

Purpose-built Student Accommodation and Shared Living Supplementary Planning Document - Consultation version (November 2021)

Summary of main issues raised

Universities, PBSA providers and agents

- **Should be more supportive and encouraging of PBSA and shared living development.** Many considered that the benefits and positive effects of this type of accommodation should be identified, in particular relieving pressure on the city's housing stock, reducing dependence on HMO's, supporting the housing needs of younger people, contributing to housing choice and mix, delivering regeneration, creating vibrant communities and supporting the sustainable and efficient use of land.
- **Should be more supportive of students and highlight their contribution to the city.** Many considered that the document's commentary and guidance infer a bias against students and young people.
- **Not legally compliant.** Mostly all expressed concerns that the guidance is contrary to the planning regulations and national policy used to define the purpose, scope and permissible content of an SPD. This included content which...
 - Is not in conformity/inconsistent with adopted Local Plan policies.
 - Provides guidance on policy issues not set out in the adopted Local Plan;
 - Constitutes new policy that should be set out in a Local Plan document;
 - Pre-empts policies in the emerging Local Plan.Particular concerns were raised over content relating to affordable student housing, harmful concentrations, the location of PBSA, shared living and mixed use.
- **Will restrict the supply of PBSA and shared living accommodation and does not reflect the scale of need for student accommodation.** All expressed concerns that restrictions in supply would result in: increased HMO demand and growth/pressure on the housing stock, higher rents and less affordable accommodation, less choice and poorer quality of accommodation, a worsening of the council's unmet housing need, missed regeneration opportunities and constraint to the growth of Bristol's academic institutions with consequential impacts on the city's economy. Some also considered that any assessment of student housing need should factor in the current shortfall (in addition to future need), provide an accurate projection of UoB need, consider the need arising from students at UWE and other higher education institutions and factor in the need to replace out-dated accommodation.
- **Harmful impacts have been misrepresented/misunderstood.** Many expressed concerns that the guidance conflates problems of poorly managed HMOs with PBSA and shared living, and incorrectly links the delivery of such housing with harmful effects such as reduced housing mix/choice and displacement of traditional housing supply. Some considered that any

residential amenity impacts caused by PBSA should not be an issue in the city centre and can otherwise be mitigated through management plans. Others suggested that there are sufficient existing policy controls to prevent harmful impacts.

- **The PBSA threshold and shared housing assessments are flawed/too restrictive.** All expressed concerns over the implications and the application of the harmful concentration assessments. The key concerns are set out as follows:
 - The harmful concentration assessments represent an unjustified blanket approach that takes no account of context/variances across the city and provides for no officer discretion. The assessments should be used as indicators rather than absolute tests.
 - The PBSA bed space densities are too low and inconsistent with the Local Plan approach to density and national policies. The approach ignores the benefits of high density development.
 - The overall approach will increase land values.
 - The overall approach is not clearly linked with the assessment process set out in relevant policies.
 - The application of the PBSA threshold assessment is inconsistent with the HMO SPD and relevant Local Plan policies.
 - The shared housing assessment is vague and inconsistent with the PBSA threshold assessment.
 - Research into the shared living market, its requirements, the need for it and the value it delivers should be undertaken to inform appropriate guidance.

- **The PBSA location approach is inflexible/too restrictive.** General support given to the principle of identifying suitable areas, in particular Broadmead/Frome Gateway and Temple Quarter, but many expressed concerns over the implications and the application of the approach. The key concerns are set out as follows:
 - The approach will increase land values.
 - The approach includes an unjustified blanket presumption against PBSA in certain areas.
 - The approach is UoB centric and does not consider the requirements of UWE.
 - Needs to be a clear link between the harms explained in the relevant Local Plan policies and the unsuitable locations identified.
 - The provision of bed spaces in suitable locations will be off-set by the restrictive thresholds.
 - The approach misapplies/contradicts the guidance in policy BCAP4 relating to locations identified as suitable and unsuitable for clustering.
 - The use of CAPs should be reviewed/reconsidered. The CAPs are too low, do not reflect overall need/need between areas, should only be used where there is clear evidence of harm and do not take account of context/variances across the city.

- **No evidence provided to support the guidance.** All expressed concerns that no evidence or explanation has been provided to justify the guidance. The key concerns over lack of evidence related to:
 - The PBSA bed space density thresholds and why exceeding these

- thresholds would be harmful.
- The shared housing assessment and why failing this assessment would be harmful.
- Unsuitable areas for PBSA and why development in these areas would be harmful.
- The bed space CAPs and why exceeding these CAPS would be harmful.
- The identified need for PBSA bed spaces.
- The need for affordable student housing.

- **Will add to the cost of development/restrict the viability of development.** Many expressed concerns that the guidance will have implications for the cost and viability of development. The key cost and viability concerns are set out as follows:

- Providing affordable student housing.
- Providing a mix of uses, in particular mainstream housing. There is no national policy basis for mixed use.

Restricting the density and therefore the bed space capacity of PBSA proposals.

Student interest groups

- **Portrays students in a negative light.** All considered that student accommodation concentrations should not be described as harmful; other tenant/minority groups are not described in this way. All expressed concerns that the guidance falsely assumes that students are harmful to the local community.
- **Will restrict the supply of PBSA and does not reflect the shortage of needs.** All expressed concerns that restrictions in supply would result in: higher rents and less affordable accommodation, further competition in the private rented sector, less choice and poorer quality of accommodation and investment in PBSA being driven elsewhere.
- **Should define and provide further detail on affordable student housing.** Considered that a definition of affordability, linked to the Government maintenance loan, and further measure to improve affordability and to strengthen delivery processes should be provided.
- **No evidence provided to support guidance.** Concerns expressed that no evidence or explanation has been provided to justify the guidance. The key concerns over lack of evidence related to:
 - The PBSA bed space density thresholds and why exceeding these thresholds would be harmful.
 - Unsuitable areas for PBSA and why development in these areas would be harmful.
 - The bed space CAPs and why exceeding these CAPS would be harmful.
 - The negative impacts of PBSA identified by the guidance.

Residents' groups, amenity societies, Councillors and the public

- **Could say more about the positive contribution students make to the city.** Some suggested that the Council could say more about the contribution students make to the socio-economic life of the city.
- **Need for student accommodation underestimated.** Some expressed concerns that the Council have underestimated the need for student accommodation and the consequent impact on communities. Restricting accommodation could have unintended consequences.
- **Harmful impacts of PBSA need to be properly defined.** Many acknowledged that impacts from PBSA are different to those of HMOs. Such impacts are less related to on-site issues but arise due to high levels of student pedestrian traffic moving through residential areas where PBSA concentrations exist.
- **PBSA bed space density thresholds and shared housing assessments supported in principle but approach questioned.** General support for harmful concentration tests but concerns expressed over their application. In particular, the need to apply the tests at the street, neighbourhood and ward level, as per Local Plan policy, and the need for a single metric or a consistent/objective approach when undertaking assessments of PBSA, HMOs and other forms of shared housing. Widespread concerns also expressed over how PBSA would be counted and other questions/concerns/suggestions expressed on the detailed process for assessing harmful concentrations.
- **Review approach to location of PBSA.** No objections in principle to the identification of suitable and unsuitable areas for PBSA but a wide range of views expressed on where these areas should be. Stoke Bishop and Western Harbour were not generally supported, other areas also raised some concerns. Additional suitable areas were suggested including areas within a 15 minute journey time from the universities, the city centre, areas with no residential context and other specific locations. Additional unsuitable locations were also identified including the city centre.
- **Support for affordable student housing.** General support for the intent/approach to secure affordable student housing. Some suggested the inclusion of the NUS definition of affordability.
- **Mixed response to shared living approach.** Some considered the approach to shared living, in terms of locations and assessing harmful concentrations, should be different to PBSA. Some suggested there was demand for shared living across the city and expressed concerns that delivery may be restricted outside of the city centre. Others supported the approach to shared living and some considered the guidance to be of little use.
- **Further explanation/clarification required on content.** Many considered that further detail was required on a range of issues. Many requested the need for a robust definition of PBSA and a clear distinction between PBSA and other forms of shared accommodation including HMOs. Other requested further detail on the harmful concentration assessments, the approach to

affordable student housing, student bed space CAPs, the approach to mixed use and accommodation need/supply.

- **Compliance with national codes for PBSA should be sought.** Many requested the SPD seek membership of and compliance with national codes for PBSA. Many considered this would also help with defining PBSA.
- **Definition of PBSA should be reviewed.** Many requested that the 10 bed space threshold used to define PBSA should be increased. This would ensure larger HMO accommodation is defined as an HMO rather than PBSA. Others suggested alternative approaches to define PBSA.
- **Traditional housing should be prioritised.** Many requested the provision of additional guidance relating to local housing requirements. This included ensuring that sufficient new homes are created for local people, that housing for local people is prioritised and that PBSA/shared living does not take precedence over other forms of housing and/or result in the loss of existing housing.