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BRISTOL CIVIC SOCIETY RESPONSE TO BRISTOL CITY COUNCIL'S DRAFT SPD ON PURPOSE BUILT STUDENT ACCOMMODATION (PBSA) AND SHARED LIVING.

1.0 Introduction.

1.1 Bristol Civic Society welcomes the opportunity to comment on this formative stage of the SPD for purpose-built student accommodation (PBSA) and shared living. Tighter policy advice relating to these issues is much needed and the draft is welcomed. The Society is very conscious of the balance that has to be struck between the needs of the student population and the requirements of the resident population. We also recognise that the universities bring benefits to the city but that these must not be at the expense of other land uses and good planning practice. Our comments are set out below.

2.0 Summary.

2.1 The Society's concerns and comments relate to the following issues:

- Policy Matters:
 - The interpretation of National Planning Policy Guidance (NPPG) particularly concerning the balance to be struck between the requirements of residents and students;
 - The basis for calculating student residential requirements in Bristol;
 - The wider impact of student accommodation.
 - The definition of large-scale
- Technical Issues:
 - The calculator and its implementation;
 - Measuring concentration including shared housing;
 - Difficulties with the map identifying suitable and unsuitable locations for student accommodation (Fig. 2).
- Other planning issues:
 - Design and private open space policies guidance, and cycle parking provision standards need clearer definition;
 - Adverse impacts;
 - The impact of PBSA on the availability of other employment generating land uses must be carefully managed.

- Affordability:
 - Consistency between policies on affordable housing.
- Shared housing concentration assessment.
- Climate change issues:
 - Ensuring design does not lead to later requirement for retro-fitting air conditioning;
 - Need to keep operational energy demands are low.

3.0 Policy Matters.

Balance between supporting the needs both of students and the resident population.

3.1 The Society considers that the way in which the SPD has been worded in referring to NPPG slightly tips the balance towards the needs of students when considering the needs of students for accommodation and the needs of the resident community.

The SPD states,

“Local planning authorities are also encouraged to consider the needs of students alongside local residents before imposing caps or restrictions on students living outside university-provided accommodation.”

The NPPG states,

“Strategic policy-making authorities are encouraged to consider options which would support both the needs of the student population as well as local residents before imposing caps or restrictions on students living outside university-provided accommodation.”

3.2 The Society believes that the balance would be better served if the SPD more clearly considered options which **supported** the needs both of the student and resident populations. Supporting the needs of the resident population should be reflected in considerations of density of student accommodation and its wider implications not just in the immediate locality of student housing but, for example, along the routes used by students to get between where they live and their academic and social venues; a point developed below.

Basis for calculating the requirement of PBSA

3.3 We believe that the basis for calculating the requirement for PBSA needs further consideration. Firstly, there is a statistical point which needs to be clarified. At one point the SPD states,

“Student numbers at the University of Bristol and the University of the West of England have increased by 18% since 2006/07 with current numbers totalling some 41,000.”

This is the basis for a PBSA requirement of 6,400 bed spaces by 2028. Later the SPD states,

“Student numbers at the University of Bristol and the University of the West of England have increased by almost 30% since 2001/2 with numbers in 2019/20 totalling some 58,000.”

There is a considerable difference in these numbers and the Society wonders if the 6,400 bed space requirement needs to be reconsidered in the light of the higher figure.

3.4 Secondly, the opportunity to support the needs of the resident population could be better served with a different rationale for calculating the number of PBSA units provided. The SPD states that future growth in student numbers should be met with PBSA. It states,

“This will ensure the local housing stock remains available to meet general housing needs and to limit further impacts on residential areas through the growth of HMOs.”

The Society believes that this does not fully reflect national policy which states,

“Encouraging more dedicated student accommodation may provide low cost housing that takes pressure off the private rented sector and increases the overall housing stock.”

We urge the Council to seek sufficient PBSA in order to encourage the freeing-up of HMOs for low cost renting for the local population and / or frees up family housing stock.

3.5 Relating to this point the SPD states that PBSA is not desirable for all students. Evidence for this should be provided and quantification of the numbers for which PBSA is not desirable should be included based on the evidence.

Wider impact of student accommodation

3.6 The SPD rightly lists many of the impacts student accommodation can have in its locality. The Society contends that that these impacts are not just borne where the student accommodation is located, but along the desire lines between home and facilities frequented by students, particularly pubs and nightclubs. There is significant noise and other disturbance to many localities from students returning home in the early hours of the morning from social venues. The SPD must consider these ‘non-static’ impacts in order to be sound.

3.7 The identified impacts also omit (in the case of HMOs) the effect of concentrations of students on community cohesion given transient populations generally have less of a stake or interest in their geographical community particularly in comparison to local residential communities. A more transient population is also less stable in terms of providing support for shops and other local facilities. How are non-residential uses to be sustained outside term, time for example?

3.8 In the discussion of mixed-use there is a requirement that proposals for large-scale purpose-built student accommodation development in suitable locations should, where appropriate and feasible, include a proportion of other compatible residential uses. For clarity, what is envisaged as a compatible residential use, how will “appropriate” be assessed?

Definition of large scale.

3.9 What are the thresholds for “large-scale PBSA” and “large-scale shared living development”? Is there any relationship with the reported (page 19) “Larger scale developments should generally exceed 250 bed spaces”?

4.0 Technical Issues.

The calculator and measuring concentration

4.1 Whilst recognising the difficulties of consistent measurement of the density of PBSA and shared housing in any given area, the Society has a number of concerns with the suggested approach and calculator.

4.2 The illustration shown in Fig 1 excludes existing PBSA from the threshold assessment for proposed PBSA simply because the site point for the existing PBSA (as defined by the Local Land and Property Gazetteer) is outside the 200m buffer zone. This would result in the omission of a significant number of PBSA spaces that are actually located in the buffer zone. Any PBSA falling within the buffer zone should be included in the calculation. It is the total number of PBSA bedspaces in the buffer zone that defines a harmful concentration. If BCC was to persist with using the site point approach then there should be ready, public access to the Local Land and Property Gazetteer to enable members of the public to understand the calculation.

4.3 Clarification is required for how the model would be applied in areas where space which cannot be developed, such as water or railway land, is within the 200m radius. We are

concerned that this might pave the way for very dense PBSA developments within the developable area but still within the limit for the circle as a whole.

4.4 The Society is not convinced by the explanation given for choosing a 200m radius. This needs further clarification.

4.5 The Society also suggests that the areas where further PBSA would create or contribute to a harmful concentration should be modified to exclude areas where there is already no residential population. PBSA can bring vitality to such areas without disturbing residents.

4.6 The Society agrees that harmful conditions could arise in a locality when impacts arising from different forms of existing shared housing, including HMOs and or shared living accommodation, combine with impacts arising from existing and or proposed purpose-built student accommodation. We therefore welcome in principle the approach set out in the box on page 11 (“Harmful concentration - Shared housing”) but it is unclear how the third leg of the approach will be delivered consistently. What are the metrics / threshold for determining when “The relative concentration of HMOs and purpose-built student accommodation together with the number of existing or proposed shared living bed spaces within the neighbourhood area combine to create or contribute to a harmful concentration of shared housing overall.” and therefore “Proposals for the development or intensification of purpose-built student accommodation are unlikely to be consistent with Local Plan policy”? And what is a “neighbourhood area”?

The map in Fig 2

4.7 A much clearer map showing the boundaries of suitable and unsuitable areas for PBSA is required.

5.0 Other Planning Issues.

Design and amenity space

5.1 National planning policy sets out an expectation that, “The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. “

It should be made explicit in the SPD that PBSA developments are not an exception to this.

5.2 The Society notes that the SPD states that balconies and roof terraces should not be provided to ensure safe environments for students. It is vital, however, that PBSA developments meet normal standards of providing private amenity space and the SPD should confirm this. If PBSA are to be truly adaptable to other residential uses, private amenity space is essential.

Adverse impacts of PBSA

5.3 The Society suggests that graffiti removal is added to the list of measures to be addressed to prevent adverse impacts arising from PBSA. Also, impacts arise from the collection of refuse and recycling as well as from storage. Both facets need to be considered.

Consideration should be given to how such measures are funded and enforced given the constraints local authorities are experiencing in both these areas. Otherwise, the clean-up costs are borne by local communities.

Cycle parking

5.4 Cycling parking provision could be more prescriptive, such as a set percentage of cycle space provision per number of occupants. Bearing in mind the client group, provision requirements should be set at a fairly high level.

Impact on employment generating land uses

5.5 PBSA are featuring in redevelopment proposals for areas containing considerable amounts of employment generating uses such as St Philips Marsh and Bedminster. Although there is clearly scope for the employment generating capacity of such areas to be consolidated more efficiently, areas considered for accommodating PBSA should provide for retaining other employment generating uses.

6.0 Affordability.

6.1 The Society believes there is an inconsistency between the SPD's encouragement of cluster flats to achieve affordable student accommodation and the draft policy H7 in the emerging Local Plan. In mixed residential developments, other than the specified PBSA locations, the latter requires self-contained accommodation to provide a contribution toward general purpose affordable housing in line with the Joint Spatial Plan Policy 3. Cluster flats are unlikely to fall within the requirement to contribute to general purpose affordable housing.

6.2 It is important that the SPD is clear and precise in its intentions, not least for local communities hosting PBSA. In the discussion of affordable student accommodation there is a requirement for PBSA to only provide "facilities and amenities that are appropriate, relevant and necessary to the student experience." How is 'appropriate, relevant and necessary' to be determined?

7.0 Shared Housing Concentration Assessment

7.1 Again for clarity, does "applied across all areas" in the advice that "For the purposes of the shared housing concentration assessment relevant bed space density thresholds for purpose-built student accommodation should be applied across all areas" include areas identified as suitable for PBSA (given advice on page 9 says "The bed space density thresholds will not apply to areas identified as suitable for purpose-built student accommodation as shown in Fig. 2.>").

7.2 Similarly, what is the neighbourhood level for the purposes of "Shared housing concentration assessments should be undertaken at the neighbourhood level, however this should not preclude assessments being undertaken at other appropriate geographical levels."; what are "other appropriate geographical levels"; and, how will the most appropriate geographical area be determined?

8.0 Climate Change Issues.

8.1 Clear advice should be given to address issues which could undermine the Council's broader objectives for mitigating climate change. Due to the high density living arrangements of student accommodation the internal heat gains are higher than would be for a standard

residential design. Careful consideration of this needs to be demonstrated in design proposals, to avoid the need for retrofitting 'bolt-on' air conditioning equipment.

8.2 The Society also feels strongly that the SPD should encourage building performance to a Passivhaus standard or equivalent to ensure that operational energy demands are low and enable our 'net zero by 2030' requirement to be met, internal heat gains are well accounted for, overheating is mitigated and does not rely on energy intensive cooling strategies or bolt-on retrofitting of equipment.