

Bath & North East Somerset Council	
MEETING	Planning, Housing and Economic Development Policy Development & Scrutiny Panel
MEETING DATE:	Tuesday 5th January
TITLE:	Student Accommodation (Placemaking Plan)
WARD:	All
AN OPEN PUBLIC ITEM	
List of attachments to this report: None	

1. THE ISSUE

- 1.1 This reports sets out the Council's proposed strategy to respond to the demand for Student Accommodation in the Bath through the draft Placemaking Plan. The Panel's comments can be taken into account in the presentation of Placemaking Plan to the Inspector at the forthcoming public consultation.

2. RECOMMENDATION

- 2.1 That the Panel comment on the strategy contained in the Placemaking Plan for responding to the demands for student accommodation.

3. RESOURCE IMPLICATIONS (FINANCE, PROPERTY, PEOPLE)

- 3.1 Preparation of the Placemaking Plan is being funded from the LDF Budget and undertaken by the Planning Policy Team working across the services.

4. STATUTORY CONSIDERATIONS AND BASIS FOR PROPOSAL

- 4.1 The Placemaking Plan is a statutory Development Plan Document and its preparation is governed by statute and regulations. This covers both process and consultation arrangements. Once adopted it will have full statutory weight and will be the primary consideration in the determination of planning applications. The Plan increases in weight as its preparation progresses.

4.2 The Inspector's role at examination is to test whether the Plan is sound. This means that the Council has sought to ensure that the plan is sound in that it (inter alia);

- Has been **positively prepared** – the plan seeks to meet objectively assessed development and infrastructure requirements, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits;
- Is **justified** – the plan is the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Is **effective** – the plan is deliverable; and
- Is **consistent with national policy** – the plan enables the delivery of sustainable development.

4.3 The Draft Placemaking Plan has been prepared in compliance with the Planning and Compulsory Purchase Act 2004 ("the 2004 Act") and The Town and Country Planning (Local Planning) (England) Regulations 2012 ("the Regulations"). Once adopted, it will be a statutory Development Plan Document ("DPD").

4.4 The Draft Placemaking Plan has been subject to a fully integrated Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) in line with the requirements of the SEA Regulations (Statutory Instrument 2004 No. 1633: The Environmental Assessment of Plans and Programmes Regulations 2004).

5. THE REPORT

Introduction

5.1 The increasing demand for student accommodation is one of the key issues currently affecting Bath. This is one of the most high profile issues affecting Bath. As part of the Placemaking Plan process the Council has reviewed the approach in the adopted Core Strategy (2014), in light of new evidence on presented by the Universities on their growth aspirations and the consequent impacts on the City. Whilst the headlines of the strategic planning framework within which the Universities need to operate remains the same i.e.

- the Article 4 Direction on Houses in Multiple Occupation (HMOs) which is flexible in its application via the HMO Supplementary Planning Document (SPD);
- Policy B5 on the management of further higher education related space in certain key areas of the city; and
- on-campus capacity e.g. for the University of Bath on the land that was removed from Green Belt in 2007) its anticipated outcome is less likely to enable delivery of the growth aspirations which was previously intended. The cumulative growth aspirations of the Universities and the related implications for student accommodation have increased since the adoption of the Core Strategy. That needs acknowledgment in revisions to the Plan.

Previous Strategic Assumptions

- 5.2 At the time of the preparation, examination and adoption of the Core Strategy in 2013/14 the combined published growth forecasts/corporate plans of both institutions were lower than the growth rates achieved prior to 2011. The needs related primarily to the growth of the University of Bath. The evidence for Bath Spa University was that it would remain the same size and would thus not generate any further pressures for student accommodation. The extent of the challenge was a need for around another 2,400 bedspaces, most likely needed by September 2020.
- 5.3 In these circumstances the student accommodation needs generated could be met alongside the city's other objectively assessed development requirements and priorities (via a combination of mainly on-campus development, supplemented by some additional off-campus development) and without the need for the already high proportion of student HMOs to increase.
- 5.4 The significance of attempting to hold 2011 levels of student HMOs as a 'high watermark' is because Bath (the city being the logical unit of analysis, not B&NES as a District) has the highest concentration of fulltime Higher Education (HE) students (HESA data), after Oxford. Moreover, unlike Oxford, it does not have the dedicated student residences of a long established college system, and the multiple Oxford Brookes campus locations are less constrained than either Claverton Down or Newton Park. Student HMOs as a proportion of the dwelling stock are therefore very high, more so than in Oxford.
- 5.5 It was recognised that to achieve an actual contraction in the baseline student HMO market (to redress past expansion) would require significant amounts of scarce and valuable land within the city to be developed for post first year student accommodation. In order for the vision for Bath to be realised it was clear that such land would be needed for the delivery of 7,000 additional 'normal' dwellings and other commercial uses, not least office space to provide employment opportunities for population growth.

Updated Strategic Assumptions

- 5.6 Growth aspirations only to September 2020 have been provided in evidence from each University. That is not unreasonable as few institutions plan corporately based on the full timeframes of a Development Plan, but it is quite possible that both institutions will aspire to further growth beyond 2020, if aspirations to that point, or thereabouts are achieved. This is not an exact science and the purpose of the analysis below is to illustrate that there is a clear issue for the city of a considerable scale, rather than to precisely identify potential future needs. Institutions may modify their aspirations, plans or initiatives at any time. Further, the numbers to 2020 present enough of a challenge without speculating to 2029, although for comprehensiveness the conclusion of a long range projection of historic trends is presented as part of the data below.
- 5.7 Summarising a snapshot of the combined position set out in the Student Numbers and Accommodation Study (2015) is difficult as there are

discrepancies between publically available HESA data (which is presented in a consistent format) and the data provided by the Universities during the preparation of the Plan. Further Bath Spa's plan evidence is set out in the form of FTEs rather than actual students. It is desirable that both institutions provide current and forecasting data in a consistent HESA format, and explain in detail how actual total registered students by mode of study are discounted to achieve a demand figure.

University of Bath – aspirations for growth

- 5.8 Data provided by the University of Bath (UoB) in July 2015 in a HESA format shows that it aspires to grow from around 14,000 registered students in 2011/12 to around 19,300 in 2020/21. The forecast growth is very much set to be oriented towards full time study, which generates the greatest need for further study bedrooms. At the start of the plan period around 79% of students were full-time yet 73.5% of total registered students were judged by the University to be in accommodation need in the city (deductions being made for a number of reasons including all part-time students, and full time students on sandwich courses etc). The baseline ratio is forecast to rise to 77.5% by 2020 (as the share of art time students falls). Therefore, the need is currently for around 10,300 bed spaces and this could rise to around 15,000 (if the aspiration is fully achieved).
- 5.9 The aspiration is therefore for 5,300 more students and this would equate to a need for 4,700 more bed spaces to 2020/21

Bath Spa University – aspirations for growth

- 5.10 Data provided by Bath Spa University (BSU) between March and July 2015 is in a different format to that presented by the UoB and lacks clarity in respect of future changes in actual students, their mode of study and accommodation needs arising.
- 5.11 In its representations at Options stage it stated that it aspired to grow from 6,632 FTEs (full time equivalents) in 2014/15 to 10,500 FTEs in 2020/21. This was broken down by year group but not mode of study. In response to the Council's request to back date FTEs figures to 2011/12 the University provided a figure of 6,060. Total aspired to FTE change for the current decade is therefore around 4,500. Clearly there is scope for a high proportion of this figure to be new full time students.
- 5.12 HESA data from 2009/10 to 2013/14 (latest available) on actual numbers and mode of study (which is more useful to assess and forecast housing needs) shows full time enrolment being quite steady at around 6,000 but that part time enrolment has contracted sharply from 3,000 to 1,200. In 2013/14 the ratio was about 83/17. The increase in the full time share of students to this level has also been a feature of change at the University of Bath. If that is to be a new 'norm' then 83% of the increase in FTEs might be full timers (3,835) and the residual 675 FTEs would be made up of something more than that in terms of actual students (say double i.e. 1,350).

- 5.13 If that is so and if aspirations are achieved then full time registrations could increase from 6,000 in 2011/12 to around 9,835 and part time to 2,550. Total enrolment would therefore be around 12,385 (79% full-time and thus less than 83% but of the same order of magnitude). 2011 total enrolment was 8,555 (HESA).
- 5.14 Using full-time students as a proxy for students in need of accommodation (by proxy it means that some full time students won't contribute to needs e.g. they live at home or outside Bath but some part-time students will contribute to need e.g. an undergraduate staying on in an HMO to do a postgraduate course), the need could increase by around 3,895.
- 5.15 BSU signalled to the Council in December 2015 that part of its aspiration (Bath Spa Global programme) was potentially going to be scaled back. Being a generator of full-time students, that change would have a notable effect on the net change in accommodation demand between 2011-/12 and 2020/21. The Council is in dialogue with the University to obtain further data from in HESA format related to this aspiration as stated in March/ July 2015 and in respect of any changes to that aspiration.

Combined Picture of base demand and aspirations

- 5.16 On the basis of the representations received at Placemaking Plan Options Stage (Jan- July 2015) it is prudent for the Development Plan to assume in total that:
- (1) aspired to enrolment would see numbers increase from around 22,500 to around 31,700 (+9,200) to 2020/21
 - (2) accommodation needs would increase from 16,300 to 24,800 (+8,500)
 - (3) that these figures are only to 2020/21 and that if they are not achieved by then, that they may be achieved later in the Plan period. If they are achieved then further growth may be aspired to later in the plan period.

Supply of student accommodation

- 5.17 At December 2015, the Council has taken into account dedicated new supply (on and off-campus) that has been built since 2011, is under construction or is permitted, and estimated additional capacity of not more than 1,000 within specific areas currently shown for accommodation development in the UoB masterplan (2014 update). Exclusive use developments yield around 3, 000 bed spaces (1,700 to UoB and 1,300 to BSU). A further 944 bedspaces that are built, under construction or permitted are currently or potentially available to any student.
- 5.18 However, of these 944 bedrooms, 375 are permitted in outline within Bath Western Riverside (BWR) on part of a BMW/Mini car showroom site that is no longer available. There is some scope to explore an alternative location elsewhere within the BMW site but at present the 375 cannot be seen as commitment as the permission will not be implemented. The 'other

commitments' figure is therefore more robustly viewed as being 569 and it is assumed that each institution students claim a half share. Future property deals on these extra sites could change that assumption.

5.19 This boosts total commitments and master planned on-campus areas to 3,569 (1,985 UoB and 1,585 for BSU) This leaves a residual need of around 4,900 bedrooms (around 2,700 for UoB and 2,300 for BSU) in relation to 2020/21 aspirations. That is equivalent to a need for:

- around 1,225 HMOs to September 2020, or if that is to be avoided
- around 11 more city centre type Green Park House developments (461 beds in 13,500 m². i.e. 148,500 sq.m. overall) or ,
- around 15 more out-of-centre type Twerton Mill Developments (327 beds on 8,700 m². i.e. 130,000 m². overall)
- that is an opportunity cost of around 1,700-1950 normal apartments or 60,000 sq m of office space and 900-1,150 apartments, and the affordable housing component which could be secured within that.

5.20 These numbers would of course increase significantly if the trajectory of aspiration to 2021 was achieved and continued to 2029. As an illustration, for the UoB alone, if the long term annual rate of growth of around 4% is projected forward, it would increase needs by a further 5,500 bedspaces (1,375 HMOs or a further 12 Green Park House Developments).

Policy approach

5.21 The Council still seeks to enable, as far as possible, the continued success of The UoB and BSU and the contribution they make to the city's identity, profile and employment base, and their a wider contribution to the UK skilled workforce and GVA. The provision of student accommodation is a high priority for the Universities and the Council also understands that each institution aspires to invest in and spread its academic and administrative estate in order to continue to provide high standards, in what is becoming an increasingly competitive higher education market. The Council is also aware Governments Higher Education Green Paper (November 2015).

5.22 However, in terms of the strategy for Bath, the University development requirements and aspirations form part of a whole suite of demands on a highly constrained city, which is a relatively small as a host for two universities and which has a limited land supply for meeting all development needs in full (see Table 1 below). Thus, difficult choices need to be made and the completion of the review of the Development Plan has highlighted such matters and site specific and derailed topic based polices have come under the spotlight. For example elsewhere in this Plan the Council has determined that it cannot meet the need for identified longer term retailing capacity without impacting on other objectives that it is has prioritised.

5.23 The development of new academic space and student accommodation are clearly matters that require policy direction in the Local Plan at a strategic and site specific level. The Council is mindful that the growth in student numbers has not been accompanied by sufficient on-campus study bedrooms but that the associated expansion of the student lettings market (which the National Planning Practice Guidance or NPPG allows as part of the solution to student housing issues) has diminished the 'normal' housing stock of the city, cancelling out, in part, gross additions to the stock. Whilst a student HMO sector is a common feature of University towns its current size in relation to Bath is already a cause for concern and the idea of it increasing further exacerbates this concern for interest groups including residents associations and those seeking to secure a house to rent or buy. The issues relate to the retention of mixed neighbourhoods in the city and also the maintenance of the conventional stock of residential properties from a strategic perspective.

Table 1: Development needs /demands in Bath

- around 60,000 – 70,000 m² of new office floorspace.
- projected capacity for approx. 30,000 m² of comparison retail up until 2029.
- around 7,000 dwellings in Bath (Core Strategy), of which around 3,300 dwellings are in the Enterprise Area.
- demand for between 931 and 1607 new hotel bedspaces by 2030, probably within the Central Area. Spatially, and to only meet the lowest capacity, this is broadly equivalent to five more Apex hotels.
- very significant demand for new student accommodation arising from revised university expansion plans. This is broadly equivalent to 11 new Green Park Houses or 150,000 m² of floorspace (see separate paper).

5.24 Some stakeholders have requested a dedicated student accommodation strategy to inform planning policy. In the Council's view the reality for Bath is that the approach to this issue cannot stand alone outside of an overall integrated suite of planning policies for the whole city that considers and balances all uses and all issues. The approach to higher education and student accommodation can only make sense against the background of the full spatial planning context and its drivers. The Council cannot direct the Universities not to aspire to grow. It can only look to achieve the full scope of all needs /requirements/ aspirations affecting the city and seek to

meet them in a sustainable way within its unique collection of environmental constraints. In a place such as Bath that may also involve a scheme of prioritisation of uses. The choices that are made affecting this issue are intimately interlinked with the choices that are made for others. The statutory Development Plan and the plan-making process is the place to set out and test policies affecting this issue and this is what the Plan does.

- 5.25 Should any interested party view the approach as unsound then detailed modifications will need to be suggested to the examining Planning Inspector
- 5.26 The implication of the Plans policies and associated tools such as the Article 4 Direction (and accompanying SPD) is that aspirations may not necessarily turn into outcomes unless, for example the UoB begins to utilise its non-green belt estate for follow-on accommodation and that one or both institutions supplement what has been already been secured in the city, with limited further windfall potential sites and solutions elsewhere. The effect of the Plan will be to contain to a significant degree the level of further in city sites.
- 5.27 The Council has considered additional measures/policies such as refusing teaching space when dedicated accommodation supply is generating a need for more than a certain number of HMO bedrooms. Such an approach is in place in Oxford, but it is not considered to be a tool to be deployed yet in Bath as new teaching space is not only about enabling growth but improving existing conditions, there is not an equivalent B5 policy in Oxford, and both Oxford Universities have more land ownership options. Such a mechanism will though remain an option for future plan reviews.

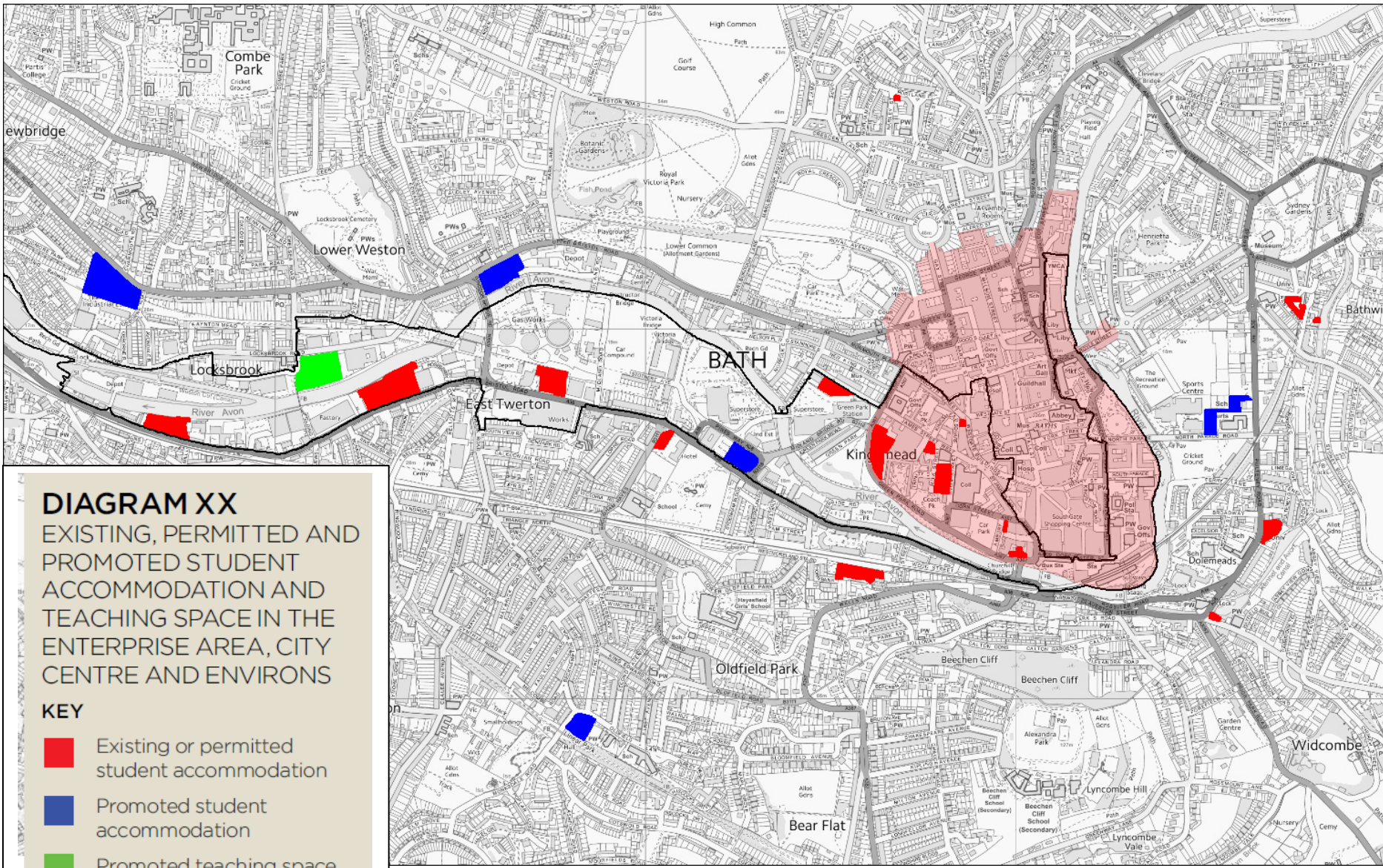


DIAGRAM XX
 EXISTING, PERMITTED AND
 PROMOTED STUDENT
 ACCOMMODATION AND
 TEACHING SPACE IN THE
 ENTERPRISE AREA, CITY
 CENTRE AND ENVIRONS

KEY

- Existing or permitted student accommodation
- Promoted student accommodation
- Promoted teaching space

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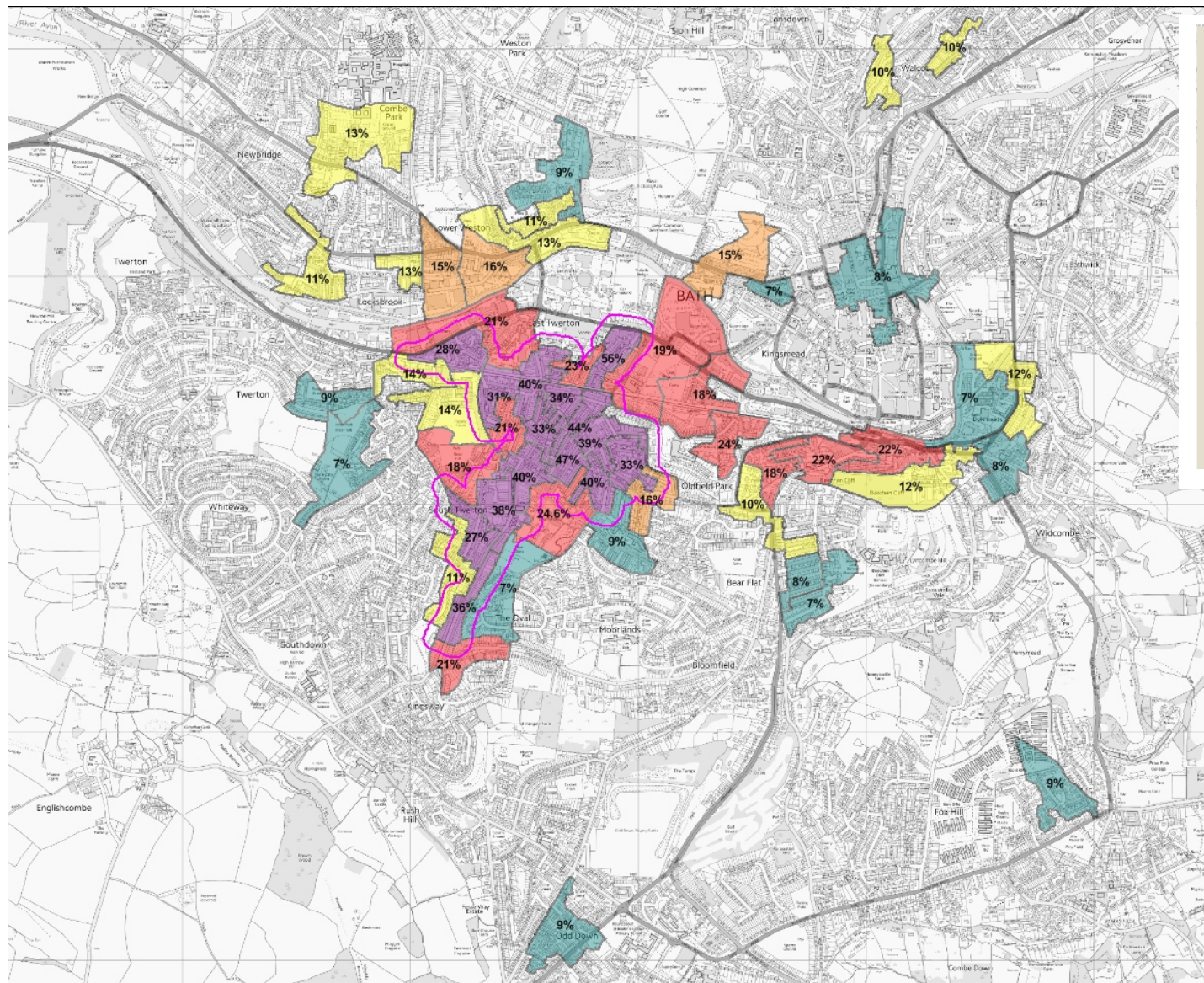


DIAGRAM XX
 CONCENTRATIONS OF
 HOUSES IN MULTIPLE
 OCCUPATION (WHERE
 AT LEAST 7% OF LSOA)

KEY

- November 2015 Stage 1 test area for Houses in multiple Occupation SPD

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In-City Student Accommodation Blocks

- 5.28 In presenting the analysis it is crucial to understand that the District's housing requirement of 13,000 dwellings and the quantum that is to be delivered at Bath (7,000) relates to non-student dwellings only. Whilst the NPPG states that student housing can count towards a housing requirement, that is only logically the case, as recognised by the Core Strategy Inspector, when that requirement itself includes a component of student housing (as a bed space equivalent). In B&NES that is not the case. Student housing needs are a separate component of specialist demand in the form of bedspaces and on the evidence above are clearly volatile – hence why they are assessed separately.
- 5.29 Whilst the NPPG also states that student accommodation can be counted based on the amount of housing that is released, this only holds true if the Universities are not growing and not using that new accommodation to achieve that growth. Where this is the case, new accommodation to enable more recruitment can simply 'fan the flames' of the HMO housing market by generating ever increasing demands for follow-on accommodation (i.e. more demand for HMOs or further accommodation blocks). Whilst short term boosts to supply recently achieved by BSU can have a short term positive effect, in the longer term once fully occupied with first years they will create further downstream demands. Neither University has historically had an eye to investing in land for follow-on demands. It is clear from BSU representations on the Options document that the space it has secured is to enable the growth in first year intake.
- 5.30 There will always be an opportunity cost of allowing student accommodation blocks with the city. Up to a point this cost is manageable as it will not impact upon the achievement of the city's overall development programme as set out in Policy B1 of the Core Strategy. However, beyond a certain point, the opportunity cost of developing too much land in the city for student accommodation or teaching space becomes harmful to the realisation of objectives for housing, affordable housing and employment space. Whilst a number of in-city private sector accommodation projects have been permitted since 2011, this was prior to the adoption of Core Strategy Policy B5, when its 'controls' were not in place. However, having regard to monitoring data those developments have not put at risk the objectives to which B5 relates – but they increase the scarcity value of the land that is left to achieve those objectives.
- 5.31 The risk identified is not helped by the fact that student accommodation is currently one of the most the most lucrative form of real estate investment and is therefore often the most commercially attractive option to landowners. There is a risk that without a suitable planning policy framework, this sector will squeeze out the achievement of other requirements and that change in Bath will become focused too much on housing a transitory learning population (not all of which will go on to use their skills in the city, sub-region or even within the UK economy) than housing a more permanent and working population and achieving employment space and affordable housing outcomes. Further even if a new accommodation block did measurably (as

opposed to in theory) release some HMOs back to the stock this would not be a release of affordable housing, and the affordable housing that could have been provided on the student accommodation site will have been forgone.

5.32 In the Council's analysis there is not the land within the city ('city' does not include on-campus land) to enable the aspirations of the Universities (even if these were curtailed somewhat) without significant negative effects on other priorities – hence the approach set out in Policy B5 of the Core Strategy. This is not a blanket moratorium on further student accommodation blocks within parts of the city to which it relates, but these will be limited to windfall sites that are not identified for other uses in the HELAA or allocated in the site allocations section of the plan. The site allocations section of the Plan identifies a number of sites that will change during the plan period within and outside Policy B5. None of the site allocations policies identify student accommodation as part of the land use mix – and where windfall sites do become available other interested parties as well as the Universities, for example Bath City college or language schools, may be interested in that land. The LPA cannot control who within the same planning use class secures the land. Due to the scale of the development challenge the Council has earmarked much of the land that is available / developable for specific uses. The scope for windfall potential is limited.

5.33 This policy framework of prioritising the achievement of targets for other land uses in key areas of the city will implicitly result in significant containment effects in respect of student accommodation block. It will likely direct even more attention to the further growth in student HMO market as a source of supply and to on-campus options. However, that too is constrained

Houses in Multiple Occupation (HMOs)

5.34 Relative to other places the proportion of the housing stock that has already been converted to student Houses in Multiple Occupation (HMOs) is very high, higher even than in Oxford. The proliferation of HMOs in Victorian terraces in the Oldfield Park/ Westmoreland area is the most visible consequence of the mismatch between the growth in students and dedicated on-campus and off-campus accommodation development.

5.35 In July 2013 in recognition of this proliferation an Article 4 Direction was made to require a planning application for the change of use of a C3 dwelling to a C4 HMO in Bath. An accompanying SPD current applies a 25% threshold for streets/ neighbourhoods in the city, after which permission will be refused. The existing concentration of HMOs in the Oldfield Park area has now reached that threshold (in many cases the threshold was already significantly breached prior to the Article 4 Direction being made). Variations to the SPD can be made outside the full plan-making process to loosen or tighten the application of the Article 4 Direction in a targeted or city-wide way. However, the Council is aware that HMOs play a role beyond housing students and is mindful of this role. Whilst there are HMOs in other parts of the city it is not clear whether landlords can/will increase their portfolios at the rate required to enable the Universities aspirations to be met.

- 5.36 It seems unlikely that the unprecedented rate of increase that the Universities would require would take place given that the hotspot (Oldfield Park area) has no further headroom for growth and when it would require the market to colonise areas with housing type profiles and asking prices that are very different to the Oldfield Park area. Some further HMOs can though be expected to be permitted. There have been 78 more HMOs permitted in the 29 months from July 2013 (32 per annum). That is far below the rate that would enable HMOs to exclusively meet the Universities residual needs relating to their aspirations to 2020. The conversion of a C3 dwelling to a C4 HMO is to be counted as a loss of a C3 dwelling housing in respect of monitoring net additional housing supply for the plan period and in respect of 5 year housing land supply, and these losses will require corrective action at plan review if the 7,000 net dwellings target for the city is at risk. The SPD can be varied to manage the extent of change and the risk of that happening.
- 5.37 A significant increase in student HMOs in Bath to 2020/21 or beyond would put the achievement of 7,000 net additional dwellings at risk and put considerable pressure on 5 year housing land supply for the District. The Council would not view it as sustainable to make corrective action for a further 1,200 HMOs. It does not see any options for corrective action on the edge of Bath, not solely for Green Belt reasons but in respect of the significance of the World Heritage Site by virtue of impacts on its setting. Further, making corrective action for that level of development further afield is significantly less sustainable than retaining that supply within the city itself. The situation will be monitored and the SPD for the Article 4 Direction reviewed and amended as deemed necessary.

On-campus Development

- 5.39 Whilst it might be supposed that on-campus land would/should be the first/preferred planning policy option for follow-on accommodation space, it has in reality been the last. This is not sustainable for the city as a whole. Each campus has different constraints that affect the provision of follow-on space.
- 5.40 Site allocations policies have been made for the UoB campus at Claverton Down (including the Sulis Club) and for BSU campus (but not including Sion Hill for which generic development management policies will be used to manage change). The UoB's and BSU's work in preparing and consulting on estate and campus masterplans demonstrates the value of proceeding on a strategic basis and has provided part of the evidence base to inform planning policy for future development.
- 5.41 The UoB has the scope to utilise land that was removed from the Green Belt in 2007, together with land within the core parts of the campus to enable it to achieve its aspirations for growth (in terms both of student accommodation and academic space). In respect of student accommodation, beyond that which has been identified in the masterplan, the site allocations policy enables significant change, but it is for the University itself to determine the

balance it wants to achieve between non-green belt playing pitch provision and aspired to growth, and the rate of growth.

- 5.42 BSU has less control over its future in respect of securing net additional student accommodation at Newton St Loe for the reasons set out in the site allocations policy. Further net additions to housing supply at Newton Supply (to that built since 2011) is unlikely although older stock can be replaced within the confines of NPPF:89. Whilst BSU has secured much of the purpose built housing that developers have had permitted in the city, this will not fully accommodate the growth envisaged for all year groups. No site specific deliverable solutions to enable further increases in housing supply specifically for BSU can be identified in the Development Plan at this time. Any proposals would be dealt with on their merits via generic development management policies in association with Policy B5 (if the site is within the affected area). Other (new) campus locations that do not have an opportunity cost for the city may be needed either within or outside B&NES.
- 5.43 No alterations to the Green Belt boundary beyond that previously made in the Local Plan are envisaged during the Core Strategy period. However, the nature of exceptional or very special circumstances is that they cannot be predicted and the Council will need to consider such circumstances, on their merits, at the time they are presented.

Summary

- 5.44 The approach of the Local Plan is to enable the realisation of a sustainable balance between the aspirations of each university, the concerns of communities and the overall functioning, performance and environmental quality of the city and its setting. The city currently over performs as a host to higher education yet under performs in relation to employment space and conventional housing. These are the Plans priority land uses for the key areas of the city where most change will take place
- 5.45 The overall strategy of the Development Plan is to enable the Universities to fulfil their ambitions, as far as possible, without those ambitions having a negative impact on the realisation of the Council's wider strategic planning requirements for the city, nor an unacceptable environmental impact on the University campuses or their environs, nor an impact on the existing normal housing stock of the city. Whilst a number of in-city accommodation blocks have been permitted since 2011, the residual supply of land to 2029 dictates that further supply must be controlled in specific parts of the city where necessary (though not affordable housing and economic strategies will not be deliverable. This also applies to teaching space.
- 5.46 Bath is a compact city and there a few places that can be regarded as unsuitable in transport terms in respect of windfall student accommodation outside of the Enterprise Area and Central Area (albeit these are the most sustainable areas and opportunity further afield would be limited in number and scale). There will be some further increase in HMOs within the city, and as a consequence of this, if the target of 7,000 dwellings for the city is put at risk, the plans to respond to the City's significant need for new housing severe need for new housing in the City would be prejudiced and

compensatory housing provision would be needed at full Plan Review (2019/20). This would need to take account of recorded changes in the stock of HMOs. The SPD accompanying the Article 4 Direction can be used to manage the growth of HMOs.

POLICY B5

Placemaking Plan Strategic policy for universities, private colleges

Overall Approach

Planning decisions should enable, as far as possible, the aspirations of the University of Bath and Bath Spa University to be met, within the context of environmental sustainability and the need to deliver the full spectrum of other development requirements for the city, in the city.

Off-campus Student Accommodation and Teaching Space

Proposals for off-campus student accommodation (whether in the form, C2, C4 or sui generis residential units) or teaching space will be refused within the Central Area and the Enterprise Area where this would adversely affect the realisation of the vision and spatial strategy in relation to for delivering housing, and economic development (in respect of office, industrial, retail and hotel space) Housing Market Impacts Between 2011 and full Plan review the number of C3 dwellings permitted to convert to (Class 'N' Council tax exempt) C4 Houses in Multiple Occupation will be monitored and compensatory provision will be made if the achievement for 7,000 net additional dwellings for the city is at risk.

6 RATIONALE

- 6.1 The rationale for the agreed strategy is included in the analysis section 5 above

7 OTHER OPTIONS CONSIDERED

- 7.1 National Policy requires that reasonable alternatives are considered in process of developing the preferred strategy. The Placemaking Plan Issues and Options document sets out the alternative approaches considered.

8 CONSULTATION

- 8.1 Preparation of the Placemaking Plan has been subject to extensive community engagement and consultation with key partners and stakeholders.
- 8.2 The pre-submission draft Placemaking Plan is now being subject to consultation under Regulation 19 of the Town & Country Planning Regulations 2012.
- 8.3 The Council's Finance Officer has been consulted in the preparation of this report

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>Lisa Bartlett 01225 477550, Simon de Beer 01225 477616</i>
Background papers	<ul style="list-style-type: none">• <i>B&NES Core Strategy 2014</i>• <i>National Planning Policy Framework</i>• <i>National Planning Practice Guidance</i>• <i>B&NES Economic Strategy</i>• <i>Placemaking Plan Issues & Options document</i>
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