



## **Bristol Local Plan**

# **Managing the Development of Purpose-Built Student Accommodation topic paper (April 2024)**

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## 1. Introduction

- 1.1 Policy H7: *Managing the development of purpose-built student accommodation* offers an approach to delivering a sustainable increase in purpose-built student accommodation in Bristol. This will be achieved by ensuring development comes forward in appropriate locations, provides for a mix of uses where appropriate, maintains a balance with the needs of the wider community including the city's wider housing requirements and delivers high quality and well-managed accommodation.
- 1.2 A principle aim of the policy is to enable the delivery of sufficient purpose-built student accommodation (PBSA) to match future identified growth in student numbers. The policy includes specific mechanisms to achieve this whilst also ensuring a balance with the city's other development needs and a balanced distribution of PBSA across the city. This approach also supports wider policy aims to create mixed use neighbourhoods within the city's growth and regeneration areas and to ensure that all types of residential development contribute to a mix of housing to help support the creation of mixed, balanced and inclusive communities.
- 1.3 The approach is also consistent with policies in the National Planning Policy Framework (NPPF)<sup>1</sup>. In particular, the NPPF is clear that plans and decisions should be contributing to the delivery of a mix of uses to promote healthy, inclusive and safe places (para. 92). The NPPF also indicates that planning policies should identify a mix of development sites (para. 68), support a mix of uses (para. 106), enable mixed use schemes (para. 120) and ensure a mix of development (para. 130).
- 1.4 To ensure sufficient PBSA can come forward in a managed and balanced manner and in order to implement national policy intentions the policy makes positive provision for:
- appropriate numbers of bed spaces in a mix of identified locations (including University of Bristol sites and Growth and Regeneration areas);
  - development in locations supported by local communities; and
  - development in all other locations balanced with other land uses and development needs including homes.
- 1.5 This topic paper provides further detail on key elements of the policy including:
- How **student housing need** is addressed;
  - How the **bed space numbers and guideline bed space thresholds** are operated and calculated; and
  - Why and how **affordable student housing** is sought.
- 1.6 A flow chart explaining how the policy would be implemented and relevant supporting evidence are set out in the paper's appendices.

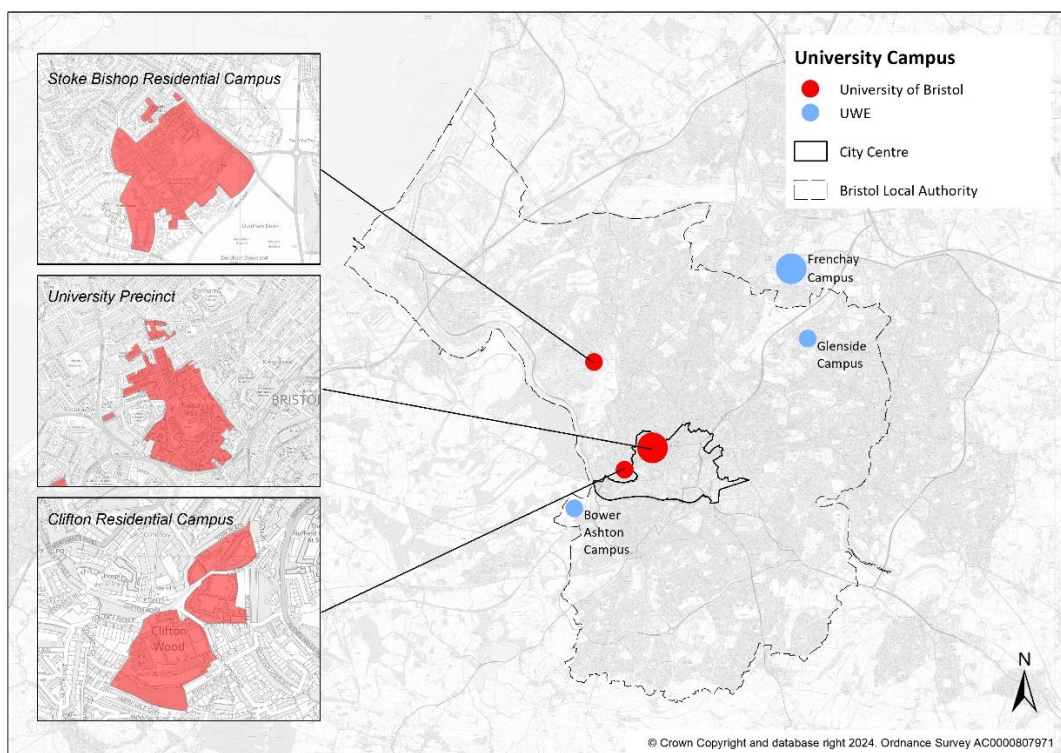
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<sup>1</sup> September 2023 version.

## 2. Student housing need

### How is the need for student bed spaces addressed?

- 2.1 National planning practice guidance (PPG) expects local authorities to plan for sufficient student accommodation and to engage with universities to understand student accommodation requirements<sup>2</sup>. Neither the National Planning Policy Framework (NPPF) nor PPG provide an explanation as to how any figure relating to student accommodation need should be calculated.
- 2.2 In the absence of detailed national policy and guidance on this issue Bristol City Council has decided to focus its policy approach to the provision of purpose-built student accommodation (PBSA) on future student growth. This is consistent with the council's objective of ensuring that any growth in student numbers is matched by the provision of PBSA. The needs of the existing student population are assumed to be met through a variety of existing accommodation types including university owned halls of residence and houses, PBSA and houses in multiple occupation.
- 2.3 There are two universities within the greater Bristol urban area. The University of Bristol (UoB) has its main campus located within the city's Central and Clifton Down wards with residential campuses located at Clifton Wood and Stoke Bishop. A new Enterprise Campus is currently under construction at Temple Quarter. The University of the West of England (UWE) has its main campus located at Frenchay, some 6km north east of Bristol City Centre, and within the adjoining authority of South Gloucestershire. The main campus locations for both universities are shown on the map below.



<sup>2</sup> Planning practice guidance: Housing needs of different groups - Paragraph: 004 Reference ID: 67-004-20190722

- 2.4 Some 16,500 PBSA bed spaces were identified within the Bristol City Council authority area as of January 2024. In addition, some 5,000 student bed spaces had planning permission at this time. A map showing PBSA within central Bristol with related accommodation key is provided at the end of this section.
- 2.5 Bristol City Council's understanding of the growth requirements of the city's universities is reflected in the explanatory text to the policy. Paragraph 6.76 identifies a need for some 8,800 additional student bed spaces city-wide by 2040. This represents the total future estimated need for bed spaces over the period 2023 to 2040<sup>3</sup>. The policy expects that student growth is met in full by PBSA and makes sufficient provision for this figure. The future additional bed space requirement represents around 10% of the council's housing requirement<sup>4</sup> (see proposed policy *H1: Delivery of new homes - Bristol's housing requirement*).
- 2.6 The bed space figure is based on information provided by UWE in March 2023 and UoB in August 2023. The information provided was in response to requests by Bristol City Council to both institutions<sup>5</sup> to provide projections on future student numbers and likely accommodation requirements.
- 2.7 UWE's response confirmed that their student growth to 2030 would be flat. The university also stated that they were not able to provide realistic projection figures beyond this date. Bristol City Council's request for information had also included figures provided by UoB, set out in a Joint Impact Statement<sup>6</sup>, showing an increase in student numbers at UWE. UWE confirmed that they did not have a strategy to grow at the scale indicated and that the figures provided were not recognised. Having regard to the information provided by UWE Bristol City Council reasonably concluded that the university was not planning for significant growth in student numbers over the plan period. For this reason, the council has not accounted for any additional bed space requirement (within Bristol) relating to UWE.
- 2.8 UoB's response included historic and projected student numbers at the university at the start of each academic year running from 2020 to 2039. These included numbers relating to full time equivalent students (FTE's), student head count, and students needing accommodation (identified as 85% of student head count). To calculate the future bed space requirement the number of students needing accommodation in 2023 was deducted from the number of students needing accommodation in 2039. This amounted to 8,834 bed spaces, rounded to 8,800. As UWE's future bed space requirement was assumed to be nil the total future bed space requirement only reflected UoB's student accommodation needs. The historic and projected student numbers provided by UoB are set out at Appendix A.

### Local Housing Needs Assessment

- 2.9 The Local Housing Needs Assessment (LHNA) provides further statistical analysis on [student housing needs](#) having regard to HESA data on historic student numbers,

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<sup>3</sup> The time period 2023 to 2040 broadly aligns with the plan period.

<sup>4</sup> Based on formula set out in Planning practice guidance: Housing supply and delivery - Paragraph: 034 Reference ID: 68-034-20190722. The total future student bed space requirement has been divided by the national average student household size of 2.5 to calculate equivalent dwellings.

<sup>5</sup> Sent to Chris Abbott (Director of Estates & Facilities) at UWE and Paul Smith (Director of Campus Operations) at UoB.

<sup>6</sup> Submitted by UoB to Bristol City Council in January 2023. The Joint Impact Statement identifies UWE student numbers increasing from 33,000 in 2022/23 to 43,000 by 2029/30 and to 48,000 by 2039/40.

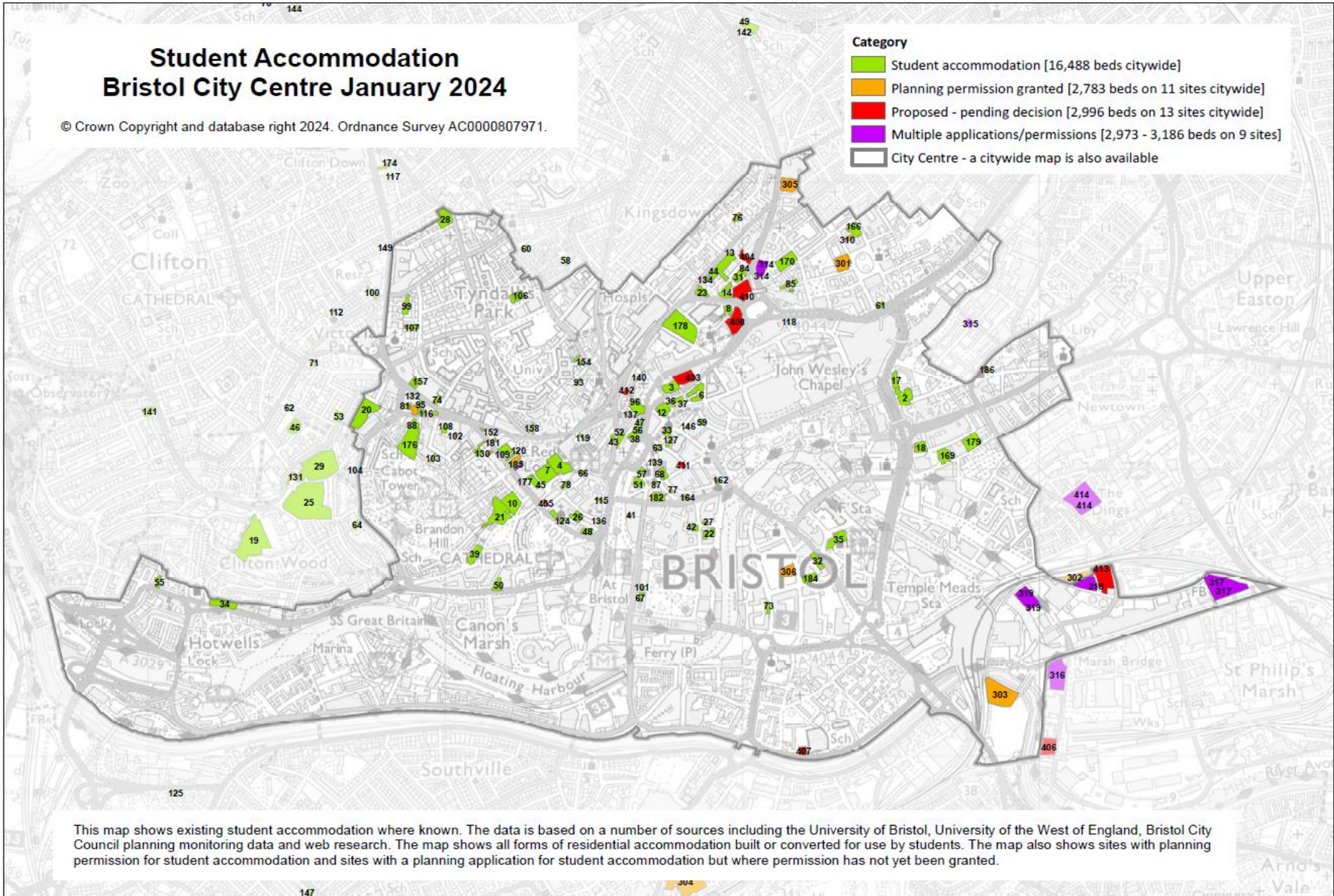
information provided by the universities to Bristol City Council on future student numbers, and data compiled by Bristol City Council on existing and planned student bed spaces. The LHNA identifies planned growth at the city's universities (UoB only) and the associated future bed space requirement. The LHNA also compares planned growth to population projections (relating to younger people) and analyses the extent to which planned accommodation can address student housing need. The LHNA concludes (on the basis of evidence available) that although future higher education expansion will be relatively limited, the council and the market have responded to future demand for student housing by enabling provision of significant new supply.

# Student Accommodation Bristol City Centre January 2024

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## Category

- Student accommodation [16,488 beds citywide]
- Planning permission granted [2,783 beds on 11 sites citywide]
- Proposed - pending decision [2,996 beds on 13 sites citywide]
- Multiple applications/permissions [2,973 - 3,186 beds on 9 sites]
- City Centre - a citywide map is also available



Ref	Student accommodation	Bed spaces
1	Hiatt Baker Hall	748
2	Marketgate	489
3	Tower	483
4	Orchard Heights	464
5	Badock Hall	422
6	New Bridewell	414
7	Unite House	385
8	IQ Marlborough Street	362
9	Churchill Hall	355
10	Deans Court	352
11	Wills Hall	336
12	The Courtrooms	321
13	King Square House	302
14	Marlborough House	297
15	University Hall	294
16	Glenside	288
17	Phoenix Court	277
18	Print Hall I	267
19	Goldney Hall	264
20	Cathedral Park	259
21	Brunel House	246
22	Riverside - Favell House	234
23	Blenheim Court	231
24	Durdham Hall	230
25	Clifton Hill House	226
26	Chantry Court	226
27	Riverside - Waverley House	217
28	Woodland Court	196
29	Manor Hall	190
30	The Hollies	186
31	Cherry Court	175
32	Transom House	168
33	St Lawrence House	166
34	Hotwells House	153
35	Water Lane Apartments	152
36	Drake House	151
37	Nelson House	151
38	Vita Student Bristol	132
39	Winkworth House	128
40	Northwell House	118
41	6 Broad Quay	5
42	Riverside - The Rackhay	115
43	Accommodation at Thirty Three	110
44	Studio 58	104
45	Culver House	97
46	Richmond Terrace	92
47	Centre Gate	88
48	College Green	84
49	The Platform	83
50	Harbour Court	132
51	The Colston	78
52	William & Matthew Houses	75
53	Hodgkin House	64
54	Tamarillo House	63
55	Dowry Mews	60
56	Stonebridge House	58
57	St Stephens House	72
58	Kings House	51
59	Fitzhardinge House	46
60	Holly Court	45

Ref	Student accommodation (continued)	Bed spaces
61	Berkeley House	43
62	115 Queens Road	42
63	Creswicke House	41
64	Jacobs Brewery	39
65	Southside Central	37
66	Pipe Lane Apartments	38
67	Crown House	32
68	Green Square Group	30
69	Cumberland Street	30
70	140A Whiteladies Road	29
71	101 Queens Road	28
72	Brigantine House	27
73	Redcliff Street	56
74	Queens Gate	29
75	10-11 Ashgrove Road	26
76	Hathaway House	25
77	Nico Lofts	25
78	Harford House	25
79	31-33 Corn Street	24
80	Carlton Chambers	24
81	41-44 Triangle West	24
82	Schooner House	23
83	Ashley Hall	23
84	Classic House	49
85	Cutter House	20
86	3-4 Byron Place	20
87	21-23 Clare Street	20
88	Summer Court	20
89	6 Upper Belgrave Road	19
90	Yelland House	19
91	5-7 Alexandra Park	19
92	68 Queens Road	18
93	Manor House	18
94	Clipper House	17
95	61-63 Queens Road	17
96	St Bartholomews Court	17
97	Launchpad Alexandra Park	16
98	66B Queens Road	16
99	Prince Rupert House	16
100	4 St Pauls Road	15
101	Kent House	15
102	27 Berkeley Square	14
103	7 Berkeley Square	14
104	75 Jacobs Wells Road	14
105	31 St Michaels Park (Campus House)	7
106	32 St Michaels Park (Campus House)	9
107	19 Elmdale Road	13
108	21-22 Berkeley Square	13
109	66A Park Street	13
110	33 St Michaels Park (Campus House)	8
111	43-45 Queens Road	12
112	17 Oakfield Place	12
113	Redland Road	12
114	70B Park Street	12
115	18 St Augustines Parade	11
116	14 Triangle South	11
117	Hampton House	11
118	22 Bond Street	10
119	1 Lower Park Row	10
120	60 Park Street	10

Ref	Student accommodation (continued)	Bed spaces
121	14 Charlotte Street	10
122	157 Whiteladies Road	10
123	98 Whiteladies Road	9
124	30 College Green	9
125	6 Clift House Road	9
126	47 Zetland Road	9
127	15 Small Street	8
128	532 Fishponds Road	8
129	101 Whiteladies Road	8
130	16 Charlotte Street	8
131	Sinclair House	8
132	75 Queens Road	8
133	76 Park Row	8
134	Hamilton Lodge	8
135	15 Charlotte Street	8
136	2-3 Denmark St	8
137	17A Christmas Steps	7
138	79 Park Street	7
139	9-11 St Stephens Street	7
140	The Yard	6
141	Rodney House	6
142	3a Cheltenham Lane	5
143	3b Cheltenham Lane	5
144	169B Whiteladies Road	16
145	17 John Street	5
146	16 John Street	5
147	227-229 North Street	4
148	19-21 Gloucester Road	4
149	30 Whiteladies Road	4
150	7 Cromwell Road	4
151	443B Gloucester Road	4
152	70 Park Row	6
153	53 St Michaels Hill (Campus House)	3
154	45 St Michaels Hill (Campus House)	5
155	43 St Michaels Hill (Campus House)	4
156	47 Doone Road	2
157	Lalonde House (Flat 7)	1
158	Woodland Road (Campus House)	9
159	28 St Michaels Park (Campus House)	5
160	29 St Michaels Park (Campus House)	5
161	30 St Michaels Park (Campus House)	10
162	St Nicholas Street (No. 6)	18
163	St Nicholas Street (No. 10)	12
164	St Nicholas Street (No. 25)	26
165	50A Park Street	13
166	Dean Street Works	225
167	68 New Station Road	6
168	844 Fishponds Road	6
169	Print Hall II	218
170	The Malthouse	345
171	15-21 Bartley Street	13
172	Gloucester Court	55
173	70A Whiteladies Road	10
174	7A Hampton Lane	3
175	7B Hampton Lane	7
176	St Marys	153
177	34 Park Street	16
178	Campbell House	416
179	Zinc Quarter	189
180	The Green	62

Ref	Student accommodation (continued)	Bed spaces
181	5 Park Street Avenue	6
182	Market Quarter Studio	92
183	Phoenix Place	39
184	St Thomas Street	384
185	52A Park Street	6
186	The Old Vicarage	29
		<b>16,488</b>

Ref	Sites with planning permission	Bed spaces
301	Portland Sq & Surrey St Warehouse	257
302	Gas Lane/Freestone Road	204
303	Former Post Office Depot	953
304	Dalby Avenue/Whitehouse Lane	819
305	Croftdale, Stokes Croft	59
306	The Glassworks	367
307	Rear of 7-10 Triangle South	7
308	54-56 Park Street	8
309	155-165 West Street	52
310	10-12 Cave Street	38
311	71 Park Street	19
		<b>2,783</b>

Ref	Multiple applications/permissions	Bed spaces
312	31-45 Lower Ashley Road	Permission 60
		Permission 60
313	48 Park Street	Permission 13
		Pending 17
314	Stokes Croft/Moon Street	Permission 184
		Permission 184
315	11-17 Wade Street	Permission 93
		Pending 93
316	Feeder Road and Albert Road	Permission 596
		Permission 612
		Pending 636
317	Silverthorne Lane	Permission 693
		Permission 706
318	North Side of Gas Lane	Permission 260
		Pending 314
319	Chanson Foods	Permission 471
		Pending 447
		Pending 627
414	Premier Business Park	Pending 705
		<b>2,973-3,186</b>

Ref	Proposed - pending decision	Bed spaces
401	68 Portview Road	5
402	Former Pring & St Hill (Plot 1)	474
403	NCP Rupert Street	328
404	1-9 Stokes Croft	175
405	1 Unity Street	14
406	40-46 Albert Road	472
407	Raj Mahal City	35
408	Premier Inn	442
409	Old Tavern	33
410	Three Six Zero	370
411	47 Corn Street	25
412	82 Colston Street	1
413	Freestone Rd/Gas Lane/Kingsland Rd	622
		<b>2,996</b>

### 3. Bed space numbers and guideline bed space thresholds

#### What is the proposed provision of bed spaces?

- 3.1 The policy would permit the development of purpose-built student accommodation (PBSA) in defined locations set out below. These include existing University of Bristol (UoB) residential sites and locations within growth and regeneration areas.

#### *University of Bristol residential sites*

- Clifton residential campus: 200 bed spaces
- Stoke Bishop residential campus: 500 bed spaces

#### *Areas of growth and regeneration*

- University of Bristol City Centre Precinct: 800 bed spaces
- Bristol Temple Quarter and St. Philip's Marsh: 4,600 bed spaces
- Bristol Shopping Quarter (Broadmead): 750 bed spaces
- Frome Gateway: 500 bed spaces
- Central Bedminster: 1,600 bed spaces

- 3.2 The council understands that the Stoke Bishop residential campus may currently not be utilised to full capacity. Ensuring full occupation of the 2,400 bed spaces known to be available and extending this capacity by a further 500 bed spaces could significantly increase the land use efficiency of the site.
- 3.3 Defined locations within the areas of growth and regeneration have been broadly agreed with UoB. The approach extends student accommodation into areas previously not occupied by PBSA providing a wider distribution of accommodation whilst ensuring easy accessibility to teaching facilities. The largest defined location, Bristol Temple Quarter and St. Philips Marsh, would serve the new UoB Enterprise Campus.
- 3.4 Further flexibility is provided within growth and regeneration areas allowing bed space numbers to be exceeded when certain criteria are met. The bed space numbers within the defined areas provide for at least 8,950 bed spaces with the potential for additional accommodation arising in other areas in accordance with the fifth section of the policy (*Purpose-built student accommodation provision - other locations*). The new development the policy facilitates therefore exceeds the student bed space need identified (see section 2).

#### Ensuring balanced communities - bed space thresholds

- 3.5 Outside of defined locations PBSA would be permitted subject to specified criteria including a requirement that development does not create a local imbalance in the level of PBSA within an area. Paragraph 6.87 of the explanatory text provides guideline bed space thresholds to denote a likely imbalance. The thresholds are applied to the immediate area surrounding any PBSA proposal defined as a 200 metre radius circle around the site. Different thresholds are set for residential areas (100 bed spaces) and city centre commercial areas/town centres (1,000 bed

spaces). The extent to which the development provides for a mix of uses, including residential, is identified as a further consideration to determine whether an imbalance in PBSA would occur. A diagram explaining how the bed space thresholds would be applied is provided in Appendix B (Fig. 2)

What data is used to calculate the bed space numbers and guideline bed space thresholds?

- 3.6 The baseline data used to calculate the bed space numbers for each defined location and the bed space thresholds for other locations is the number of known student bed spaces (including PBSA and university halls of residence) completed or with planning permission within the city in July 2022. At this time there were 15,584 known existing bed spaces citywide and 5,486 bed spaces with planning permission. The majority of these bed spaces (some 71%) were within the city centre. A map indicating the number and location of bed spaces at this time is provided at Appendix C.

How are the bed space numbers for the defined locations calculated?

- 3.7 The bed space numbers for the defined locations are broadly informed by the overall density of student accommodation across the city centre (expressed as student bed spaces per hectare) calculated using the baseline data. The method for informing the numbers is as follows:

$$\text{(Step 1) Overall density (bed spaces per hectare) = } \frac{\text{Number of bed spaces within the city centre}}{\text{Area of city centre (hectares)}}$$

$$\text{(Step 2) Bed space number = Overall density (bed spaces per hectare) x Area of defined location (hectares)}$$

A table setting out the calculations for each defined location is provided at Appendix D (Table 1).

- 3.8 The overall density figure represents the concentration of student accommodation that has naturally arisen in the city centre over time as a result of normal market operation and in the absence of a location-based policy approach to student accommodation (under the existing local plan). The council considers this a reasonable method for informing bed space numbers in locations where the proposed policy would expect PBSA to be developed. In some locations local considerations have also informed bed space numbers.

How are guideline bed space thresholds for development outside of the defined locations calculated?

- 3.9 The methodological approach used to inform the guideline bed space thresholds relevant to development outside of defined locations is based on the following principle:

*Housing imbalance is likely to occur when the level of concentration of one particular form of housing within a specific area is significantly above its normal or average concentration across a wider area.*

- 3.10 This is the same principle that was used to inform the setting of the 10% threshold currently applied to HMOs in accordance with guidance set out in the [Managing the development of houses in multiple occupation Supplementary Planning Document](#).
- 3.11 The level of concentration where imbalance could occur has been established through a statistical analysis method known as standard deviation. This measures the level of divergence (or standard deviation) of any individual unit of data from the average of all the data collected. This method has been applied to densities of student accommodation (bed spaces per hectare) as calculated from the baseline data. In this particular case, the individual units of data correspond to densities within small city geographies which are then measured against the average density across a larger city geography to calculate the level of divergence<sup>7</sup>. The results for each small geography are categorised according to the level of divergence from the average density (either above or below).
- 3.12 The threshold densities corresponding to the 'Much higher than average' category of divergence have been used to indicate when an imbalance of PBSA could start to occur. Densities at these threshold levels and above represent the highest concentrations of student accommodation in the city compared to the average density for the wider area and broadly correspond to locations within the city where student accommodation is starting to predominate and or raise concerns with local communities. For the city centre the threshold density is around 83 student bed spaces per hectare compared to an average of 33.7. For the rest of the city the threshold density is around 8 student bed spaces per hectare compared to an average of 0.6. The bed space thresholds have been calculated by multiplying the threshold densities by the area of the 200 metre radius circle. Maps and tables showing the geographies, the standard deviation calculations and categories, and the bed space threshold calculations are provided at Appendix D (Tables 2, 3 & 4 and Figs 3 & 4).

#### Why is the radius for the bed space threshold set at 200 metres?

- 3.13 The 200 metre radius circle is equivalent to an area of 12.56 hectares. This distance and area reflect the likely maximum range of any potential impacts that might be experienced by surrounding neighbours. Such impacts may include street noise associated with occupants walking to and from the development and changes to the character, function, and diversity of an area as a result of the needs of the student population. These potential impacts are more likely to be felt over a wider area.
- 3.14 The radius distance is greater than the HMO threshold assessment radius which is set at 100 metres (set out in the [Managing the development of houses in multiple occupation Supplementary Planning Document](#)). The shorter HMO radius reflects the smaller range over which potential harmful impacts will be felt given the different form of development and the different impacts associated with it. Potential impacts arising from HMOs are more also likely to be experienced by close neighbours.

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<sup>7</sup> The small city geographies correspond to 400 metre grid squares (34 within the City Centre and 768 within the remaining authority area). The larger city geographies correspond to the City Centre and the total area outside of the City Centre.

#### 4. Affordable student housing

4.1 The policy would seek an appropriate proportion of affordable student housing from development to meet identified need. This is identified in paragraph 6.88a of the explanatory text as being at least 35%. The policy would also require the affordable bed spaces to be allocated by the relevant higher education provider (normally either the University of Bristol or UWE). Paragraph 6.88c of the explanatory text explains that this would only occur where the accommodation is operated by the higher education provider or where a nomination agreement is in place between the higher education provider and the accommodation provider.

4.2 The following matters are relevant to the justification and implementation of the approach and are explored through the questions set out below:

- Evidence relating to student accommodation affordability in Bristol;
- Rationales for defining affordable student housing and quantifying the level of need;
- Assessment of the viability of delivering affordable student housing.

#### What evidence has been collected relating to student accommodation affordability in Bristol and what does it tell us?

4.3 To assess affordability issues, data was collected on rental costs for student accommodation in the city and assumptions made on student income. The information was used to calculate the average rental for different types of accommodation in the city and the proportion of a student's income that would typically be spent on accommodation costs.

#### *Student rents*

4.4 An assessment of student accommodation rental costs in Bristol was undertaken in 2021; this included:

- Analysis of published undergraduate rental costs for accommodation provided by the University of Bristol and UWE in the academic year 2021/22;
- Analysis of published rental costs for accommodation provided by the main private accommodation providers through direct let in 2021;
- Information provided by the University of Bristol and by Bristol SU Lettings on shared house rental costs in 2021.

A summary of the findings is set out as follows.

Accommodation provider	Average rent per annum
University provided accommodation*	£6,710
Private providers	£9,973
Room in shared house	£6,000 to £6,500

\*Provided directly by the universities (halls of residence or houses) or by third party providers with nomination agreements with the universities (PBSA).

4.5 The [NatWest Student Living Index 2021](#) was also used to compare Bristol with 21 other university cities across the UK in terms of student living costs. The index identified Bristol as the 3rd most expensive city for students in terms of overall living

costs and student rents. The most recent [NatWest Student Living Index 2023](#) identified Bristol as the 2nd most expensive city for student rents behind London.

- 4.6 The [Accommodation costs survey 2021 \(National Union of Students/Unipol\)](#) identified the average annual rent in Bristol for the academic year 2021/22 as £8,133. The most recent survey conducted by Unipol, [The Ten Cities Rent Survey](#), identifies the average annual rent in Bristol for the academic year 2023/24 as £9,200.

### *Student incomes*

- 4.7 A primary source of data on student incomes is the [Student income and expenditure survey](#) published by the Department for Education. The survey provides a detailed analysis of the financial position of higher education students in England and Wales. The most recent survey covers the academic year 2021/22 and has calculated the median total income (excluding Tuition Fee Loans) for a full-time student in England at this time as £11,500. A review of this and other evidence sources<sup>8</sup> indicates that the highest proportion of students' overall income is derived from state funded sources including student loans for tuition fees and maintenance. Discounting the loan for tuition fees the key source of income available for accommodation rental costs is the Government's [Maintenance Loan for living costs](#). For students living away from parents and outside of London the maximum loan available to students in 2021/22 was £9,488 and is currently (2023/24) £9,978.
- 4.8 Students from households earning £25,000 per annum or less qualify for the full maintenance loan. The Government does not expect students from these households to receive financial support from parents/family nor is such support likely in practice. Where students do not receive the full amount there is an expectation that any deficit is funded from other sources including from parents/family. It is therefore reasonable to assume that the Government regards the full Maintenance Loan level as adequate in most cases to pay for the entirety of a student's living costs during the academic year and that all students will receive at least this level of income.
- 4.9 For the reasons set out above the full Maintenance Loan level is considered a reasonable indicator of the level of income that most students would be expected to receive as a minimum.

### *Affordability assessment*

- 4.10 The tables below compare average rental costs in Bristol in 2021/22 and 2023/24 with the full Maintenance Loan for the respective year.

**Bristol City Council assessment of rental costs 2021/22**

	<b>Average rent per annum</b>	<b>% of full Maintenance Loan - £9,488</b>
University provided accommodation*	£6,710	71%
Private providers	£9,973	105%
Room in shared house	£6,000 to £6,500	63% to 69%

\*Provided directly by the universities (halls of residence or houses) or by third party providers with nomination agreements with the

<sup>8</sup> Student income and expenditure survey (DFE) 2014/15, Student Living Index (Nat West) 2023.

universities (PBSA).

#### Accommodation costs survey 2021 (National Union of Students/Unipol)

	Average rent per annum	% of full Maintenance Loan - £9,488
All accommodation	£8,133	86%

#### The Ten Cities Rent Survey (Unipol) 2023/24

	Average rent per annum	% of full Maintenance Loan - £9,978
All accommodation	£9,200	92%

4.11 The evidence indicates that average rentals costs accounted for a significant proportion of the full maintenance loan in 2021/22. This proportion has increased in 2023/24. The evidence suggests ongoing affordability problems for students seeking to study in Bristol with accommodation costs swallowing the greater part of a student's income. This provides reasonable justification a policy approach that seeks a proportion of bed spaces within all new PBSA development to be let at more affordable rental levels.

#### How is affordable student housing defined?

4.12 The policy defines affordable student housing as a bed space within a development that is provided at a rental cost for the academic year equal to or below 50 per cent of the maximum income that a new full-time student living away from home could receive from the Government's Maintenance Loan for living costs for that academic year. The full Maintenance Loan for living costs is considered a reasonable indicator of the level of income that all students would be expected to receive (as a minimum).

4.13 There is no definitive percentage that is considered an affordable proportion of an individual's income to spend on accommodation costs. The [ONS](#) deem a property affordable if a household would spend the equivalent of 30% or less of their income on rent. [Shelter](#) define an affordable level as being 35% of net income. A general budgeting rule of thumb is that individuals or households should aim to spend no more than 50% of income on essential living expenses such as housing costs and bills.

4.14 An important consideration when assessing expenditure on student accommodation is the shorter period of occupation of student accommodation compared to the general population. As students will only occupy their accommodation for a few years they may be able to spend a higher proportion of their income on accommodation than an individual renting over the longer term. PBSA also differs from conventional market rental by including charges for utilities and other service costs within the rental agreement. Full-time students will also usually be exempt from council tax. For these reasons a greater proportion of a student's income may be available for rental costs than would be the case for the general population. On this basis student housing has been defined as affordable when set at a maximum of 50% of total income i.e. equal to or below 50% of the full Maintenance Loan.

4.15 Previous engagement with stakeholders including Bristol Student Union and the University of Bristol indicate general support for this definition. Bristol Student Union have stated that the definition is also supported by the National Union of Students.

The [London Plan 2021](#) also applies similar principles to defining affordable student accommodation.

#### How is affordable student housing need defined?

- 4.16 Paragraph 6.88 of the policy explanatory text identifies the proportion of affordable student housing sought as at least 35%. The explanatory text also states that the level of need for affordable student housing could be quantified by reference to the number of students receiving the full Maintenance Loan or otherwise determined by the universities and agreed with the council.
- 4.17 Students awarded the full Maintenance Loan are from households where total income is £25,000 or less per annum. The Government does not expect these households to provide financial support to students nor is such support likely in practice. As this threshold has been frozen since 2008<sup>9</sup>, and has therefore not kept pace with earnings/inflation, its real level has also fallen over time. By way of example individuals with incomes of up to £25,000 now account for the lowest 20% of earners in the country<sup>10</sup>. Students from these households are therefore likely to have the greatest level of need for affordable student housing. On this basis the proportion of students receiving the full Maintenance Loan could reasonably indicate the proportion of affordable student housing needed.
- 4.18 Data provided by the Student Loans Company in 2019 has helped to quantify the proportion of students likely to be in the greatest level of need. The data identified the number of students at the University of Bristol and UWE receiving the full Maintenance Loan for living costs over a 5 year period from 2013/14 to 2017/18. Using other data available on total student numbers the proportion of students receiving the Full Maintenance loan was calculated.
- 4.19 For the University of Bristol this ranged from 23% to 29% of domestic students over the period 2014/15 to 2017/18. For UWE the range was from 41% to 51% of domestic students over the same period. For both universities the range was from 32% to 42% of domestic students over the same period.
- 4.20 Based on the data available for both universities combined it was considered reasonable to set the proportion of bed spaces sought as affordable at 35%. At the time of writing this paper further data from the Student Loans Company is being sought. Full analysis of the Maintenance Loan data is provided at Appendix D (Table 5).

#### Will an expectation for 35% affordable student housing affect development viability?

- 4.21 The [Bristol City Council: Local Plan Viability Assessment](#) indicates that the development of PBSA, in the form of either one bedroom studios or 4 person cluster flats, will be viable with at least 35% affordable student housing provision in most cases.

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<sup>9</sup> Source: The value of student maintenance support (House of Commons Library).

<sup>10</sup> Source: ONS annual survey of hours and earnings - Full time workers.

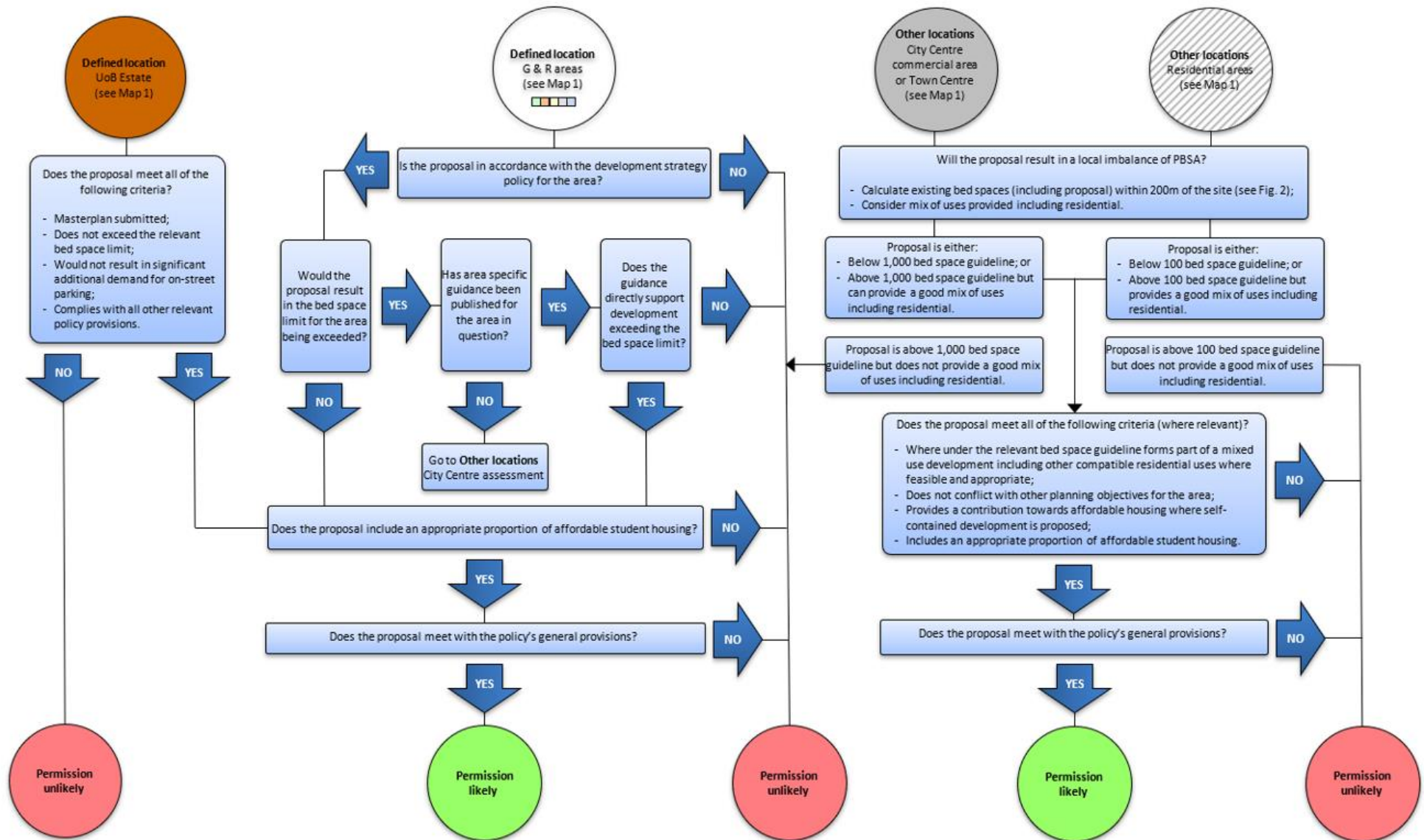
## Appendix A: University of Bristol - Student numbers 2020-2040

Factor	Start of the Academic Year							TREND	TREND	TREND											
	2020	2021	2022	2023	2024	2025	2026	FORECAST	FORECAST	TARGET	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040
University of Bristol Student FTE forecast	28,276	30,122	30,110	31,901	32,155	32,865	33,746	34,731	35,586	36,000	36,600	37,200	37,800	38,400	39,000	39,600	40,200	40,800	41,400	42,000	
University of Bristol Student Head Count forecast																					
Roughly 102.92% of FTE	29,102	31,002	30,989	32,833	33,094	33,825	34,731	35,745	36,625	37,051	37,669	38,286	38,904	39,521	40,139	40,756	41,374	41,991	42,609	43,226	
University of Bristol Housing need is roughly 85% of Head Count *	24,736	26,351	26,341	27,908	28,130	28,751	29,522	30,383	31,131	31,494	32,018	32,543	33,068	33,593	34,118	34,643	35,168	35,693	36,218	36,742	

\* does not include Study Abroad, industry placements, distance learning and those who register living at home as their term time address - Roughly equals 85% of Headcount

## Appendix B: Policy H7 - Implementation

Fig. 1: Policy implementation simplified flow chart



Map 1: Policy zones

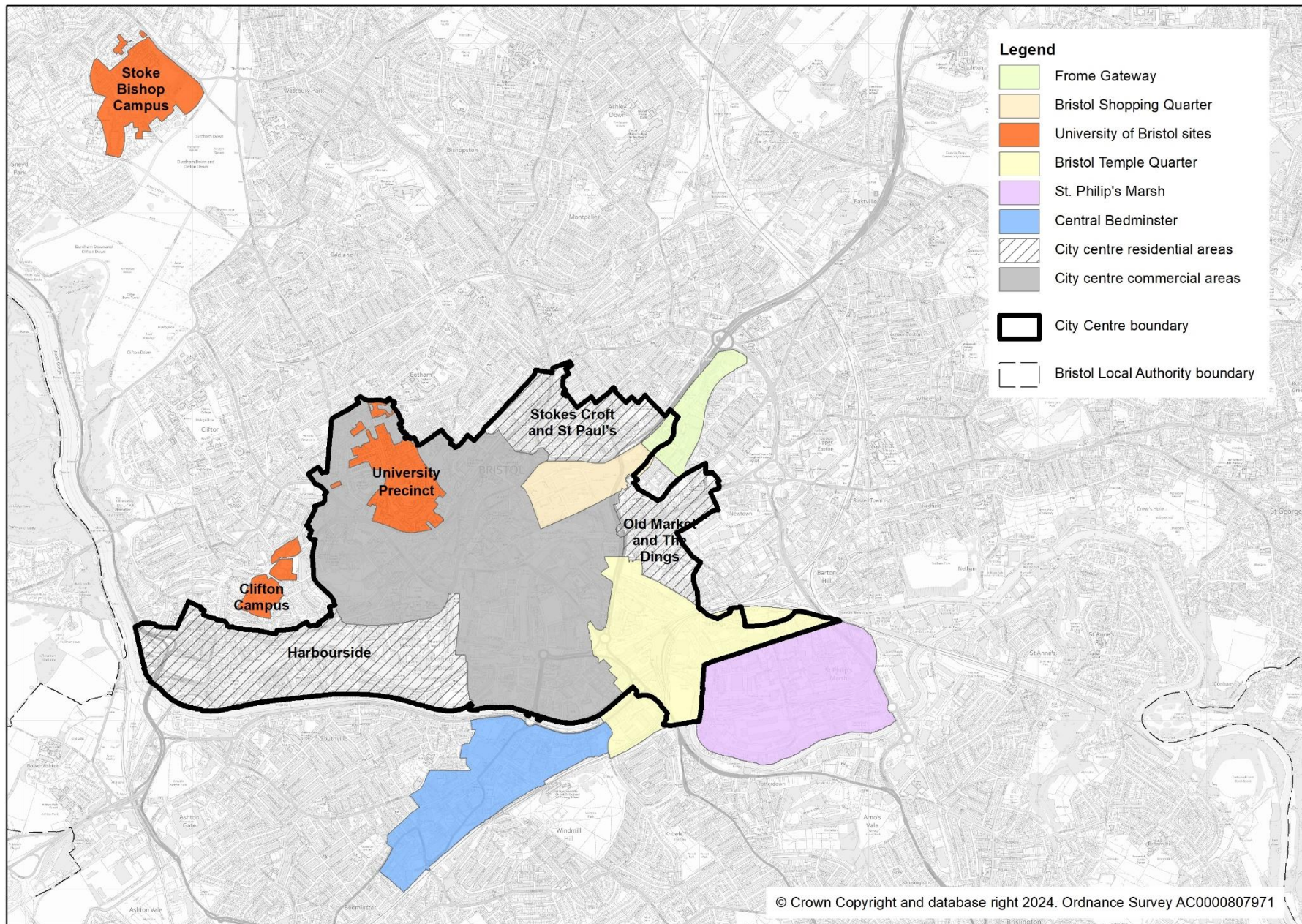
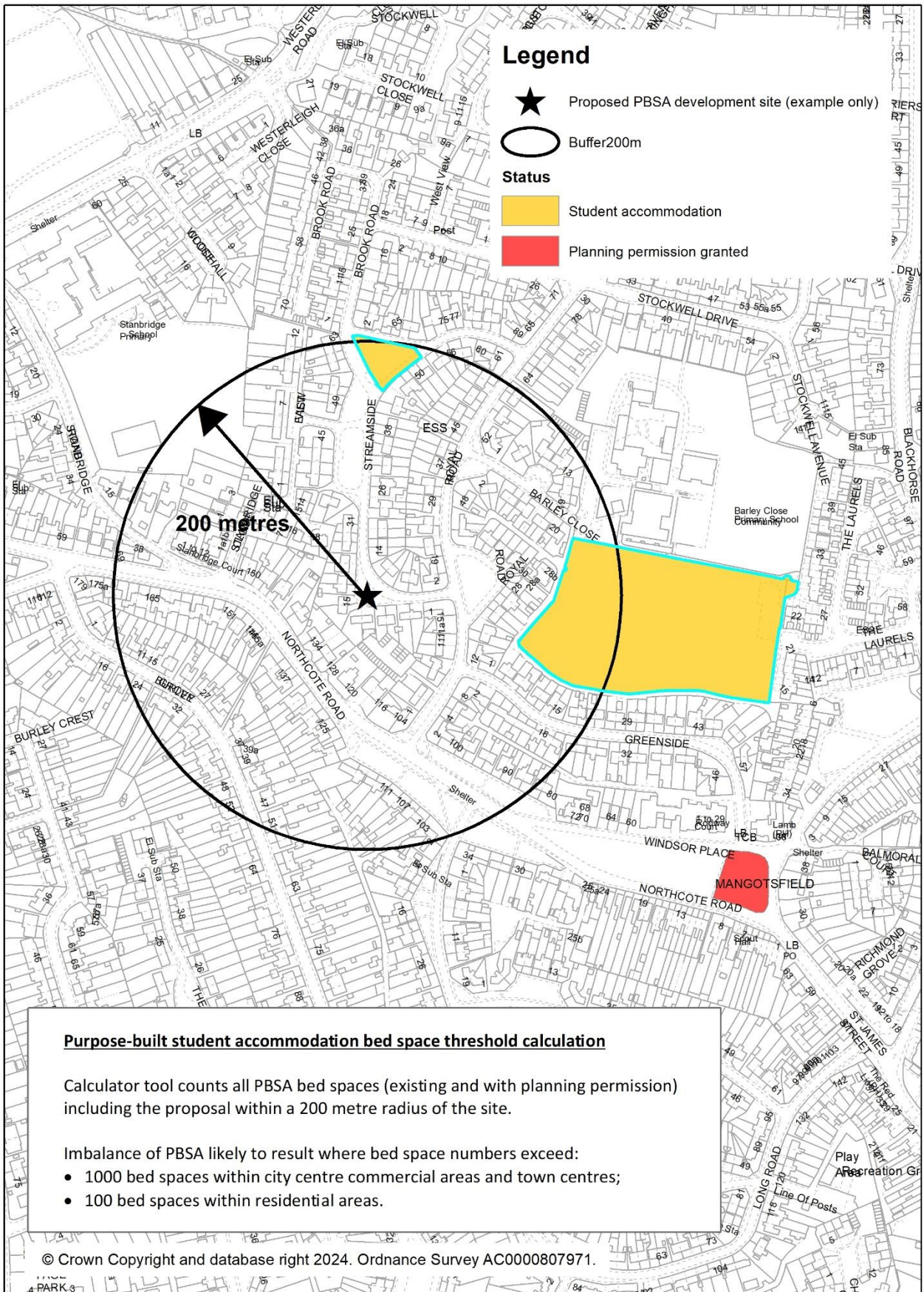
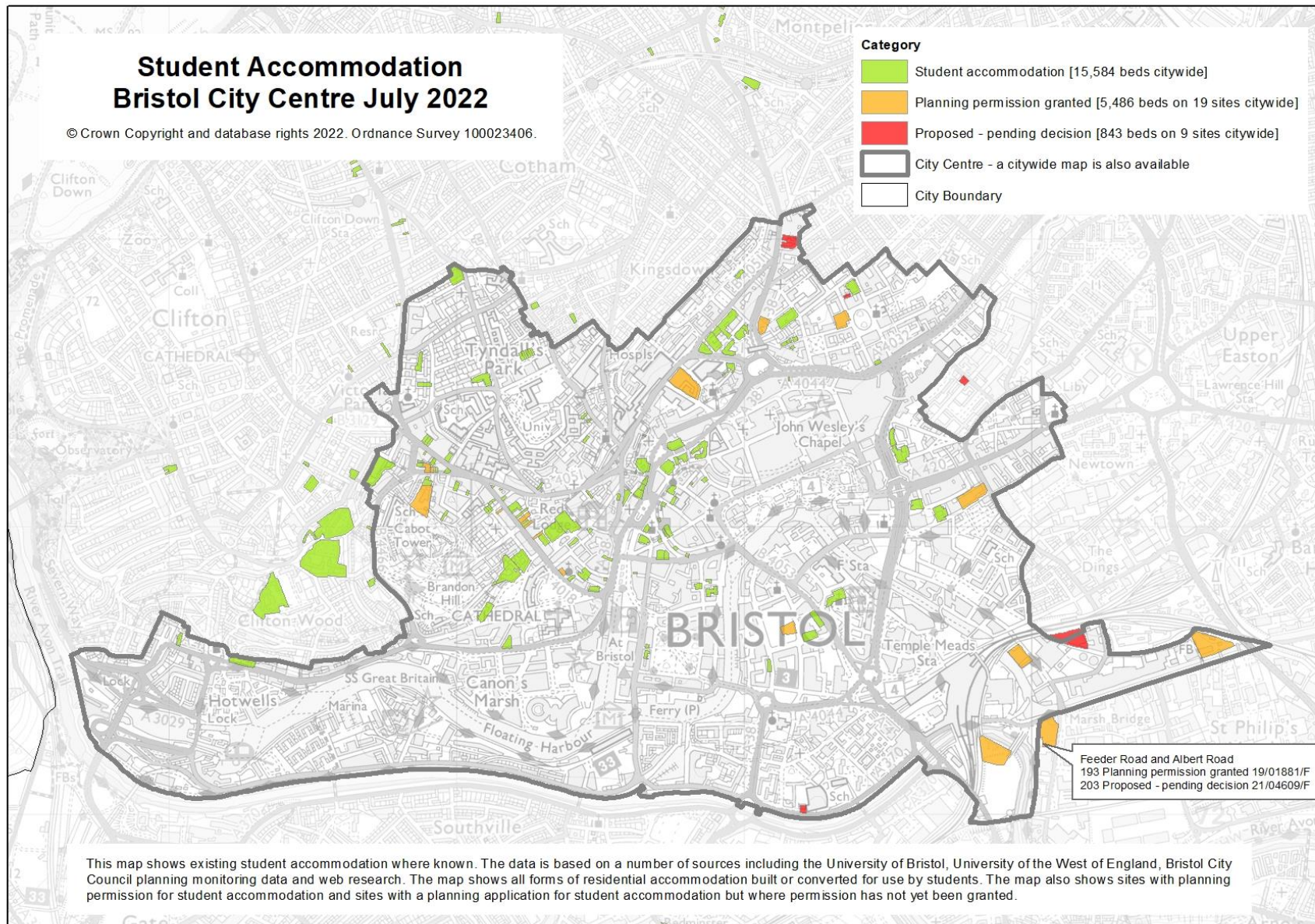


Fig. 2: Bed space threshold calculation



## Appendix C: Student accommodation map - July 2022



## Appendix D: Data tables

### Bed space numbers

Table 1: Calculation of bed space numbers for defined locations

Location	Area (hectares)	Area multiplied by average city centre bed space density (33.7 bsph)* to provide bed space limit	Bed space number (rounded to nearest 100)	Bed space number in policy
Bristol Temple Quarter & St. Philip's Marsh	137.2	4,623.6	4,600	4,600
Central Bedminster	52.6	1,772.6	1,800	1,600
Bristol Shopping Quarter	19.0	640.3	600	750
Frome Gateway	14.7	495.4	500	500
UoB Precinct	20.1	677.4	700	800
UoB Clifton Residential Campus	6.2	208.9	200	200
UoB Stoke Bishop Residential Campus	26.7	899.8	900	500

\*Number of bed spaces within city centre @ July 2022 (15,054) divided by area of city centre (446.2 hectares) = 33.7 bed spaces per hectare (bsph)

### Guideline bed space thresholds

Table 2: Standard deviation table for City Centre

CityCentre	Grid400m	Hectare	Sites (ex+pp)	Beds	Beds per hectare	Diff from mean	St Dev	Category	Categories based on one Standard Deviation
City Centre	W26	16	26	1,844	115.3	87.1	2.59	> 2.5 Std. Dev.	Very much higher than city centre average
City Centre	X24	16	15	1,843	115.2	87.1	2.59	> 2.5 Std. Dev.	Very much higher than city centre average
City Centre	W25	16	11	1,575	98.4	70.3	2.09	1.5 to 2.5 Std. Dev.	Much higher than city centre average
City Centre	V26	16	24	1,331	83.2	55.1	1.64	1.5 to 2.5 Std. Dev.	Much higher than city centre average
City Centre	Z28	16	1	953	59.6	31.4	0.93	0.50 to 1.5 Std. Dev.	Higher than city centre average
City Centre	X27	16	4	846	52.9	24.8	0.74	0.50 to 1.5 Std. Dev.	Higher than city centre average
City Centre	AB27	16	1	841	52.6	24.4	0.73	0.50 to 1.5 Std. Dev.	Higher than city centre average
City Centre	Y25	16	3	809	50.6	22.4	0.67	0.50 to 1.5 Std. Dev.	Higher than city centre average
City Centre	X25	16	3	786	49.1	21.0	0.62	0.50 to 1.5 Std. Dev.	Higher than city centre average
City Centre	Y27	16	3	704	44.0	15.9	0.47	-0.50 to 0.50 Std. Dev.	Similar to city centre average
City Centre	Z26	16	3	674	42.1	14.0	0.42	-0.50 to 0.50 Std. Dev.	Similar to city centre average
City Centre	Y24	16	2	482	30.1	2.0	0.06	-0.50 to 0.50 Std. Dev.	Similar to city centre average
City Centre	Z27	16	1	471	29.4	1.3	0.04	-0.50 to 0.50 Std. Dev.	Similar to city centre average
City Centre	U25	16	12	420	26.3	-1.9	-0.06	-0.50 to 0.50 Std. Dev.	Similar to city centre average
City Centre	T27	16	2	417	26.1	-2.1	-0.06	-0.50 to 0.50 Std. Dev.	Similar to city centre average
City Centre	U26	16	12	404	25.3	-2.9	-0.09	-0.50 to 0.50 Std. Dev.	Similar to city centre average
City Centre	X26	16	5	292	18.3	-9.9	-0.29	-0.50 to 0.50 Std. Dev.	Similar to city centre average
City Centre	V27	16	2	208	13.0	-15.1	-0.45	-0.50 to 0.50 Std. Dev.	Similar to city centre average
City Centre	V25	16	5	143	8.9	-19.2	-0.57	< -0.50 Std. Dev.	Lower than city centre average
City Centre	W27	16	3	131	8.2	-19.9	-0.59	< -0.50 Std. Dev.	Lower than city centre average
City Centre	V24	16	3	62	3.9	-24.2	-0.72	< -0.50 Std. Dev.	Lower than city centre average
City Centre	S27	16	1	60	3.8	-24.4	-0.72	< -0.50 Std. Dev.	Lower than city centre average
City Centre	S28	16	0	0	0.0	-28.1	-0.84	< -0.50 Std. Dev.	Lower than city centre average
City Centre	T28	16	0	0	0.0	-28.1	-0.84	< -0.50 Std. Dev.	Lower than city centre average
City Centre	U27	16	0	0	0.0	-28.1	-0.84	< -0.50 Std. Dev.	Lower than city centre average
City Centre	U28	16	0	0	0.0	-28.1	-0.84	< -0.50 Std. Dev.	Lower than city centre average
City Centre	V28	16	0	0	0.0	-28.1	-0.84	< -0.50 Std. Dev.	Lower than city centre average
City Centre	W28	16	0	0	0.0	-28.1	-0.84	< -0.50 Std. Dev.	Lower than city centre average
City Centre	X28	16	0	0	0.0	-28.1	-0.84	< -0.50 Std. Dev.	Lower than city centre average
City Centre	Y26	16	0	0	0.0	-28.1	-0.84	< -0.50 Std. Dev.	Lower than city centre average
City Centre	Y28	16	0	0	0.0	-28.1	-0.84	< -0.50 Std. Dev.	Lower than city centre average
City Centre	Z24	16	0	0	0.0	-28.1	-0.84	< -0.50 Std. Dev.	Lower than city centre average
City Centre	Z25	16	0	0	0.0	-28.1	-0.84	< -0.50 Std. Dev.	Lower than city centre average
City Centre	AA27	16	0	0	0.0	-28.1	-0.84	< -0.50 Std. Dev.	Lower than city centre average

Average density within City Centre boundary = 33.7 bed spaces per hectare

Threshold density indicating likely imbalance = 83.2 bed spaces per hectare

Table 3: Extract of standard deviation table for outside of City Centre

CityCentre	Grid400m	Hectare	Sites (ex+pp)	Beds	Beds per hectare	Diff from mean	St Dev	Category	Categories based on one Standard Deviation
Outside City Centre	R19	16	4	1,694	105.9	105.4	21.54	> 4.5 Std. Dev.	Extremely higher than outside city centre average
Outside City Centre	W30	16	1	819	51.2	50.7	10.36	> 4.5 Std. Dev.	Extremely higher than outside city centre average
Outside City Centre	AA28	16	1	595	37.2	36.7	7.50	> 4.5 Std. Dev.	Extremely higher than outside city centre average
Outside City Centre	T26	16	4	516	32.3	31.8	6.49	> 4.5 Std. Dev.	Extremely higher than outside city centre average
Outside City Centre	AF18	16	2	474	29.6	29.2	5.96	> 4.5 Std. Dev.	Extremely higher than outside city centre average
Outside City Centre	R20	16	1	355	22.2	21.7	4.44	3.5 to 4.5 Std. Dev.	Very very much higher than outside city centre average
Outside City Centre	S19	16	1	336	21.0	20.5	4.20	3.5 to 4.5 Std. Dev.	Very very much higher than outside city centre average
Outside City Centre	U24	16	3	215	13.4	13.0	2.65	2.5 to 3.5 Std. Dev.	Very much higher than outside city centre average
Outside City Centre	X22	16	5	215	13.4	13.0	2.65	2.5 to 3.5 Std. Dev.	Very much higher than outside city centre average
Outside City Centre	U23	16	7	128	8.0	7.5	1.54	1.5 to 2.5 Std. Dev.	Much higher than outside city centre average
Outside City Centre	T25	16	2	70	4.4	3.9	0.80	0.50 to 1.5 Std. Dev.	Higher than outside city centre average
Outside City Centre	T22	16	4	64	4.0	3.5	0.72	0.50 to 1.5 Std. Dev.	Higher than outside city centre average
Outside City Centre	X21	16	2	59	3.7	3.2	0.66	0.50 to 1.5 Std. Dev.	Higher than outside city centre average
Outside City Centre	W24	16	1	51	3.2	2.7	0.56	0.50 to 1.5 Std. Dev.	Higher than outside city centre average
Outside City Centre	AJ18	16	1	39	2.4	2.0	0.40	< 0.50 Std. Dev.	Similar to outside city centre average
Outside City Centre	Y18	16	1	23	1.4	1.0	0.20	< 0.50 Std. Dev.	Similar to outside city centre average
Outside City Centre	S22	16	1	19	1.2	0.7	0.15	< 0.50 Std. Dev.	Similar to outside city centre average
Outside City Centre	AH19	16	1	19	1.2	0.7	0.15	< 0.50 Std. Dev.	Similar to outside city centre average
Outside City Centre	AG19	16	1	16	1.0	0.5	0.11	< 0.50 Std. Dev.	Similar to outside city centre average
Outside City Centre	W29	16	1	13	0.8	0.3	0.07	< 0.50 Std. Dev.	Similar to outside city centre average
Outside City Centre	V22	16	1	12	0.8	0.3	0.06	< 0.50 Std. Dev.	Similar to outside city centre average
Outside City Centre	S29	16	1	9	0.6	0.1	0.02	< 0.50 Std. Dev.	Similar to outside city centre average
Outside City Centre	W22	16	1	9	0.6	0.1	0.02	< 0.50 Std. Dev.	Similar to outside city centre average
Outside City Centre	AG20	16	1	8	0.5	0.0	0.01	< 0.50 Std. Dev.	Similar to outside city centre average
Outside City Centre	S25	16	1	6	0.4	-0.1	-0.02	< 0.50 Std. Dev.	Similar to outside city centre average
Outside City Centre	T30	16	1	4	0.3	-0.2	-0.04	< 0.50 Std. Dev.	Similar to outside city centre average
Outside City Centre	Y17	16	1	4	0.3	-0.2	-0.04	< 0.50 Std. Dev.	Similar to outside city centre average
Outside City Centre	Z15	16	1	2	0.1	-0.3	-0.07	< 0.50 Std. Dev.	Similar to outside city centre average
Outside City Centre	B11	16	0	0	0.0	-0.5	-0.10	< 0.50 Std. Dev.	Similar to outside city centre average
Outside City Centre	B12	16	0	0	0.0	-0.5	-0.10	< 0.50 Std. Dev.	Similar to outside city centre average
Outside City Centre	B13	16	0	0	0.0	-0.5	-0.10	< 0.50 Std. Dev.	Similar to outside city centre average
Outside City Centre	C10	16	0	0	0.0	-0.5	-0.10	< 0.50 Std. Dev.	Similar to outside city centre average



Outside City Centre	AK21	16	0	0	0.0	-0.5	-0.10	< 0.50 Std. Dev.	Similar to outside city centre average
Outside City Centre	AK22	16	0	0	0.0	-0.5	-0.10	< 0.50 Std. Dev.	Similar to outside city centre average
Outside City Centre	AK23	16	0	0	0.0	-0.5	-0.10	< 0.50 Std. Dev.	Similar to outside city centre average
Outside City Centre	AK24	16	0	0	0.0	-0.5	-0.10	< 0.50 Std. Dev.	Similar to outside city centre average
Outside City Centre	AK25	16	0	0	0.0	-0.5	-0.10	< 0.50 Std. Dev.	Similar to outside city centre average
Outside City Centre	AK26	16	0	0	0.0	-0.5	-0.10	< 0.50 Std. Dev.	Similar to outside city centre average
Outside City Centre	AK27	16	0	0	0.0	-0.5	-0.10	< 0.50 Std. Dev.	Similar to outside city centre average
Outside City Centre	AK33	16	0	0	0.0	-0.5	-0.10	< 0.50 Std. Dev.	Similar to outside city centre average
Outside City Centre	AL16	16	0	0	0.0	-0.5	-0.10	< 0.50 Std. Dev.	Similar to outside city centre average
Outside City Centre	AL17	16	0	0	0.0	-0.5	-0.10	< 0.50 Std. Dev.	Similar to outside city centre average
Outside City Centre	AL19	16	0	0	0.0	-0.5	-0.10	< 0.50 Std. Dev.	Similar to outside city centre average
Outside City Centre	AL20	16	0	0	0.0	-0.5	-0.10	< 0.50 Std. Dev.	Similar to outside city centre average
Outside City Centre	AL21	16	0	0	0.0	-0.5	-0.10	< 0.50 Std. Dev.	Similar to outside city centre average
Outside City Centre	AL22	16	0	0	0.0	-0.5	-0.10	< 0.50 Std. Dev.	Similar to outside city centre average
Outside City Centre	AL23	16	0	0	0.0	-0.5	-0.10	< 0.50 Std. Dev.	Similar to outside city centre average
Outside City Centre	AL24	16	0	0	0.0	-0.5	-0.10	< 0.50 Std. Dev.	Similar to outside city centre average
Outside City Centre	AL33	16	0	0	0.0	-0.5	-0.10	< 0.50 Std. Dev.	Similar to outside city centre average

Average density outside of City Centre boundary = 0.6 bed spaces per hectare

Threshold density indicating likely imbalance = 8.0 bed spaces per hectare

Table 4: Calculation of guideline bed space thresholds

Location	Average density (bed spaces per hectare)	Threshold density (bed spaces per hectare)	Area of 200m radius (hectares)	Bed space threshold (unrounded)	Bed space threshold (rounded to nearest 100)
		(a)	(b)	(a) x (b)	(a) x (b)
City Centre	33.7	83.2	12.6	1,048.3	1000
Outside of City Centre	0.6	8.0	12.6	100.8	100

Fig. 3: Density of PBSA - City Centre

### Density of Purpose Built Student Accommodation July 2022

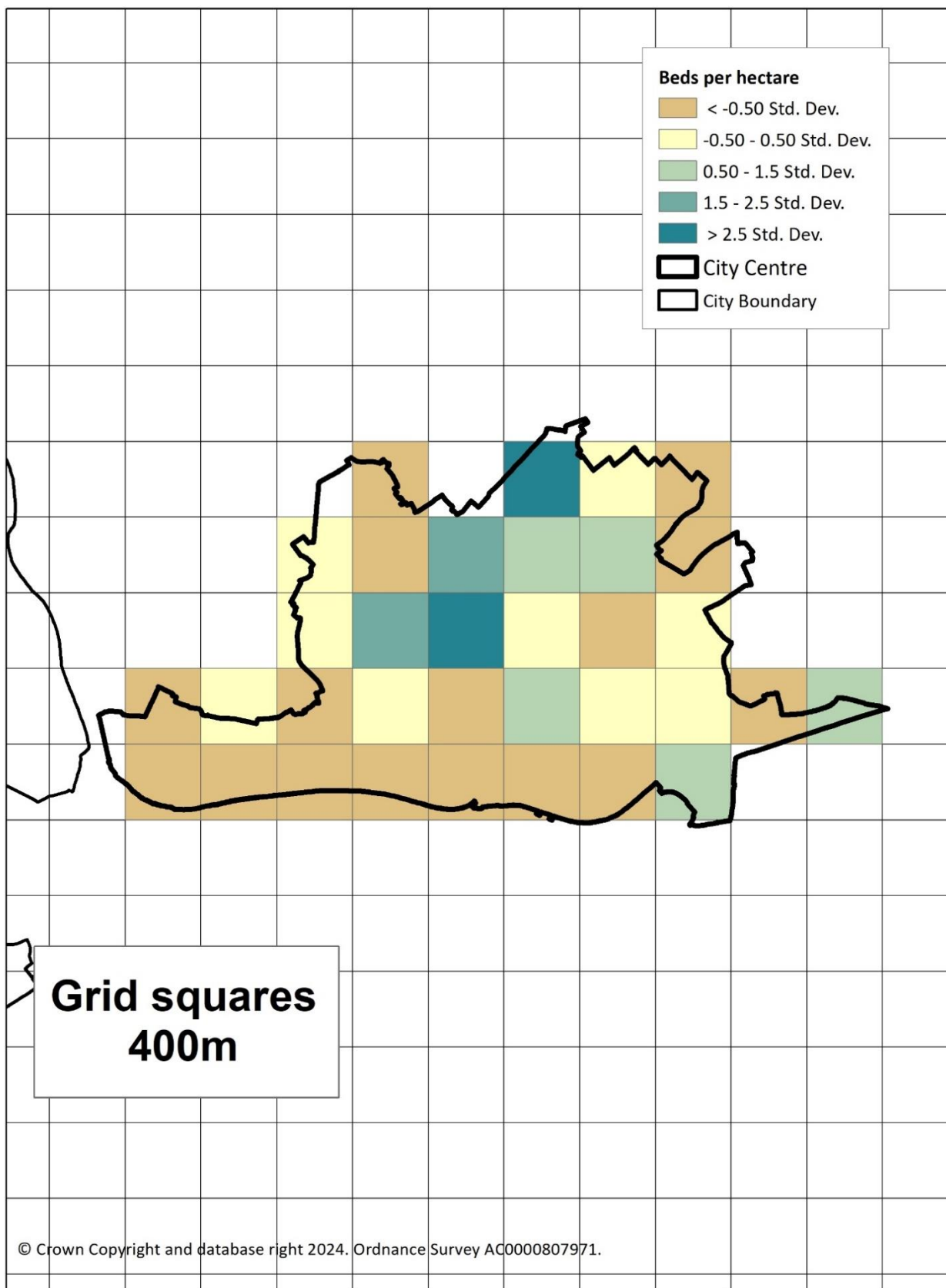
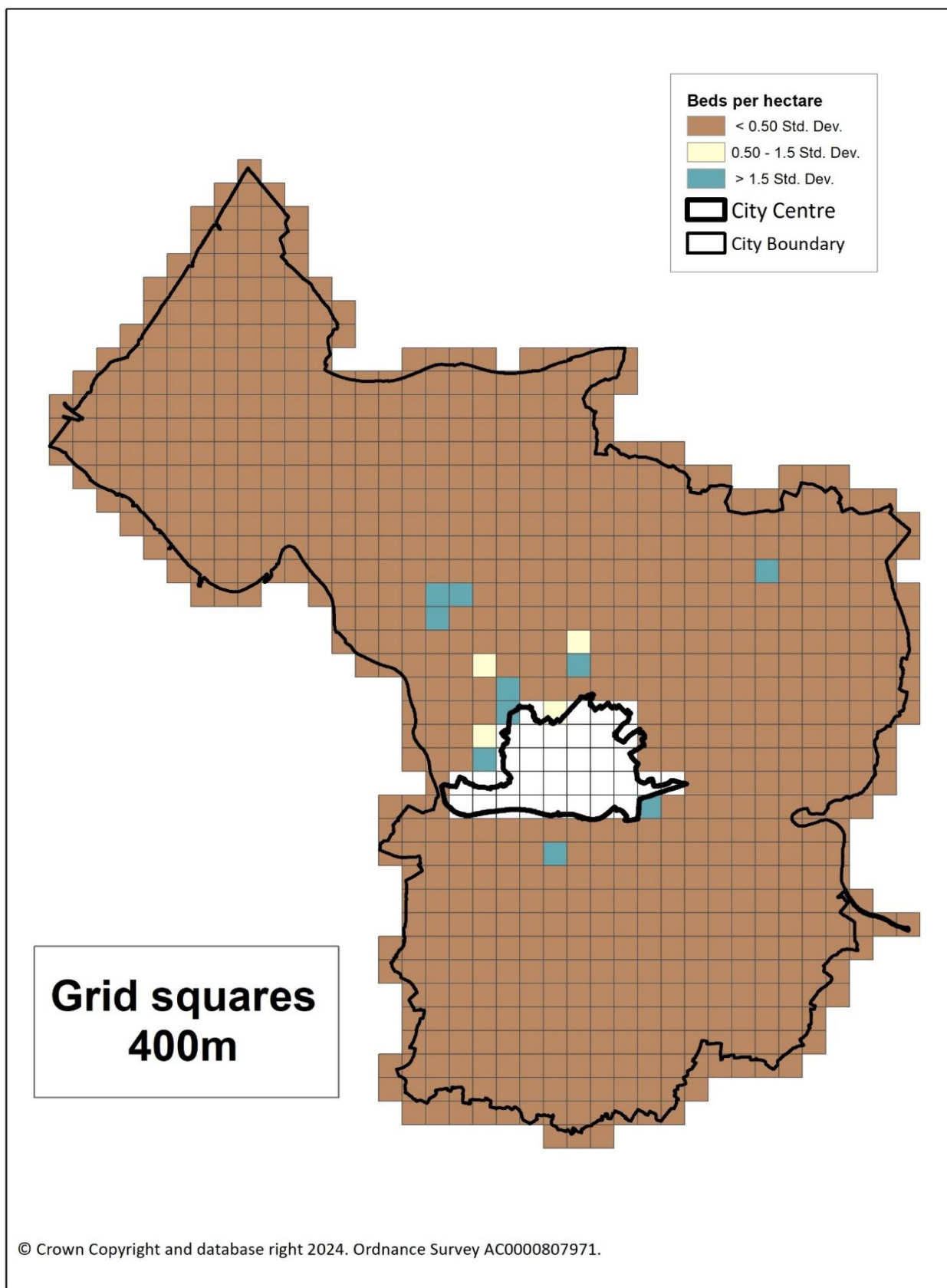


Fig. 4: Density of PBSA - Outside of City Centre

### Density of Purpose Built Student Accommodation July 2022



## Affordable student housing

Table 5: Percentage of UoB & UWE students awarded maximum maintenance loan for living costs 2013/14 to 2017/18

### University of Bristol

Academic Year >	2013/14	2014/15	2015/16	2016/17	2017/18
<b>Level of Award</b>					
Maximum	3,210	3,580	3,770	3,490	3,180
<b>England Undergraduates</b>					
<b>England undergraduates only</b>	n/a	12,655	13,135	13,730	14,125
% Maximum award level only	n/a	28.3	28.7	25.4	22.5
<b>Total students</b>					
<b>Total students</b>	20,170	21,560	21,900	23,595	24,850
% Maximum award level only	15.9	16.6	17.2	14.8	12.8

### University of the West of England

Academic Year >	2013/14	2014/15	2015/16	2016/17	2017/18
<b>Level of Award</b>					
Maximum	9,070	8,640	8,460	7,770	6,910
<b>England Undergraduates</b>					
<b>England undergraduates only</b>	n/a	16,825	16,850	16,835	16,995
% Maximum award level only	n/a	51.4	50.2	46.2	40.7
<b>Total students</b>					
<b>Total students</b>	27,050	26,665	27,710	27,880	28,790
% Maximum award level only	33.5	32.4	30.5	27.9	24.0

### Both universities

Academic Year >	2013/14	2014/15	2015/16	2016/17	2017/18
<b>Level of Award</b>					
Maximum	12,280	12,220	12,230	11,260	10,090
<b>England Undergraduates</b>					
<b>England undergraduates only</b>	n/a	29,480	29,985	30,565	31,120
% Maximum award level only	n/a	41.5	40.8	36.8	32.4
<b>Total students</b>					
<b>Total students</b>	47,220	48,225	49,610	51,475	53,640
% Maximum award level only	26.0	25.3	24.7	21.9	18.8

Source: Student Loans Company - FOI - ML payments to students at University of Bristol and University of West of England