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

Bath & North East Somerset Council

Prepared by the Planning Policy Team

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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 of 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 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

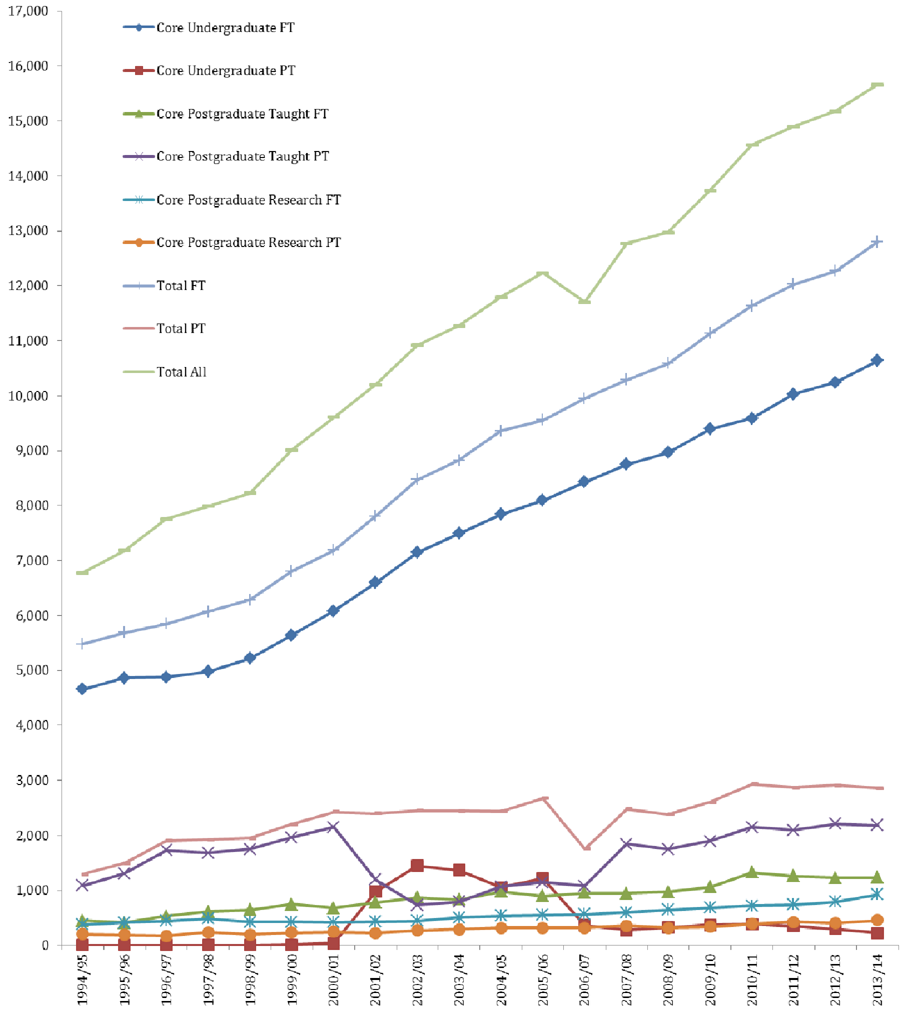
2.1 Table 1 and Figure 1 sets out how the number of students enrolled at the University of Bath has increased during the last 20 years. For the 2013/14 academic year total enrolment was 15,660, up from 6,776 in 1994/95.

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

Year	Undergraduate		Postgraduate				Total FT	Total PT	Total All
			Taught		Research				
	FT	PT	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

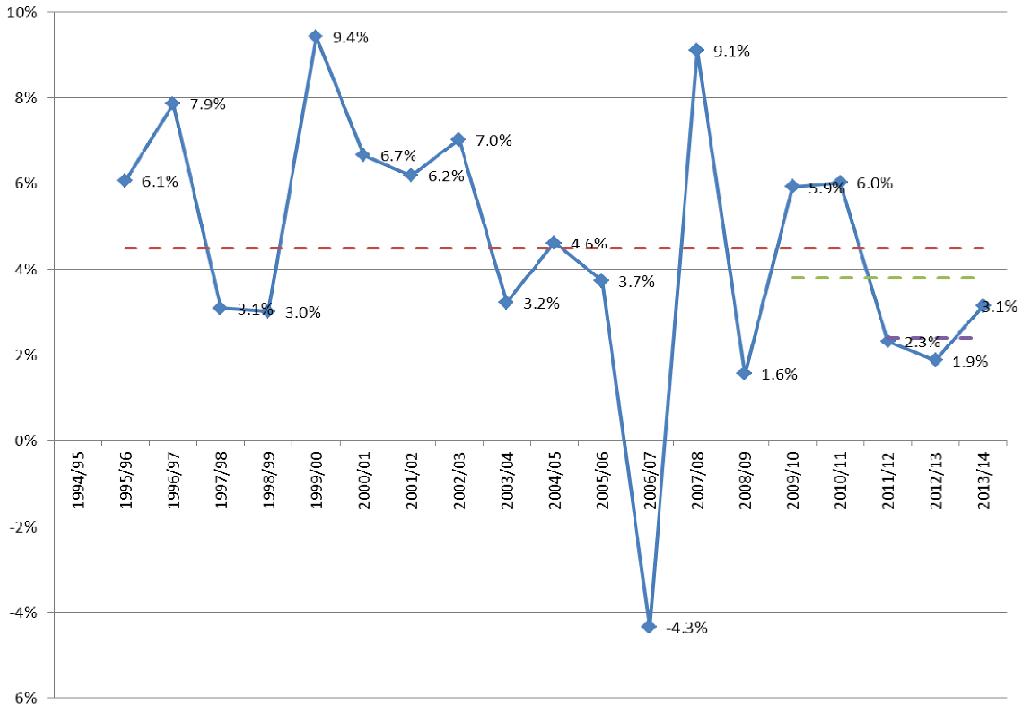
Figure 1: University of Bath Student Numbers 1994/95 – 2013/14



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 e last 5 and 3 years).

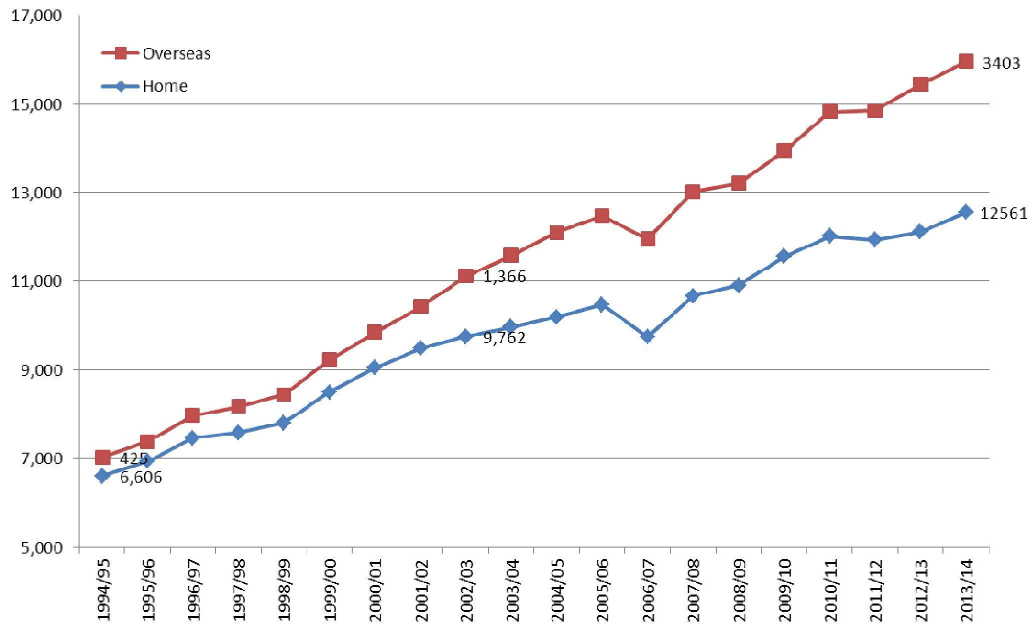
2.3 The contraction in enrolment in 2006/07 was due to the culling of part-time undergraduate courses/places. This can be seen in Table 1

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% in1994/95 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 be 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

Campus Sub Total	***3,156***	***Claverton Campus***
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 2026[1].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.

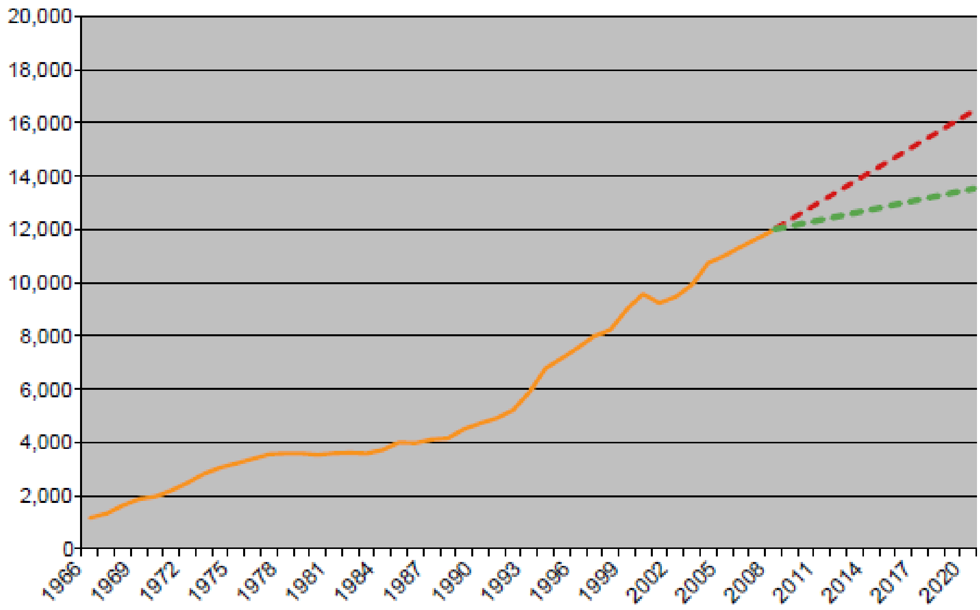
2.11 The original 2009 master plan contains the graph shown overleaf (Figure 4), which forecasts growth in enrolment. The red line represents 3% per annum to 2020 and the green line 1% per annum. Also identified was a need for 2,400 bedspaces and a target to build these on-campus by 2020. At the time 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.

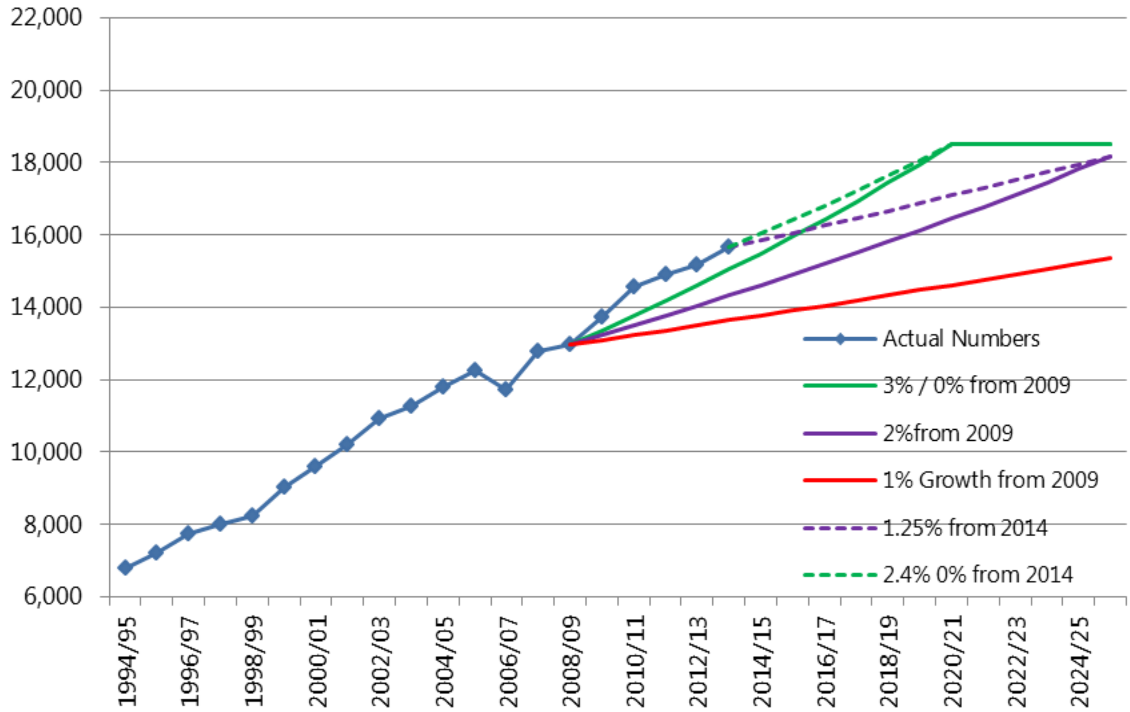
2.14 The 2012 summary update also included Figure 5 (updating the one presented in the original 2009 master plan i.e. figure 4). Figure 5 shows that, on its best assumptions that the University anticipates that it will reach between 15,000-16,000 FTEs by at least 2026, maybe earlier.

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	master plan horizon	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
Total annual growth		*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
Need annual growth		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
Residual Prv Beds Change from 2011		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

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	master plan horizon	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
Total annual growth		*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
Need annual growth		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
Residual Prv Beds Change from 2011		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

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 is 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 arsing 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 delivered[2]). 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 of 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 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

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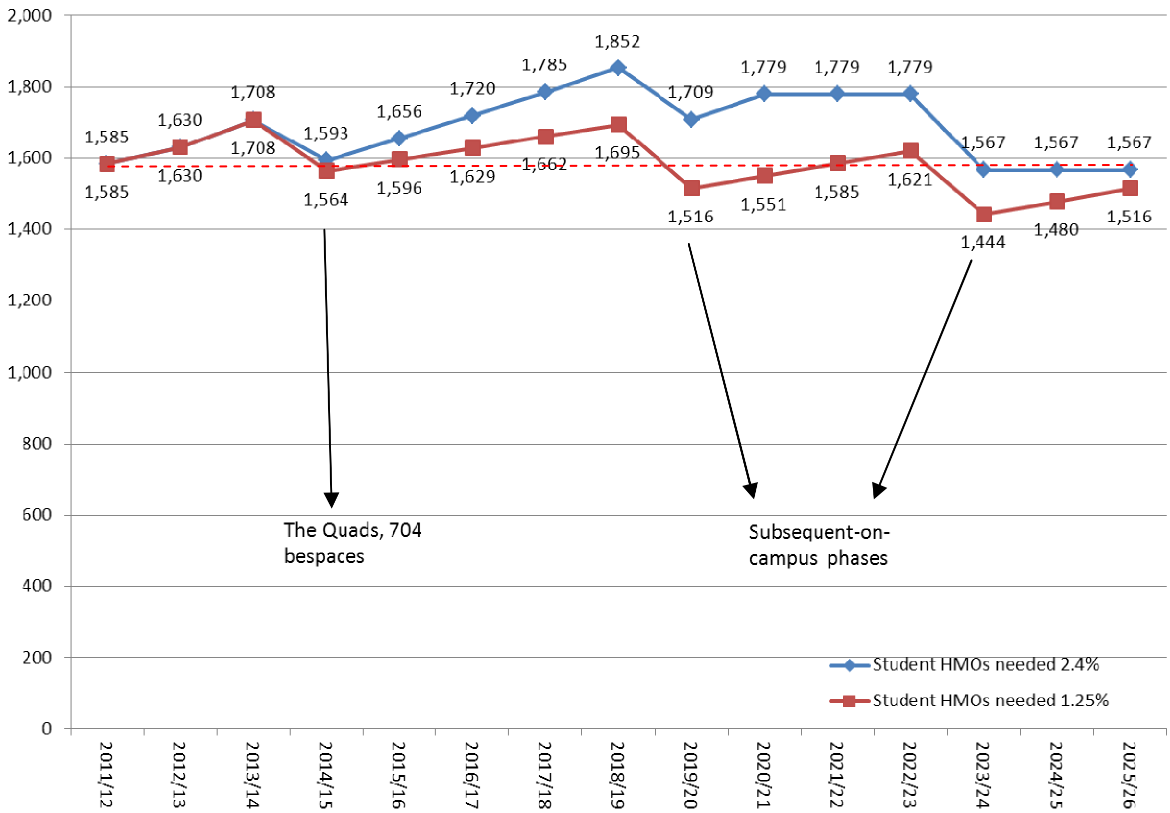
[2] this being 2,400 less 704/ divided by 2).

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

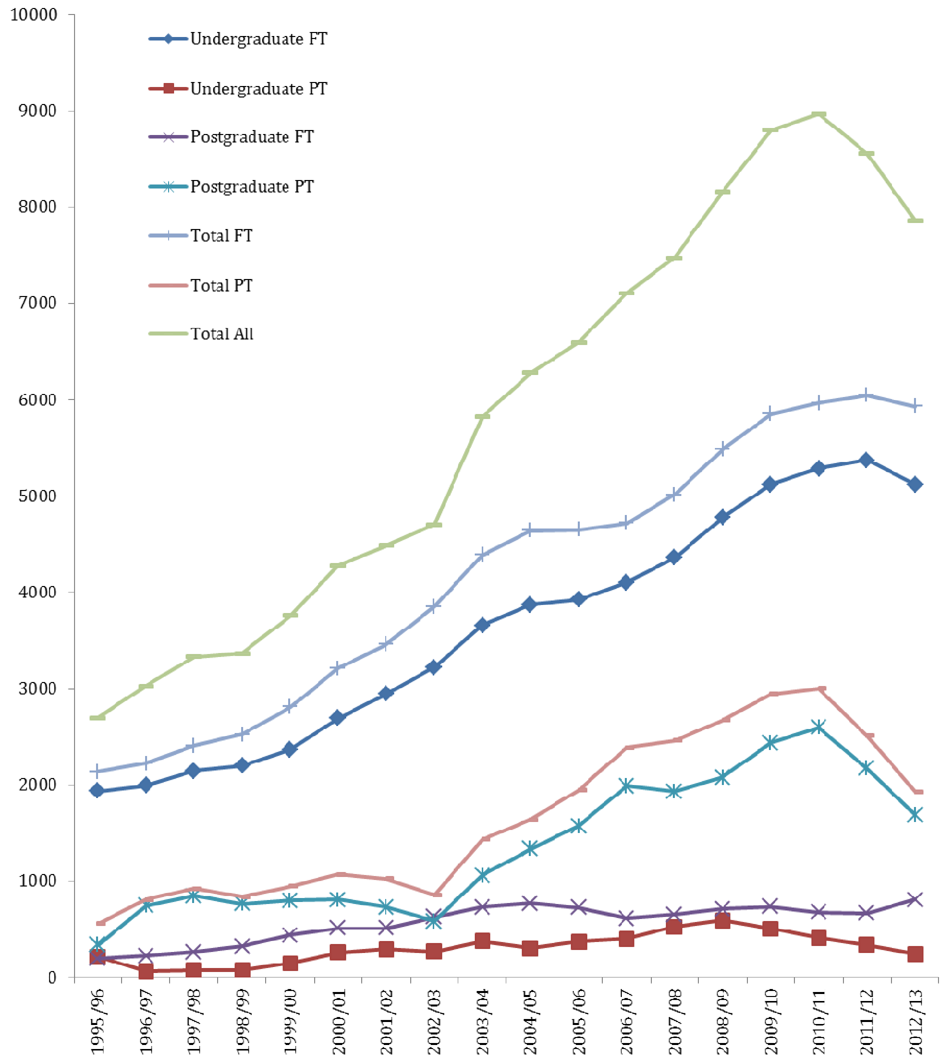
Bath Spa University – Growth in Enrolment

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 is 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 not[3]. 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 course 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).

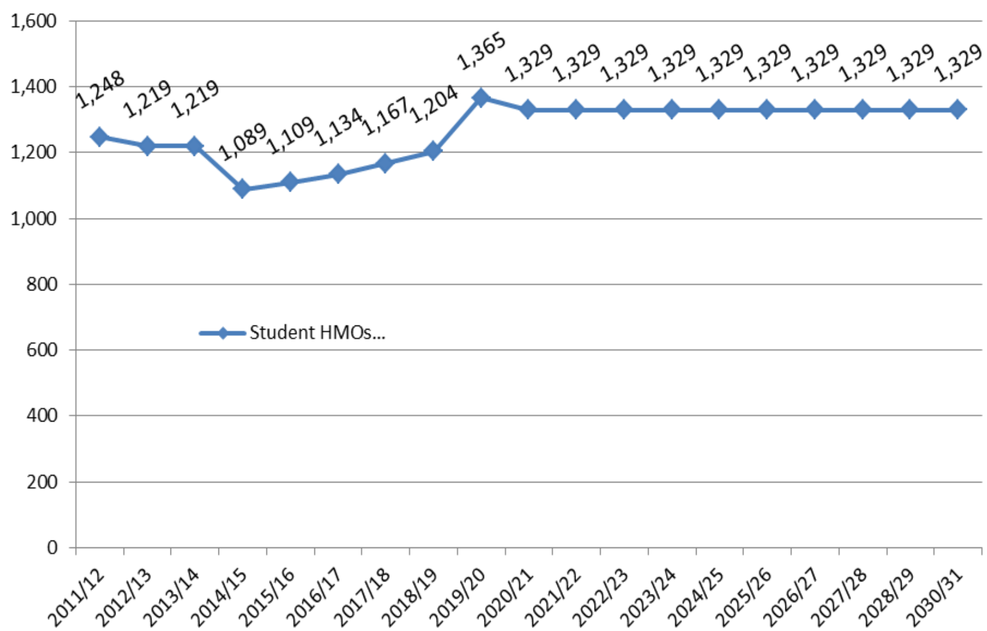
3.9 The University has recently added a further 561 bedspaces on campus (blue bold) and there may be some flux in the future as old stock is demolished and new stock replaces it (blue bold). This will be temporary and does not signal a further additional need for bedspaces off-campus over and above the 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 <u>a shortfall of bedspaces to additional demand is projected of 324 to 2023/24, which is equivalent to 80 HMOs.</u> 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
Total annual growth		*-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
Residual Prv Beds Change from 2011		-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
Change in HMOs from 2011		-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

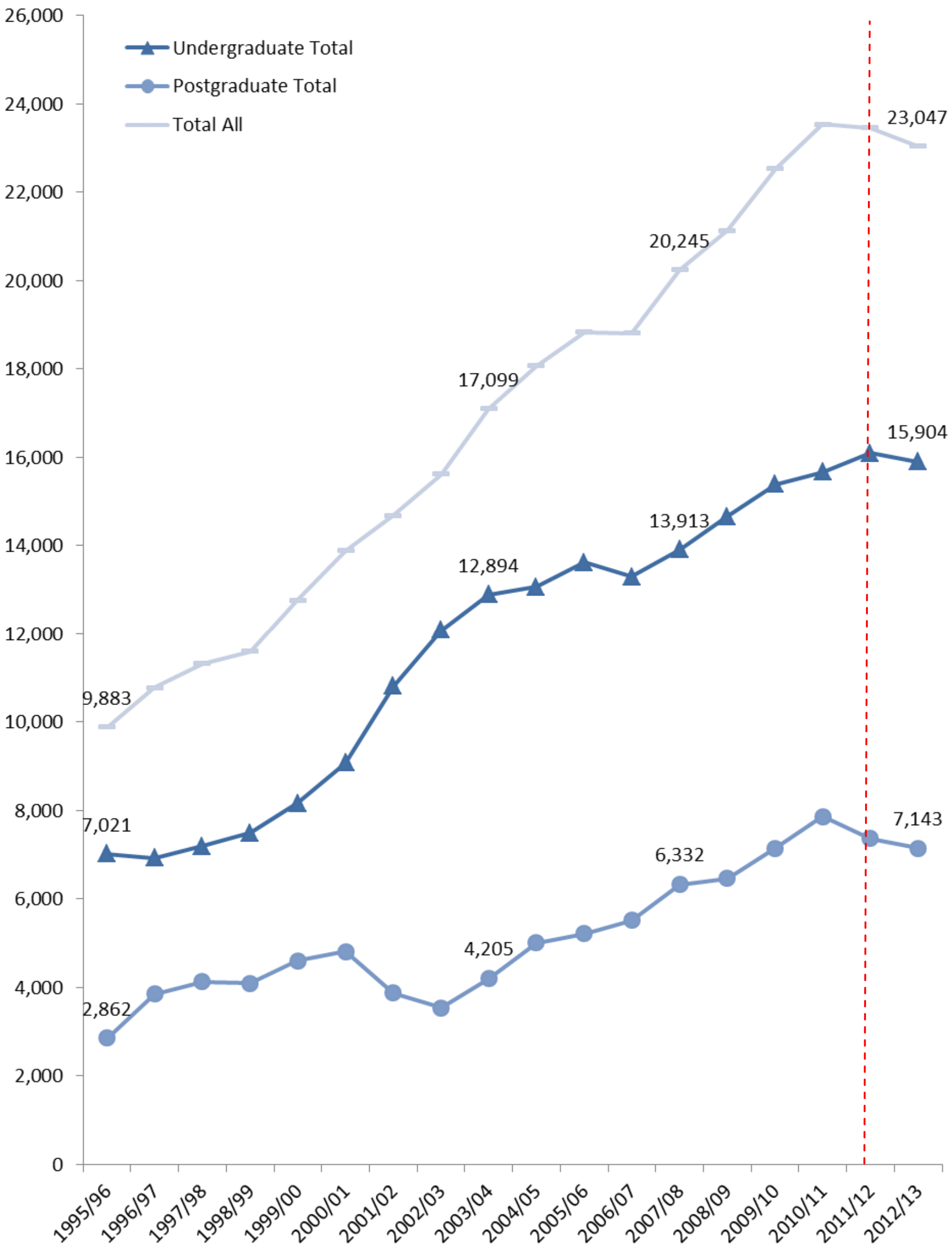
5.2 The latest year for which we have figures for both Universities is 2012/13. This can be updated to 2013/14 from 15th September 2014, when Bath Spa releases their data to the HESA.

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									

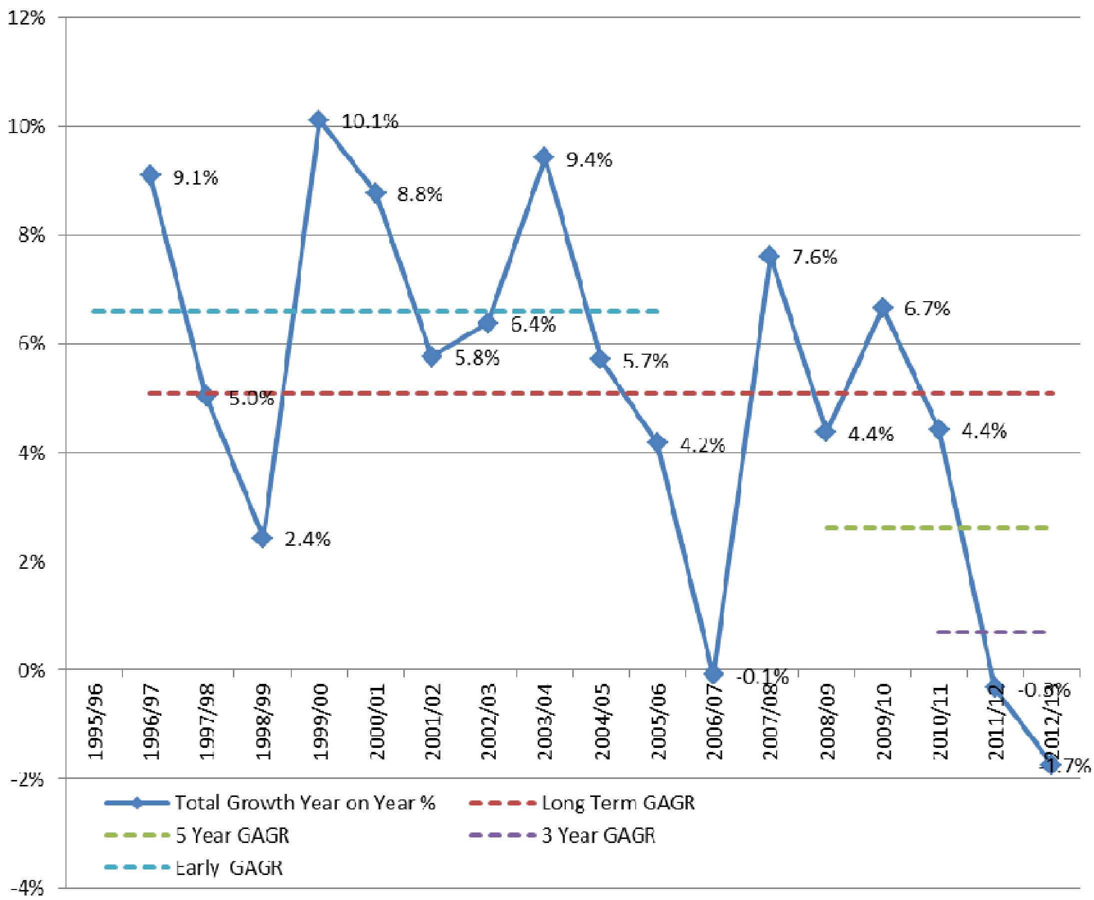
5.3 Tables 6 and Figure 8 set out how the number of students has been increasing. For the 2012/13 academic year there were a total of 23,047 students. There were about 16,000 undergraduates (70%) and 7,000 postgraduates (30%). 18,200 (79%) were studying on full-time courses. the vertical dashed line 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**
Additional Need Cumulative		*67*	*378*	*662*	*992*	*1,348*	*1,741*	*2,159*	*2,684*	*3,216*	*3,216*	*3,216*	*3,216*	*3,216*	*3,216*	
Needs as % of total students	*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**
Additiopnal Off-campus	***0***	***48***	***48***	***48***	***905***	***905***	***905***	***905***	***905***	***905***	***905***	***1,280***	***1,280***	***1,280***	***1,280***	***1,280***
Quasar		*48*	*48*	*48*	*48*	*48*	*48*	*48*	*48*	*48*	*48*	*48*	*48*	*48*	*48*	
1-3 Westgate					*29*	*29*	*29*	*29*	*29*	*29*	*29*	*29*	*29*	*29*	*29*	
Widcombe Social Club					*40*	*40*	*40*	*40*	*40*	*40*	*40*	*40*	*40*	*40*	*40*	
Green Park House					*461*	*461*	*461*	*461*	*461*	*461*	*461*	*461*	*461*	*461*	*461*	
Twerton Mill					*327*	*327*	*327*	*327*	*327*	*327*	*327*	*327*	*327*	*327*	*327*	
Western Riverside												*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**
Additional Beds Cumulative		*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*	
Beds as % of Demand	*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**
Residual Prv Beds Demand Change from 2011	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**
Change in HMOs from 2011		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.

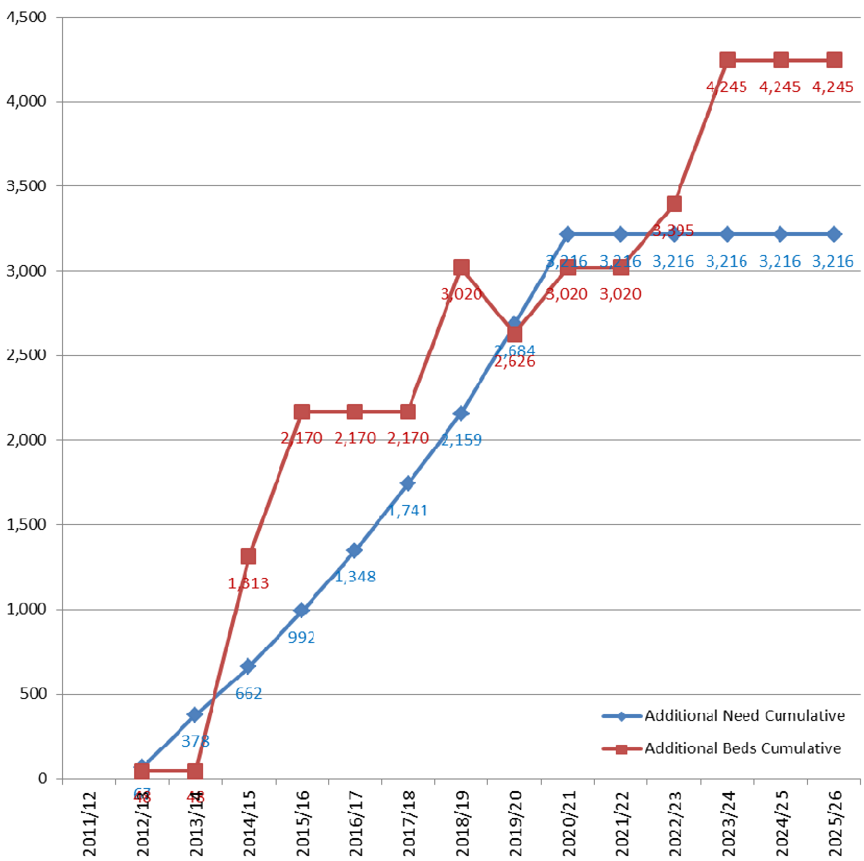
5.14 In total then, from 2011, we can currently identify **4,241** bedspaces of supply. However we forecast that **3,016** are deliverable by 2020/21 academic year

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



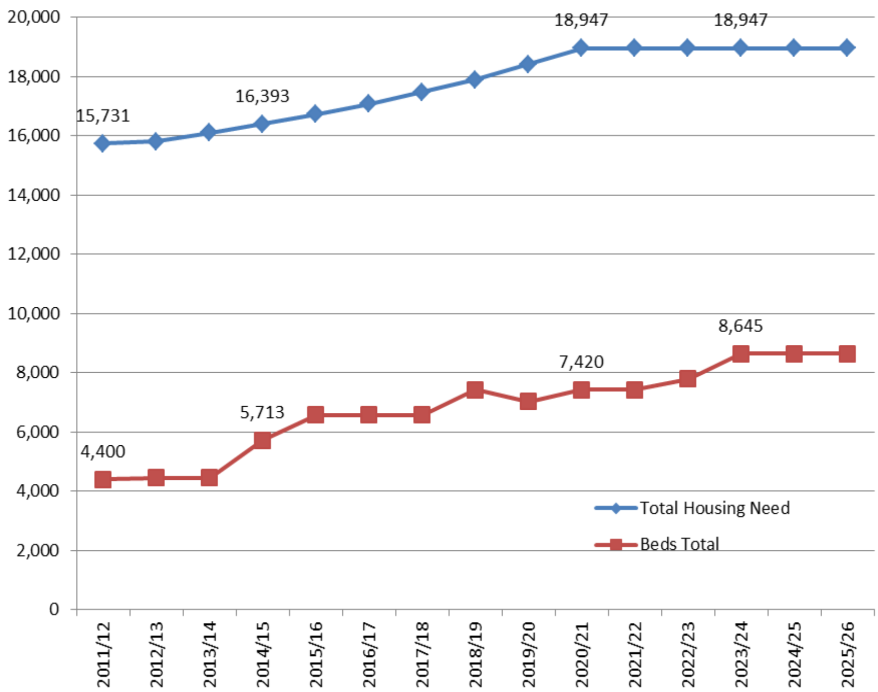
5.17 Paragraph 4.4 identifies further sites where developers are seeking 1,243 bedspaces. There may be some scope for 10% of this to come forward to deal with the forecast shortfall to 2021. The 'side effects' would need to be weighed in the balance as well as the opportunity cost of using the site for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

Future Balance between total Demand and total Supply

Best Case Scenario

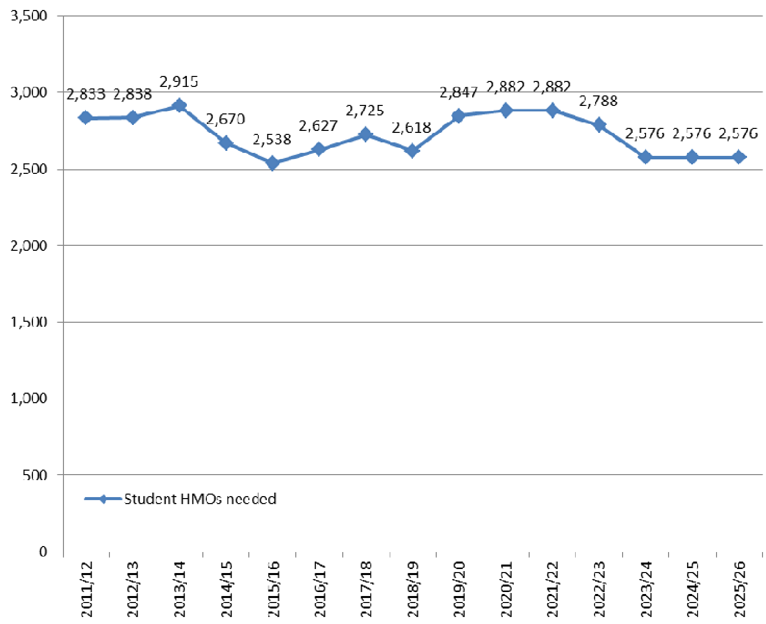
5.18 Theoretically, if the growth assumptions (3,896) and additional need assumptions (3,216) hold true, and all the new bedspaces are built (4,245), then dedicated bedspaces will shift from accommodating 28.0% of demand in 2011/12, 34.8% of demand in 2014/15 to 45.6% of demand by 2023/24.

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.

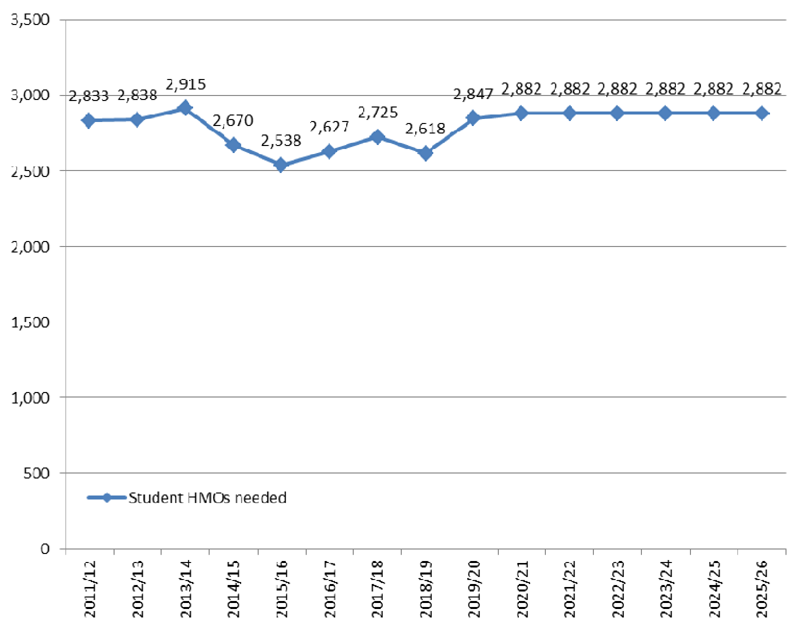
Figure 14: HMO levels under best case scenario



Alterative 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 Rpoert (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-timeon 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 later 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 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.