2014 planning permission was granted for 461 bedspaces (14/00480/FUL)
 - **1-3 Westgate Buildings:** in February 2014 planning permission was granted for 29 bedspaces
 - **Widcombe Social Club:** in November 2013 planning permission was granted for 40 bedspaces (12/03234/FUL) as part of a mix use retail, social club and student housing scheme.
 - **Bath Western Riverside:** The Crest outline application (06/01733/OUT) proposes up to 675 student bedrooms or 375 bedrooms and a primary school. A minimum of 375 bedrooms can be relied upon and this is the Councils preferred scenario as it wishes to see a primary school built on this site.

Planning Applications and Pre-application enquiries

4.4 In addition the following sites are 'on the radar' as planning applications (305) and pre-application enquiry's * (938), totalling 1,243.

- **James Street West** (14/02412/FUL) **190** bedspaces.
- **1-3 James Street West** (14/01896/FUL) **115** bedspaces.
- ***Transport Depot, Brougham Hayes:** (14/03415/PREAPP) **103** bedspaces.
- ***Site of Old Gas Works, Upper Bristol Road** (14/00004/PADEV) **404** bedspaces.
- ***Hartwells, Upper Bristol Road** (14/01688/PAHWDC) **431** bedspaces

4.5 In the following section we combine the outcomes for both Universities and reflect on whether these additional sites are needed against the current policy framework.

The Combined Picture

- 5.1 In this section we merge together the findings for each University re growth with on-campus and committed off-campus. We then reflect on the need for any additional off-campus provision, within the framework set by the Development Plan of holding HMOs constant at 20111 levels.

Total Growth in Enrolment

- 5.2 The latest year for which we have figures for both Universities is 2012/13. This can be updated to 2013/14 from 15th September 2014, when Bath Spa releases their data to the HESA.

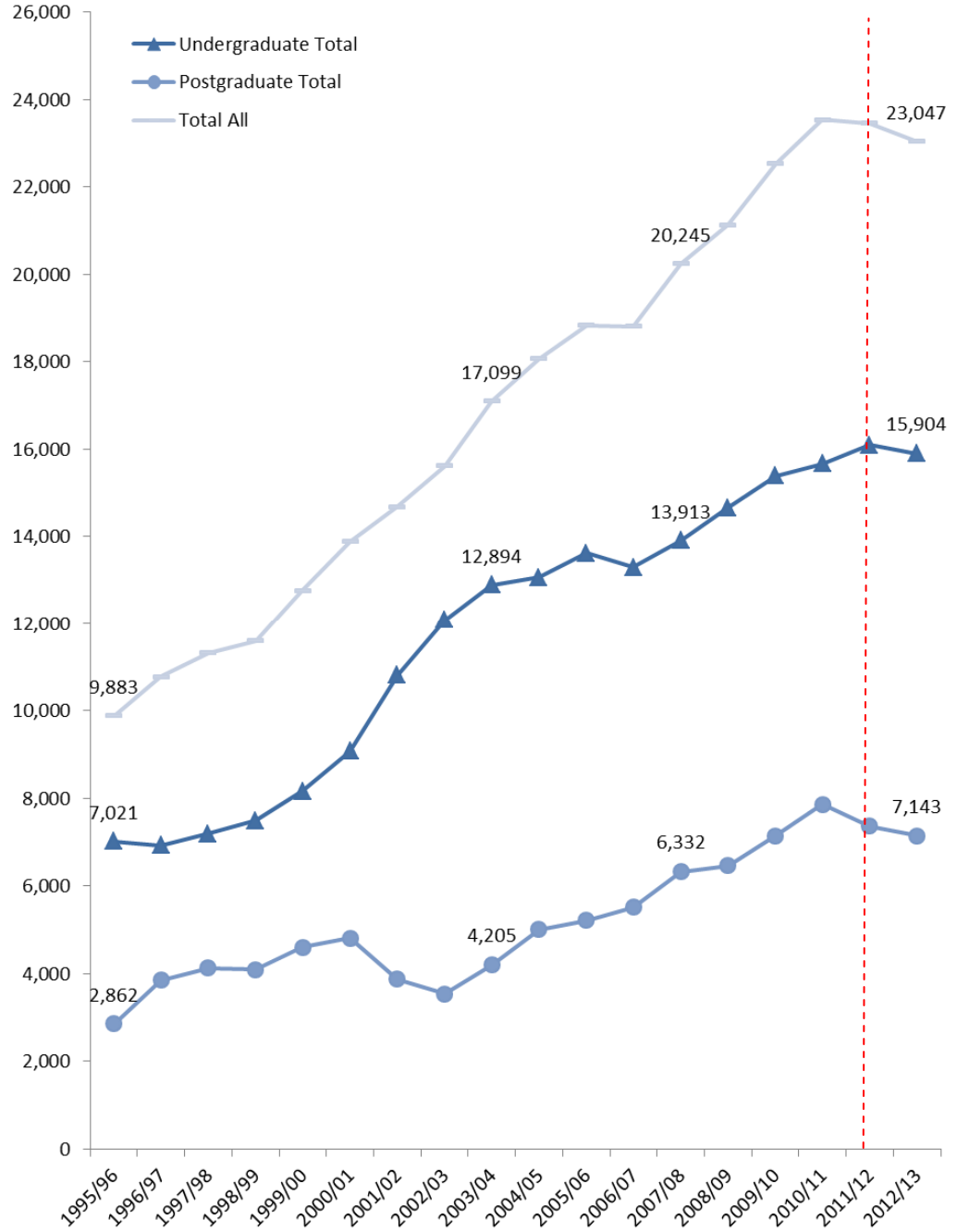
Table 6: Total Student Numbers

	Undergraduate			Postgraduate			Total FT	Total PT	Total All
	FT	PT	Total	FT	PT	Total			
1995/96	6,802	219	7,021	1,025	1,837	2,862	7,827	2,056	9,883
1996/97	6,873	60	6,933	1,201	2,647	3,848	8,074	2,707	10,781
1997/98	7,121	76	7,197	1,355	2,771	4,126	8,476	2,847	11,323
1998/99	7,423	75	7,498	1,390	2,710	4,100	8,813	2,785	11,598
1999/00	8,011	159	8,170	1,607	2,993	4,600	9,618	3,152	12,770
2000/01	8,781	296	9,077	1,613	3,200	4,813	10,394	3,496	13,890
2001/02	9,544	1,272	10,816	1,726	2,148	3,874	11,270	3,420	14,690
2002/03	10,367	1,720	12,087	1,951	1,589	3,540	12,318	3,309	15,627
2003/04	11,154	1,740	12,894	2,064	2,141	4,205	13,218	3,881	17,099
2004/05	11,714	1,357	13,071	2,285	2,719	5,004	13,999	4,076	18,075
2005/06	12,024	1,592	13,616	2,180	3,034	5,214	14,204	4,626	18,830
2006/07	12,535	763	13,298	2,131	3,385	5,516	14,666	4,148	18,814
2007/08	13,111	802	13,913	2,193	4,139	6,332	15,304	4,941	20,245
2008/09	13,743	916	14,659	2,328	4,143	6,471	16,071	5,059	21,130
2009/10	14,514	879	15,393	2,477	4,668	7,145	16,991	5,547	22,538
2010/11	14,874	795	15,669	2,726	5,140	7,866	17,600	5,935	23,535
2011/12	15,404	690	16,094	2,671	4,692	7,363	18,075	5,382	23,457
2012/13	15,362	542	15,904	2,835	4,308	7,143	18,197	4,850	23,047
2013/14									

- 5.3 Tables 6 and Figure 8 set out how the number of students has been increasing. For the 2012/13 academic year there were a total of 23,047 students. There were about 16,000 undergraduates (70%) and 7,000 postgraduates (30%). 18,200 (79%) were studying on full-time courses. the vertical dashed line in Figure 8 represents the

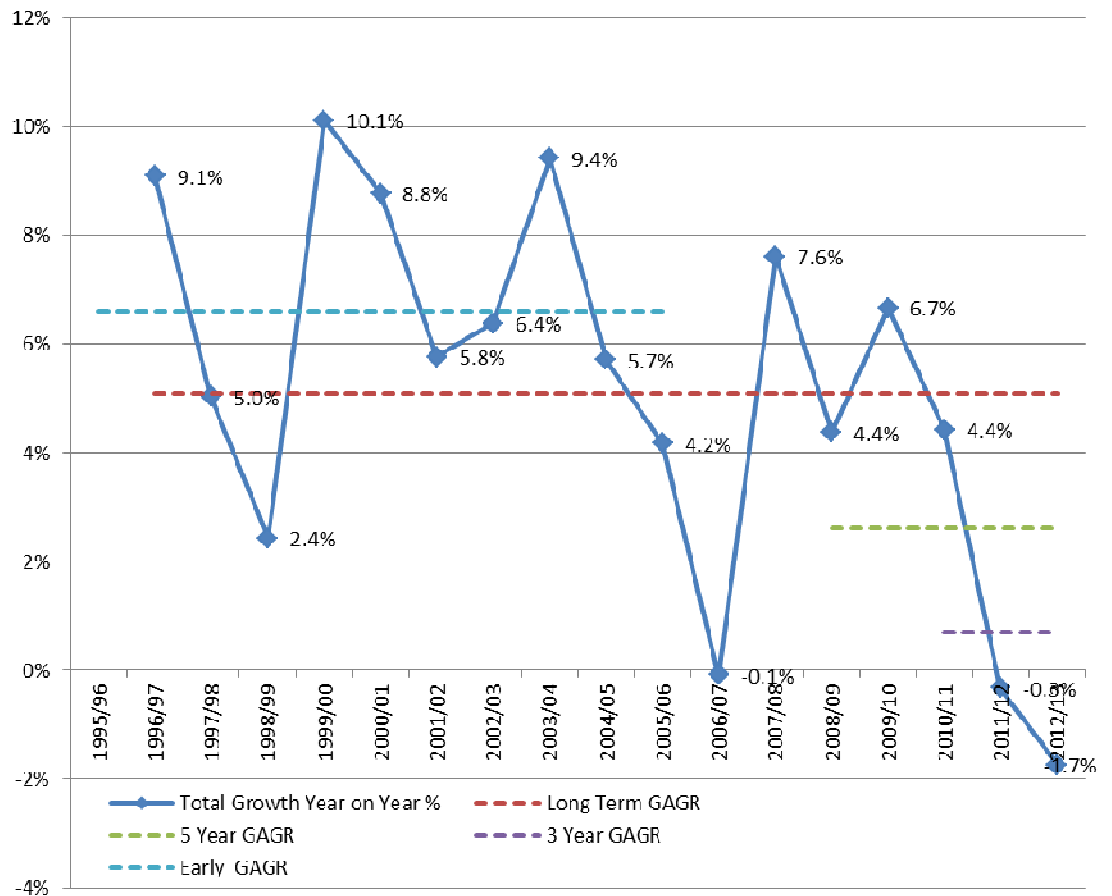
beginning of the Development Plan Period (Core Strategy period), there was a contraction in year 1 of 400 students.

Figure 10: Total Student Numbers



5.4 Figure 9, overleaf, shows that the long term compound annual growth rate has been about 5.1%, but for the last 5 years it has been 2.6% and for the last 3 years 0.7%. During the first 10 year of data it was 6.6%

Figure 11: Annual and Compound Average Rates of Growth



Current Demand for Living Accommodation

5.5 This section and the following sections draw on Table 7

5.6 We base the current assessment of demand and supply assessment on our enrolment projections for the 2014/15 academic year, which also ties in with the opening of two major accommodation projects on the campuses. There will be just short of **23,941** students enrolled. Not all of these will require housing in Bath, and of those that do a significant number live in conventional housing arrangements (not HMOs) e.g. mature postgraduates and part-time students.

5.7 When the housing need assumptions for The University of Bath and Bath Spa University at 2014/15 are combined a figure of about **16,393** students is generated as being the number in need of accommodation in the city. That is 68.5% of total enrolment.

Table 7: Combined current data and forecasts for each university and off-campus provision

	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	Change 11-26
Bath Uni Total Students	14,902	15,182	15,660	16,036	16,421	16,815	17,218	17,632	18,055	18,488	18,488	18,488	18,488	18,488	18,488	3,586
Bath Spa Total Students	8,555	7,865	7,865	7,905	7,985	8,085	8,215	8,365	8,615	8,865	8,865	8,865	8,865	8,865	8,865	310
Total Students	23,457	23,047	23,525	23,941	24,406	24,900	25,433	25,997	26,670	27,353	27,353	27,353	27,353	27,353	27,353	3,896
Bath Uni Housing Need	9,686	9,868	10,179	10,423	10,673	10,930	11,192	11,461	11,736	12,017	12,017	12,017	12,017	12,017	12,017	2,331
Bath Spa Housing Need	6,045	5,930	5,930	5,970	6,050	6,150	6,280	6,430	6,680	6,930	6,930	6,930	6,930	6,930	6,930	885
Total Housing Need	15,731	15,798	16,109	16,393	16,723	17,080	17,472	17,891	18,416	18,947	18,947	18,947	18,947	18,947	18,947	3,216
<i>Additional Need Cumulative</i>		67	378	662	992	1,348	1,741	2,159	2,684	3,216	3,216	3,216	3,216	3,216	3,216	
<i>Needs as % of total students</i>	67.1%	68.5%	68.5%	68.5%	68.5%	68.6%	68.7%	68.8%	69.1%	69.3%	69.3%	69.3%	69.3%	69.3%	69.3%	2.2%
Uni Beds on-campus at 2011	2,846	2,846	2,846	2,846	2,846	2,846	2,846	2,846	2,846	2,846	2,846	2,846	2,846	2,846	2,846	0
Additional Uni beds on-campus to 2026	0	0	0	1,265	1,265	1,265	1,265	2,115	1,721	2,115	2,115	2,115	2,965	2,965	2,965	2,965
Uni Beds Off campus at 2011	1,554	1,554	1,554	1,554	1,554	1,554	1,554	1,554	1,554	1,554	1,554	1,554	1,554	1,554	1,554	0
Additional Off-campus	0	48	48	48	905	905	905	905	905	905	905	1,280	1,280	1,280	1,280	1,280
<i>Quasar</i>		48	48	48	48	48	48	48	48	48	48	48	48	48	48	
<i>1-3 Westgate</i>					29	29	29	29	29	29	29	29	29	29	29	
<i>Widcombe Social Club</i>					40	40	40	40	40	40	40	40	40	40	40	
<i>Green Park House</i>					461	461	461	461	461	461	461	461	461	461	461	
<i>Twerton Mill</i>					327	327	327	327	327	327	327	327	327	327	327	
<i>Western Riverside</i>												375	375	375	375	
Beds Total	4,400	4,448	4,448	5,713	6,570	6,570	6,570	7,420	7,026	7,420	7,420	7,795	8,645	8,645	8,645	4,245
<i>Additional Beds Cumulative</i>		48	48	1,313	2,170	2,170	2,170	3,020	2,626	3,020	3,020	3,395	4,245	4,245	4,245	
<i>Beds as % of Demand</i>	28.0%	28.2%	27.6%	34.8%	39.3%	38.5%	37.6%	41.5%	38.2%	39.2%	39.2%	41.1%	45.6%	45.6%	45.6%	17.7%
Residual Private Sector Beds Demand	11,331	11,350	11,661	10,680	10,153	10,510	10,902	10,471	11,390	11,527	11,527	11,152	10,302	10,302	10,302	-1,029
<i>Residual Prv Beds Demand Change from 2011</i>	0	19	330	-651	-1,178	-822	-429	-861	58	196	196	-179	-1,029	-1,029	-1,029	
Student HMOs needed	2,833	2,838	2,915	2,670	2,538	2,627	2,725	2,618	2,847	2,882	2,882	2,788	2,576	2,576	2,576	-257
<i>Change in HMOs from 2011</i>		5	82	-163	-294	-205	-107	-215	15	49	49	-45	-257	-257	-257	
HMO Index	100.0%	100.2%	102.9%	94.3%	89.6%	92.7%	96.2%	92.4%	100.5%	101.7%	101.7%	98.4%	90.9%	90.9%	90.9%	-9.1%

Current Supply of Living Accommodation and the implications for HMOs

- 5.8 When the accommodation supply figures for 2014/15 are combined they yield 5,713 dedicated bedspaces. These cater for 34.8% of the need. There is a residual of 10,728 students who must meet their needs in the private rented sector (in HMOs). At an average HMO size of 4, this requires 2,682 HMOs.

Future Growth in Enrolment and Demand

- 5.9 Total enrolment is forecast to increase by 3,896 to 27,353 (from 2011-2029) Housing need is forecast to increase by 3,216 to 18,947 for the same period. The growth is forecast to take place by 2021 and stability is forecast once 2021 levels are reached. For the University of Bath we have adopted the accelerated growth scenario (Table 3a). For Bath Spa there is one scenario (Table 5).
- 5.10 82% of the growth in enrolment will need accommodation in Bath. However, overall the proportion of share of total enrolment needing accommodation will increase only marginally from 68.5 to 69.3%. Crucially much of the growth will occur to 2021.

Future Accommodation Plans

- 5.11 1,265 units of accommodation have been built on the campuses since 2011/12 and 48 units within the city, a total of 1,313
- 5.12 There remain 1,696 units worth of capacity at Claverton Down. Based on the cycle of past phases of development it is reasonably probably that about half of this could come forward by 2021. The additional capacity at Newton Park is effectively nil. There may be a reduction in capacity at Bath Spa for a brief period as old stock is demolished to make way for new stock as part of Phase III of the master plan. There may be a temporary surge in demand for HMOs when this happens to the tune of about 100 (as 394 bedspaces will be demolished). This is regarded as being temporary in the modelling.
- 5.13 Commitments off-campus total 1,232. There is some doubt as to whether all of this is deliverable by 2021. Capacity within BWR (of 375) may not be. This is an assumption we make until there is developer interest and it reduces the deliverable capacity to 2021 to 857.

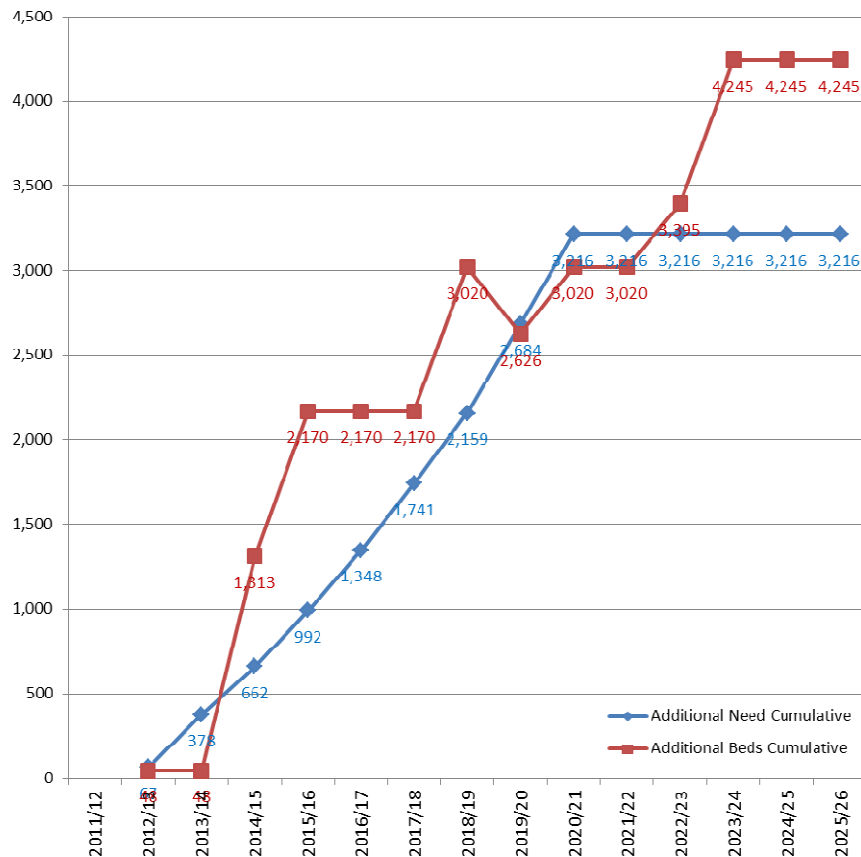
5.14 In total then, from 2011, we can currently identify **4,241** bedspaces of supply. However we forecast that **3,016** are deliverable by 2020/21 academic year

Future balance between additional Demand and additional Supply

5.15 Sufficient capacity (4,241) can be identified to deal with the growth in demand (3,216). There is a potential surplus of 1,025. Some of the identified capacity may not come forward i.e. a final phase at Claverton Down (c.850) due to off-campus permissions being granted before the Core Strategy was adopted. The student accommodation at BWR is also uncertain in the longer term, this being applied for when there was little in-city provision. That has changed now.

5.16 However to 2021 there is a small deficit of about 200 bedspaces (50 student HMOs). However, measures to address the short term shortfall to 2021 may further affect the realisation of development on campus at Claverton.

Figures 12: Cumulative additional need vs additional supply



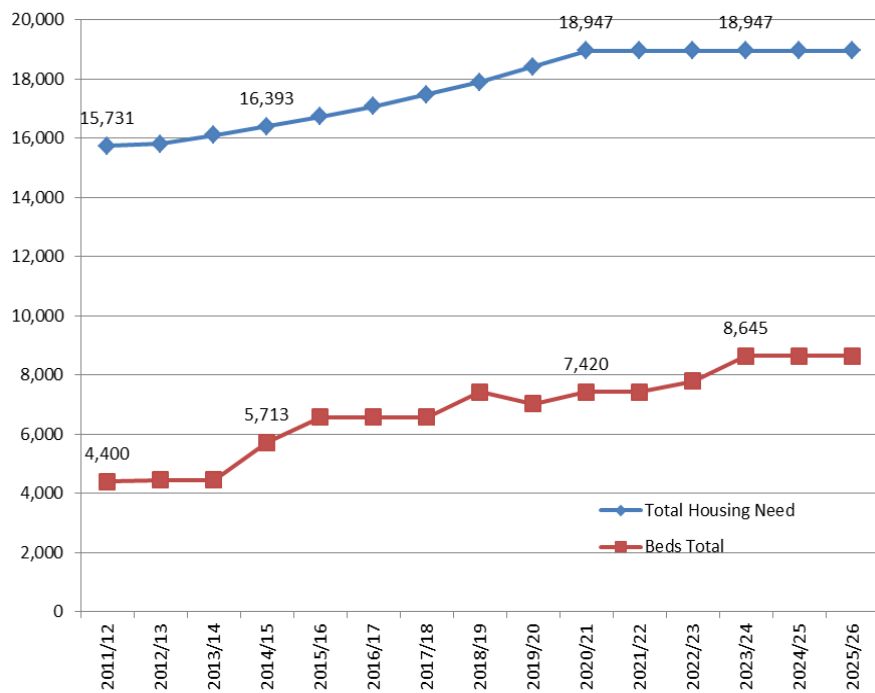
5.17 Paragraph 4.4 identifies further sites where developers are seeking 1,243 bedspaces. There may be some scope for 10% of this to come forward to deal with the forecast shortfall to 2021. The ‘side effects’ would need to be weighed in the balance as well as the opportunity cost of using the site for student accommodation.

Future Balance between total Demand and total Supply

Best Case Scenario

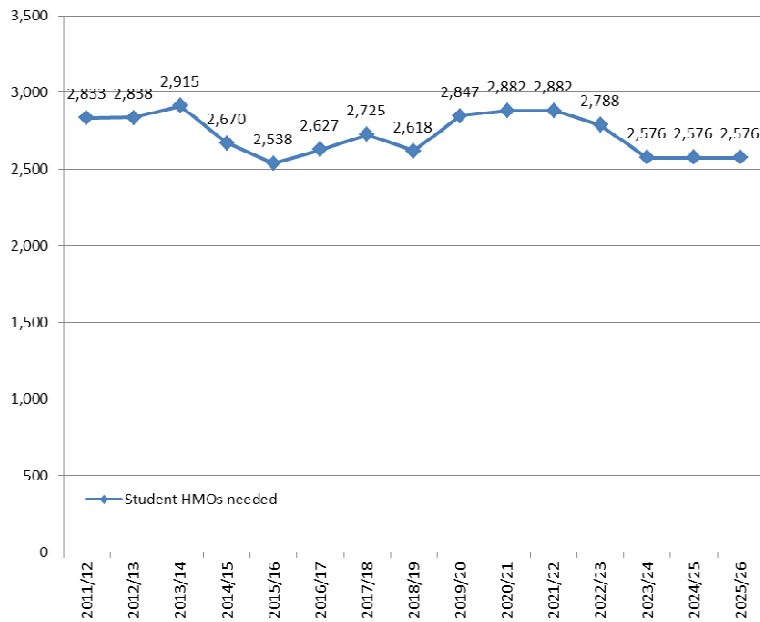
5.18 Theoretically, if the growth assumptions (3,896) and additional need assumptions (3,216) hold true, and all the new bedspaces are built (4,245), then dedicated bedspaces will shift from accommodating 28.0% of demand in 2011/12, 34.8% of demand in 2014/15 to 45.6% of demand by 2023/24.

Figure 13: Best case scenario of relationship between total need and supply of dedicated bedspaces



5.19 That would reduce the demand for HMO bedspaces by just over 1,000 and the demand for Student HMOs by about 250 (9%). this is shown graphically in Figure 14.

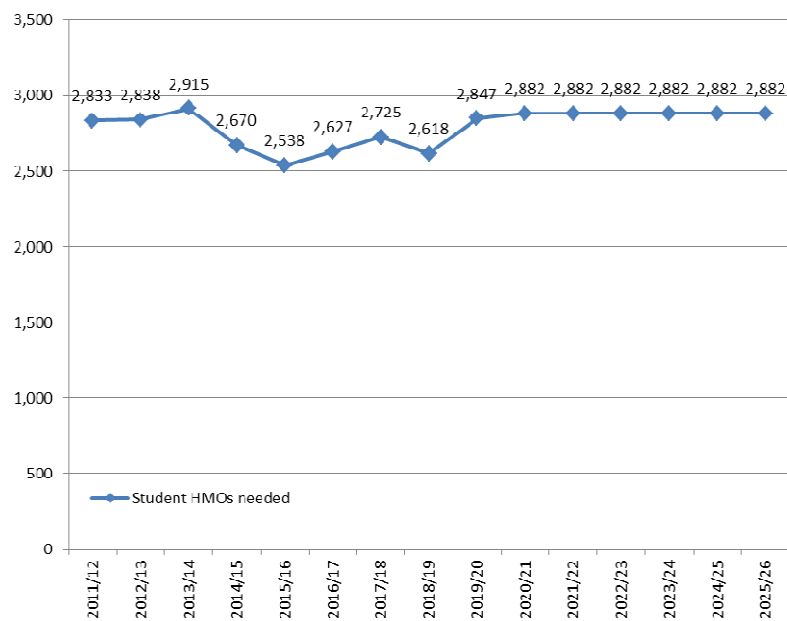
Figure 14: HMO levels under best case scenario



Alternative Scenario

5.20 It is also possible that some of the capacity for accommodation that is phased for later on in the plan period (3rd residential phase at Claverton and BWR) might not come forward and that new supply would match new demand, not exceed it.

Figure 15: HMO levels under alternative scenario



Implications for the total housing stock off the Bath

- 5.21 Out of a total dwelling stock of 39,000 in 2011, it is estimated that 2,833 were occupied as student HMOs (7%), housing about 11,300 students.
- 5.22 The strategy of the Development Plan is to keep the number of student HMOs at 2011 levels, whilst increasing the overall housing stock of the city to 46,000 by 2029. This will mean that student HMOs will account for 6% of the stock, a small net reduction. This doesn't sound much but zero no growth in HMOs and 7,000 more dwellings from 2011-29 is a very different outcome than the balance between housing growth and student HMO growth experienced between 2001 and 2011.
- 5.23 To retain student HMOs at 2011 levels, new dedicated accommodation will be needed to match demand. The strategy is to achieve this mainly on-campus, with supplementary off-campus provision being allowed where necessary and appropriate. See Core Strategy (paras 1.26d, Policy B1(7a) and Policy B5). See also Core Strategy Inspectors Report (paras 59-64). The strategy is not to reduce the actual number of HMOs, because of the consequences for land supply for other uses.
- 5.24 Too much off-campus development will disincentivize the University of Bath to build further accommodation phases, in a timely manner, on campus. Too much off-campus accommodation would 'flip' the spatial strategy for housing new students.
- 5.25 Further, whilst lots of supplementary bedspaces might result in a reduction in demand for bedspaces in student HMOs (assuming Bath Uni does also build out its full capacity on-campus), and might lead to landlords seeking other tenants or selling part of their portfolio, this will be market housing. It will not be affordable housing (although it might be relatively affordable market housing). Conversely if large sites in the city are used for general needs housing rather than student housing, the Council can secure a mix of tenures on the site. The need for this balancing act is particularly acute in a city such as Bath, which is effectively an island, given the negligible prospects for outward expansion.

Appendix 1: Determining Housing need from total enrolment for the University of Bath

- Total student enrolment at the University of Bath is about 15,500
- Of these, 1,200 students are on distance learning courses, 1,700 are on their sandwich year, 50 are studying overseas and a further 50 are classed as dormant i.e. left within the first term. This totals 3,000.
- Of the 1,700 on their sandwich year, 400 maintain a BA postcode and are perhaps on placement in Bath or the sub-region.
- This means that the total number of students who can initially be discounted as needing accommodation within a BA postcode in 2012/13 is about 2,600.
- Therefore, from this initial filter, 12,900 students are likely to require accommodation within a BA postcode. These can be subdivided as follows.

Group 1	400 sandwich students on placement but living within a BA postcode
Group 2	4,340 sandwich students who are not currently on their placement year who are full time on campus
Group 3	6,465 non-sandwich course students who are full-time on campus
Group 4	1,760 who are part-time on campus
- An analysis of the term time postcodes of groups 2-4 reveals that 9,330 have a BA postcode, 1,700 have a non BA postcode and 1,450 have an international address or no postcode. The latter is assumed as the home addresses international students who indeed do live in a BA postcode during term time.
- Together with Group 1, Groups 2-4 yield about 11,200 students in need of accommodation in a BA postcode. Of these, just 50 live at home with parents within a BA postcode, leaving 11,050.
- A more significant trend is home ownership or a long term tenancy amongst students. 1,781 are classed as homeowners or people that rent long term. About 800 of these are undergraduates and 1,000 are postgraduates. The undergraduate figure seems surprising on first inspection but may reflect investments in the housing market from the families of students (particularly overseas students). These are likely to be shared dwellings of some sort and so the 800 undergraduates are not discounted from a residual housing need figure, but the 1,000 post graduates who state that they are homeowners or long term renters are discounted.

- Once postgraduate home owners/long term renters are discounted the figure of 11,050 reduces to 10,050 students. This is **65%** of the total enrolment for 2012/13 and this ratio will be used for projections. We will monitor this at each plan review.

Appendix 2 Paragraphs 54-65 of the Core Strategy Inspector's Report

Students

59. The PPG (*How should local planning authorities deal with student housing?*) indicates that all student accommodation can be included in the housing requirement based on the amount of accommodation it releases in the housing market. The Council's treatment of student housing needs and the provision of student accommodation has changed several times during the course of the Examination. The PPG does not make it a requirement to include student housing as part of housing supply, but it is essential for the assumptions about student demand for accommodation and its supply to be clear and to be monitored in case those assumptions do not hold true for the plan period.

60. The *Draft SHMA Update 2013* had not included students at all in the projections, but the *Addendums* do include a student population within the projections, the size of which is assumed to remain constant (*Addendum 1a*, paragraph 14). This assumption is based on the Council's conclusions from its *Student Numbers and Accommodation Requirements Evidence Base July 2013* (published with BNES/43). This updated a similar paper from 2010 (CD6/D1). The 2013 paper draws on the advice provided to the Council by the two universities within the district - Bath University and Bath Spa University - regarding their future plans for students and accommodation.

61. Bath University's known plans do not extend over the full plan period, but project either 1% or 3% growth for part of the period. It is continuing to plan for additional accommodation on the campus. Bath Spa University is assuming no future growth in students, but plans to add a further 600 beds on campus. Overall, the Council concludes that if Bath Spa does not expand and Bath University grows by only 1% pa and all the accommodation plans are realised, then students should not add to housing pressures over the plan period and that between 250-575 houses in multiple occupation could be released from student use and returned to the general housing market. But it has not relied on any such releases as a contribution to supply.

62. Clearly there are uncertainties. The universities might grow more than currently planned, particularly given the lifting of the Government's cap on university places – albeit that Bath University's growth may not have been influenced by the cap because of its high entrance requirements. Post-hearing comments on the PPG on behalf of Unite Group PLC refer to Bath Spa's plans to significantly increase its proportion of overseas students, but it is not clear whether this would represent an increase in students overall or simply a higher proportion of overseas students. In addition, the delivery of on-campus accommodation for both universities has been slower than originally intended and similar delays might occur.

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.

64. Bath spatial strategy policy B1.7 refers to additional on-campus accommodation enabling a growth in student numbers and/or a shrinkage of the private student lettings market, whereas the assumption by the Council is for limited growth in numbers and no need for expansion of the private letting market. Accordingly this text needs to be amended to reflect this position (**MM23** in part). With this change, the plan would leave off-campus purpose-built student accommodation to be determined on its merits other than in the Central Area and Western Corridor (Enterprise Area) where policy B5 indicates that such proposals would be refused if they would adversely affect the realisation of other aspects of the vision and spatial strategy. This approach is reasonable given the other priorities for these areas which cover only a small part of the City. In any case, avoiding additional student pressures in the housing market is part of the underlying strategy which the Council would need to take into account in determining whether any proposals conflicted with this policy. A growing need for such off-campus accommodation would be a matter to address in a review of the plan.

Appendix 3 Core Strategy Extracts

Para1.26d

The assessment of housing needs is based on two important assumptions. Firstly, the Council assumes that the expected limited growth in the student population at Bath's two universities will be accommodated in the planned growth of mainly on-campus new student accommodation, which can be supplemented by new off campus accommodated where appropriate. 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. Secondly, the SHMA assumes that the contribution to the provision of affordable housing needs from private rented accommodation where occupiers are receiving housing benefit will continue at a similar scale in the future. If this contribution were to significantly fall, the need for new affordable housing would increase.

Policy B1(7a)

Enable 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.

Policy B5 re Off-Campus Student Accommodation

Proposals for off-campus student accommodation will be refused within the Central Area, the Enterprise Area and on MoD land where this would adversely affect the realisation of other aspects of the vision and spatial strategy for the city in relation to housing and economic development.

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Planning Policy Comments in relation to the need for student accommodation in respect of:

James Street West (14/02412/FUL) - 190 student bedspaces. The Johnsons Group Ltd
1-3 James Street West (14/01896/FUL) - 115 student bedspaces

Key Documents

- Core Strategy Inspectors Report, Paragraphs 59-65
 - Core Strategy, paragraph 1.26d and Policies B1(7a), B2 and B5
 - Student Numbers and Accommodation Requirements
- 1) One of the main assumptions underpinning the SHMA (Strategic Housing Market Assessment) and the adopted housing requirement of 13,000 dwellings, is that will not be any increase in the demand for student accommodation with the general housing market during the plan period (2011-29)
 - 2) This means that new dedicated accommodation for students needs to be provided to match the additional demand arising. If insufficient accommodation is provided to match demand then the logic is that more students will have to meet their accommodation needs in additional HMOs. This would mean that the general housing stock is diminished from 2011 levels and would impact on the suitability of 13,000 as the housing requirement for BANES
 - 3) The strategy of the Development Plan is not to achieve a substantive contraction of the HMO market. This would require more land than a strategy of containment and impact upon the capacity of the city accommodate other new uses. Some including private accommodation providers may think that this should be the strategy, but it is not and that is an important point as it sets part of the framework for decision making.
 - 4) There is no specific target in the Development Plan for the amount of student accommodation to be provided, but the Student Numbers and Accommodation Evidence Base provides forecasts of likely future demand. This is based on advice from both Universities.

University of Bath

- 5) Growth forecasts for the University of Bath are for 1%-3% growth per annum from 2009-26. To the end of 2013/14 academic year growth has been above this rate, However, the University maintains that the number of students in the future will fall within the range of forecasts made in 2009. We discount the bottom end of this range as it has already been reached and instead focus on the top end as being the most probable scenario that should be planned for. This means that a further 2,330 students will need to be housed from 2011-2021. From this point the size of the University will stabilise. The details of this are in the attached paper.
- 6) Against this background a campus master plan to 2026 identifies, 2,400 units of accommodation capacity. The first 704 (the Quads) will be occupied in September 2014. However, it is not realistic to expect all of the remaining capacity to be built 2021. That would not reflect the pace of recent waves of new accommodation that have been built in 2003, 2008 and now 2014.
- 7) It is reasonable to assume one more cycle of accommodation before 2021 and this would be not more than half of the remaining capacity on the campus (i.e. $(2,400-700)/2 = 850$). This means that by 2021 up to about 1554 bedspaces could be built on-campus. It follows that there could be shortfall of 927 bedspaces (2,330 need less 704 built and 700 to follow) unless there is supplementary in-city provision before 2021.
- 8) 776 bedspaces is equivalent to a likely increase in the demand for about 200 HMOs. In simple terms the University has the capacity, on-campus to consume its own smoke. However it won't or can't build this out at the rate that is required to ensure that the number of HMOs does not increase to 2021. The time period for implementation will likely extend beyond 2021 and HMOs will rise unless more immediately deliverable sites are developed in the city.

Bath Spa

- 9) Bath Spa had been clear in the supporting planning statement to recent planning applications that there will be no further growth, but has since entered into a programme to attract more international students (mostly from the US). Reports in the Press of 2,000 over four years (from September 2014) are wide of the mark. Discussions with the Director of International relations at Bath Spa suggest that a figure of about 500 is more reasonable over the 5 years from 2014/15 and that the maximum number they envisage is 1,000 (presumably taking another few years to achieve). 100% of these new students will need accommodation. This is the only additional growth that is forecast

and could impact upon the number of HMOs in the city. The first intake for 2014/15 will be 40. To achieve 500 over the following 4 years could materialise by way of a stepped increase of 80, 100, 130, 150. To achieve a further 500 thereafter we assume 250 per annum for the next two years. It could be or slower or not at all. We use the accelerated pathway to account for the greatest 'risk' trajectory in order to be able to plan for /absorb this eventuality.

- 10) Because the University enrolment contracted by 690 between 2011/12 and 2012/13 net growth will be 310 students, although the net accommodation need will be 885 as the contraction was in part-time enrolment, whereas growth will be full time enrolment.
- 11) Against this, 561 new bedspaces at Newton Park begin will be ready for occupation in September 2014. There will be a subsequent stage of residential development on the northern part of campus but this will largely replace stock rather than add to it. There may be a small net increase as a result of redevelopment. We do not budget for this yet though, as it is too early to say. It might around 45 in order to reach the University's target of 1,000 on campus bedspaces 'on the nose'. We do not know when this phase will take place or how the University will manage it yet. In our forecast we assume demolitions of 394 in 2019/20 and completions of 394 in 2020/21.
- 12) So, with the need rising by 885 and the stock rising by 561 there is therefore a potential deficit to 2020/21 of about 324 units currently forecast (assuming Bath Spa is successful in attracting up to 1,000 new international students by this point).

Summary of Additional Demand & Supply

Demand

- 13) We are currently 5 months into year 4 of the plan period. Looking forward to the end of year 10, (2020/2021), nearly 7 years hence, the following is forecast.
- 14) By the end 2020/21 the need for bedspaces due to the growth of the University of Bath is forecast to be 2,330. Against this, 704 bedspaces have already been built. There will be a need for a further 1,626 bedspaces to 2021 to ensure no additional growth in HMOs. It is reasonably probable that about a further 450 units could be completed on-campus by then as a second phase. This leaves a shortfall of 776. It may be necessary to deal with this in the short term off-campus but this might important not to prejudice the delivery of the later phases of on campus delivery. Further too much off-campus development I the short term would likely also prejudice the delivery of the second phase.

- 15) The need for bedspaces due to the growth of Bath Spa University is forecast to be 885 to 2020/21. Against this, 561 bedspaces have already been built. There may be a need for a further 324 bedspaces to 2020/21, if the university achieves its target of 1,000 new students by then. If these additional bedspaces are not provided there will likely be an increase on HMOs to compensate. There is no further capacity on campus to achieve this.
- 16) We are left with a combined forecast shortfall of 1,100 bedspaces to 2021, after completed and reasonably probable on-campus developments are accounted for. No further growth is currently forecast after 2021, although it took take longer for this level to be reached.
- 17) Forecasts will be reviewed at next plan review stage. If there is a growing need, beyond that which is assumed, the Inspector's Report (para 64) advises that this is a matter to be addressed at plan review. The consequence of a mismatch between new demand and new supply would be an additional need for dedicated accommodation, or an alternative strategy of making good any losses to the general housing stock by increasing housing provision (or a mixture of the two).

Off-Campus Supply

- 18) Completed off-campus accommodation blocks since 2011 comprise 'The Ambury' (48 bedspaces).
- 19) There are currently 1,232 off-campus units on five sites that have permission. There is a high degree of confidence that the first four sites will be completed by 2021 and that these will yield 857 units. There is more uncertainty about the implementation of the BWR capacity of 375 by 2021. These sites play the supplementary role for off-campus development that is identified in 1.26d and Core Strategy Policy (B1.7a).
 - **Twerton Mill:** In April 2014 planning permission was granted for 327 bedrooms (266 in studio/cluster flats and 61 in 10 townhouses (13/01876/EFUL).
 - **Green Park House:** in May 2014 planning permission was granted for 461 bedspaces (14/00480/FUL)
 - **1-3 Westgate Buildings:** in February 2014 planning permission was granted for 29 bedspaces

- **Widcombe Social Club:** in November 2013 planning permission was granted for 40 bedspaces (12/03234/FUL) as part of a mix use retail, social club and student housing scheme.
- **Bath Western Riverside:** The Crest outline application (06/01733/OUT) proposes up to 675 student bedrooms or 375 bedrooms and a primary school. A minimum of 375 bedrooms can be relied upon and this is the Councils preferred scenario as it wishes to see a primary school built on this site

20) Taking the 40 bedspaces that have been built and the 857 that are likely to 202 (i.e. excluding BWR), leaves a shortfall of 203 (50 HMOs) against the identified need for about 1,100 (275 HMOs).

Evaluation of the Proposals in this Context

General matters

- 21) In principle, further in-city provision to 2021 would have pros and cons. It could help keep demand absolutely in step with growth on a year-on-year basis. But, if the numbers are too high but it could prejudice the fuller realisation of on-campus capacity at Claverton Down both before and after 2021. This needs to be weighed in terms of its significance and risk. It would be acceptable for additional demand and supply to be slightly out of sync for a short while, so long as there was evidence that this could be made good by the implementation of a third phase of on-campus accommodation within a short period of time. We note the Inspector's comments in paragraph 63 of his report that there is some leeway for such factors to be out of sync without significantly affecting the housing market. A shortfall of bedspaces is about 70 HMOs
- 22) The realisation of a primarily on-campus is significant. The Core Strategy (1.26d) maintains that forecast additional need is to be accommodated mainly on-campus, supplemented by off-campus provision, where appropriate. We consider that off-campus provision is appropriate where it is shown that on-campus provision cannot meet the need, in a timely manner, and also where off-campus provision would itself not adversely affect the prospect of delivery on-campus. There is a sequential test of sorts to be applied.
- 23) If accommodation (that was available to students at the University of Bath) was to be provided to a greater level than was necessary in the city, it could undermine the on-campus focus. This matter is relevant to current applications, as decisions by the

University of Bath on the implementation of the next and subsequent phase of on-campus provision at Claverton Down will be made against the background of what is happening in the city.

- 24) The 850 further units that could realistically come forward by 2021 may not come out of the ground if there is too much alternative off-campus development. This would disincentivize the University of Bath to build, sooner, or at all. A recent meeting with the Director of Estates (July 2014) has confirmed that the University is monitoring off-campus applications and pre-applications and that the granting of /implementation of development of off-campus may affect the University intent and timetable for on-campus projects.
- 25) This would affect the realisation of the student accommodation strategy and overall housing strategy. Too much off-campus development in the Central Area/ Enterprise Area would fail part of the test of Core Strategy Policy B5 as it would adversely affect the realisation of the vision and spatial strategy in relation to for housing in Bath. This includes the strategy for delivering new student accommodation that is needed, mostly on-campus. The on-campus focus for Bath Sap/Newton Park is not at risk, but for Claverton Down it is at risk. Of course if new accommodation in the city was not available to University of Bath students then there would be no conflict. However, I do not know if this could be an enforceable condition of a planning permission.
- 26) However, as set out in paragraph 15 there may well be as shortfall of about 200 bedspaces to 2021, and there is a case for dealing with that sooner rather than later, in principle.
- 27) However, there are further pros and cons to be considered
- 28) In addition to the potential for too much off-campus accommodation to slow or stop the implementation of an on-campus strategy, Policy B5 could also be offended in respect of the opportunity cost of using a site in the Central Area or Enterprise Area for student housing as opposed to another housing or economic development use. This is because off-campus sites would be used for student housing rather than other uses, and these other uses could not simply be accommodated on the land that is left undeveloped on campus. The significance and potential role of the site in question matters.
- 29) The question of whether further 283 off-campus units be permitted now (on top of existing consents) so the city can arrive at 2021 without any increase in HMOs, or whether to accept a small increase and anticipate that the University of Bath will develop

its final phase of capacity post 2021 to ultimately make good any expansion of the number of HMOs that might arise in the short term.

- 30) Of course another way of looking at this is that the less developed or undeveloped parts of the Claverton Campus are valuable to its character and if the need for accommodation on-campus fell to less than the capacity identified in the masterplan the scope for development in campus to harm that character is reduced.
- 31) We consider it preferable if new accommodation keeps pace with new demand, (following the Sedgefield approach taken to general housing needs re 5 year land supply). The capacity on-campus is useful if can be phased/delivered as required. That is not quite the case at the moment. The temporal dimension is an important one, but the potential implications of permitting accommodation in the city for the full realisation of on campus delivery need to be understood. If the long term growth assumptions do not increase the campus masterplan might not be fully realised. We would draw the line after upto about 250 more units have been permitted and object to any further large off-campus accommodation blocks.
- 32) So, at the moment, in principle, we would entertain further student bedspaces off-campus to 2021. The issue then moves onto the site specifics and the opportunity costs.

Site Specific Matters

- 33) Both sites are within the Central Area and so Core Strategy Policy B5 is applicable to decision making. This deflects student accommodations where there would be adverse impacts on the realisation of other aspects of the vision and spatial strategy for the city re housing and economic development. We have addressed the potential impact on the implementation of the Bath University master plan /on-campus focus. The remaining issue is the alternative use of the site and whether it is needed for other uses.
- 34) Addressing 1-3 James Street West first as this most straightforward, this is not identified in the SHLAA as a potential housing site. We do not budget for any housing on this site during the plan period and its capacity would be quite low. By virtue of its immediate context it is not really an office site and this use is unlikely to be viable. The site is in close proximity to existing student accommodation on Milk Street and adjoins Bath Spa College. There is therefore some synergy with its surroundings and it is a suitable student housing site. Further, the scheme rightly includes space for ground floor town centre uses. We have no objection to this site being a student block. However, the height scale and massing and visual appearance of the structure needs some adjustment to make it permissible. This will reduce likely the number of bedspaces.

- 35) James Street West is more complicated. This site is allocated within Policy GDS.1/B1 of the Local Plan and is addressed in the BWR SPD (not as a specific site but as part of a larger BWR East city centre extension area). It also forms part of the large BWR East large SHLAA site for which 300 dwellings are anticipated alongside other uses. This estimate reflected the Sainsbury's application that was 'on the table' at the time of the latest version of the SHLAA. The intention from Sainsbury's seems to have fallen away somewhat since its application was withdrawn. There is some likelihood that it will remain in its present location for a long time. This means that the JSW site could only come forward a discreet opportunity. It also means that when the lease of Homebase is up in 2021 on the British Land site, an alternative scheme to that recently presented by Sainsbury's may come forward. That area is unlikely to stay the same by the end of the plan period.
- 36) As a discreet site JSW could perhaps yield 40-50 flats at most if parking was provided on a 1:1 basis. If this site didn't yield housing it would be possible for that to be made up elsewhere on BWR East. I do not think that the use of this site for student accommodation site would harm the housing capacity to be realised in the Central Area.
- 37) This is currently a defunct office site that detracts from the Conservation Area and WHS. It is not a prime location of office redevelopment in the current market and I doubt whether office redevelopment is viable. It is highly probable that there will be no change on the neighbouring Sainsbury's site for at least the next 5 years until Homebase's lease ends on the 'British Land site'. There may well be no change at all. I do not think that it is reasonable for this site can be left 'on the shelf'; waiting for Sainsbury's to do something, as there is no guarantee that it will. It is reasonable for something to happen at JSW now.
- 38) In the numerical context that has been presented we have to this site being used for student accommodation. However, it currently looks like it is being overdeveloped and that the urban design response to the rear of the site, particularly the footpath does not take the opportunity to create a new active frontage. I expect that further adjustment will be needed to make this permissible in design terms e.g. against NPPF:64. This will reduce the number of units that this site can yield.

Conclusions

- 39) There is a forecast shortfall in deliverable supply to 2021 of 203 bed spaces.
- 40) Both sites area acceptable in principle in the forecast demand/supply context.

- 41) In combination both sites would yield 305 units.
- 42) If both sites are to be student housing projects then the capacity of the sites, in term of built form, should be optimised and if this results in slightly more than 203 units then that would be acceptable.
- 43) However, both sites are being overdeveloped in design terms and there are other design matters to address. These can be addressed and permissible schemes can be achieved but this will reduce the number of units, perhaps to nearer 200-250.
- 44) Planning Policy would be unlikely to any further large student accommodation projects in the Central Area or Enterprise Area, or elsewhere if these two sites are permitted.
- 45) Para 36 would apply to additional large sites are on our 'radar'
- **Transport Depot, Brougham Hayes:** (14/03415/PREAPP) 103 bedspaces
 - **Site of Old Gas Works, Upper Bristol Road** (14/00004/PADEV) 404 bedspaces
 - **Hartwells, Upper Bristol Road** (14/01688/PAHWDC) 431 bedspaces
 - **Kingsmead House** (TBC but likely at least 250 and up to 500)

Richard Walker, Planning Policy

Attachment: Student Numbers and Accommodation Requirements.

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Bath & North East Somerset Council		
MEETING/ DECISION MAKER:	Housing & Major Projects Policy Development & Scrutiny Panel	
MEETING DATE:	23rd September 2014	<small>EXECUTIVE FORWARD PLAN REFERENCE:</small>
TITLE:	Lower Bristol Road Gypsy & Traveller Site – Nominations Policy	
WARD:	All	
AN OPEN PUBLIC ITEM		
List of attachments to this report:		
Appendix 1: Draft		

1 RECOMMENDATION

1.1 That the panel consider, and comment, on the proposed allocation policy attached in appendix 1.

2 RESOURCE IMPLICATIONS (FINANCE, PROPERTY, PEOPLE)

2.1 There are no direct financial implications arising from this report.

3 STATUTORY CONSIDERATIONS AND BASIS FOR PROPOSAL

3.1 There are three principle statutory considerations in relation to the provision of Gypsy and Traveller sites, these being:

- The Housing Act 2004 which places a duty on local housing authorities to undertake regular assessments of the accommodation needs of Gypsies and Travellers, known as a Gypsy & Traveller Accommodation Assessment (GTAA). The most recent GTAA, completed in 2012, identified a significant and unmet need for Gypsy & Traveller pitches within the area. The Act also requires local housing authorities to include the needs of Gypsies and Travellers in any housing strategy they produce in line with the Local Government Act 2003 and to take any such strategy in to account in exercising their functions.

- The National Planning Policy Framework guidance places a requirement on local authorities to set pitch targets for Gypsies and Travellers which address the likely permanent and transit site accommodation needs of their area, as informed by the GTAA. In addition to setting pitch targets local authorities are required to identify a supply of specific deliverable sites, sufficient to provide five years' worth of sites against the locally set targets. There is also a requirement to plan for a further 10 years' supply of sites.
- Whilst the Equalities Act 2010 does not define race case law has established that Roma gypsies and Irish travellers are covered by the protected characteristic of race for the Equality Act 2010. Local authorities have a duty under this Act to actively seek to eliminate unlawful discrimination, advance equality of opportunity and promote good race relations.

3.2 In addition the nominations policy has been informed by the Housing Act 1996 (as amended by the Homelessness Act 2002 and Localism Act 2011); the Allocation of Housing and Homelessness (Eligibility)(England) Regulation 2006 and the Allocation for Accommodation Guidance for Local Housing Authorities in England (June 2012).

4 THE REPORT

4.1 On the 4th June 2014 Development Control Committee approved a planning application, submitted on behalf of the Council, for the development of a 13 pitch gypsy and traveller site on the land adjacent to the Lower Bristol Road.

4.2 To meet the conditions of the HCA grant, and to ensure that appropriate site management experience is secured, the scheme will be developed and managed by a Register Provider. Following an appropriate procurement exercise Elim Housing have been selected as the Council's preferred partner.

4.3 The site will comprise of 8 permanent pitches (also known as residential pitches) and 5 temporary pitches (also known as transit pitches). The transit pitches will be allocated by the Registered Provider on a "first come" basis to eligible households transiting the district. However, the Council retains nomination rights to the permanent pitches. As such the Council is required to produce a nominations policy which articulates how the pitches will be allocated.

4.4 The proposed nomination policy, attached in appendix 1, has been designed, where possible to mirror the existing Homeseach Policy which sets out how traditional social housing is prioritised and allocated. The gypsy & traveller allocation policy is therefore based upon the principles of balancing assessed housing need, time on list and choice. Applicants who apply to go on the waiting list will be placed into one of three groups. When a pitch becomes available applicants who are on the waiting list can then express an interest in the pitch. It will then be offered to the household in the highest group, and if more than one household is in the same group, time on list. It should be noted that the Council reserves the right not to nominate. The three bands cover the following categories:

- Group A – local households who have a priority need;
- Group B – local households who do not have a priority need;
- Group C – households who are not local to Bath & North East Somerset

4.5 An equalities impact assessment has been completed as part of the development of the proposed allocations policy. The assessment did not suggest any amendments.

5 RATIONALE

5.1 The Council is required to adopt and publish a housing allocations policy which articulates how social housing is allocated. The implementation of this policy will ensure that the allocations create balanced communities where people choose live, make the best use of the housing stock and ensuring that those in greatest need are prioritised.

6 OTHER OPTIONS CONSIDERED

6.1 None

7 CONSULTATION

7.1 The policy has been developed with extensive consultation. This has included gypsy & traveller households; interested partners and other experienced Councils.

8 RISK MANAGEMENT

8.1 A risk assessment related to the issue and recommendations has been undertaken, in compliance with the Council's decision making risk management guidance.

Contact person	Graham Sabourn, Head of Housing 01225 477949
Background papers	None
Please contact the report author if you need to access this report in an alternative format	

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Housing Services Pitch Allocation Scheme

How Bath & North East Somerset Council allocates
pitches to Gypsies and Travellers on the Lower Bristol Road site in Bath

July 2014



Fraud

Fraud is unlawful and in some cases is also a criminal offence. In partnership with the site landlord, we are committed to identifying and dealing with fraud. Fraud may include giving false information or withholding information to obtain a pitch. Fraudulent applications will be cancelled and any offer of a pitch revoked.

If you have information about pitches or social housing within Bath and North East Somerset that you think are unlawfully occupied please let us know.

Bath and North East Somerset Council Housing Services PO Box 3343 Bath, BA1 2ZH	Name of provider Address of provider
Telephone: 01225 396118	Tel number of provider
Fax: 01225 477839	Fax number of provider
Minicom: 01225 477815	Website of provider
Email: Housing@Bathnes.gov.uk	Email of provider

This document can be made available in a range of languages, large print and Braille.



Printed on recycled paper

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Introduction

The Gypsy and Travellers Pitch Allocation Scheme sets out how permanent pitches will be allocated within the district. It is based upon similar principles to the Homeseach Allocation Scheme which is the scheme that allocates social housing, and gives priority to people with a local connection and the most housing need.

People who want a pitch must apply to join the scheme. Applicants tell us that they are interested in a pitch (we call this 'bidding'). After bidding time has closed, a shortlist of applicants is given to [name of provider], [name of provider] are the landlord and are responsible for managing the site. [name of provider] will decide in agreement with Housing Services which of the households on the shortlist is offered the pitch.

Within the district there are a number of transit pitches are allocated to Gypsies and Travellers by separate arrangements.

Housing Services offer a range of housing options and services to the public, such as access to private rented housing, shared ownership, mutual exchanges and extra care.

To apply for shared ownership, please contact Housing Services on 01225 477818

To apply for supported housing, please visit www.housingsupportgatewaybathnes.org.uk

To apply for social housing, private renting, mutual exchanges or transfers for existing social tenants, please visit www.Homeseachbathnes.org.uk

To apply for a transit pitch, please contact Housing Services on 01225 396296.

All teams within Housing Services can also be contacted by telephone through the Council's switchboard on 01225 477000.

The Law

The Council will comply with the Mobile Homes Act 1983 and have due regard to the Human Rights Act 1998 and the Equality Act 2010.

The Equalities Act recognises both Roma Gypsies and Irish Travellers as ethnic minorities against whom discrimination is unlawful. The Equality Act also places a general duty on public authorities to work towards the elimination of unlawful discrimination and to promote equality of opportunity and good relations between persons of different racial groups in the carrying out of their functions.

The Council also recognises the definitions of Gypsies and Travellers as defined by the law and judicially defined by case law which is listed in the table of authorities at the end of this document.

Aims of the policy

All pitch allocations will be made in a clear, fair and transparent manner. Priority for pitches will be given to those with greatest housing need and a local connection to the district. Gypsy and Traveller pitches will be managed effectively and the right to the peaceful enjoyment of the site by existing residents, who are legally occupying a pitch, will be protected.

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Making an application for a pitch

Every person or family must complete an application form.



Online: www.bathnes.gov.uk/housing



In person:

One Stop Shop, 3 – 4 Manvers Street, Bath, BA1 1JQ
The Hollies, High Street, Midsomer Norton, BA3 2DP
Riverside, Temple Street, Keynsham, BS31 1LA



By phone: 01225 477000 to request a paper application

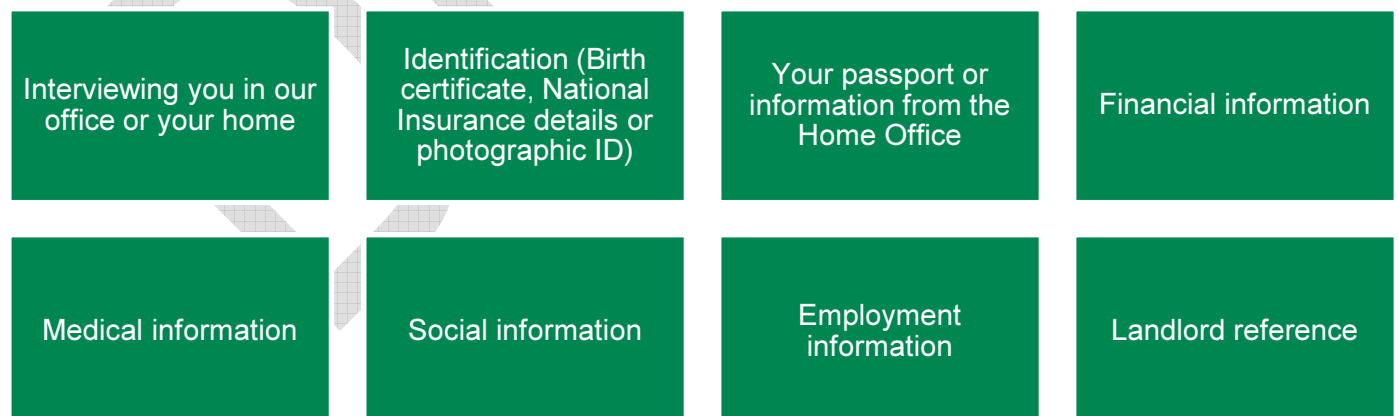


By post:

Bath and North East Somerset Council
Housing Services
PO Box 3343
Bath, BA1 2ZH

Applications will not be accepted unless all the information we ask for is provided. We will not contact other people or organisations without your consent.

We will check information and our checks can include (but are not limited to):



References

[Name of provider] will ask for a reference before offering a pitch to an applicant. Ideally the reference will be provided by a previous landlord. Where the applicant is unable to provide a landlord's reference [name of provider] may consider a reference from the following persons.

Employers
reference

Personal
reference

The person who writes a reference is called a referee. The referee must live in the UK and must not be closely related or involved with the applicant, for example:

- Related by birth or marriage
- In a relationship or live at the same address as the person applying.

The referee giving a personal reference must have known the person applying for at least 2 years and work in (or be retired from) a recognised profession or be 'a person of good standing in their community'¹.

Registration letter

People who meet the eligibility and qualification criteria will be told in writing:

Their priority for a pitch:
Effective date and group

The terms of the agreement
to occupy a pitch

How to bid for a pitch

Waiting time indication: The number of applicants waiting and average waiting times.

¹ To be taken from the list of persons approved to countersign a passport application

Assessment of applications and housing need

Eligibility and qualification criteria

Housing Services and [name of provider] want to help local people in housing need and to provide a well-managed site so that the community living on the site can peacefully enjoy their homes. Pitches are designed and appropriate for a household of 6 people or less.

Applications from the following people will not be accepted:

- People who are not a Gypsy or Traveller
- People under the age of 16 or those aged 16 or 17 without a guarantor²
- People who are serving a prison sentence of longer than 6 months
- People who have a history of unacceptable behaviour serious enough to make them unsuitable as a prospective tenant or to be part of the site community
- People who have income above the financial resource limit of £60,000³
- People who own a property (this does not include a caravan or other mobile home)⁴
- People who own their own land to place their home or have been granted planning permission to build on land
- People who do not have a habitable caravan (or the means to get one) to put on the pitch
- People from abroad who are subject to immigration control under the Asylum and Immigration Act 1996 and are ineligible for an allocation of housing accommodation
- People who are not habitually resident in the Common Travel Area⁵
- People whose only right to reside in the UK is derived from their status as a jobseeker
- People whose only right to reside in the UK is an initial right to reside for a period not exceeding three months
- People whose only right to reside in the Common Travel Area is a right equivalent to one of the rights mentioned above

If the application does not meet the eligibility and qualification criteria the applicant will be given the reasons for this decision.

Definition of a Gypsy or a Traveller

The scheme is only available to Gypsies or Travellers. There are a number of definitions for the term Gypsy and Traveller. The Council will use the Planning definition to decide if a person is a Gypsy or a Traveller and is eligible to join the scheme. However, the other legal definitions, appropriate guidance and case law may be used to inform this decision.

² Guarantor has the same meaning as the Homeseach Allocation Scheme.

³ Financial resource limit has the same meaning as the Homeseach Allocation Scheme.

⁴ Condition relevant to owning a property is the same as the Homeseach Allocation Scheme.

⁵ Common travel area is defined as the UK, the Channel Islands, the Isle of Man and the Republic of Ireland.

Caravan Site and Control of Development Act 1960

- A persons of a nomadic habit of life, whatever their race or origin.

Housing Act 2004

- Persons with a cultural tradition of nomadism or of living in a caravan; and
- All other persons of a nomadic habit of life, whatever their race or origin, including
- Such persons who, on grounds only of their own or their family's or dependant's educational or health needs or old age, have ceased to travel temporarily or permanently; and members of an organised group of travelling show people or circus people (whether or not travelling together as such).

Planning policy

- Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling show people or circus people travelling together as such.

The following questions are relevant and can form part of the assessment process⁶:

⁶ R v Shropshire CC ex p Bungay [1991]; R v South Hams DC ex parte Gibbs [1994]; Hearne v National Assembly for Wales [1999]; Wrexham CBC v the National Assembly for Wales and Berry [2001]; O'Connor v the First Secretary of State and B&NES [2002]

Does the person have a tradition of travelling?

Is the person travelling in a group?

Is the person travelling with an economic purpose?

What is the person's history?

What are the reasons the person has ceasing to travel? Are they in abeyance or abandoned?

What are the person's future wishes and intentions to resume travelling when the reasons for settling have ceased to apply?

What is the person's attitude to living in a caravan rather than a conventional house?

Grouping system

The grouping system sets out how the scheme will organise priority. There are three groups A, B, and C. The grouping system takes into account legal requirements and the Council's local strategic priorities. Applicants in group A have the greatest priority. Priority decreases from group B to group C.

Any changes in the circumstances of an applicant must be checked to see if they change the group that the application is placed in.

Priority between applicants within groups A and B will be decided by the applicant's effective date. Priority between applicants in group C will be decided by how closely they are living to the district of Bath and North East Somerset and their suitability for a pitch.

Group A is for local people who have a priority for a pitch

Statutory homeless and owed the full housing duty by Bath & North East Somerset Council under s.193 (3) (65(2))	In urgent need because of medical, disability, welfare or hardship problems	Granted discretionary housing priority	Occupying unsanitary conditions
---	---	--	---------------------------------

Group B is for local people who do not have a priority for a pitch

People who are local to Bath & North East Somerset and who do not qualify for Group A

Group C is for people who are not local to Bath & North East Somerset

People who are not local to Bath & North East Somerset.

Similarities exist between Homesearch and the Pitch Allocation scheme; therefore the policies and procedures contained in the Homesearch Allocation Scheme may be applied and adapted where necessary for legal or practical reasons to fit with this policy. This can include (but is not limited to) decisions on:

- Reducing priority when an applicant for example, is not ready to live independently or issues relating to poor behaviour or rental style payments
- Accepting and refusing applications from family members and friends
- Accepting and refusing fresh applications
- Assessing whether an applicant is a separated family
- Assessing an applicant's priority on medical or disability grounds
- Assessing an applicant's priority on welfare or hardship grounds
- Assessing whether an applicant is homeless or threatened with homelessness
- Making a direct property offers
- Making a decision to cancel an application
- Making a decision on whether an application is fraudulent or deliberately made their housing circumstances worse to receive priority for a pitch.

Occupying unsanitary conditions

Housing Services will undertake an assessment to decide whether an applicant is entitled to priority on the grounds of living in unsanitary conditions. Priority will only be awarded if the living circumstances of the household can be improved by moving home and it is not a life style choice of the household.

In determining whether to give an application priority the following factors will be relevant (but are not limited to):

- Living without access to running water
- Living without access to a toilet

- Living without access to bathing facilities
- Children living in the household and difficulties arising as a result of the condition of the home
- General condition on the site they are living
- Any health or safety concerns arising as a result of their living conditions.

Discretionary decisions

All applications will be considered on their own merit. In exceptional circumstances, where there is a good reason a special case can be agreed by a Senior Officer in Housing Services. A decision can be made to steer away from the policy normal rules and award an applicant priority.

The circumstances where this could apply are:

Discretionary grounds: Eligibility and qualification	
A person does not meet the eligibility or qualification criteria	A person cannot provide a suitable reference

Discretionary grounds: Priority for housing	
There is a strategic, management or legal reason for an applicant to move.	There is a strategic, management or legal reason not to allocate a pitch to a household with the highest priority.

Discretion is also afforded to offer other pitches than those applied for (where these may also meet the needs of the applicant, or where the household would otherwise have no choice but to reside on an unauthorised encampment). This decision will be made in partnership with [name of provider].

Effective date

The time an applicant has been waiting for a pitch will be taken into account when calculating their housing priority. This is known as the effective date. The effective date is when the Council receives a complete and comprehensive application.

If the applicant moves to a higher group after they have applied the effective date will change to the date they changed group. This means that people in the higher group have an effective date that is relevant to their increased need. If an applicant moves down a group the original effective date will be used.

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Local to Bath and North East Somerset

Housing Services aim to help people who have a connection to Bath and North East Somerset above those who do not and ensure that wherever possible, pitches go to local people. .

Housing Services will consider the applicant's individual circumstances when deciding if a person has a local connection, or, in light of their circumstances whether it would be appropriate for them to qualify.

Housing Services will ensure that people in the Armed Forces will not be disadvantaged when applying this condition and will have regard to the methods laid out in the Homeseach Allocation Scheme.

A person is local to Bath and North East Somerset if they meet the following criteria:

Residency	They have chosen to live in the district permanently for 6 out of the last 12 months or 3 out of the last 5 years.
Employment	They have permanent paid employment or substantial voluntary work in the district
Family support	They need to move to the area to receive or provide significant medical or welfare support to or from a close relative
Special circumstances	They have a connection with the district through special circumstances, such as they need to receive specialist medical or support services within the district which cannot be provided elsewhere
Asylum	They have been provided with accommodation in the district under section 95 of the Immigration and Asylum Act 1999
Homeless	They have been accepted by Bath and North East Somerset as owed a duty under s 195 (2) or 193 (2) of the Housing Act 1996, Part 7, and are not subject to a referral to another local housing authority under s 198

Bidding for a pitch

Advertising vacant pitches and letting criteria

Vacant pitches will be advertised in a similar way to all other social housing in the area and will be widely accessible. When a pitch is advertised every eligible applicant who is registered with the Gypsy and Traveller Pitch Allocation Scheme can place a bid. Advertisements will be made public on:

On line

www.bathnes.gov.uk/housing

Applicants that do not have access to a computer can use one at any Council Connect reception or a library.

Adverts

Printed adverts are available to view in Council receptions and in the office of [name of provider].

Vacant pitches advertised on the Council's website will include as much information as possible about the pitch and about the letting plan of the pitch. This can include, but is not restricted to:

Family size suitable for the pitch

Childrens age restrictions for the pitch

Support needs that can be managed

Employment status of the applicant

Pets and animals that are allowed

Amount of rent or other applicable charges

Site amenities

Electricity and hot water connections

Location of the pitch

Community activites or facilities

Making a bid 'bidding'

An applicant can make a bid in any of these ways:



Online: www.bathnes.gov.uk



In person:

One Stop Shop, Manvers Street, Bath, BA1 1JQ

The Guildhall, High Street, Bath, BA1 5AW

The Hollies, High Street, Midsomer Norton, BA3 2DP

Riverside, Temple Street, Keynsham, BS31 1LA



By phone: 0845 270 1239



By post:

Bath and North East Somerset Council

Housing Services

PO Box 3343

Bath, BA1 2ZH

Assisted bidding

Assistance and help to bid for a pitch is available at Council Connect offices.

Friends, relatives and support workers can bid on behalf of a vulnerable applicant with specific needs. They can also assist with the applicant's correspondence subject to the applicant's permission being confirmed to Housing Services.

Applicants with the following support needs may require help:

- English is not a first language
- Literacy problems
- Learning difficulties
- Diagnosed with a mental health problem
- Diagnosed with a long-term disability
- Live a chaotic lifestyle, such as misuse of drugs or alcohol
- Undergoing a crisis, such as a victim of domestic violence
- Socially excluded, such as a person sleeping on the streets.

Assessment of bids

Pitches can be advertised to a single group or a combination of groups. Group A have the highest priority and will get more opportunity to bid for a pitch. Family connections and personal preferences will be considered when deciding the most suitable applicant for the pitch.

An applicant can contact Housing Services to see their position in relation to other applicants who have also placed a bid.

If Housing Services or [name of provider] have a good reason to be concerned about the risk of conflict between existing residents and an applicant or their family they will consider the following action:

- Discuss their concerns with existing residents and the applicant
- Carry out a risk assessment.

Residents living on the site may be involved in the assessment of bids. Living in close proximity to each other means it is important that both the applicant and the existing residents are respectful of each other's kinship network and cultural needs. The applicant's personal information will not be disclosed to site residents.

Invalid bids

All bids will be checked to make sure that they are valid. After close of bidding, an applicant's circumstances will be reassessed and verified. The reassessment will check:

- Suitability to the advertised letting criteria
- Priority under the grouping structure
- Eligibility and qualification
- Effective date
- Ability to afford the rent and service charge.

Bids can be removed if an applicant does not meet these requirements or has failed to keep their application up to date.

An applicant's bid can also be removed in the following situation:

- Fails to co-operate
- Fails to reply to telephone calls or a letter
- Fails to attend a meeting
- Fails to make a decision on whether to accept a pitch within a reasonable timescale
- Suspected of making a fraudulent or misleading application.

An applicant will be told in writing if their bid is invalid or if their group, effective date, eligibility or qualification has changed as a result of reassessing their application.

Offering a pitch

In group A and B, pitches will usually be offered to the applicant with the earliest effective date within the highest group. If there is more than one application with the same effective date and group, the applicant with the earliest application by time will be offered the property.

If there are no suitable applicants in group A or B a pitch can be offered to an applicant within group C. Decision about which applicant within group C will be offered the pitch will be decided with regard to the following factors:

- The proximity of the applicant's current residence to the boundary of Bath and North East Somerset and any prior history they have with the district
- Any issues relating to whether the applicant would be a suitable resident, such as a history of antisocial behaviour
- Their effective date and housing need

Priority for the pitch will usually be given to the applicant who lives nearest to the district of Bath and North East Somerset and would be the most suitable tenant for the pitch. Other factors, such as effective date and housing need are secondary considerations.

The Housing Services Manager may decide an applicant's case is so exceptional that they should be offered a pitch even though they do not live nearest to the district of Bath and North East Somerset.

The decision about who is offered a pitch will be made by Housing Services in partnership with [name of provider]. The decision will be based on the merits of the application, without undue influence from those already living on site. All applications will be considered fully and fairly.

Applicant property refusal

If an applicant bids for a property, but after viewing decides it is not suitable, the applicant and the [enter name of provider] will need to contact Housing Services.

Refusal of an applicant

[Enter name of provider] can refuse to offer the pitch to the first applicant in line for nomination. They must tell Housing Services if they wish to reject an applicant.

There may be circumstances when they feel that an applicant or a member of their household is considered unsuitable for a pitch. If an applicant is refused for a pitch it will be offered to the next person in line for nomination. [Enter name of provider] can refuse an applicant on the following grounds:

- An applicant has a history of anti-social behaviour and housing the applicant is likely to have a significant effect on neighbouring residents
- An applicants has support needs and does not have a support plan in place

- An applicant is unsuitable for the property because of a recent tenancy management issue on the site
- An applicant has unmanaged rent arrears relating to a current or former tenancy or site
- An applicant was previously evicted from a site or tenancy for breach of the conditions in the last 2 years
- An applicant has displayed threatening, violent or otherwise unreasonable behaviour, such as towards a member of staff or neighbouring residents in the last 12 months
- An application appears to be false or misleading and further investigation is required
- An applicant is unable to afford the rent for the pitch or is not able to purchase a caravan.
- An applicant has been found guilty of tenancy or benefit fraud relevant to their suitability to be a resident
- An applicant is unable to provide a reference and has been given a reasonable opportunity to do so.

All applicants will be considered individually. [Enter name of provider] will comply with the Equality Act 2010 and evidence their reason for refusing an applicant for a pitch.

A decision to refuse an applicant for a pitch should be made in partnership with Housing Services. [Enter name of provider] will write to the applicant to:

Explain their reasons for refusing an applicant

Include information on how to appeal to a senior manager

Pitches will not normally be kept available during an appeal period. If an applicant's appeal is successful [Enter name of provider] will directly offer the applicant the next pitch which becomes available. If an applicant refuses the pitch no further offer will be made.

Administration of the scheme

Appeals

There may be circumstances when an applicant disagrees with the way their application has been dealt with. An applicant can only ask for a decision made on their application to be reviewed if they disagree with:

- The facts of their case which are likely to be, or have been, taken into account in considering whether to allocate a pitch, and
- Whether they are eligible or qualify to join the scheme.

Appeals can be in writing or in person but must be received within 21 days of the decision which is being appealed. Housing Services or [name of provider] will conduct a review of the decision and tell the applicant in writing the outcome of that review.

Residents' forum

Housing Services and [name of provider] will listen to the views of residents (if a forum exists) and give them an opportunity to improve the pitch allocation process. Through listening to residents it is hoped the allocation process will be seen to be fair and transparent as well as promote equality of opportunity and good race and community relations.

Consulting residents about applicants who have placed a bid for a pitch will be undertaken through a residents' forum. To be worthwhile and representative of the site as a whole, a quorum of three residents must be willing to attend a meeting. The Council may decide to proceed without reference to the residents' forum where there is limited or a lack of interest. These paragraphs do not intend to imply that a qualifying residents' association has been created.

Welcome to the site

New residents will be clearly told what they can expect as tenants, and what is expected of them by [name of provider]. They will be asked to sign an Agreement to Occupy a Pitch. The terms of the agreement will be explained verbally before they sign the agreement. An applicant will not be permitted to occupy a pitch until the agreement is signed.

Applicants will be given a tour of their pitch and boundaries of the site. As well as being provided with an information pack that includes:

- Welcome
- Agreement to Occupy the Pitch

- How to pay and what is covered in the rent
- Repairs and maintenance
- Other services provided
- Responsibilities of the resident
- Resident involvement
- Complaints
- Changes to the household
- Moving out
- Useful information, such as, nearby schools, help lines, travel information, locations of places of worship and other useful telephone numbers.

Through the Council's Gateway, each person, where necessary will receive an individual support plan. The plan will look at all of their needs and support them in leading an independent lifestyle. Every child will also receive support to cover their health and educational needs.

Support and care

Support and care needs can include, but are not limited to:

- Age
- Drug or alcohol abuse
- Rough sleeping
- Physical disability
- Mental illness
- Learning difficulties.

Statutory and voluntary agencies who are working with an applicant are able to provide a support plan. A support plan should be person centred and aims to identify areas where an applicant needs support with their life. It will put in place strategies to provide that support. Support needs can have an impact on the community and it is in the interests of everyone that support needs and the applicant's suitability for a pitch will be considered.

Change of circumstances

Circumstances may change during an application, for example when an applicant moves home or a member of their family leaves or arrives or a new baby is born. Changes like these may affect an application. An applicant must update their application if their circumstances change as this could affect:

- Their entitlement to join the scheme
- Their group

Monitoring

Housing Services will review this policy on an annual basis and carry out satisfaction surveys to take into account applicants and residents feedback on the application of this policy. Outcomes for applicants will be monitored to ensure that applications are being processed in a fair and transparent manner.

Information sharing

Personal data about applicants will be administered consistently with the Data Protection Act 1998. This means that personal information will be shared with [name of provider] and may also be shared with other agencies including local authorities, the Home Office, Immigration and Nationality Directorate and other government departments and agencies.

Letting outcomes will be published on the Council website by group and effective date. They provide valuable information to help other applicants understand how long they are likely to wait for a pitch. Where providing information might put the successful applicant at risk of violence or intimidation by other individuals or a member of the public, information will not be published.

An applicant who wishes to discuss their application will be asked to comply with the following procedure.

- Confirm their name, address and date of birth and
- Answer a security question

All information provided will be treated confidentially and all enquiries will be made in a sensitive and appropriate manner.

Periodic review

Periodic reviews will ensure that all applicants registered on the scheme require a pitch. Applications will be checked to see whether there are any changes in the circumstances of an applicant.

Periodic reviews also provide an opportunity of discussing other housing options with an applicant. This review will normally occur every twelve months.

An applicant who fails to respond to the review will have their application cancelled. Housing Services will ensure a letter and telephone call is made when an applicant has a support need.

Limitations of the scheme

This document explains how the process of allocating a pitch will work in practice. It is not nor does it claim to provide the policy or procedures on agreement to occupy a pitch or site management.

Local letting plan

A local letting plan is an agreement between Housing Services and [name of provider]. It is used in exceptional circumstances, to meet specific local issues on the site.

As a new development, Housing Services will write a local letting plan to support the allocation process when pitches are first let with the aim of ensuring that the community created is mixed and sustainable.

Other examples of the circumstances when a local letting plan can be agreed are:

To deal with concentrations of deprivation on site or create a more mixed community

To deal with anti-social behaviour on the site

A local lettings plan will include the following:

- Neighbourhood profile and supporting information (if applicable)
- Purpose of the plan
- Objectives
- Timescale
- Review date
- Letting criteria.

A local letting plan will be agreed between the Housing Services Manager in consultation with the Cabinet Member, and [name of provider]. Local letting plans are time limited; and will be monitored and reviewed regularly to ensure they are effective. When a local letting plan is no longer effective it will be revised or revoked in agreement with the [name of provider] and the Housing Services Manager.

A copy of a local letting plan can be obtained from Housing Services.

Quotas

Pitches are a standard size and are suitable for families, couples and single people. Housing Services will decide the size of the household which will be entitled to bid for the pitch. People with dependent children will have more chance of being allocated a pitch than those without dependent children and this is reflected in the quota.

Housing Services will broadly comply with the quota but have the discretion to allocate the pitch to a family rather than a household without dependent children where there is good reason.

Housing Services will set broad targets on an annual basis which will be monitored throughout the year. The target reflects the aims of the allocation scheme and will be discussed with [name of provider]. These targets are subject to change in agreement with the Housing Services Manager.

There could be a difference between the advertising quota and the number of pitches allocated to the quota. A possible reason could be because there were no suitable household for the pitch. The quota will be monitored for advertising and allocation to ensure the scheme is fair and creates a sustainable community.

This table shows the broad percentage of pitches which will be targeted to household types.

Quota for pitch size	
75% for households with dependent children	25% for households without dependent children

Table of authorities

Legislation and regulation	Case law	Statutory guidance	Other guidance
<p>Caravan Site and Control of Development Act 1960</p> <p>Caravan Sites Act 1968</p> <p>Mobile Homes Act 1983</p> <p>Children Act 1989 Part III</p> <p>Environmental Protection Act 1990</p> <p>Town and Planning Act 1990</p> <p>Criminal Justice and Public Order Act 1994</p> <p>Housing Act 1996</p> <p>Human Rights Act 1998</p> <p>Homelessness Act 2002</p> <p>Anti Social Behaviour Act 2003</p> <p>Planning and Compulsory Purchase Act 2004</p> <p>Housing Act 2004</p> <p>Equality Act 2010</p> <p>Localism Act 2011</p>	<p>R v Shropshire CC ex p Bungay [1991]</p> <p>R v South Hams DC ex parte Gibbs [1994]</p> <p>Hearne v National Assembly for Wales [1999]</p> <p>Wrexham CBC v the National Assembly for Wales and Berry [2001]</p> <p>O'Connor v the First Secretary of State and B&NES [2002]</p>	<p>Gypsy and Travellers Accommodation Needs Assessment Guidance [2007]</p> <p>Gypsy and Travellers Site Management Good Practice Guide [2009]</p> <p>Planning Policy for Travellers Sites [2012]</p> <p>National Planning Policy Framework [2012]</p>	<p>Bath & North East Somerset Gypsy and Traveller Accommodation Assessment [2012]</p> <p>Bath & North East Somersets Homeseach Scheme [2013]</p> <p>Bath & North East Somerset draft Pitch Nomination Agreement</p>

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Bath & North East Somerset Council		
MEETING/ DECISION MAKER:	Housing & Major Projects Policy Development & Scrutiny Panel	
MEETING DATE:	23rd September 2014	<small>EXECUTIVE FORWARD PLAN REFERENCE:</small>
TITLE:	Empty Property Policy Update	
WARD:	All	
AN OPEN PUBLIC ITEM		
List of attachments to this report:		
None		

1 THE ISSUE

- 1.1 In January 2013 the Council formally adopted an updated Empty Property Policy. This policy articulates the Council’s twin track approach of providing encouragement and assistance to all owners of empty properties to help bring their properties back into use whilst at the same time seeking to select high priority empty properties for bespoke assistance and potentially enforcement action. The purpose of this report is to update the panel on the progress made with implementing this policy.

2 RECOMMENDATION

- 2.1 To note the report

3 RESOURCE IMPLICATIONS (FINANCE, PROPERTY, PEOPLE)

- 3.1 The staff resource required to deliver the empty property policy includes 0.5 FTE Empty Property Officer and some management support; the cost of this is covered by the approved Housing Services budget. Costs of producing leaflets are also included within this budget.
- 3.2 The recovery of empty homes is eligible for the New Homes Bonus funding (NHB); this work stream has already generated cumulative NHB funding of £635,289 over the period 2011/12 to 2014/15 based on the 105 net empty homes brought back into use since the start of the NHB scheme. Future NHB funding will depend on any changes in numbers of empty homes and any changes to the NHB scheme.
- 3.3 All actionable empty homes owners are offered a £500 grant for work to help bring the home back into use; to date £3,035 has been paid and this is funded by the approved Housing Services Remedial Repairs budget.
- 3.4 For high and medium priority empty homes, a loan of up to £30,000 is available for work to bring the home back into use. The loans are offered via a partner organisation, Wessex Home Improvement Loans. To date £30,000 has been paid out. The repayment mechanism for this loan is over 10 years at an interest rate of 4%.
- 3.5 In June 2014 Cabinet approved the £1.015m Affordable Housing capital budget. This budget includes supporting work on tackling empty homes, such as funding Compulsory Purchase Orders.

4 STATUTORY CONSIDERATIONS AND BASIS FOR PROPOSAL

- 4.1 Local Authorities have a range of duties and powers to promote economic wellbeing, improve health impacts and reduce inequality within their area. The Empty Property Policy is a mechanism designed to assist in achieving these outcomes.
- 4.2 In addition:
 - Section 3 of the Housing Act 2004 requires Local Authorities to keep housing conditions in the area under review.
 - Section 17 of the Housing Act 1985 gives power to acquire land, houses and other properties compulsorily for the purposes of (amongst other things) bringing empty properties into housing use and the improvement of substandard or defective housing.
 - The Regulatory Reform (Housing Assistance) (England and Wales) Order 2002 gives the Council powers to provide assistance that improves housing conditions in the area.

5 THE REPORT

- 5.1 In September 2013, the Council adopted a revised Empty Property Policy. This policy focuses Housing Services resources on those homes which are likely to

require intervention to bring them back into use. The policy defines an empty home as one which has been empty for over 6 months and an actionable empty home as one that has been empty over two years. Homes empty less than two years are likely to come back into use without Council intervention. Homes empty over 2 years are subject to a Council Tax charge of 150%. This charge is to encourage owners to bring their empty home back into use and therefore, our resources are aligned to those homes receiving a premium charge. The Policy uses the following twin track approach to bring empty homes back into use:

- Provide advice, assistance and incentives to all empty home owners; and
- Prioritise homes which have been empty for over 2 years (these are known as actionable empty homes).

The Policy further provides that Housing Services will respond to complaints from the public about empty homes.

5.2 During 2013/14, 89 actionable empty homes were brought back into use reducing the number of actionable empty homes to 143. During the current financial year to date, 41 actionable empty homes have been brought back into use and the number of actionable empty homes stands at 157.

5.3 Actionable empty homes are prioritised using a points based system which is based on a combination of length of time empty, property condition and the impact on the local community to give a points score. Properties are then grouped into high, medium and low priority groups. Based upon the latest information there are:

- 16 high priority homes
- 35 medium priority homes
- 106 low priority homes

5.4 Regardless of priority, all empty homes owners are contacted and offered advice and assistance to bring these homes back into use including:

- A bi-annual newsletter and dedicated website www.no-use-emptywest.co.uk run with our West Of England colleagues allowing free advertising of empty homes for sale, reporting of empty homes, case studies and advice for empty home owners
- Contacting all empty home owners to encourage the effective use of the property, inform them of their options and provide free advice if required, including visits by the empty homes officer,
- For those homes empty over 5 years, VAT reduction on refurbishment work.
- All actionable empty home owners are offered a £500 grant for work to help bring the home back into use.
- For high and medium priority empty homes, a loan of up to £30,000 is available for work to bring the home back into use

5.5 The owners of high priority empty homes are contacted specifically and encouraged to take action to bring their homes back into use. Since the introduction of the original Policy in 2011, in total four high priority homes have been brought back into use, reducing the original list of 17 by one quarter. Action taken on these four high priority homes includes provision of grant assistance, advertising homes for sale, joint working with Planning and Environmental Protection which has resulted in the service of Notices under the Town and County Planning Act section 215 given the detrimental effect these homes are having on the amenity of the neighbourhood.

5.6 Bringing back four high priority empty homes has allowed Housing Services to work more intensively on medium priority empty homes.

Achievements since the adoption of the Empty Homes Policy in 2010 are shown in the table below.

Year	Number of homes brought back into use following contact with Housing	Empty homes initiatives
2011/12	44	Launch of No Use Empty website with a B&NES case study
2012/13	160	Introduction of small grants and loans as incentives
2013/14	89	Drop in surgery for advice in Bath one stop shop 5 grants approved
2014/15	41 (to 31 August 2014)	Approval of 1 st loan 2 grants approved Housing Services / Council Tax review of actionable empty homes

They also include:

- Surveying over 500 properties and sending out over 3000 news letters to empty home owners;
- Bringing a total of nearly 300 empty homes back into use following contact with Housing Services contributing to the generation of New Homes Bonus for the Council.

5.7 Where there is no prospect of high priority homes being brought back into use, further action including enforcement action may then be taken in accordance with the Policy where the following four criteria are met.

- The Council has made numerous attempts to engage with the owner, all reasonable offers of assistance have been made and these offers have not been acted upon; and
- There is no prospect of the house being brought back into use by the owner within a reasonable period; and
- There is a housing need and / or the property is causing a significant problem in the local neighbourhood; and
- A cost benefit analysis demonstrates that enforcement action is both financially viable and appropriate

5.8 The above four criteria for taking enforcement action were met in relation to two high priority properties. . As such on 11 September 2013, Cabinet authorised the Council's use of a Compulsory Purchase powers for these two properties. Following a significant amount of ground work and preparation the Order was served and advertised on 31 July 2014. The objection period has now concluded and to date the Secretary of State has confirmed that no objections have been received.. The Secretary of State will therefore be invited to confirm the Order.

5.9 Since serving the Order, one owner has contacted the Council with regard to an agreed sale and negotiations are underway.

5.10 Housing Services have made contact with affordable housing providers interested in purchasing these homes to ensure the two homes subject to the Order are brought back into use. It is hoped that agreement will be reached with an affordable housing provider following a viability assessment. This assessment requires access to the properties and can only take place by agreement with the owners or once the authority takes possession. In the case of the owner who has entered negotiations it has been agreed that access can be arranged for the viability assessment to take place.

5.11 A condition will be included in the contract of sale which requires the homes to be brought back into use within a finite period of 2 years.

6 RATIONALE

6.1 To update the panel.

7 OTHER OPTIONS CONSIDERED

7.1 None

8 CONSULTATION

8.1 This report is merely providing an administrative update for the panel and so no wider consultation has been undertaken. However, extensive consultation was undertaken in relation to supporting the development of the Empty Property Policy.

9 RISK MANAGEMENT

9.1 A risk assessment related to the issue and recommendations has been undertaken, in compliance with the Council's decision making risk management guidance.

Contact person	<i>Katherine Coney 01225 396736</i>
Background papers	<i>List here any background papers not included with this report, and where/how they are available for inspection.</i>
Please contact the report author if you need to access this report in an alternative format	

HOUSING AND MAJOR PROJECTS PDS FORWARD PLAN

This Forward Plan lists all the items coming to the Panel over the next few months.

Inevitably, some of the published information may change; Government guidance recognises that the plan is a best assessment, at the time of publication, of anticipated decision making. The online Forward Plan is updated regularly and can be seen on the Council's website at:

<http://democracy.bathnes.gov.uk/mgPlansHome.aspx?bcr=1>

The Forward Plan demonstrates the Council's commitment to openness and participation in decision making. It assists the Panel in planning their input to policy formulation and development, and in reviewing the work of the Cabinet.

Should you wish to make representations, please contact the report author or Mark Dumford, Democratic Services (01225 394458). A formal agenda will be issued 5 clear working days before the meeting.

Agenda papers can be inspected on the Council's website and at the Guildhall (Bath), Hollies (Midsomer Norton), Riverside (Keynsham) and at Bath Central, Keynsham and Midsomer Norton public libraries.

Housing and Major Projects PDS Forward Plan

Bath & North East Somerset Council Anticipated business at future Panel meetings

Ref Date	Decision Maker/s	Title	Report Author Contact	Strategic Director Lead
HOUSING & MAJOR PROJECTS POLICY DEVELOPMENT AND SCRUTINY PANEL - 23RD SEPTEMBER 2014				
23 Sep 2014	HMP PDS	Radstock & Westfield - Projects Update	Tim Hewitt, Emily Price Tel: 01225 477552,	Andrew Pate
23 Sep 2014	HMP PDS	Student Accommodation	Lisa Bartlett Tel: 01225 477281	Louise Fradd
23 Sep 2014	HMP PDS	Lower Bristol Road Gypsies & Travellers Site	Graham Sabourn Tel: 01225 477949	Louise Fradd
23 Sep 2014	HMP PDS	Gypsies & Travellers Allocations Policy	Graham Sabourn Tel: 01225 477949	Louise Fradd
23 Sep 2014	HMP PDS	Empty Property Initiative Update	Graham Sabourn Tel: 01225 477949	Louise Fradd
HOUSING & MAJOR PROJECTS POLICY DEVELOPMENT AND SCRUTINY PANEL - 18TH NOVEMBER 2014				
18 Nov 2014	HMP PDS	Registered Providers Presentation	Graham Sabourn Tel: 01225 477949	Louise Fradd
20 Jan 2015	HMP PDS			

Ref Date	Decision Maker/s	Title	Report Author Contact	Strategic Director Lead
18 Nov 2014	HMP PDS	Medium Term Plan and 2015/16 Budget Update	Graham Sabourn Tel: 01225 477949	Louise Fradd
18 Nov 2014	HMP PDS	Corporate Gypsies & Travellers Policy	Graham Sabourn Tel: 01225 477949	Louise Fradd
HOUSING & MAJOR PROJECTS POLICY DEVELOPMENT AND SCRUTINY PANEL - 20TH JANUARY 2015				
20 Jan 2015	HMP PDS	Homelessness Update		Louise Fradd
20 Jan 2015	HMP PDS	Additional HMO Licensing Update	Graham Sabourn Tel: 01225 477949	Louise Fradd
20 Jan 2015	HMP PDS	Boat Dwellers & River Travellers Update		Louise Fradd
HOUSING & MAJOR PROJECTS POLICY DEVELOPMENT AND SCRUTINY PANEL - 10TH MARCH 2015				
FUTURE ITEMS				
21 Jan 2014	HMP PDS	Former MoD Sites	John Wilkinson Tel: 01225 396593	Louise Fradd
The Forward Plan is administered by DEMOCRATIC SERVICES : Mark Durnford 01225 394458 Democratic_Services@bathnes.gov.uk				

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