

Appendix 2 - showing tracked changes

Purpose-built student accommodation in Norwich: Evidence and best practice advice note

Draft for consultation



Norwich City Council
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1 Purpose

- 1.1. Norwich has experienced a significant rise in ~~demand-proposals~~ for purpose built student accommodation (PBSA) in recent years. As a result of this increase, the city council is seeking to develop a better understanding of both the need for such accommodation and of the key factors that should be taken into consideration as part of the planning application process.
- 1.2. Purpose built student accommodation has traditionally taken the form of halls of residence provided by the universities themselves, primarily focused on the University of East Anglia (UEA) campus. However ~~demand-isproposals are~~ now coming predominantly from the private sector, with developers ~~proposing and~~ delivering significant levels of PBSA in the city centre and, to a lesser extent, in peripheral neighbourhoods. There are currently ~~2,295~~ 1930 units of PBSA in the 'planning pipeline'¹ for both conversions and new development.
- 1.3. The adopted local plan (the Norwich development management policies plan, 2014) does not contain a specific policy relating to such development. It is not legally possible to produce a Supplementary Planning Document to guide planning decision making as there is no current policy basis for such a document.
- 1.4. This document therefore does not have the status of a supplementary planning document but it may be material to planning decisions. Its purpose is to inform both applicants and decision makers by pulling together relevant policy, evidence, best practice and information about student development. It should also help inform emerging policy relating to student accommodation in the Greater Norwich Local Plan (GNLP) which is due for adoption in late 2021.

2 Introduction

- 2.1. Higher education institutions and their students have many positive economic impacts for Norwich, boosting the city's national and international profile, providing local companies with skilled graduates, and purchasing local goods and services. The universities have an important role to play in delivering a creative city as part of the emerging Norwich 2040 City Vision. Norwich's student population has been expanding steadily over recent decades alongside the Expansion of Higher Education, with both the University of East Anglia (UEA) & Norwich University of the Arts (NUA) planning for continued growth over the coming years.
- 2.2. Current data² shows that there are 20,170 students in Norwich. Of these, 18,015 students are full-time, accounting for about 13% of Norwich's total population of 139,900 residents, and potentially in need of accommodation.

¹ Planning pipeline is defined as either sites under construction, with planning consent but not commenced, or subject to a current planning application.

² Higher Education Statistics Agency (HESA) statistics for 2017/18.

- 2.3. Over the past five years Government has made a number of changes to admissions and funding policies for Higher Education which has the potential to affect the number and demographic characteristics of students studying and living in Norwich. Student enrolments in Norwich have continued to steadily increase, including a rise in the number of international students, particularly at UEA.
- 2.4. It is important to both the city of Norwich and the higher education establishments based here that the overall offer to students includes an attractive range of good quality accommodation. This can take the form of both purpose built student accommodation and private rented accommodation (which includes Houses in Multiple Occupation - HMOs).
- 2.5. Private rented housing including HMOs currently fulfil a large proportion of the need for student accommodation in Norwich. They are located in neighbourhoods throughout the city, but with particular concentrations in the Golden Triangle, West Earlham, Bowthorpe and parts of Eaton. HMOs are perceived as a problem in some areas where high concentrations may have some negative impacts. This note does not cover student HMOs however the provision of significant levels of PBSA is likely to take some pressure off the private rented sector. It is important that a joined up approach is taken to PBSA and HMOs; this note will help inform the council's policy response to the issue of proliferation of HMOs.
- 2.6. This note also aims to encourage potential for closer working with both universities and other relevant bodies (such as students unions), to encourage development of well managed appropriate student accommodation and reduce the potential for conflict arising between students and their neighbours. By encouraging good quality and appropriate student accommodation in Norwich with a positive student experience, the council will help support the continuing success of the higher education institutions in the city, and increased retention of graduates in Norwich following their studies thereby boosting the city's reputation and economic prospects.



UEA Campus Accommodation

3 Policy Context

National Planning Policy Context

- 3.1. The National Planning Policy Framework 2018 (NPPF) sets out the Government's policy approach to achieving sustainable development. In relation to delivering a sufficient supply of homes, the NPPF requires that the needs of groups with specific housing requirements are addressed and reflected in planning policies (paragraph 61). Students are specifically listed as a particular group whose needs should be addressed.
- 3.2. Planning Practice Guidance (PPG), updated in September 2018, states that local planning authorities should plan for sufficient student accommodation whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus. It states that encouraging more dedicated student accommodation may provide low cost housing that takes pressure off the private rented sector and increases the overall housing stock. The PPG encourages plan makers 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 of university-provided accommodation. Plan makers "need to engage with universities and other higher educational establishments to ensure they understand their student accommodation requirements". The city council is currently working with UEA to develop its new Development Framework Strategy, likely to be published in 2019. This will inform UEA's development requirements to 2036 as well as informing the preparation of the emerging GNLP.
- 3.3. The 2019 NPPF places increased emphasis on housing delivery, introducing a Housing Delivery Test and a new standard approach for assessing housing need. Guidance relating to the Housing Delivery Test includes communal student accommodation in the calculation of housing need, with an assumption that 2.5 units of student accommodation equates to one unit of general market housing. If all [2,2951,930](#) units of student accommodation with current planning consent were to be built out this would equate to [948-772](#) units of housing; ~~rising to around 1,288 units of housing if all pre-application proposals were progressed to approvable applications, granted consent and constructed~~. The NPPF also aims to build a strong and competitive economy, stating that significant weight should be placed on the need to support economic growth and productivity, and aims to ensure the viability of town centres.

Local Planning Policy Context

- 3.4. Policy DM13 relates to communal development and multiple occupation. Part of the policy relates specifically to residential institutions and student accommodation and sets out a number of criteria that such proposals need to satisfy in addition to satisfying the overall objectives for sustainable development in policy DM1, and criteria for residential development in policy DM12. The requirements of DM13 are summarised as follows:
(a) the site must not be designated or allocated for an alternative non-residential use;

- (b) if allocated for housing, it can be demonstrated that the proposal would not compromise the delivery of a 5 year housing supply for the city;
 - (c) the location provides convenient and direct access to local facilities and bus routes;
 - (d) the provision of shared amenity space is satisfactory; and
 - (e) applicants can demonstrate provision of satisfactory servicing and warden / staff accommodation.
- 3.5. Policy DM12 sets out principles for all residential development, not all of which are relevant to student accommodation. Relevant criteria are summarised below:
- (a) proposals should not compromise delivery of wider regeneration proposals and should be consistent with the objectives for sustainable development set out in the JCS and in policy DM1;
 - (b) proposals should have no detrimental impacts upon the character and amenity of the surrounding area (including open space) which cannot be resolved by the imposition of conditions; and
 - (c) proposals should contribute to a diverse mix of uses within the locality.
- 3.6. The Council is currently revising its affordable housing Supplementary Planning Document (SPD) to reflect the 2018 NPPF and the latest evidence for housing need which is set out in the 2017 Strategic Housing Market Assessment (SHMA). Once adopted, the Affordable Housing SPD will be a material consideration in determining applications for new student accommodation on sites allocated for housing or housing-led development.
- 3.7. As noted previously a new local plan is currently being prepared to provide the planning strategy and identify sites for growth across the three districts of Broadland, Norwich and South Norfolk. The GNLP will build on the long-established joint working arrangements for Greater Norwich, which have delivered the current Joint Core Strategy (JCS) for the area. The JCS plans for the housing and employment needs of the area to 2026. The GNLP will ensure that these needs continue to be met to 2036. The GNLP has a target adoption date of September 2021.
- 3.8. The Community Infrastructure Levy (CIL) applies to all new development which adds 100m² of new floorspace, the creation of a new dwelling, the conversion of a building no longer in lawful use ([link to information on when CIL applies](#)). Section 106 agreements and planning conditions may also be used where necessary. The [CIL Charging Schedule](#), adopted by Norwich City Council on the 25 June 2013, sets out the charge per square metre that will apply to each category of new development. Privately developed Purpose-Built Student Accommodation is regarded as Sui Generis use class which falls under the category 'All other types of development covered by the CIL regulations'. This currently returns a charge of £7.10 per m². The Charging Schedule rate is index linked which is updated annually, however it is expected that the schedule will undergo thorough review alongside production of the GNLP.

4 Need for additional purpose built student accommodation

- 4.1. One of the key objectives of this document is for the council to develop a better understanding of the need for additional PBSA in Norwich, to inform planning decision-making.
- 4.2. This section firstly pulls together current data on the student population and the distribution and characteristics of PBSA in Norwich. It then factors in projected growth in the student population at the city's higher educational institutions, whilst noting the factors that might affect growth in student numbers and future demand for PBSA. Based on this information and experience elsewhere it reaches a conclusion on the need for additional PBSA looking ahead for 5 and 10 years.

Current Student Population

- 4.3. The most recently available data (Higher Education Statistics Agency - HESA, 2017/18) on student numbers for UEA and NUA is shown in Table1, along with the breakdown between undergraduates and postgraduates, and UK and non-UK students. It also includes data about full-time students who require accommodation.

Table 1: Student numbers in 2017/18 (HESA data) including estimate of number of students requiring student accommodation.

Table 1	Total Students - 2017/18			Full-time students - 2017/18			Full-time students requiring accommodation *
UEA	Undergraduate	12,985	17,955	Undergraduate	12,725	15,850	13,948
	Postgraduate	4,970		Postgraduate	3,125		
	UK	14,025		UK	11,975		
	International	3,930		International	3,875		
NUA	Undergraduate	2,115	2,215	Undergraduate	2,115	2,165	1,299
	Postgraduate	105		Postgraduate	50		
	UK	2055		UK	2005		
	International	165		International	160		
Total	20,170			18,015			15,247

*(88% at UEA, 60% at NUA. 85% of full time students)

- 4.4. HESA published figures for 2017/18 show that 88% of UEA students and 98% of NUA students are full time. The institutional growth targets referred to below relate to total student numbers. The projected growth targets used in the calculation of need have been adjusted using these percentages to reflect estimated full-time student numbers.

4.5. Not all full-time students need to live in rented accommodation as they may live either in their parental/guardian home, a house or flat bought for them by their parents, or may own their accommodation (more likely at postgraduate level). The ratios used in Table 1 to arrive at students in need of accommodation were agreed with UEA and NUA: 88% of UEA full time students and 60% of NUA full time students are assumed to require student accommodation. This equates to 85% of students overall requiring student accommodation.

Distribution and characteristics of PBSA

- 4.6. The term 'purpose-built student accommodation' (PBSA) refers to both university maintained property and private sector halls. There are currently [5,145](#) student bedspaces in Norwich in PBSA. This figure will rise to [7,440](#) [7,695](#) bedspaces if all development in the planning pipeline is completed (although it should be acknowledged that not all pipeline development will necessarily be delivered).
- 4.7. Figures 1 to 3 below illustrate the distribution of existing and pipeline PBSA in Norwich; figure 1 is an overview whilst figures 2 and 3 show the UEA campus and city centre in more detail. These figures show that whilst most institutionally provided PBSA is focused on the UEA campus, the city centre is now a key location for privately provided PBSA, with some outlying developments in other parts of the city less well related to the HEIs. PBSA in the planning pipeline tends to be more concentrated in the city centre.
- 4.8. Appendix 1 provides the information on individual PBSA schemes that sits behind Figures 1 to 3, and is split into existing schemes and those in the pipeline.

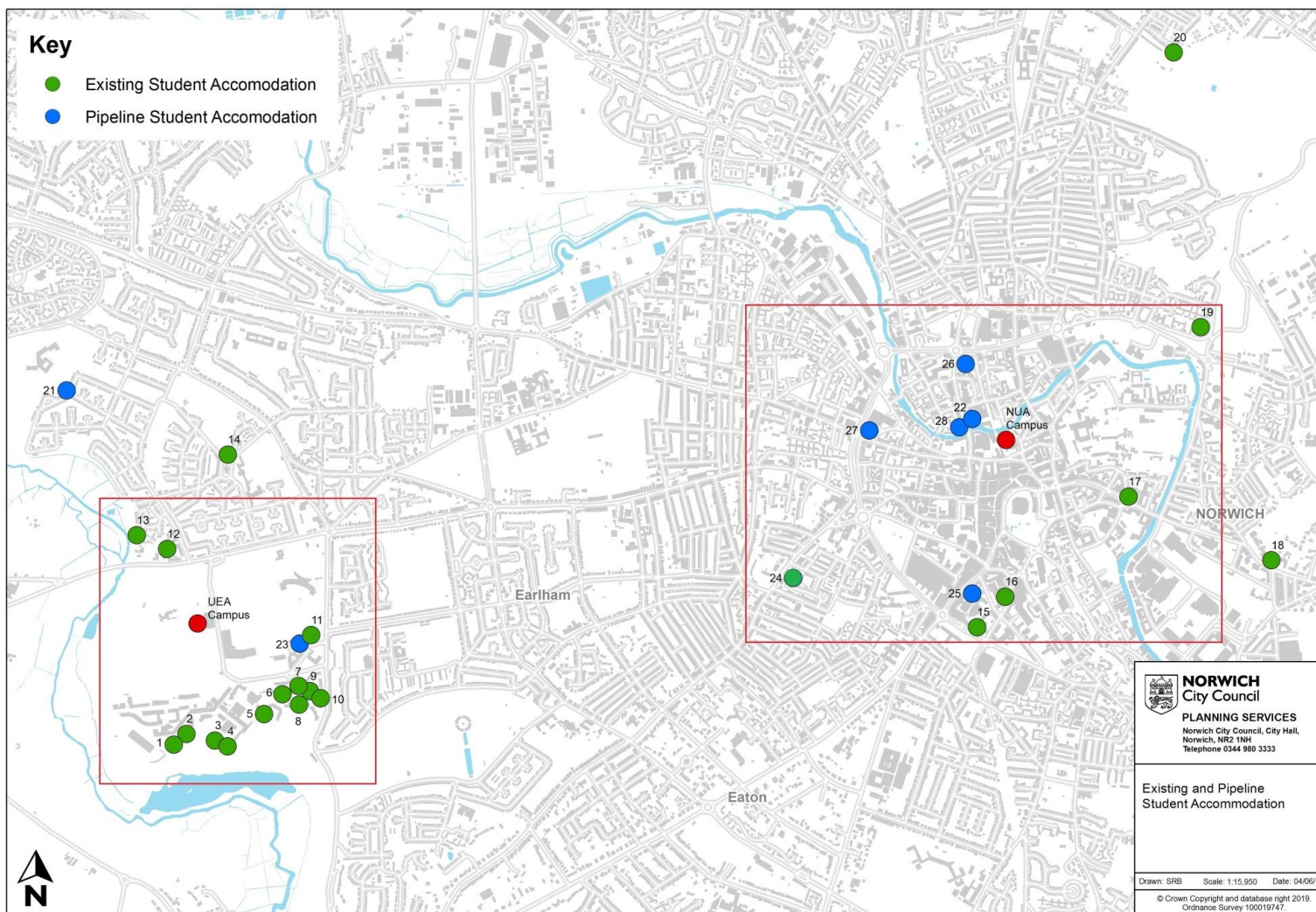


Figure 1: Distribution of Existing and Pipeline PBSA in Norwich overview

For details of PBSA location/names please refer to Appendix 1 (tables 1a and 1b).

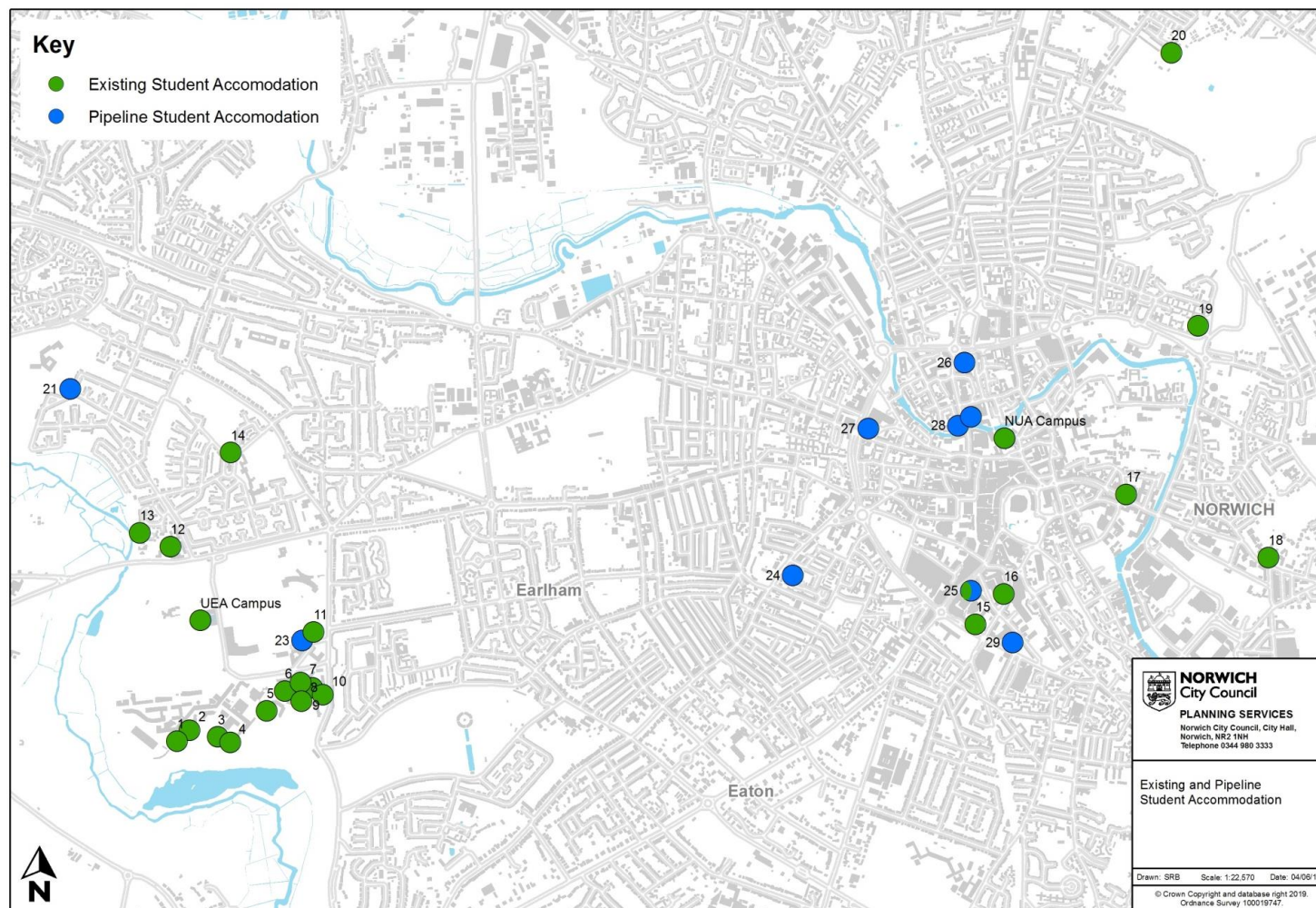


Figure 2: Existing and Pipeline PBSA at UEA Campus/Village (detail)

For details of PBSA location/names please refer to Appendix 1 (tables 1a and 1b).

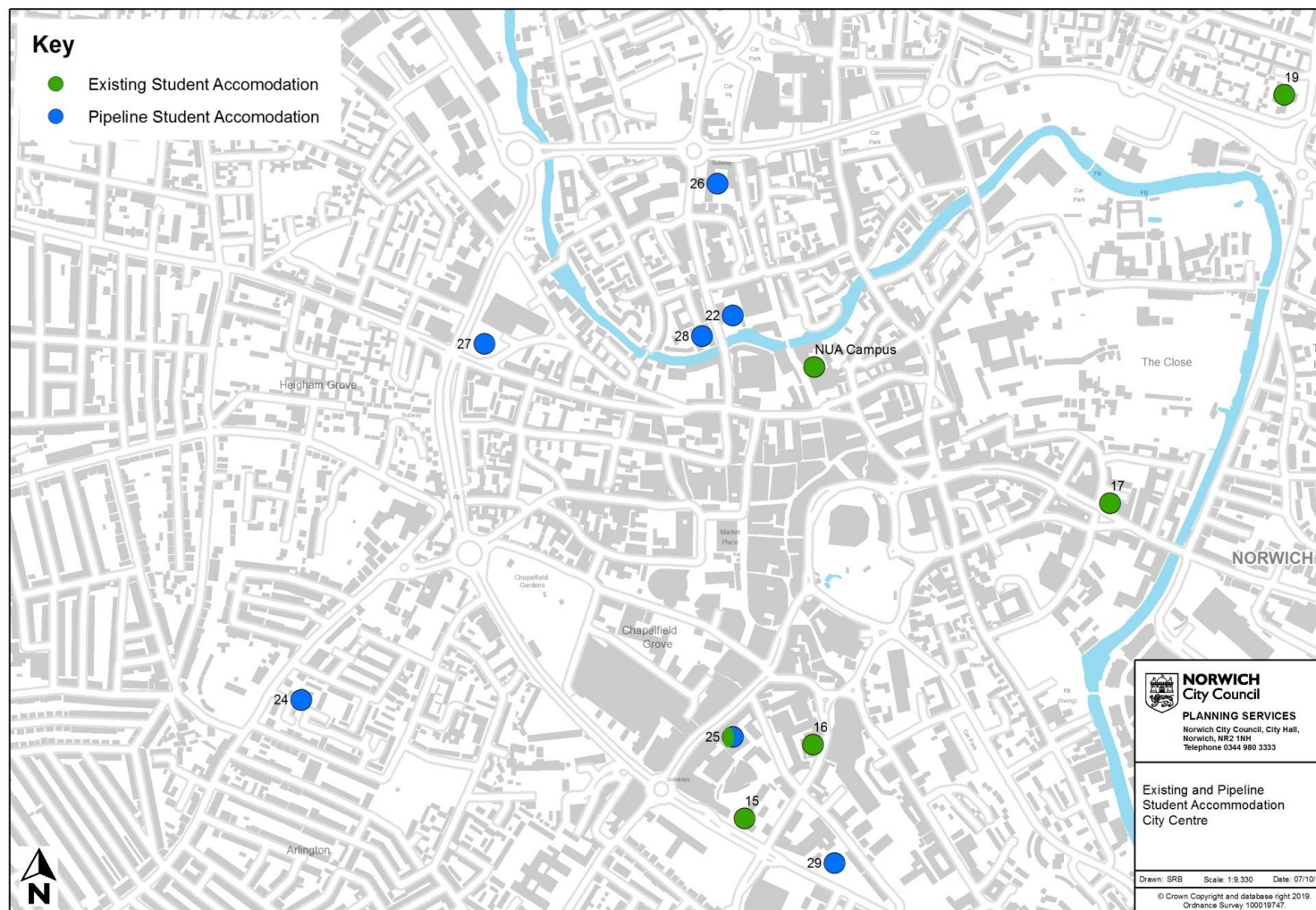


Figure 3: Distribution of Existing and Pipeline PBSA in the City Centre (detail)

For details of PBSA location/names please refer to Appendix 1 (tables 1a and 1b).

4.9. Of the existing PBSA in Norwich (Institutional and private), the majority is 'cluster' type. Cluster accommodation is typically a group of study bedrooms with either en-suite or shared facilities and a shared kitchen/communal space. Only a small proportion is 'studio' type. Studios are self-contained units within student accommodation whereby the occupant does not share facilities, kitchen or communal space with other students. 'Other' includes shared rooms, house style units in the UEA village etc. (refer to Appendix 1 table 1a for details)

4.10. Of the pipeline PBSA in Norwich, whilst the majority remains as 'cluster' type there is a recognisable increase in the proposed amount of studio type accommodation. The pipeline accommodation introduces two-person studios; these have been included in 'other'. (refer to Appendix 1 table 1b for details)

4.11. Overall, the future of PBSA in Norwich remains focused upon cluster accommodation, with an increased offering of alternative options.

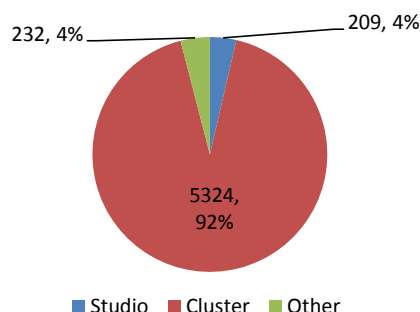


Chart 1: Existing PBSA characteristics

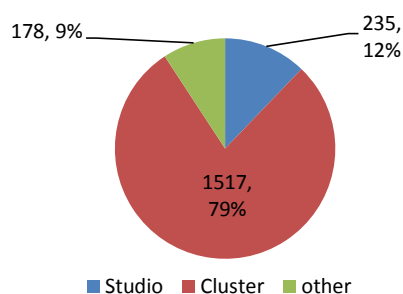


Chart 2: Pipeline PBSA characteristics

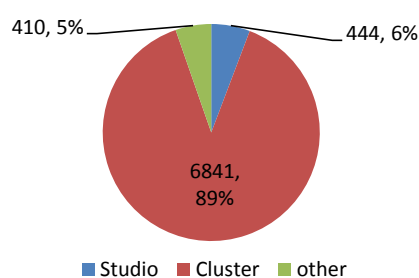


Chart 3: Existing and Pipeline PBSA characteristics

Projected growth and relationship to demand for PBSA

- 4.12. The council has liaised with both higher education institutions on their respective growth plans to inform this document.
- 4.13. As shown in Table 1, NUA is significantly smaller than UEA in terms of its student population so will have less impact overall on future demand for PBSA. NUA's aspiration is to maintain current student numbers over the next 5 to 10 years, with small incremental growth year on year. This has informed the growth projections set out in Table 2.
- 4.14. The UEA's current projections are for an increase in overall student numbers of 22% from 2016/17 (17,195 total students) to 2035/36 (22,000 total students). This represents a net increase of 4,805 students over the 20-year period from 2016 to 2036.
- 4.15. The UEA currently plans for small increase in campus-based accommodation through phase two of the Blackdale development (401 bed-spaces granted planning consent in 2016). NUA currently has planning consent to redevelop Mary Chapman Court (previously occupied by UEA) to provide 104 bed-spaces (granted planning consent in January 2019). Without development of further PBSA in the city, the predicted additional student numbers will need to seek accommodation in the private rental market (HMOs).



NUA – Mary Chapman Court

4.16. As indicated in Table 1, the proportion of international students is significantly higher at UEA than at NUA. Approximately 24% of total students from UEA are from either the rest of the EU or non-EU countries, compared to 7% at NUA (the UK average proportion of international students is 19% in 2017/18³). The evidence suggests that international students tend to be better financed than UK students and are considered to generate a greater demand for PBSA rather than for shared accommodation in the private rented sector.



INTO building – international student school/accommodation

4.17. Table 2 sets out estimated growth at UEA and NUA over 5 and 10 year periods, based on HESA data and ratios agreed with the HEIs.

Table 2: Estimated number of students requiring accommodation

Table 2	Estimated Total Students		Estimated Full-time students		Estimated Full-time students requiring accommodation *	
	5yrs	10 yrs	5yrs	10yrs	5 yrs	10 yrs
UEA	19,455	20,205	17,174	17,836	15,113	15,695
NUA	2,400	2,600	2,346	2,541	1,407	1,524
Total	21,855	22,805	19,520	20,377	16,520	17,219

*(88% at UEA, 60% at NUA. 85% of full time students)

³ Source: Universities UK, Higher Education in Numbers. <https://www.universitiesuk.ac.uk/facts-and-stats/Pages/higher-education-data.aspx>

- 4.18. Projected growth in student numbers is obviously a key determinant of the future need for PBSA, however there are a number of factors which may affect future student numbers which include:
- (a) Demographic changes: the UK is currently in the middle of a 'dip' in the number of 18 to 20 year olds. ONS statistics⁴ for national population projections for 18-20 year old UK citizens show a decrease of 10% in this age group from 2014 to 2021, followed by an increase in this group of 19% between 2021 and 2030. As UK students make up the majority of the higher education population this demographic 'dip' is currently impacting on student numbers but they are expected to grow during the next decade.
 - (b) Changes in demand from international student market: HESA data indicates that the overall number of non-UK students has been growing, largely driven by a Chinese market for good quality higher education. However it is also noted that countries such as China and India are developing their own high quality HE institutions. In addition China is undergoing a steep decrease in the young population, with a projected decrease from 176 million in 2010 to 105 million in 2025⁵. This will affect demand for UK university places, alongside competition from other countries for international students from outside the EEA, and emerging student migration policies from central government (Migration Advisory Committee – [Impact of international students in the UK](#)). Therefore it may be necessary to exercise a degree of caution in relying upon the international student market for growth in student numbers.
- 4.19. Other factors which may also affect future student numbers include:
- (a) increased competition between universities;
 - (b) tuition fees & loans systems;
 - (c) macro-economic factors such as the possible impact of Brexit;
 - (d) national and local trends for student living in PBSA;
 - (e) the impact of University league tables and student experience rankings;
 - (f) changes in desirability of achieving Higher Education qualifications; ~~and~~
 - ~~(g)~~ the potential introduction of 2-year degrees and increased focus on vocational qualifications; and
 - ~~(g)(h)~~ any changes to government policy arising from the Review of Post-18 Education Review (the Augar review) which aims to create a joined up post-18 education system.-
- 4.20. In addition there are several other factors which may affect student demand for PBSA. These include:
- (a) Changing student preferences: until recently there has been little alternative for students requiring accommodation in Norwich during their time at university outside of institutionally provided halls of residence, which are at most only available to first year students, or in student HMOs. At present there is no publicly available research into student

⁴ Source: Universities UK Patterns and Trends in UK Higher Education 2017
<https://www.universitiesuk.ac.uk/facts-and-stats/data-and-analysis/Documents/patterns-and-trends-2017.pdf>

⁵ Source: <https://www.universitiesuk.ac.uk/facts-and-stats/data-and-analysis/Documents/patterns-and-trends-2017.pdf>

accommodation preferences in Norwich from the student perspective, such as second or third year students seeking PBSA, however it is acknowledged that the choice of accommodation is driven to a great extent by the significant disparity in rental costs between PBSA and HMOs. The increasing availability of PBSA may see uptake from such students but this needs to be monitored. Although there is no evidence to suggest that students prefer to live in HMOs, the city council continues to receive regular applications for conversion of a residential dwellinghouse (C3a) to larger house in multiple occupation (sui generis HMO) indicating continuing pressure on the private rented sector.

- (b) Affordability of student accommodation: this issue was recently extensively reviewed by the National Union of Students (NUS) and Unipol, in their '[Accommodation Costs Survey – 2018](#)' report. There is increasing concern nationally that cost of accommodation is taking up greater proportions of financial support available to students: "over time, the rate of increase in student finance is falling short of the rate of increases in the cost of living and students are, on average, using a higher proportion of their income on rent". Other publicly available research reports that, nationally, private development of student accommodation was dominated by the provision of en-suite and studio bed spaces in 2017/18⁶. The increase of provision of studio rooms is noted as a cause for concern in their research, they argue that much studio development has been driven by land cost rather than true student demand, with evidence suggesting that a number of developments elsewhere in the UK are experiencing occupancy issues – despite demand continuing to outstrip supply for bed spaces at a national level. This is coupled with a significant increase in delivery of en-suite rooms both of which will be aimed at the higher cost and luxury market, and an under delivery of 'standard rooms' which are considered to provide the most affordable type of accommodation. Affordability issues may therefore affect demand for particular types of student accommodation. They are addressed further in section 5 of this document.

4.21. There are obviously a number of uncertainties about the future growth in student numbers. However many of these uncertainties existed in the past and, despite this, both NUA & UEA have successfully planned for and achieved increased student numbers over recent years. This suggests that their projected growth plans are a good basis for assessing future need, but it is important that, going forward, regular monitoring is undertaken in conjunction with the higher education institutions to verify assumptions and forecasts, and to gain more detailed information about changing student preferences.

4.22. Most PBSA developed within the city in recent years is fully occupied, even let prior to completion in some instances, which indicates strong demand for this product to date. Although there is a significant amount of PBSA in the planning

⁶ Sources: <https://www.cushmanwakefield.co.uk/en-gb/research-and-insight/2017/uk-student-accommodation-report-2017> , Unipol Accommodation Cost Survey 2018 available at: <https://www.unipol.org.uk/acs2018> , <https://www.alltop.co.uk/media/time-put-purpose-built-student-accommodation-myth-bed/>

pipeline, not all such proposals will necessarily go ahead for various reasons such as lack of finance or change in a developer's aspirations for a site.

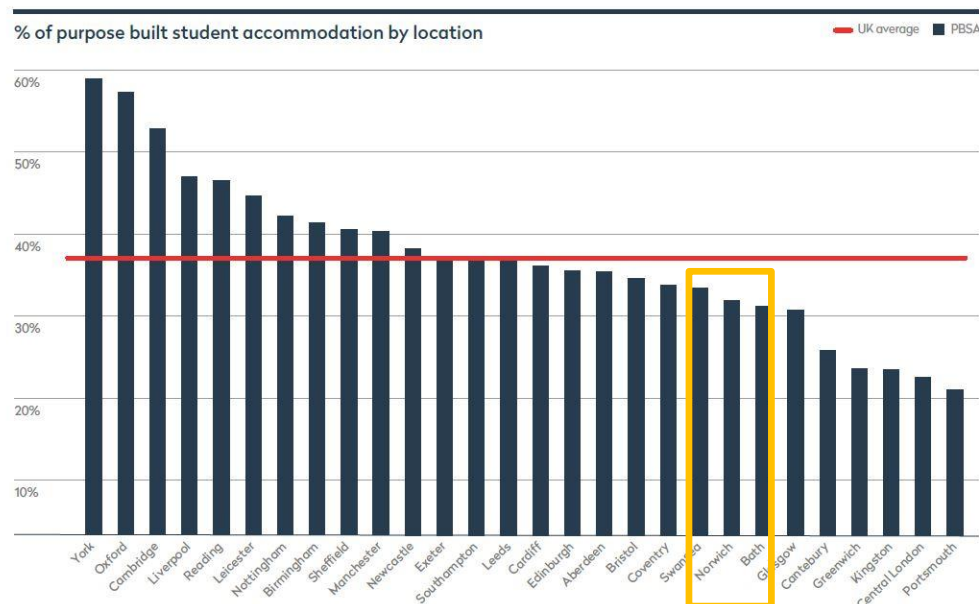
- 4.23. There is a risk that if Norwich does not facilitate the growth of its student population appropriately by providing opportunities for development of new and appropriate student accommodation, this may have negative impact upon the reputation and popularity Norwich currently enjoys as a destination for higher education. The city needs to offer a range of forms of good quality accommodation to maximise the growth of the universities, and continue to nurture the growth in international student numbers with Norwich remaining an attractive destination for higher education students.

Conclusion on need for additional PBSA

- 4.24. A review of best practice in other parts of the UK shows that there is no 'one size fits all' approach to calculating the need for PBSA based on the size of the student population.
- 4.25. Locally there is currently a lack of robust data regarding student accommodation preferences and future need for PBSA. For example, the numbers of students requiring purpose built student accommodation are not collected by the higher educational institutions in Norwich.
- 4.26. Therefore it has been necessary to make informed assumptions relating to the ratio of full-time students likely to require student accommodation which have been agreed with representatives from UEA and NUA.
- 4.27. Nationally, evidence from a report produced for the Mayor of Liverpool '[The Future of Student Accommodation in Liverpool](#)' found that "*generic investor evidence which suggested that investment in purpose-built accommodation will start to trail off once the bed-spaces to total student numbers ration reaches 40%*". This review was produced in 2015/2016 as such the market may have moved on since then. A report by [Allsop](#) suggests that, using HESA data, full-time student numbers have risen by 11.3% nationally between 2007-2017. A significant proportion of these students require student accommodation which will influence need over coming years. If this trend is reflected locally this will push up the proportion of students requiring accommodation.
- 4.28. There is no conclusive evidence to suggest that Norwich is reaching a ceiling in terms of the need for new PBSA, even if all pipeline development is delivered. From research produced in 2018 by GVA (now Avison Young)⁷ as shown in figure 4 below, PBSA is shown to provide around 35% of student bed-spaces in Norwich, which places Norwich below average for this type of provision in the UK. Approaches taken in other university cities have been to encourage PBSA to alleviate the pressure on the private rental sector; this is often accompanied by locational recommendations and affiliation with higher education institutions.

⁷Graph sourced from Avison Young (Formerly GVA)
<https://www2.avisonyoung.co.uk/insights/research/student-housing-review/> this graph represents the number of PBSA bed-spaces, including those under construction, relative to the number of full-time students in each location.

Figure 4: GVA Student Housing Review Spring 2018



4.29. Table 3 estimates the future capacity for PBSA in both 5 and 10 years' time based on student population projections, taking account of existing PBSA and development currently in the planning pipeline. The table uses the 40% threshold from the Liverpool study as ~~a working target~~ guidance to estimate need, and data is therefore based on total student numbers to be consistent with that study's methodology.

Table 3: Estimated PBSA bedspace capacity available

Table 3	2017/18	5yrs	10yrs
Total Students	20,170	21,855	22,805
Percentage of existing PBSA bed-spaces (5,145,765) to students	2629%	2426%	2325%
Percentage of existing and pipeline bed-spaces (7,4407,692) to students (pipeline = applications pending decision, approved but un-commenced & under construction)	3738%	3435%	3334%
Additional bed-spaces over and above 'pipeline' to reach estimated capacity (40% of total students)	628376	1,3021,050	1,6821,430

4.30. The 2017/18 figures in the table are based on the most recent HESA data and form the baseline for future projections. The table indicates that in order to meet the need arising from projected student growth there is an estimated potential ~~need~~ for up to ~~1,300~~ 1,000 additional units of PBSA in a 5 year period from now (by 2024) or nearly ~~1,700~~ 1,500 units by 2029. Due to uncertainty over future growth noted above, these figures should not be treated as a fixed target or cap, but as an estimate for potential growth.

4.31. It is concluded that the evidence suggests that there is potential for well-designed, well-located, and appropriately priced PBSA to meet the needs of a greater student population than at present, subject to this development according with the best practice guidelines set out in section 5 below. However, as stated above, ongoing data collection, monitoring and review of data in association with higher education institutions in Norwich is essential to improve the understanding and accurate forecasting of such developments.

5 Evidence and best practice advice:

5. Introduction:

- 5.1. The purpose of this document is to better inform both applicants and decision makers in relation to proposals for purpose-built student accommodation, with the objective of encouraging good quality accommodation in appropriate and sustainable locations which will meet the needs of Norwich's student population and contribute to mixed and inclusive neighbourhoods.
- 5.2. This section lists the factors that the council will take into consideration in the assessment of relevant planning applications. It pulls together existing policy, evidence, best practice and information about student development into a series of guidelines to inform the planning application and assessment process.
- 5.3. Individual proposals will be assessed on a case by case basis. Applicants are encouraged to engage with the council's [Pre-application service](#) which may increase their chances of receiving planning consent.

Need

- 5.4. Development proposals for PBSA will be supported, subject to the other considerations set out below, so long as the need for development remains justified in relation to the current and future size of the institutions. The evidence set out in section 4 above estimates that there is currently considered to be a need for additional PBSA in Norwich.
- 5.5. The need for student accommodation will be a material consideration in the assessment of planning proposals for PBSA (both new-build and conversions). If need cannot be demonstrated, proposals are unlikely to be supported.
- 5.6. The quantum of need will change over time, as further sites are developed for PBSA, or other factors change such as the universities' growth plans. Information on need will be kept up-to-date and will be informed by ongoing council engagement with the higher education institutions. Any subsequent updates on need will be publicised on the council's website or included in a future iteration of this document.
- 5.7. Whilst it is recognised that it is important to meet the accommodation needs of the current student population and its planned growth, there remains a need in Norwich for development of market and affordable housing as defined in the Strategic Housing Market Assessment ([SHMA](#)). This means that, while it is important to consider the merit of additional student accommodation, due consideration should be given to the opportunity to deliver much needed housing.
- 5.8. Student ~~housing should not be prioritised to the detriment of other forms of housing or development undermining accommodation is one of a number of forms of housing which may contribute to~~ the provision of mixed and balanced communities in Norwich. ~~However s~~Student accommodation in the city centre

may be competing with other, high value commercial interests. Care needs to be exercised in ensuring sites utilised for student accommodation do not impact on the overall commercial potential of the city or the implementation of local plan policy.

Location:

- 5.9. Historically the majority of university accommodation for students has been located on the UEA campus but, as Figure 1 shows, that pattern is changing and a significant amount of new PBSA has been provided in the city centre in recent years to serve both UEA and NUA.
- 5.10. The key locational focus for future provision of new student accommodation will be the UEA campus and the city centre where the two key higher education institutions are situated. This does not rule out provision of PBSA to serve the future needs of Norwich City College, should that need arise.
- 5.11. Development proposals will be supported in principle at the UEA campus (as defined in [Adopted Policies Map – South Sheet](#) in accordance with policy [DM26](#)), subject to all the other considerations in this section. Away from the UEA campus proposals will be supported where they are in a location otherwise suitable for residential development with [excellent](#) sustainable access to the higher education institutions served [as described in paragraph 5.16](#).
- 5.12. Unite Students Resilience report 2016⁸ states that both applicants and current students place a high priority on location / walking distance to campus and service provision (such as laundry facilities) ahead of physical features such as room size, when choosing accommodation.
- 5.13. Proposals should also be located with good access to existing local facilities and amenities, such as shops, cafes, and leisure uses appropriate to the student market, to ensure a high quality of student experience.
- 5.14. PBSA will not normally be considered acceptable on sites allocated or designated for other purposes, unless evidence is provided to demonstrate that an allocated site has no realistic prospect of being developed and that it is therefore relevant to consider the extent to which an alternative use would address an unmet need, except in certain circumstances as set out below (5.49) and subject to not undermining planning policies in the adopted local plan (such as DM [12,13, 15, 16, 17, 18, 19, 20](#)).
- 5.15. For city centre located PBSA developments, mixed-use development is encouraged, with active frontages provided at street level to maintain vibrant streets for the wider community throughout the year.
- 5.16. As stated above proposed new PBSA developments must demonstrate that the site is in an accessible location for higher education institutions and accessible by sustainable transport modes (including bus transport, cycling and

⁸ <https://www.unitestudents.com/about-us/insightreport/2016-full-report>

walking). For all applications it should be demonstrated that bus provision runs at times and with capacities appropriate for the number of students requiring the service to fulfil their educational needs. Secure cycle storage should be provided on site for occupants and their visitors in accordance with policy DM28 'Encouraging sustainable travel' and appendix 3 'standards for transportation requirements within new development' of the adopted local plan.

5.17. Proposed developments should be appropriately located to enable them to be car free in accordance with policy DM32 'Encouraging car free and low car housing' of the adopted local plan. If sites are appropriately located there should be no need or desire for residents to use a private car (with the exception of appropriate provision of car parking spaces for disabled people). Further to this, management of sites and contractual arrangements should be agreed with residents to discourage/prohibit private car parking/use whilst in residence.

5.18. Access to Norwich Car club or provision of a Norwich Car Club bay or bays close to proposed development may contribute to a successful car free development.

Scale:

5.19. In recent years the council has received proposals for PBSA for a range of sizes. Appendix 1, table 1b shows schemes currently in the pipeline, which range from a small development of 34 units at St Mildred's Road with planning consent to the Crown Place development on St Stephen's Street where construction of ~~700~~[705](#) units is ~~underway~~ [nearing completion](#).

5.20. There are a number of factors considered relevant to the appropriate scale for provision of new purpose built student accommodation:

- (a) The development must be of sufficient scale to be capable of providing for high standards of student welfare, including 24 hour staffing on-site. Student resilience and emotional wellbeing are of great concern to the higher educational establishments as well as to the council. The Unite survey referred to above states that good quality accommodation has an important role to play in student wellbeing, with issues such as provision of on-site maintenance, reception and security being key considerations for students, and identifies the ability to talk to wardens and counselling services as very valuable in times of difficulty.
- (b) New PBSA development should ensure that adequate infrastructure and on-site amenities, as described in these guidelines, can be provided and serviced effectively.
- (c) New PBSA development should achieve appropriate densities, and planning decisions should support development that makes efficient use of land (National Planning Policy Framework, paragraph 122). On the one hand proposed PBSA should be of sufficient scale to represent an efficient use of land; low-density developments are unlikely to be able to demonstrate this. On the other hand, proposed PBSA should contribute to mixed and inclusive neighbourhoods, and should not be so high density that it dominates existing residential developments.

5.21. In line with these considerations, the city council regards developments within the range of 200-400 student bed-spaces as acceptable in principle for new PBSA developments in Norwich. ~~It is considered that De~~ developments below the 200 threshold are considered less likely to be able to viably provide the appropriate level of management and facilities required to ensure a high quality development. Proposals within the 200-400 bed-space range are likely to be relatively high-density which would be most suited to city centre or campus locations. PBSA development In excess of 400 bed-spaces may have negative impacts on neighbourhoods and existing residential communities.

5.22. However this range is not a cap and applications outside this range will be considered on their merits. Well managed accommodation in accordance with a management plan can ensure the amenity of neighbouring properties is not adversely affected and can address the wellbeing of occupants. There may be valid reasons why applications for PBSA developments outside the 200-400 range are appropriate, for example such development might include a mixture of educational uses within the site in addition to student accommodation. ~~In any case, Any application for PBSA applications development outside this range~~ should provide appropriate justification to address the issues set out in paragraph 5.20 above.

External Building Design:

5.23. Norwich is a historic city with many important cultural landmarks. The appearance, scale, height and massing of proposed developments are highly important considerations and must be sympathetic to relevant positive characteristics of the site and its setting. Norwich local authority area has 17 designated conservation areas, approximately 1,500 statutory listed buildings and 31 scheduled ancient monuments of international importance; as well as many locally listed buildings. It is important that regard is paid to safeguarding the historic environment.

5.24. Developments should respect the existing form and grain of the local area, including the historic skyline, and must be designed sympathetically to respect their immediate and surrounding environments to minimise any adverse impacts. Inappropriate design of scale influenced by economic factors alone will not be supported. Building design must accord with policies and guidance laid out in paragraph 5.26 below. Specific advice on individual projects can be provided by Conservation and Design officers as part of a pre-application advice request. Historic England welcome early discussion when student accommodation sites are first brought forward so that detailed development of proposals can take place in a collaborative manner.

5.25. Buildings should be designed with minimal impact upon the amenity of its surroundings and neighbouring residents, with regards to noise, loss of light, overshadowing and loss of privacy and shall be assessed against relevant local planning policies. Proposed developments should also address the cumulative impact of the new development.

5.26. Policies in the Adopted Local Plan (2014) relevant to design and building form include:

DM2: Ensuring satisfactory living and working conditions (Amenity),

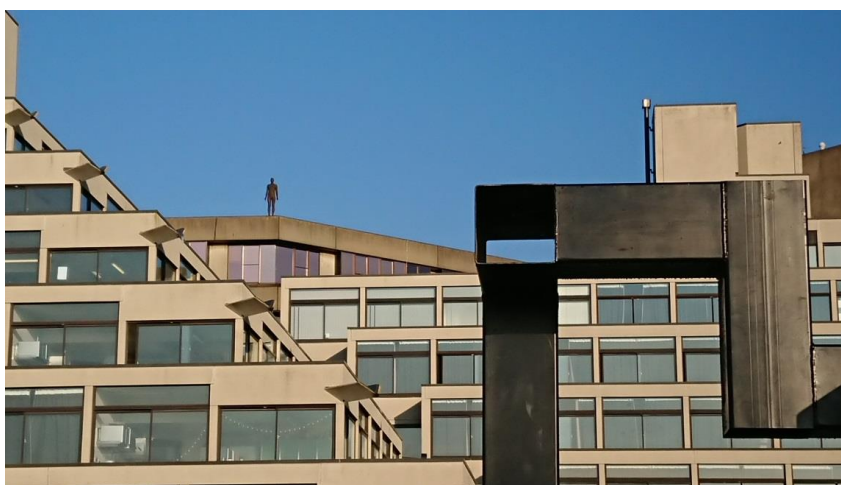
DM3: Delivering High Quality Design [which includes reference to Secured by Design guidelines \(further detail available at www.securedbydesign.com\)](http://www.securedbydesign.com);

DM9: Safeguarding Norwich's heritage,

Local heritage and conservation design guidance can be found on the council website: [Heritage and Conservation](#)

Heritage Interpretation SPD: [Heritage Interpretation SPD](#)

Conservation area appraisals: [Conservation Area Appraisals](#)



UEA Ziggurats



Pablo Fanque House

External Amenity and Landscape Design:

5.27. Creating sustainable communities depends, amongst other things, on the relationship between the design of buildings, their location, and the quality of the outdoor space. Successful places, where people are attracted to live, have successful provision of external amenity and green spaces offering lasting economic, social, cultural and environmental benefits.

5.28. External green space is a vital component of healthy living. Given the increase in high-density residential developments in recent years, it is essential to ensure that a sufficient supply of high quality external space is included to minimise impacts on biodiversity and provide net gains in biodiversity and green infrastructure where possible. All development proposals should seek to manage and mitigate against flood risk from all sources and opportunities should be taken to improve blue and green infrastructure where appropriate. Appropriate landscaped external space for use by occupants is an essential

requirement of successful applications for PBSA. City centre developments in particular must seek to facilitate this provision, preventing increasing pressure on existing public amenity and green space.

5.29. General guidance relating to local landscape design and information expected to be provided in support of a planning application can be found in the adopted 'Landscape and Trees supplementary planning document' available on the council website: [Landscape and Trees SPD](#).

5.30. Policies in the Adopted Local Plan (2014) relevant to landscaping include:

DM2: Ensuring satisfactory living and working conditions

DM5: Planning effectively for flood resilience

5.30. DM6: Protecting and enhancing the natural environment

DM7: Trees and development,

DM8: Planning effectively for open space & recreation

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Internal Building Design:

- 5.31. Purpose built student accommodation is typically occupied by students for the majority of a year (contracts are often between 46 and 48 weeks in length) and therefore it is critical that design is of a high quality with adequate amenity to contribute to healthy sustainable lifestyles including daylight, sunlight, privacy and outlook. Appropriate amenities and facilities must be provided for the occupants including sufficient communal space, private and shared facilities, for example kitchens and dining rooms should be designed to be of a sufficient size for all occupants to dine together. Sufficient on-site laundry facilities are often regarded as important facilities for students. [Internal design should have regard to Secured by Design guidelines \(see www.securedbydesign.com\)](http://www.securedbydesign.com).
- 5.32. Student accommodation has unique characteristics differing from other residential accommodation. Student accommodation should provide an appropriate environment in which to study as well as live, socialise and sleep. It is likely that elements of the buildings will be in use for 24 hours a day. In high density developments where the occupants are unable to select their neighbours, the provision of private space is also important.
- 5.33. The government has provided guidelines for space standards in general market housing in the “Technical housing standards – nationally described space standard”. However, there are no equivalent guidelines for student accommodation.
- 5.34. The ‘Metric Handbook – Planning and Design Data’⁹ is a well-recognised source of planning and design data for all types of development. In the absence of government technical standards for student accommodation the council has used the Metric Handbook as the basis for the following requirements, which it expects proposals for PBSA to meet:

Room Sizes:

- A standard study bedroom without en-suite bathroom should have a minimum area of 10m².
- A standard study bedroom with en-suite bathroom should have a minimum area of 13m².
- A study bedroom shared by two students with en-suite bathroom should have a minimum area of 20m².
- Appropriate provision must be made for accessible rooms and wheelchair access in accordance with document M4 of the Building Regulations, with at least 5% of bedrooms to be wheelchair accessible. Requirements for accessible rooms are also addressed in BS 8300:2009+A1:2010; wheelchair users require larger study bedrooms, with room for a wheelchair turning space between furniture. Circulation, social and communal spaces should also be accessible.
- Studio ‘room’ for one student with en-suite bathroom and kitchen area should have a minimum area of 18m². Studio rooms could arguably be comparable

⁹ ‘Metric Handbook – Planning and Design Data’, fifth edition (2015), edited by Pamela Buxton (Chapter 23 Student housing and housing for young people)

to a bedsit flat with additional space sufficient to accommodate the appropriate furniture to use for study purposes as well as an en-suite bathroom.

- Studio 'flat' for one student or a couple with en-suite bathroom and kitchenette should have a minimum area of 30m². Studio flats could arguably be comparable to 1 bed 1 person flats for minimum internal space requirements. Other shared facilities such as laundry and communal spaces may contribute to the acceptability of the comparably smaller space in a studio flat. However there must be sufficient space to accommodate the appropriate furniture to use for study purposes as well as an en-suite bathroom
- Sizes of communal rooms will need to be determined against the number of people sharing them. The figures in table 4 below are indicative only, for guidance. However if alternative sizes are considered appropriate, for example due to additional provision elsewhere in the development, this should be demonstrated by supporting evidence as part of a planning application .:

Number of Residents	3	4	5	6	7
Living room in a dwelling with dining kitchen	13m ²	14 m ²	15 m ²	16 m ²	17 m ²
Dining Kitchen	10 m ²	11 m ²	12 m ²	13 m ²	14 m ²

Table 4: communal spaces – indicative minimum sizes

5.35. Overall accommodation satisfaction is important for student wellbeing. Recent student experience surveys carried out by Unite & Higher Education Policy Institute (hepi) relate accommodation as a significant contributing factor to general life satisfaction. Supporting students to integrate well in their accommodation and socialise with housemates helps to ensure an overall satisfactory student experience; this results in a greater level of retention of students and increases wellbeing.

5.36. There appears to be some correlation between 'living with others' and being more likely to report learning gain. This could be a benefit of sharing accommodation and therefore being more likely to engage in peer-to-peer discussion, support and collaboration either of an interdisciplinary or cross-disciplinary nature (Higher Education Policy Institute 2018 Student Academic Experience Survey)¹⁰. The Unite student resilience report referred to above indicates that both applicants and current students rate the size of kitchen/dining and communal areas as important attributes when selecting their accommodation. These positive attributes are unlikely to be achieved through residing in studio flats, there are concerns that such accommodation does not encourage interaction with fellow students and can encourage social isolation. Further to this, speculatively developed PBSA that is delivered as studio flats is unlikely to be affordable for a large proportion of the student population. ~~Developments seeking provision of studio flats should do so only in conjunction with specific nomination rights from an institution.~~

¹⁰ <https://www.hepi.ac.uk/2018/06/07/2018-student-academic-experience-survey/>

Management:

5.37. Given the recent trend for increased provision of privately developed PBSA in the student housing market, it is important that quality of management of PBSA is on a par with university managed accommodation. Proposals for new student accommodation should be accompanied by a management plan which displays how the accommodation will be managed during operation; this should include (but not exclusively):

- **Arrangements for moving in/out days:**

To ensure that impacts on traffic network are managed effectively. A schedule of how this will be operated will be expected.

- **Arrangements for Servicing and Deliveries**

To ensure that appropriate arrangements have been considered to ensure impacts on traffic network are managed effectively. A schedule of how this will be operated will be expected.

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- **Control of Car use:**

It is expected that proposals for new PBSA will be located in the city centre or the UEA campus, and will be expected to be car free developments, (with the exception of provision for students with disabilities). Applicants should provide details of measures to ensure that a car free policy shall be adhered to (such as clear advertising as a car free site prior to moving into the property, terms of tenancy agreements, restrictions on parking within a one-mile radius of the property amongst local residences, parking inspection patrols, procedures for dealing with tenants who do not abide by the agreement, measures to positively promote alternative sustainable transport methods).

- **On site security, cleaning and maintenance procedures:**

Security: Details of appropriate security measures, such as a security door and window locks, intercom entry systems, lighting, wardens and CCTV, which can all help to make the local environment safer for occupants and reduce opportunities for crime.

Cleaning: Nature and frequency of provision including the responsibilities and expectations for all parties involved and how this information shall be conveyed. (e.g. what areas will be cleaned by professional cleaners & expected frequency; what areas are the responsibility of the occupants to clean)

Maintenance: Details of commitment to a 'planned maintenance schedule' as well as procedure for reporting and dealing with unexpected maintenance events.

- **Refuse storage and collection arrangements:**

High densities of students living together can produce a large amount of refuse. Refuse storage and collection arrangements must be clearly defined, along with guidelines for responsibilities of occupants including refuse minimisation and positive recycling protocols.

- **Compliance and Standards:**

Details to be provided to demonstrate that compliance with relevant safety standards (Fire, Health and Safety etc.) and how this will be managed and updated.

Details of key personnel and their responsibilities.

Method of conveying information to occupants including detailing their responsibilities.

Paragraph 0.16 of 'Building Regulations Approved Document M: access to and

use of buildings, volume 2 – buildings other than dwellings¹¹ indicates that purpose-built student living accommodation should be treated as hotel/ motel accommodation in relation to space requirements and internal facilities, as set out in paragraphs 4.17 to 4.24 of the document. These include a requirement for at least 5% of bedrooms to be wheelchair accessible.

- **Neighbour/Community liaison to address & mitigate concerns:**
 - Details of proposed measures to ensure that occupants of the accommodation integrate effectively into the host community. (Existing example initiatives in Norwich could include UEA SU 'Good Neighbour' scheme)
 - What procedures, measures and guidance will be provided to address or mitigate issues that may arise?
 - How will expectations of occupants be conveyed to them & what may be the repercussions of not abiding by expectations.
 - Details of method of how neighbouring residents may report concerns, and expectations for resolution management.
- **Appropriate soundproofing:** to address both internal and external noise transmission.
- **Pastoral care and welfare:**
24 hour staffing on site is required to provide for high standards of student welfare. Pastoral care is considered to be of high importance in PBSA to ensure the wellbeing of the occupants. Details as to how this shall be provided will be required, including details of partnership with external bodies or Higher Education Institutions where appropriate. (e.g. Issues that may arise: debt management, health issues, criminal behaviour). Methods of delivery may include personnel on site, senior resident/resident tutor scheme, and/or a telephone helpline. The level of provision is expected to vary dependent upon the scale of the proposed development and whether the accommodation provided is on or off campus.
- **Provision of onsite wardens** is considered to be beneficial to ensuring that there is a point of contact to address concerns relating to all of the above issues as and when they arise.
- **Provision of a fire strategy; this will be used to develop the Fire Risk Assessment required on occupation by the The Regulatory Reform (Fire Safety) Order 5005 Article 9.**

5.38. Provision of a well thought out and detailed management plan may assist in building community confidence in proposed developments and promote a positive experience for students as residents. Developments subject to management and supervision arrangements appropriate to the size, location and nature of occupants of schemes may be supported.

Partnership/Support from Higher Education Institutions in Norwich:

5.39. Higher education institutions and their affiliated Students Unions are best placed to understand and represent the needs of their students. ~~It should be demonstrated that~~ Ideally proposals for new student accommodation ~~has~~ should

¹¹ Source: Building Regulations Approved Document M – Volume 2.
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/441786/BR_PDF_AD_M2_2015.pdf

involved consultation with, and meets the needs of, higher education institutions in Norwich as representatives of their students. ~~This could include a~~ Agreement ~~should be sought~~ relating to appropriate: location, facilities, amenities, tenure type, cost, and management. ~~It should also be demonstrated that accommodation meets either a current need or accurately projected future growth of HEIs in Norwich.~~

5.40. A planning application for proposed new student accommodation developments ~~should would ideally~~ demonstrate that contact has been made with at least one of the HEIs in Norwich. ~~The through the~~ following means may be considered appropriate (in order of preference)::

- (a) Proposed new student accommodation can be demonstrated to be in collaboration/partnership with one of Norwich's HEIs.
- (b) Proposed new student accommodation has agreed nomination rights from at least one of Norwich's HEIs.
- (c) Consultation with at least one of Norwich's HEIs can be demonstrated with a written response from the institution(s) confirming support in principal for the proposal as submitted.

5.41. The City Council proposes the establishment of a working group containing representatives from the City Council, Higher Education Institutions and Student's Unions, to meet periodically to provide improved assessment and monitoring of student numbers and accommodation needs.

Providing an accommodation mix for a wide range of students

5.42. As discussed in the Policy Context above, the planning practice guidance (PPG) encourages more dedicated student accommodation to provide low cost housing that takes pressure off the private rented sector and increases the overall housing stock. The information presented in paragraphs 4.20(b), while referencing national trends, raises a degree of caution that recent delivery of PBSA may not be in accordance with PPG guidelines. Rather than delivering low-cost accommodation, development has largely been targeted at the high-cost luxury market aimed at the overseas/mature student sector. This potentially upwardly affects rental rates in *all* areas of student accommodation delivered through the private sector.

5.43. The National Union of Students (NUS) has a policy, referred to in paragraph 4.20 (b), that an affordable rent for PBSA is no more than 50% of the maximum amount of student finance available in England, and that providers should ensure that at least a quarter of their portfolio sits within this cap. In addition, the BBC report discussed in Appendix 4 highlights the importance of ensuring that there is an appropriate mixture of tenures and rental arrangements to suit a variety of student's financial situations. Care must be taken not to saturate the market with high-end high-cost provision.

5.44. The following methods to improve affordability of student accommodation should be considered by applicants when developing proposals for PBSA:

- offer a range of room types

- offer rents at a range of prices
- increased amount of low-priced rooms, offer some at a percentage of rent below market value
- vary tenancy lengths
- external protocol for affordability criteria (Unipol/students' union etc.)
- include other bills in rent cost (internet, energy etc.)
- offer subsidies/bursaries/scholarships

~~5.45. Applicants should demonstrate that contact has been made with HEIs & their Student Union organisations in Norwich and agreement/support has been reached on the level of low cost provision of accommodation or affordability policy of the development.~~

~~5.46-5.45.~~ All planning applications for PBSA shall be scrutinised to ensure that they are genuinely accommodation solely for use by students, and not C3 (ie. general market) housing. Applicants will be liable for affordable housing contributions for developments which are not considered to be genuine Sui Generis (private) / C2 (institutional) student accommodation, all applications will be liable for Community Infrastructure Levy.

~~5.47-5.46.~~ Sui Generis PBSA does not have any permitted development rights for change of use, as such any future change of use would require formal planning consent.

Affordable housing provision

~~5.48-5.47.~~ Both the Joint Core Strategy and Norwich local plan acknowledge the importance of new residential development that contributes to a mix of housing types and tenures, which in turn contribute to mixed and balanced communities. New student accommodation is often proposed on sites that could otherwise be developed for general purpose housing which would include affordable homes as part of the wider tenure mix.

~~5.49-5.48.~~ Where proposals for PBSA come forward on sites allocated for residential or residential led development in the adopted Norwich Local Plan (2014), the [Affordable Housing Supplementary Planning Document \(June-July 2019\)](#) notes [at paragraphs 2.20-2.27](#) that the loss of the opportunity for affordable housing on such sites is a matter that can be taken into consideration when considering relevant planning applications. In accordance with the SPD, a quantum of affordable housing will be sought on such developments that would be expected if the site were developed for general needs housing. Such provision may be made by off-site provision via a commuted sum as set out in the SPD.

6 Implementation

6.1. Moving forward / next steps:

- The draft 'Evidence and best practice advice note' shall be presented to Sustainable Development Panel (SDP), with a recommendation to comment on the document prior to public consultation.
- The document shall then be subject to public consultation for a minimum period of four weeks in accordance with the Statement of Community Involvement for Norwich and the Local development Regulations.
- Following the period of public consultation, amendments to the document shall be made as appropriate/necessary.
- The document in its amended form will then be presented again to SDP with a recommendation to note the summary of consultation responses, and comment on the revised document.
- The finalised document shall then be presented to cabinet for adoption.

6.2. Monitoring and data collection

As mentioned throughout this document, there are areas of this report that require ongoing monitoring to establish a greater understanding of the current climate and developing picture of student accommodation in Norwich; these include:

- student numbers at both institutions relevant to institutional growth plans with accurate estimations of those requiring accommodation.
- international student numbers
- new consents and delivery of consented accommodation
- student accommodation preferences (in association with students union representatives)
- available tenure types
- occupation levels of institutional and private PBSA
- At present there are no post-graduation co-housing developments in Norwich, this is something that has been seen in other University cities; emergence of accommodation of this nature should also be monitored.

6.3. In line with paragraph 4.21, it is proposed that a working group is established to collate share information to provide an accurate response to the changing climate of student accommodation to best meet the needs of the students, the institutions and the city.

~~7—Details of public consultation~~

~~7.1. A 6-week period of consultation on this document will commence at 9am on Monday 1st July 2019 and end at 5pm on Sunday 11th August 2019.~~

~~7.2. Copies of the consultation document will be available in City Hall and in the forum.~~

~~7.3. Please submit comments on the consultation by the closing date in one of the following ways:~~

- ~~• In writing to: Norwich City Council Planning Service, City Hall, St Peter's Street, Norwich NR2 1NH; or~~
- ~~• By email to: LDF@norwich.gov.uk~~

~~7.4. Representations cannot be made anonymously. Please provide your name, company name (if applicable). Please note that your representations will be made publicly available along with your name.~~

~~7.5. All consultation comments will be assessed and taken into consideration in a revised version of the document which will be considered by Sustainable Development Panel, likely to be in September 2019. The final version of the document will be reported to Cabinet for approval, likely to be in October 2019.~~

Glossary

C2 Residential institutions - Residential care homes, hospitals, nursing homes, boarding schools, residential colleges and training centres.

C3 Dwellinghouses - this class is formed of 3 parts:

- C3(a) covers use by a single person or a family (a couple whether married or not, a person related to one another with members of the family of one of the couple to be treated as members of the family of the other), an employer and certain domestic employees (such as an au pair, nanny, nurse, governess, servant, chauffeur, gardener, secretary and personal assistant), a carer and the person receiving the care and a foster parent and foster child.
- C3(b): up to six people living together as a single household and receiving care e.g. supported housing schemes such as those for people with learning disabilities or mental health problems.
- C3(c) allows for groups of people (up to six) living together as a single household. This allows for those groupings that do not fall within the C4 HMO definition, but which fell within the previous C3 use class, to be provided for i.e. a small religious community may fall into this section as could a homeowner who is living with a lodger.

C4 Houses in multiple occupation - small shared houses occupied by between three and six unrelated individuals, as their only or main residence, who share basic amenities such as a kitchen or bathroom.

Sui Generis - Certain uses do not fall within any use class and are considered 'sui generis'. Such uses include: betting offices/shops, pay day loan shops, theatres, larger houses in multiple occupation with more than six persons sharing, hostels providing no significant element of care, scrap yards. Petrol filling stations and shops selling and/or displaying motor vehicles. Retail warehouse clubs, nightclubs, launderettes, taxi businesses and casinos.

Purpose Built Student Accommodation (PBSA) - housing specifically built for university students by private developers, further education institutions or higher education institutions. Properties may be provided in a variety of forms, including: Multiple bedrooms with shared facilities, modern halls of residence containing en-suite bedrooms with shared kitchen, dining and living facilities. Self-contained studio or flats with private kitchens but shared living space.

APPENDIX 1: Current and future supply of PBSA.

Table 1a: Existing purpose-built student accommodation as at [June-October 2019](#):

Site	Provider	Map ref	Total bed-spaces	Studio	Cluster	Other
Crome Court	UEA	1 to 10	231		231	
Campus (Britten, Browne, Colman, Kett, Paston, Victory House(s); Constable Terrace; Nelson Court)	UEA	1 to 10	1816		1816	
Two bed units Constable Terrace, Nelson Court	UEA	1 to 10	168			168
Suffolk Walk & Village Close	UEA	1 to 10	40			40
Ziggurat Single Norfolk & Suffolk Terrace	UEA	1 to 10	505		505	
Orwell & Wolfson Close	UEA	1 to 10	114		114	
Ziggurat Twin (Norfolk & Suffolk terrace) 88 x 2 bedspaces	UEA	1 to 10	176		176	
Campus Twin rooms (Britten, Colman, Paston, Victory House(s); Constable Terrace) 35x2 bedspaces	UEA	1 to 10	70		70	
Premier Colman House	UEA	1 to 10	1	1		
Premier Ziggurat Flats	UEA	1 to 10	4	4		
Premier Norfolk/Suffolk Terrace flats	UEA	1 to 10	3	3		
The Blackdale Building - Phase 1 (Barton & Hickling)	UEA	11	514		514	
Village - (Ash, Beech, Elm, Larch, Oak, Yew House(s); Courtyard A/B.	UEA	12	545		545	
Village - (Hawthorne, Pine, Willow - House)	UEA	13	166		166	
Site of former Public House, Earham West Centre	PRIVATE	14	7073		7073	
Winnalls Yard	PRIVATE/ NUA	15	228	3	225	
Pablo Fanque House	PRIVATE/ UEA	16	244	30	214	
Portland House - 102 Prince of Wales Road	PRIVATE	17	40		40	
Graphic House – 120 Thorpe Road	PRIVATE	18	31		31	
Heathfield	PRIVATE	19	43		43	
Beechcroft	NUA	20	77		77	
Somerleyton Street	PRIVATE	24	59		59	
St Stephen's Tower, St Stephen's Street	PRIVATE	25	617	164	429	24
			Total bed-spaces	Total studio	Total cluster	Total other
Total			5765445	44209	48965324	208232

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Table 1b: Purpose-built student accommodation in the pipeline at October 2019

Site	Map ref	Total No. of units	decision pending	approved	under construction	under appeal	Notes
112 St Mildreds Road	21	34			✓		
Land adjacent to former shoe maker PH - Enfield Road		Refused (20)				✓	18 Units Refused
The Blackdale Building (PHASE 2)	23	401		✓			
St Stephen's Tower, St Stephen's Street	25	705 88			✓		Phase 4 Remainder expected to open be completed by Sept November 2019
Car Park Adjacent to Sentinel House 37-43, Surrey Street	<u>29</u>	Refused (252)		✓		✓	
Barn Road Car Park	27	302			✓		
Mary Chapman Court	28	104		✓			
Car park rear of Premier Travel Inn, Duke Street	22	149	✓				Reduced scheme following refusal of previous scheme.
St Crispins House, Duke Street	26	600		✓			
		Total Bed-spaces	Total 'decision pending'	Total approved	Total under-construction		
Total		<u>22951930</u>	149	<u>44051357</u>	<u>4041424</u>	-	

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APPENDIX 2: Methodology & Assumptions

1. This document focuses on student accommodation for use by UEA and NUA only as City College currently does not generate significant demand for PBSA; their students tend to live at home and many study on a day-release basis. Easton and Otley College is just outside of Norwich City Council jurisdiction, it has been established that this college does not have significant impacts upon student accommodation in Norwich.
2. The approach used by the council to establish the need for student housing in Norwich is firstly to identify baseline information on the current full-time student population in the city (part-time students are excluded as they are assumed not to generate demand for PBSA). Projected growth in full-time students at both institutions is then factored in, and adjusted to take account of the proportion of students who do not require housing. This results in a figure for the number of students who are estimated to require housing in Norwich, set out Table 1.
3. The current supply of purpose-built student accommodation (specifically bed-spaces) plus any planned developments is then deducted from the total number of students requiring housing to provide a figure for the potential need for new PBSA in the city.
4. This note is based on data from several sources: the Higher Education Statistics Agency (HESA) returns submitted by UEA and NUA, and information from structured meetings with both institutions. HESA collects data on student accommodation from higher education institutions throughout the UK¹².
5. This note relates to University maintained property and private-sector halls, collectively referred to as Purpose-Built Student Accommodation (PBSA). In Norwich, we currently have examples of University provided PBSA (e.g. UEA Ziggurats), privately provided PBSA with no (e.g. Heathfield, Crown Place & Portland House) and privately provided PBSA operated in partnership with a specific University (e.g. All Saints Green/Winnalls Yard).
6. Student accommodation needs are split into two categories:
 - **Students not requiring 'student accommodation'**; this category includes students living at their parental/guardian home, and students living in their own home.
 - **Students requiring 'student accommodation'**: this category includes students living in: College/University maintained property, private sector halls, rented accommodation, and other¹³.
7. Figures in the planning pipeline attributed to pre-application enquiries and applications under appeal following refusal of consent by Norwich City Council

¹² HESA accommodation categories: college/university maintained property, private-sector halls, parental/guardian home, own residence, other rented accommodation, other, and unknown.

¹³ Figures returned in the 'unknown' category have been discounted from any calculations.

have not been included in the calculations in this guidance note. Whilst they may be considered as part of the broader picture, there is a lot of uncertainty associated with this data.

8. The approach used by the council to establish the need for student housing in Norwich is firstly to identify baseline information on the current full-time student population in the city, factor in projected growth of both institutions (total growth projection figures adjusted to reflect the percentage estimated to be full time students based on current ratio), and adjust this figure to take account of the proportion of students who do not require housing (also based on current ratio agreed with UEA & NUA). This results in a figure for the number of students who require housing in Norwich, set out below.
9. The current supply of student housing (specifically bed-spaces) plus any planned developments is then deducted from the total number of students requiring housing to provide a figure for the potential need for new PBSA in the city.

APPENDIX 3: Relevant Local Planning Policy

Relevant Local Planning Policies/Documents	
Joint Core Strategy for Broadland, Norwich and South Norfolk adopted March 2011 amendments adopted Jan. 2014 (JCS)	
JCS1	Addressing climate change and protecting environmental assets
JCS2	Promoting good design
JCS3	Energy and water
JCS4	Housing delivery
JCS5	The economy
JCS6	Access and transportation
JCS7	Supporting communities
JCS9	Strategy for growth in the Norwich policy area
JCS11	Norwich city centre
JCS20	Implementation
Norwich Development Management Policies Local Plan adopted Dec. 2014 (DM Plan)	
DM1	Achieving and delivering sustainable development
DM2	Ensuring satisfactory living and working conditions
DM3	Delivering high quality design
DM4	Providing for renewable and low carbon energy
DM5	Planning effectively for flood resilience
DM6	Protecting and enhancing the natural environment
DM7	Trees and development
DM8	Planning effectively for open space and recreation
DM9	Safeguarding Norwich's heritage
DM11	Protecting against environmental hazards
DM12	Ensuring well-planned housing development
DM13	Communal development and multiple occupation
DM15	Safeguarding the city's housing stock
DM16	Supporting the needs of business
DM17	Supporting small business
DM18	Promoting and supporting centres
DM19	Encouraging and promoting major office growth
DM20	Protecting and supporting city centre shopping
DM21	Protecting and supporting district and local centres
DM22	Planning for and safeguarding community facilities
DM23	Supporting and managing the evening and late night economy
DM26	Supporting development at the University of East Anglia (UEA)
DM28	Encouraging sustainable travel
DM31	Car parking and servicing
DM32	Encouraging car free and low car housing
DM33	Planning obligations and development viability
DM34	Securing essential strategic infrastructure from development through the Community Infrastructure Levy

Supplementary Planning Documents (SPDs)		
	Landscape and Trees (June 2016)	
	Heritage Interpretation (Dec 2015)	
	Open Space and Play (Oct 2015)	
	Affordable Housing (2019)	
	Main Town Centre Uses and retail Frontages (Dec 2014)	
Conservation areas		
1	City Centre	Introduction Northern city character area Anglia square character area Northern riverside character area Colegate character area Cathedral close character area Elm hill and maddermarket character area Prince of wales character area King street character area St giles character area St stephens character area Ber street character area Civic character area All Saints Green character area
2	Bracondale	Bracondale conservation area appraisal
3	Newmarket Road	
4	Heigham Grove	Heigham grove conservation area appraisal
5	Thorpe St Andrew	Thorpe St Andrew conservation area appraisal
6	Sewell	Sewell conservation area appraisal
7	Eaton	Eaton conservation area appraisal
8	Trowse Millgate	Trowse Millgate conservation area appraisal
9	Earlham	
10	Old Lakenham	Old Lakenham conservation area appraisal
11	Bowthorpe	Bowthorpe conservation area appraisal
12	Mile Cross	Mile cross conservation area appraisal
13	Thorpe Hamlet	Thorpe Hamlet conservation area appraisal
14	Thorpe Ridge	Thorpe Ridge conservation area appraisal
15	Unthank & Christchurch	
16	Hellesdon Village	
17	St Matthews	St Matthews conservation area appraisal

APPENDIX 4: Mix of Tenures

1. [The Accommodation Costs Survey 2018](#) recommends: “The shape of new provision should be defined by new stock types that promote wellbeing by design; that are more social, supported by investment in residential life; and are configured with more social space that can be used for informal study as well as socialising.”
2. The survey report explores methods of addressing the affordability issue concluding that: “a better solution in the longer term would be to create a rent structure that includes an appropriate proportion of rooms offered at an affordable rate, allocated to students from the lowest-income backgrounds”.
3. The NUS has responded to this accommodation costs survey with a series of [recommendations](#) calling for improved policy and delivery of affordable student accommodation informed by dialogue with students in partnership with their students unions; they have particular concern regarding the over-investment of the studio market.
4. The NUS reports that: “Less than 7% of private sector rooms are offered at an affordable rate, in contrast to the significant growth at the more expensive end of the market – demonstrated by a marked increase in the number of en-suite or studio rooms”.
5. The length of term of contract can impact the affordability of accommodation.
6. According to a report by BBC News in February 2018 Rent Burden ‘leads to student stress’¹⁴. The report references a survey which found that on average the maintenance loan (designed to cover living costs – separate to the student loan which is to pay for tuition fees), following payment of rental accommodation leaves a typical student with only £8 a week for all other living costs such as food, travel etc. further to this, the survey reports:
 - 44% of students struggle to keep up with rent
 - 45% of respondents said their mental health suffered as a result
 - 31% said their studies risked being affected.
7. This highlights the importance of ensuring that there is an appropriate mixture of tenures and rental arrangements to suit a variety of student’s financial situation.
8. Alongside the mixture of tenure types; there is increasing demand nationally for an element of ‘specialist’ accommodation types including:
 - alcohol-free, single-sex, quiet blocks
 - rooms that can be adapted for ambulatory disability
 - safeguarding accommodation
 - accommodation for families

¹⁴ <https://www.bbc.co.uk/news/business-43157092>