

| | | |
|------------------|---|-------------|
| Report to | Sustainable development panel 16 October 2019 | Item |
| Report of | Director of regeneration and development | 4 |
| Subject | Purpose-built student accommodation in Norwich: evidence and best practice advice note: Consultation responses. | |

Purpose

To inform members about feedback from the public consultation on the draft Purpose-built student accommodation in Norwich: Evidence and best practice advice note, and to present a revised advice note for comments prior to its adoption by cabinet.

Recommendation

To note the summary of the consultation responses and comment on the revised advice note prior to it being reported to cabinet for adoption.

Corporate and service priorities

The report helps to meet the corporate priority for great neighbourhoods, housing and environment, inclusive economy, and people living well.

Financial implications

No direct financial implications.

Ward/s: All Wards

Cabinet member: Councillor Stonard - Sustainable and inclusive growth

Contact officers

Samuel Walker - Planner 01603 212257

Judith Davison - Planning policy team leader 01603 212529

Background documents

None

Report

Introduction

1. Members discussed the draft Purpose-built student accommodation in Norwich: Evidence and best practice advice note ("the advice note") at the Sustainable Development Panel Meeting on 29th June 2019. Minor amendments suggested by the panel, as noted in the minutes of the meeting, were carried out prior to the start of the public consultation. Consultation on the draft advice note commenced on Monday 1st July and ended on Sunday 11 August 2019.
2. This report updates members with feedback on the consultation (set out in Appendix 1), and seeks members' comments on a revised advice note (see Appendix 2) which is expected to be reported to cabinet on 13 November.
3. The purpose of the advice note is to inform both applicants and decision makers by pulling together relevant policy, evidence, best practice and information about student development. It is not a supplementary planning document but it may be material to planning decisions. By encouraging good quality and appropriate student accommodation in Norwich, the council will help support the continuing success of the city's higher education institutions and increase retention of graduates in Norwich, thereby boosting the city's reputation and economic prospects.

Consultation feedback - overview

4. Representations were submitted by 23 respondents during the six week consultation period, including local authorities, planning agents representing developers of student accommodation, statutory bodies including Historic England, Norfolk Constabulary, the Norwich Society, as well as several private individuals. Overall around 106 separate issues have been raised.
5. The representations are set out in summary form at Appendix 1, along with the council's response and any proposed changes. Full copies of the representations are set out on the council's [website](#).
6. The representations are categorised in the following table. Two of the representations were received after the end of the consultation period (from UEA and Cllr Bogelein) but are included in the table and in Appendix 1 for completeness.

| Support (2) | Objection (8) | Comments / Clarification (13) |
|---------------------------------------|---|---|
| -Historic England -Norwich Society | -Lanpro -Lanpro for Raer -Maureen Baker -David Payne -Frank Sheppard -Miguel Santos -Kathryn Griffiths & -Steve Keenan | -Broads -Norfolk Constabulary -Norfolk County Council -Patricia Skipper -Peter Easby -Gill & Mike Pavitt -Highways -Heathfield – David Patey -ROK |

| Support (2) | Objection (8) | Comments / Clarification (13) |
|-------------|---------------|--|
| | | -UEA (SU) -David Parker -Cllr Bogelein -UEA – Ian Callaghan |

Substantive Issues

- The most substantive issues raised through the consultation process relate to: the figures used in the study of need and the conclusions drawn; setting of parameters of scale (both of number and size of rooms); the nature of consultation requirements with Higher Education; affordability of PBSA for students; locational issues; and the level of student input into the advice note.

Estimation of 'need'

- Several representations challenge or object to the findings of the study of need. Representations come from both sides of the argument with some feeling that the estimates are overly conservative (representations submitted by planning agents on behalf of PBSA developers including two representations from Lanpro) with concern that the estimation of a figure of need for 5 and 10 year periods could inhibit development and set an inappropriate cap detrimental to the growth of the HEIs, student welfare and the private housing market. On the other hand, other representations consider the estimations to be overly generous, with concerns that land will be put to inappropriate use and potentially stand vacant. The latter representations are largely submitted by local residents affected by an ongoing planning application for PBSA.
- The council's response to issues around need is set out in a number of places in Appendix 1, but mostly fully in relation to the representations at rows 3a, 3b and 6c. In summary, the level of need presented is caveated with the recognition that this is an informed estimate based on the best available data, with a need to continue to actively collect and monitor data moving forward. Minor change is proposed to paragraphs 4.29-4.30 to clarify that the figures for 'need' set out in Table 3 "should not be treated as a fixed target or cap, but as an estimate for potential growth". It is not considered appropriate to amend the need figures either upward or downward at this time. The advice note proposes an ongoing process of data collection and monitoring of the Council's study of need as well as encouraging applicants to produce accurate up to date information in support of proposed schemes.

Scale of development (both the number and size of rooms)

- Representations received from Lanpro and ROK Planning raise concerns relating to introducing thresholds for scale of developments, relating to room numbers as well as 'space standard' guidelines for room sizes. It is argued that this approach is unduly restrictive, not based on sufficiently robust evidence and potentially acts as an inhibitor to delivery of a diverse mix of student accommodation.

11. The council's response to issues relating to scale of development is addressed at row 3i in Appendix 1, with some changes recommended. In summary, it is accepted that the size range could be more flexible and should be based on consideration of relevant evidence. An amendment is proposed to the wording of paragraphs 5.21 and 5.22 of the advice note to provide greater flexibility in this respect.
12. The council's response to representations on internal space standards is addressed at rows 3j and 3k, with minor change to wording recommended in relation to the representation at row 3k. In summary, as part of the research for this guidance it was noted that questions relating to appropriate room sizes were raised at Planning Applications Committee for some proposed PBSA developments, with decision makers feeling there would be benefit for some guidance in this area. A representations arguing that standardisation of room sizes would reduce diversity of provision (3j) is not accepted; nationally set space standards for residential accommodation have not led to a 'generic offering' in the housing market. It is considered important to ensure design provides a high quality of amenities to contribute to healthy sustainable lifestyles. This approach is in accordance with the requirements of local policy DM2 'Ensuring satisfactory living and working conditions'. However, additional wording is recommended to paragraph 5.34 (see council response to representation at row 3k) accepting a greater degree of flexibility in justification of alternative room sizes which are fit for purpose, with reference to relevant standards or guidelines, subject to this being supported by evidence. Such examples could include provision of adequate quiet study space separate from bedrooms, reducing the need for desk space within a bedroom.

The nature of consultation with Higher Education Institutions

13. Representations from Lanpro, Boyer and Heathfield (as representatives of PBSA developments) and Patricia & Stephen Skipper, Gill and Mike Pavitt, Maureen Baker, (as private individuals) raise issues relating to the expectation of achieving partnership/support from Higher Education Institutions in Norwich. In response (see row 3l in Appendix 1) it is noted that Planning Practice Guidance requires Local Planning Authorities to engage with HEIs, but that there is no requirement for applicants to demonstrate that engagement has been carried out. There is also no requirement for HEIs to respond to such approaches and no agreed timescales or contacts for such a process to be undertaken. It is also considered that there may be difficulty on part of HEIs to provide such assurances and other considerations or interests may affect consultation.
14. It is therefore accepted that it may be unreasonable to require this from applicants, although it could be beneficial for applicants to approach HEIs as part of the development of schemes. A change is therefore proposed to paragraphs 5.39 & 5.40 of the advice note in this respect.

Affordability of PBSA

15. A number of representations refer to affordability of PBSA.
 - a) Private individuals, UEA (SU), the Norwich Society and David Patey on behalf of Heathfield student accommodation raise concerns relating to the

affordability of student accommodation across the sector with particular concern relating to the cost of PBSA (both private and institutional) and its impact upon the cost of student accommodation across the sector as well as the impact on the cost of private housing for sale and rent.

- b) Planning agents Boyer and ROK suggest a flexible approach is taken to affordability of Student Accommodation to ensure it will not have an adverse impact of limiting investment in the City.
16. The council's response is set out at rows 8a(4), 8c, 9b, 13b, 18g, 19g, and 22c. In summary, rents cannot be set through or controlled through planning policy or through this advice note.
 17. Concerns have been raised that the advice note seems to want to control private investor rent levels by getting the HEIs to pre-approve any application for PBSA. The intention of this guidance note is to encourage a diversity of provision of PBSA in Norwich including encouragement of affordable units. There is a broad demographic of students studying in Norwich, not just students requiring low cost provision.
 18. The text relating to Partnership / Support from HEIs in Norwich, at paragraphs 5.39-5.40 of the advice note, is proposed to be amended by to encourage, but not require, liaison between applicants and the HEIs where possible on a range of issues including affordability.
 19. In correspondence with the UEA it is understood that the University works each year with representatives of the Union of UEA Students, to allocate rent increases across the variety of accommodation options on campus. As part of this year's process a commitment by UEA to ensuring that at least 25% of UEA accommodation stock will be let for no more than 50% of the maintenance loan available to students has been made. The aim is to achieve this commitment over two years with the first year being rents for the 2019/20 academic year.
 20. Research suggests that not all students have the same requirements from their accommodation; there is a market for a diversity of provision at a range of costs.
 21. It is worth noting that the UEA report that they continually see higher demand for the higher cost, higher specification accommodation, but do acknowledge that for those students without access to family or other support the cost of accommodation is a significant part of their budget. In addition, the University offers a range of bursaries to support students from lower income backgrounds and all of these are also available as discounts on accommodation costs.
 22. In summary, the council is not looking to set or control rental arrangements for PBSA in Norwich. The purpose of this document is to encourage a diverse mix of purpose built student accommodation, available to all that need it. Paragraphs 5.42-5.43 reference best practice from National Planning Guidelines and students union research. They do not set out requirements for local planning policy but prompt consideration from the applicant.

Locational issues

23. A number of representations raise concerns that the advice note supports development of PBSA in the city centre. Representations submitted by private individuals state that as the highest demand for accommodation (in any form) comes from the UEA, accommodation should be located in close proximity to the UEA campus. The UEA SU also states support in principle of appropriate PBSA in close proximity to campus. ROK Planning Agents are generally supportive of the locational expectations set out in the document subject to minor amendment to the wording.
24. The Council's response is laid out at rows 5b and 20c, with no change proposed. In summary, the advice note highlights in paragraph 5.10 that key locations for student accommodation are "where the two higher education institutions are situated" and in paragraph 5.11 states that away from the UEA campus proposals will be supported where they are in a location otherwise suitable for residential development with sustainable access to the higher education institutions served [as described in paragraph 5.16].
25. If the student population rises as estimated alongside general population increase this results in an overall increase in demand for housing amongst all sectors of the community. The areas around the university are established residential areas. It is not considered reasonable or desirable to expect these areas to accommodate the entirety of the student community. At a time where there is rising housing needs both locally and nationally a range of provision to accommodate all needs whilst enabling mixed and balanced communities is the ideal outcome.

Student input to advice note

26. A number of representations submitted by private individuals contend that there has been no student input into the advice note, with the assumption that no attempt was made to make contact with Higher Education students studying in Norwich, or with the respective Students Unions.
27. It is understandable that there would be an expectation for student opinion and preferences to be sought as part of an advice note relating to student accommodation, and indeed Norwich City Council has made contact with both universities and their student unions in the process of developing the advice note as set out below.
28. The council's response is set out most fully at row 5a with no change suggested. In summary, obtaining opinion of current students for use in publicly published research requires a high response rate across the sector to obtain a balanced opinion. Due to data protection legislation it is not possible for information returned by students to their respective institutions to be shared with Norwich City Council without consent. Norwich City Council has met with UEA representatives as well as UEA Student's Union Officers during the course of this research for this document and work is already under way in association with the UEA to make progress in obtaining this information in accordance with Data Protection Legislation. This is a key area of interest for the proposed establishment of a working group. Both UEA and their students union have expressed a willingness to assist in data collection moving forward.

The council has also met with a representative of NUA in the course of developing the advice note.

29. Both universities and their students unions were directly consulted as part of the recent consultation and representations were received from UEA and the UEA SU. It is hoped that there will be a willingness from both universities and their respective students union to be involved in discussions relating to PBSA in Norwich moving forward.

Other Issues

30. Several responses (including Maureen Baker and the Norwich Society) have raised issues related to Houses in Multiple Occupation (HMOs) including concern at the impacts of HMOs, questioning whether increased PBSA will lead to reduced pressure on the private rented sector as anticipated, and arguing for this issue to be considered alongside the PBSA advice note. The delivery and occupation of PBSA to date has already taken some pressure off accommodation in the private rented sector. Given the level of PBSA development in the pipeline as noted in paragraph 1.2 of the revised advice note (in excess of 1,900 bedspaces), and the fact that PBSA proposals are continuing to come forward, it is reasonable to expect that provision of increased PBSA will continue to take pressure off the private rented sector where many students currently live. The proposed partnership working with the HEIs will be a useful way to review the balance of accommodation between PBSA and the private rented sector going forward.
31. A number of factual updates have been made to the advice note to reflect changes in the numbers of current and future supply of PBSA since the consultation. These changes particularly affect Table 2 and figures / charts in section 4, as well as appendices 1 and 2.
32. The intention is to make a final update, if needed, to the data in the advice note prior to reporting it to Cabinet so that the information in the final document is as up-to-date as possible.

Conclusions

33. The aim of the PBSA Evidence and Best Practice advice note is to guide both applicants and decision makers to ensure delivery of PBSA appropriate for Norwich. It is considered necessary in order to address the current absence of specific planning policy within the current local plan, following a rise in planning applications for student accommodation in Norwich.
34. There has been a good level of response to the recent public consultation as noted above, attracting 23 representations containing around 106 individual comments. However the level of change proposed to the revised advice note is not considered significant, and largely consists of minor changes and clarifications, factual updates, and some greater flexibility in relation to guidance on the scale of development and on liaison with HEIs.
35. Members' comments on the revised advice note are welcomed, to enable a final version of the document to be reported to cabinet in November. Once finalised the advice note will be a material planning consideration when

decisions are made about planning applications for PBSA, and will also inform the review of planning policy in the Greater Norwich Local Plan (Regulation 18 draft plan), expected to be published for consultation in early 2020.

Appendix 1: Summary of consultation responses

| Organisation / individual | Ref | Summary of response | Council response | Proposed change |
|---------------------------|-----|---|--|--|
| Broads Authority | 1 | <p>Cycle parking is expected to be in line with DM28, but is there a need to have lots of cycle parking for student accommodation?</p> <p>Is there evidence that students have a higher tendency to use cycles and therefore need more cycle parking?</p> | <p>Noted.</p> <p>The level of cycle usage will vary from scheme to scheme, depending upon location and the higher education institution (HEI) that students are attending.</p> <p>On previously approved schemes a reduced level of cycle storage has been accepted in response to cycle use survey data, with the requirement that there should be sufficient space/appropriate design for this to be expanded in the future if required.</p> | No change |
| Norfolk Constabulary | 2 | <p>General advice regarding 'Secured By Design' guidelines for designing out crime; specifically relating to: Secure mail delivery, Cycle Storage, Bin Stores, Communal Entrance Door sets, Door entry access and control systems, Security Compartmentalisation of developments incorporating 25 or more flats, apartments, bedsits or bedrooms.</p> | Accepted. Make reference to Secured by Design Guidelines as appropriate. | Add reference to Secured by Design guidelines in paragraphs 5.26 and 5.31. |

| Organisation / individual | Ref | Summary of response | Council response | Proposed change |
|--|-----|--|--|--|
| Lanpro (on behalf of an unspecified student accommodation provider with interests in an unspecified site in Norwich) | 3a | <p><u>Current Supply and Future Need:</u></p> <p>Para 2.1.4 of the representation states that there is a lack of clarity over HEI figures for students requiring accommodation with regards to current need for PBSA.</p> <p>Para 2.1.8 suggests that the NUA proportion of students requiring accommodation should be closer to 80%</p> | <p>Not Accepted.</p> <p>The percentages of students requiring accommodation at each HEI (88% for UEA and 60% for NUA) were established through discussion with the individual institutions. Paragraph 2.1.7 of the representation accepts the UEA position of 88%.</p> <p>There is no publicly available evidence to suggest that 80% of NUA students require student accommodation as suggested by Lanpro. The figure of 60% of NUA students requiring student accommodation for the duration of their studies is provided by NUA and based upon their internally collected data.</p> | No change |
| | 3b | The application of the 40% recommendation of the Liverpool Report is illogical. | <p>Noted:</p> <p>The caution to be applied to the use of this ratio has been addressed within the document, through discussion with HEIs. It is in no way presented as an absolute figure, target or cap. This ratio has been referred to in other studies, including independent research by Ernst & Young.</p> | Update paragraphs 4.29 and 4.30 to reflect the council's response. |
| | 3c | <p>The Norwich market has the potential to perform at a higher rate than the national average. The council should be seeking to help guide new development to the right locations, not to hamper investment in provision of PBSA.</p> <p>Performing at a higher rate than the national average</p> | <p>Not accepted</p> <p>This document has been produced to guide new development to the right locations; it is not seeking to hamper investment in provision of well-designed, well-located and appropriately priced PBSA.</p> <p>The report does not take the position that performing at a higher rate than the national average should be considered as a negative outcome as this representation suggests. It simply presents the research to demonstrate Norwich in comparison to other university cities in the UK and the national average.</p> | No change |

| Organisation / individual | Ref | Summary of response | Council response | Proposed change |
|---------------------------|-----|--|--|---|
| | | should not be considered as a negative outcome. | | |
| | 3d | <p>In paragraph 2.2.2 of their representation Lanpro suggest introducing a lapse rate.</p> <p>In paragraph 2.2.3 a notional lapse rate of 10% is used for the purpose of illustrative calculations, with a suggestion this is likely to be higher.</p> | <p>Not accepted.</p> <p>As suggested in paragraph 2.2.2 of the representation, an assessment of PBSA applications over the past five years finds that 16 applications have received consent, of these 1 lapsed (14/01413/F – Emmanuel House). However this planning application was not made by a student accommodation provider and a subsequent application for an alternative use was made 7 months after the approval date which was implemented.</p> <p>This establishes a lapse rate of 6% of PBSA development in Norwich which was approved, and expired without being implemented.</p> <p>Of the pipeline PBSA development only three are approved – but not under construction, none of which are considered to have lapsed.</p> <p>No change is proposed as the advice note makes clear that the need figures are not absolute and will be subject to ongoing review. In any case the application of a 5 year lapse rate of 6% to these figures makes very little difference to the overall outcomes in Table 3.</p> | No change |
| | 3e | <p>Paragraph 2.2.2 states: <i>“The Council have also included 272 bed spaces which are currently going through an appeal process. We do not consider it appropriate for these bed spaces to be included in the pipeline.”</i></p> | <p>Not Accepted</p> <p>Table 1b in Appendix 1 of the draft advice note did not include the 272 bedspaces in the total – they were shown as refused and highlighted in red.</p> <p>For information: During the public consultation process, the appeal against refused application 18/00437/F ‘Land adjacent to Sentinel House’ has been allowed by the Planning Inspectorate, as such 252 bed-spaces has now been added to the pipeline figure in Table 1b in Appendix 1(a new total of 2547).</p> | <p>No change in respect of the representation.</p> <p>Factual update made to Appendix 1 Table 1b to reflect the Sentinel House appeal and to clarify that</p> |

| Organisation / individual | Ref | Summary of response | Council response | Proposed change |
|---------------------------|-----|---|--|---|
| | | | | applications subject to appeal are not counted in the pipeline total. |
| | 3f | Lack of robust assessment of need or locally influenced market considerations. Limited evidence and reliance of feedback from HEIs alone should not be used for projections. Pipeline is considered to be overestimated and need is considered to be under estimated. | <p>Not accepted</p> <p>Lanpro suggests in paragraph 2.4.3 of their response that the council has underestimated current need. Their calculation is incorrect: table 1 of the advice note clarifies that the number of full time students requiring accommodation is 15,247 rather than 12,959 as suggested by Lanpro.</p> <p>The table in para 2.4.3 of Lanpro's representation implies that a PBSA bedspace should be available for all students who require accommodation; no allowance is made for students wishing to live in alternative accommodation such as HMOs.</p> <p>It is unlikely that PBSA accommodation is going to appeal to all HE students through all years of their studies, This certainly is not represented in the pattern of student accommodation demonstrated in UK HESA returns whereby private and institutional halls combined accounts for 34% of student accommodation in 2017/18. To expect this figure to increase to 100% within the next decade is considered unrealistic and inappropriate. https://www.hesa.ac.uk/data-and-analysis/students/where-study</p> <p>The level of need presented is caveated with the recognition that this is an informed estimate based on the best available data, with a need to continue to actively collect and monitor data moving forward (4.31). It is clearly stated in paragraph 4.30 (as proposed to be amended at 3b above) that <i>"due to uncertainty over future growth...,these figures should not be treated as a fixed target or cap, but as an estimate for potential growth"</i></p> | No change |

| Organisation / individual | Ref | Summary of response | Council response | Proposed change |
|---------------------------|-----|---|---|--|
| | | | | |
| | 3g | Paragraph 4.1.5 states that PBSA developers are best placed to assess market saturation. There is no need to try to cap the amount of accommodation coming forward. | <p>Not accepted</p> <p>PBSA developers represent only one section of the affected market with very specific motivators; they may not be best place to assess the needs of the community as a whole in their assessment of 'market saturation'.</p> <p>In accordance with Planning Practice Guidance, a cap has not been recommended within this document; an estimate has been made with a commitment in paragraph 4.31 to: <i>"ongoing data collection, monitoring and review of data in association with higher education institutions in Norwich [which] is essential to improve the understanding and accurate forecasting of such developments"</i></p> | No change |
| | 3h | Best Practice: d) Paragraph 3.1.1 bullet point one states that the council suggest "If a need case cannot be demonstrated a proposal should be refused" | <p>Not accepted</p> <p>This is misrepresentation of the report which states in paragraphs 5.4 & 5.5: <i>"development proposals for PBSA will be supported... so long as the need for development remains justified in relation to the current and future size of the institutions... If the need cannot be demonstrated, proposals are unlikely to be supported"</i>. This is in accordance with paragraph 004 Reference ID:67-004-20190722 of the Planning Practice Guidance which states: <i>"Strategic policy-making authorities are encouraged to consider options which would support both the needs of the student population as well as local residents before imposing caps or restrictions on students living outside university-provided accommodation"</i></p> | No change |
| | 3i | Paragraph 3.1.3; No evidence provided to justify the 200-400, suggest removal of minimum and | Accepted that that the size range could be more flexible, and should be based on consideration of relevant evidence. | Amend wording in paragraphs 5.21 & 5.22 to clarify the |

| Organisation / individual | Ref | Summary of response | Council response | Proposed change |
|---------------------------|-----|--|---|--------------------------------------|
| | | maximum scales for applications to be assessed on their own merits | | council's approach to scale. |
| | 3j | Standardisation of scale internally reduces opportunity for mixture and diversity in design, | <p>Not accepted</p> <p>The nationally set space standards for residential accommodation have not led to a 'generic offering' in the housing market. As stated in paragraph 5.31 of our report it is considered important to ensure design provides a high quality of amenities to contribute to healthy sustainable lifestyles. This approach is in accordance with the requirements of local policy DM2 'Ensuring satisfactory living and working conditions'</p> | No change |
| | 3k | Room size guide decreases diversity and encourages standardisation. Along with the 200-400 bed range this will further reduce the diversity of developers attracted to the Norwich market resulting in a "one size fits all" type of development that Norwich is wishing to avoid. | <p>Noted.</p> <p>The size of rooms for student accommodation was raised as an area of concern in applications presented to planning committee in recent years. The lack of guidelines for such accommodation has made decision making more difficult for Planning Committee members. The sizes provided in this advice have been checked against approved schemes in Norwich and they are largely compliant across the board. It is not the intention of this guidance to restrict development or reduce diversity of options, it is intended to guide applicants and decision makers in an assessment of fitness for purpose.</p> <p>Other methods of guidance on room sizes were considered, and the source used was felt to be the most concise & understandable. It is also considered to be a well-considered source, for example: Where kitchen, dining and bathroom facilities are provided elsewhere in the accommodation - Private sector housing standards¹ require minimum bedroom size of 6.51m². If a student bedroom is expected to provide private study space, a typical desk and chair will require approximately 3.0m². As such an expectation (rather than requirement) of 10m² is</p> | Amend final bullet of paragraph 5.34 |

¹ https://www.norwich.gov.uk/downloads/file/2252/amenity_standards_booklet

| Organisation / individual | Ref | Summary of response | Council response | Proposed change |
|---------------------------|-----|--|---|-------------------------------|
| | | | <p>considered to be reasonable advice/best practice.</p> <p>To provide a room of a smaller size is unlikely to be fit for purpose. If study areas are to be provided elsewhere in the property separate from bedrooms, the spatial requirement is likely to be approximately the same on balance.</p> <p>However a change is proposed to paragraph 5.34 (final bullet) to allow for alternative sized rooms where appropriate subject to this being supported by evidence, for consideration by the Local Planning Authority. [NB a change is proposed in relation to scale of development at 3i above.]</p> | |
| | 3l | Expected levels of engagement with HEIs and need for support are unreasonable, and the expectations do not account for timescales or commercial competition interests of HEIs. Suggested amendment to paragraph 5.40 to remove the wording '(in order of preference)'. | <p>Objection noted.</p> <p>It is noted that PPG requires LPAs to engage with HEIs, but that there is no policy requirement for applicants to demonstrate that engagement has been carried out. It is therefore accepted that it may be unreasonable to require this from applicants, although it could be beneficial for applicants to approach HEIs as part of the development of schemes. A change is therefore proposed to the advice note in this respect.</p> <p>It is noted that Lanpro acknowledge that engagement with HEIs is standard practice for most professional PBSA providers and seeking formalisation of this as best practice is understandable. Details of appropriate points of contact for consultation and agreed timescales can be addressed as part of the proposed working group to assist in this level of engagement for applicants moving forward.</p> | Amend paragraphs 5.39 & 5.40. |
| | 3m | Objection to working group in its proposed form. No detail of governance, no | <p>Not accepted</p> <p>In accordance with the recommendations of PPG paragraph: 004</p> | No change |

| Organisation / individual | Ref | Summary of response | Council response | Proposed change |
|---------------------------|-----|---|---|--|
| | | representation from independent market experts or PBSA developers. | <p>Reference ID: 67-004-20190722 “Plan makers need to engage with universities and other higher educational establishments to ensure they understand their student accommodation requirements”</p> <p>The proposed working group is intended to be established to fulfil this expectation. Its role will include: monitoring student numbers including full time and part time study patterns; gathering information on up-to-date growth plans of the Higher Education Institutions; and gaining an understanding of the accommodation needs and preferences.</p> <p>Engagement on an individual basis has been carried out as part of the research for this report. It is considered that a working group would be a positive proactive forum to discuss these issues in a wider forum. The objections raised by Lanpro do not reflect the advice in the PPG.</p> | |
| | 3n | The draft advice note does not have the ability to put in place a new affordable housing requirement. | <p>The proposals set out in paragraphs 5.47 & 5.48 of the PBSA report are in accordance with the expectations set out in paragraphs 2.20 to 2.27 of the Affordable Housing SPD adopted in July 2019.</p> <p>At the time of the previous report to SDP the council’s Affordable Housing SPD had not yet been adopted. It was adopted on 1st July 2019, so a weblink has now been added to paragraph 5.48; https://www.norwich.gov.uk/info/20022/planning_policy/1622/affordable_housing_supplementary_planning_document</p> | Officer change: Add weblink to the Affordable Housing SPD and reference the paragraph numbers. |
| Norfolk County Council | 4a | <p><u>Lead Local Flood Authority.</u></p> <p>‘External Building’ should include flood risk from all sourcesm and should include blue/green infrastructure e.g. SuDs as per DM5.</p> | <p>Accepted.</p> <p>Amend para 5.28 to make reference to managing and mitigating flood risk, and make reference to policy DM5 in para 5.30.</p> | Amend paras 5.28 and 5.30 to make reference to flood risk and to DM5 |

| Organisation / individual | Ref | Summary of response | Council response | Proposed change |
|---------------------------|-----|---|---|---|
| | 4b | <u>Historic Environment</u> No specific comments – preapp advice with Historic Env. team recommended for applications within or close to historic core | Noted | No change |
| | 4c | <u>Highways</u> Generally happy with the advice note. Requests adequate provision for servicing and deliveries. | Noted. Add referencing to the need for adequate servicing and deliveries in Management section. | Amend 5.37 to refer to servicing and deliveries |
| | 4d | <u>Sustainability</u> 1) More information on alternative sustainable transport methods aside from car club required 2) No mention of actual building standards – document could be more direct with requirements with specific reference to ‘stretch standards’ to avoid only ‘de minimis’ standards being achieved | 1) Noted, however public transport, cycling and walking are covered in paragraphs 5.11, 5.16 2) Noted. In the absence of direct policy requirement for such standards within adopted development management policies it is not possible to make these a requirement. | 1) No change 2) No change |
| | 4e | <u>Fire Service</u> Additional details of fire strategy recommended to be included in management section of document for new build and conversions | Noted. Make reference in the Management section to provision of a fire strategy which will be used to develop Fire Risk Assessments. | Amend para 5.37 to make reference to a fire strategy. |

| Organisation / individual | Ref | Summary of response | Council response | Proposed change |
|---------------------------|-----|---|---|--|
| | 4f | <p><u>Public Health:</u></p> <p>1)Support for conclusion in paragraph 4.31</p> <p>2)Welcome requirement for development proposals to be located in areas suitable for residential development and with ‘excellent sustainable access to the higher education institution served’, the requirement to accommodate sustainable transport options</p> <p>3)Welcome consideration of scale & high standards of student welfare.</p> <p>4)Would like to see inclusion of internal air quality within design section</p> <p>5)Would like clarification of where converted offices fit within the guidance</p> | <p>1,2 and 3 Noted</p> <p>4) Noted. Provision of new specific standards of internal air quality would need to be supported by evidence and may then need guidelines to be produced for all development, not just PBSA.</p> <p>5) Proposals to convert offices to sui generis student accommodation will require a formal full planning application, and this advice note will be a material consideration.</p> <p>Where an office is converted to residential use under prior approval schedule 2, part 3 class O of the GPDO 2015 (as revised), such accommodation will be regarded as C3 residential. This may be targeted at students by the landlord, but as self-contained C3 residences/flats and not as PBSA. This document will not be a material consideration of prior approval applications.</p> | <p>1,2 & 3: No change</p> <p>4) No change</p> <p>5) No change.</p> |

| Organisation / individual | Ref | Summary of response | Council response | Proposed change |
|------------------------------|-----|--|---|---|
| Patricia and Stephen Skipper | 5a | <p>Need has not been established properly – conclusions not founded on evidence, for the following reasons.</p> <ul style="list-style-type: none"> - No reference to findings of Augar Report - UEA going down in rankings may reduce popularity - No reference to student opinion of PBSA in Norwich: rent, lifestyle, level; of study, comparison to HMO. - No evidence that PBSA frees up housing | <p>Noted</p> <p>The Post-18 Education Review (the Augar review) was published by Government on 30 May 2019. The PBSA report was completed for internal review prior to this date and prepared for public publication in advance of the Sustainable Development Panel on 19th June, and therefore does not reference this document. An amendment to make reference to the review is now proposed. It should be noted that the Augar Review is not intended to be a deterrent to higher education; aspects not mentioned in this representation include lowering tuition fees and re-introducing maintenance loans for example. The government has not yet responded to the review and the recommendations contained within have not been passed into legislation.</p> <ul style="list-style-type: none"> - Whilst the UEA may have gone down slightly in rankings in recent years, this is marginal and it continues to be a high ranking and successful university in the UK and internationally. - Obtaining opinion of current students for use in publicly published research requires a high response rate across the sector to obtain a balanced opinion. Due to data protection legislation it is not possible for information returned by students to their respective institutions to be shared with Norwich City Council without consent. Norwich City Council has met with UEA representatives as well as UEA Student's Union Officers during the course of this research for this document. <p>The proposed working group should help facilitate the collection and sharing of this information. Both UEA and their students union have expressed a willingness to assist in data collection moving forward.</p> <p>Both UEA Student's Union and NUA Student's union were directly consulted for comment under this consultation.</p> | Update paragraph 4.19 to refer to the Augar Review. |

| Organisation / individual | Ref | Summary of response | Council response | Proposed change |
|---------------------------|-----|---|---|-----------------|
| | | | Planning Practice Guidance (as noted in para 3.2 of the advice note) acknowledges that provision of PBSA may provide low cost housing that takes pressure off the private rented sector. Anecdotal information suggests that uptake of HMO accommodation has slowed since the recent development of PBSA in Norwich. The proposed partnership working with the HEIs will be a useful way to review the balance of accommodation between PBSA and the private rented sector going forward. | |
| | 5b | PBSA should be located close to UEA where there is greatest need | <p>Noted</p> <p>The report highlights in paragraph 5.10 that key locations for student accommodation are “where the two higher education institutions are situated” and in paragraph 5.11 that UEA campus is acceptable in principle and 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.</p> | No change |
| | 5c | Noise and nuisance associated with student accommodation would be transferred to City Centre as PBSA will be poorly run for maximum profit. | <p>Paragraph 5.37 & 5.38 seek to address these issues through appropriate management structures. HMO accommodation is not managed in the same way as PBSA developments, as such are not directly comparable.</p> <p>Area Management Teams at Norwich City Council who deal with noise and disturbance complaints have commented that issues within PBSA do usually seem to be contained and are generally managed by the universities. There are limited complaints about PBSA.</p> | No change |
| | 5d | Best practice section contains some generally helpful ideas. | Noted | No change |

| Organisation / individual | Ref | Summary of response | Council response | Proposed change |
|---------------------------|-----|--|--|--|
| | 5e | Applicants obtaining support from HEIs (as proposed in paras. 5.39 – 5.41) is considered to be a bad idea & would not stop developers going back on that once they have consent. | Noted. Change proposed in response to representation 3l above | See proposed change to representation 3l (to paras 5.39 and 5.40). |
| Peter Easby | 6a | Need has not been established properly – conclusions not founded on evidence, for the following reasons. - No reference to findings of Augar Report - UEA going down in rankings may reduce popularity - No reference to student opinion of PBSA in Norwich: rent, lifestyle, level; of study, comparison to HMO. | Noted. See response to 5a above | No change |
| | 6b | PBSA should be located close to UEA where there is greatest need | See response to 5b above | No change |
| | 6c | No evidence to back-up conclusions on need – based on optimistic assessment of student numbers | Not accepted The growth plans of the Universities in the report are not considered to be optimistic, NUA advises small incremental growth over the coming years; the UEA has developed comprehensive growth plans ² with accompanying strategies to facilitate growth along with refurbishment | No change |

² https://www.uea.ac.uk/documents/6207125/9569122/UEA+Plan+2016-2020+final/8932d777-faa6-4f8e-9020-190bb92cf58b?_ga=2.229866009.467948271.1566211362-624595845.1522059304

| Organisation / individual | Ref | Summary of response | Council response | Proposed change |
|---|-----|---|---|---------------------------|
| | | | and development on campus to accommodate this. | |
| Lanpro (on behalf of Raer Estates Ltd.) | 7a | Growth projections are conservative and not reflective of past ten years | <p>Not accepted</p> <p>The growth targets are based on information provided by the HEIs, who are best placed to provide these numbers. Factors including the bottoming out of the demographic dip over the next two years affect growth; also the UEA's planned refurbishment of the Lasdun Wall will mean that there are factors beyond 'historic patterns' which will influence growth over coming years.</p> | No change |
| | 7b | The study does not account for City College or the Aviation Academy | <p>Not accepted</p> <p>The reasons for this are outlined in Appendix 2 paragraph 1 of the consultation document. The Aviation Academy comes under the remit of Norwich City College.</p> | No change |
| | 7c | There are many reasons why Norwich will peak above the national average for PBSA (including " <i>less stay at home students than accounted for by the council</i> ") | <p>Not accepted</p> <p>The reasons listed are noted, however these do not amount to evidence. They do not represent increased student preferences for this type of accommodation or a quantifiable need for higher than estimated levels of PBSA.</p> <p>(To clarify - the figure for 'stay at home students' in the report was taken from the official HESA return.)</p> | No change |
| | 7d | Due to various factors the 40% Liverpool Approach cannot be seen as a robust method of estimation, as such the council should remove precise figures based upon this and instead focus on good quality development. If this figure is used it should be clearly | Noted. Please refer to response to representation 3b, proposing change to paras 4.29 – 4.30. | See change proposed at 3b |

| Organisation / individual | Ref | Summary of response | Council response | Proposed change |
|---------------------------|-----|---|---|---------------------------------|
| | | stated as a minimum. | | |
| | 7e | Minimum room sizes runs the risk of defeating the one size fits all scenario as it will reduce the supply of different room types and tenures to provide for a range of rental costs. | Noted. Please refer to response to 3k which proposes to amend the final bullet of paragraph 5.34. | See proposed change at 3k above |
| | 7f | HEI Partnership: This approach is standard practice by PBSA developers, but is not derived from planning legislation or validation requirements – this should at best be highlighted as good practice and a preference that developers have followed good practice. To make this a requirement is unreasonable & may be subject to conflict of interests. | Noted. Please refer to response to 3l which proposes amendment to paragraphs 5.39 and 5.40. | See change proposed at 3l |
| | 7g | No explanation of governance of the proposed working group, how this will affect future planning applications and policy. Does not include representatives from private sector. | Please refer to response to representation 3m above | No change |
| | 7h | Affordable housing requirements are unlawful in | Not accepted. Please refer to response to representation 3n | See proposed officer change |

| Organisation / individual | Ref | Summary of response | Council response | Proposed change |
|---------------------------|-----|---|--|---|
| | | an advice note & should be explored through the Local Plan. | The advice note is not seeking to introduce affordable housing policy through this advice note but it makes reference to the Affordable Housing SPD. Now that the Affordable Housing SPD has been adopted, a link shall be added to the PBSA advice note with reference to the relevant paragraph numbers of the Affordable Housing SPD 2.20 to 2.27. | at 3n above |
| Maureen Baker | 8a | <p>Need has not been established. In particular:</p> <p>1) The advice note fails to address findings of Augar Report</p> <p>2) Although it references increased competition between universities, the advice note fails to include UEA's decline in rankings.</p> <p>3) There has been no attempt to provide local research on student preferences and the advice note will perpetuate high student rents. Queries whether student or their representatives have been involved.</p> <p>4) Lack of information on rents in PBSA and HMOs. No evidence on whether private landlords would rent to families if more students go into PBSA.</p> | <p>Not accepted overall.</p> <p>1) Please refer to response to representation 5a above which proposes adding a reference to the Augar Report.</p> <p>2) Noted. At present, there is no publicly available information to clarify the impact of the league table position on the number of students for the 2019 intake. As the representation acknowledges, this is an influencing factor highlighted by the consultation document which requires periodic review. This information should be monitored over time using HESA data and discussed at the proposed working group.</p> <p>3) Attempts have been made to obtain student opinion relating to accommodation through meetings discussions with both the UEA and their students' union and by liaising with UEA on design of annual student surveys which will provide greater information on preferences going forward.</p> <p>4) The significant level of PBSA provision anticipated is likely to take pressure off the private rented sector and there is some anecdotal evidence this is happening (see response to 5a above). The proposed partnership working with the HEIs will be a useful way to review the balance of accommodation between PBSA and the private rented sector going forward.</p> | <p>See proposed change at 5a above</p> <p>No change</p> <p>No change</p> <p>No change</p> |

| Organisation / individual | Ref | Summary of response | Council response | Proposed change |
|---------------------------|-----|--|---|---|
| | | <p>5) The document places misleading reliance on a study of PBSA in Liverpool which indicates that PBSA of 40% of total students could be achieved in Norwich.</p> <p>6) Queries whether living in PBSA is beneficial to students as opposed to living in HMOs</p> | <p>5) Noted. See council response to representation 3b above and changes made to paragraphs 4.29 – 4.30 for clarification.</p> <p>6) The advice note does not take a one-size-fits-all approach. It is focused on guidance for PBSA but acknowledges the role of HMOs in currently fulfilling a large proportion of the need for student accommodation in Norwich (para 2.5). Provision of additional PBSA will increase the diversity of accommodation including the encouragement of more affordable units.</p> | <p>See proposed change at 3b above</p> <p>No change</p> |
| | 8b | Concern at locational guidance. Living in city centre PBSA is hardly living close to UEA. No reason to believe that private PBSA in city centre would be well managed. They may result in in relocating social problems from HMOs to the city centre. | <p>Not accepted. The city centre has excellent sustainable access to both higher education institutions as noted in paragraphs 5.10-5.11 of the advice note, which makes it a suitable location for PBSA.</p> <p>The intention of the section on Management (paras 5.37 – 5.38) is to ensure effective management of PBSA on a range of issues including neighbour / community liaison to address and mitigate local concerns.</p> | No change |
| | 8c | Rents cannot be set through planning policy. The advice note seems to wish to control private investor rent levels by getting the HEIs to pre-approve any application for PBSA. | <p>Noted: agree that PBSA rent levels cannot be set through the advice note.</p> <p>The text relating to Partnership / Support from HEIs in Norwich, at paragraphs 5.39-5.40 of the advice note, is proposed to be amended by 3l above to encourage, but not require, liaison between applicants and the HEIs where possible on a range of issues.</p> | See change at 3l above. |
| DM Payne | 9a | No attempt to obtain the | Please refer to response to 5a | No change |

| Organisation / individual | Ref | Summary of response | Council response | Proposed change |
|---------------------------|-----|---|--|-----------------|
| | | views of any student or NUS officer | | |
| | 9b | PBSA is far more expensive than HMO, accommodation costs are a major burden for students. | The intention of this guidance note is to encourage a diversity of provision of PBSA in Norwich including encouragement of affordable units. There is a broad demographic of students studying in Norwich, not just students requiring low cost provision. | No change |
| | 9c | No evidence that PBSA frees up family housing. Family housing should be built in city centre instead of PBSA | <p>Please refer to response to 5a</p> <p>Anecdotal evidence from UEA & UEA SU suggests a recent migration away from Golden Triangle & decrease in uptake of HMO accommodation.</p> <p>The purpose of this report is not to discourage delivery of market housing. Delivery of family housing in the city centre is supported in principle.</p> | No change |
| | 9d | Greatest need is from the UEA, Student Accommodation location should reflect this. | Please refer to response to 5b | No change |
| Frank Sheppard | 10a | <p>Are calculations/assumptions accurate, have the following been considered:</p> <ul style="list-style-type: none"> - student debt is becoming more of an issue - declining birth rates - apprenticeships becoming an attractive alternative to further education - UEA slipping down tables | <p>Comment regarding student debt noted, please refer to response to 9b.</p> <p>ONS does report declining birth rates, however this is alongside an increasing aging population and overall higher population numbers resulting in greater housing need and strategies required to address this.</p> <p>This document does not consider the accommodation needs of students pursuing Further Education in Norwich as they are typically less likely to require student specific accommodation. There is no evidence provided to support the statement that apprenticeships are impacting Higher Education intakes.</p> | No change |

| Organisation / individual | Ref | Summary of response | Council response | Proposed change |
|---------------------------|-----|---|---|-----------------|
| | | | Whilst the UEA may have gone down slightly in rankings in recent years, this is marginal and it continues to be a high ranking and successful university in the UK and internationally. | |
| | 10b | Greatest need is from the UEA. Student Accommodation location should reflect this. | Please refer to response to 5b | No change |
| Norwich Society | 11a | Thoroughly welcomes the Council's initiative in producing this document and the valuable research evidence which it has generated which will help inform decision taking. | Support noted | No change |
| | 11b | Agrees with the material factors for consideration when assessing individual applications for PBSA in section 5 of the document. | Support noted | No change |
| | 11c | Concern that the restricted scope which does not cover HMO conversions. There has been considerable loss | Noted, The intention of the report 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 | No change |

| Organisation / individual | Ref | Summary of response | Council response | Proposed change |
|---------------------------|-----|---|---|-----------------|
| | | of family friendly affordable accommodation over past 30 years through right-to-buy, permitted development, and failure of local planning policy to protect its stock. | emerging policy relating to student accommodation in the Greater Norwich Local Plan (GNLP) which is due for adoption in late 2021. Smaller HMO (for 6 persons or under) do not require planning consent for conversion, as such are outside of the control of the local authority. | |
| | 11d | Loss of family housing to student use was previously regarded as reversible due to little or no physical alteration involved in small HMO. The increasing conversion to larger HMO through substantial extension renders such properties highly unlikely to ever return to family accommodation. | Noted | No change |
| | 11e | The estimated rise in student numbers would rightly justify PBSA development beyond the current pipeline; but on past evidence HMO conversions will continue to be proposed in significant numbers at the lower rent end of the market as student demand increases & debt issues remain unresolved. This should be debated alongside PBSA – not inferred. | Noted. Although the advice note does not cover HMOs the provision of significant levels of PBSA is anticipated to take pressure off the private rented sector. The proposed partnership working with the HEIs will be a useful way to review the balance of accommodation between PBSA and the private rented sector going forward. | No change |

| Organisation / individual | Ref | Summary of response | Council response | Proposed change |
|---------------------------|-----|---|--|---------------------------------|
| | 11f | Welcomes the Council's commitment to ongoing data collection, monitoring and review in this potentially volatile area. | Noted | No change |
| Gill and Mike Pavitt | 12a | Need has not been established properly "work in progress" –conclusions not founded on evidence, for the following reasons. - No reference to findings of Augar Report - No reference to student opinion of PBSA in Norwich or elsewhere in the country: rent, lifestyle, study, cost. | Please refer to the response to 5a above | See proposed change in 5a above |
| | 12b | Confuses demand from students with demand from developers | Accepted Revise wording of paragraph 1.1 and 1.2: where it states 'demand' change this to 'proposals' | Amend paragraph 1.1 & 1.2 |
| | 12c | If a need is established, the Best Practice section is generally helpful and if implemented would result in well-designed, well-managed and acceptable accommodation. | Noted | No change |

| Organisation / individual | Ref | Summary of response | Council response | Proposed change |
|---------------------------|-----|---|---|---------------------------------|
| | 12d | Collaboration between HEIs and PBSA developers to achieve lower rents is a naïve assumption which is unenforceable. | <p>Planning Practice Guidance requires Local Planning Authorities to engage with Higher Education Institutes, but that there is no policy requirement for applicants to demonstrate that engagement has been carried out or that agreements have been met. See proposed change in 3l above to paragraphs 5.39-5.40.</p> <p>Engagement with HEIs is standard practice for most professional PBSA developers. Details of appropriate points of contact for consultation and agreed timescales can be addressed as part of the proposed working group to assist in this level of engagement for applicants moving forward.</p> | See proposed change at 3l above |
| Miguel Santos | 13a | Impacts of Brexit vote likely to negatively impact estimated student numbers through decline in applications from EU. | <p>Noted</p> <p>This was addressed in paragraph 4.19 (c) of the draft document for consultation</p> | No change |
| | 13b | <p>Report seems to consider students only wish to live in PBSA, this is disputed. PBSA is not attractive to postgraduate students as they do not wish to live alongside undergraduate students, noise and drinking.</p> <p>PBSA is expensive compared to shared</p> | <p>The report is specifically about PBSA, rather than student accommodation as a whole sector, which may have led to the confusion over the <i>apparent bias</i>. The figures presented in section 4 of the document do not work on the basis that “students only wish to live in PBSA”, they work on a proportion – acknowledging that not all students will want to live in PBSA using an estimated 40% threshold.</p> <p>The City Council has liaised with the UEA Student’s Union whilst drafting this document, with the intention of developing a closer working relationship and information sharing.</p> <p>This representation also does not consider the possibility of specialist postgraduate accommodation.</p> <p>Research suggests that not all students have the same requirements from their accommodation; there is a market for a diversity of provision</p> | No change |

| Organisation / individual | Ref | Summary of response | Council response | Proposed change |
|------------------------------------|-----|--|--|-----------------|
| | | housing. | at a range of costs. | |
| Kathryn Griffiths and Steve Keenan | 14a | Insufficient evidence to support need for further PBSA development in the city | Noted | No change |
| | 14b | Need should be balanced alongside council waiting lists for accommodation and development of affordable housing should be promoted. PBSA is built for maximum profit with minimum tax liabilities. | <p>Not accepted</p> <p>This does not represent the approach laid out by central government in NPPF 2019.</p> <p>Norwich City Council has recently adopted an updated SPD for Affordable Housing planning policy (July 2019). As such this matter has been thoroughly considered by Norwich City Council in recent months and was subject to public consultation at the time.</p> | No change |
| | 14c | Unconvinced that student accommodation will free up affordable housing stock for people of Norwich | <p>Not accepted</p> <p>Please refer to response to 5a</p> <p>Anecdotal evidence from UEA & UEA SU suggests a recent migration away from Golden Triangle & decrease in uptake of HMO accommodation.</p> <p>The purpose of this report is not to discourage delivery of market housing. Delivery of family housing in the city centre is supported in principle.</p> | No change |
| Highways England | 15 | The advice note is unlikely to have severe impact on strategic road network, therefore no comment is made. | Noted | No change |
| Boyer (on behalf of the | 16a | In general the content of the advice note is supported, in | Noted, support is welcomed | No change |

| Organisation / individual | Ref | Summary of response | Council response | Proposed change |
|---------------------------------------|-----|--|---|---------------------------|
| East of England Co-operative Society) | | particular, the recognised demand for further PBSA to be provided in Norwich. | | |
| | 16b | The weight afforded to the advice note for the purposes of decision-taking should be appropriate to its status taking into consideration that it is not an SPD, the advice note should be used as a positive guide rather than restricting appropriate schemes. | Noted This is not intended to be an SPD, the intended status is purely as an advice note as set out in paragraph 1.4 | No change |
| | 16c | Paragraphs 5.21 & 5.22 should be reworded to be less restrictive to developments outside of the 200-400 threshold. The justification for a threshold is unclear and requires robust evidence. | Accepted. Please see response to 3i which proposes amendments to paragraphs 5.21 – 5.22. | See proposed change at 3i |
| | 16d | Paragraph 5.45 goes beyond the requirements of National Policy. Local Authorities should engage with HEIs, there is nothing that requires applicants to make direct agreements outside of the planning process. This is considered to potentially be unreasonable. | Please see response to 12d and proposed change in 3l above to paragraphs 5.39-5.40. | See proposed change at 3l |

| Organisation / individual | Ref | Summary of response | Council response | Proposed change |
|---------------------------------|-----|--|--|-----------------|
| | 16e | Where low-cost student accommodation is provided, it would be appropriate for such accommodation to be CIL exempt, in the same way as for affordable housing under C3 Use Class. Clarification is sought regarding update to the council's CIL charging schedule | Comments noted, however no changes are proposed under this document – as stated in paragraph 3.8 of the report the CIL charging schedule shall undergo thorough review alongside the production of the GNLP. | No change |
| David Patey, Heathfield Norwich | 17 | <p>a) The advice note envisages a gate-keeping role for the city council and acknowledges that universities experience powerful tensions in relation to PBSA, including the need to ensure fair access, meet income targets for accommodation, and the importance of being able to compete with the commercial sector.</p> <p>b) Needs could potentially be met in a more imaginative way in Norwich to provide affordable PBSA and revive mixed residential neighbourhoods, rather than allowing developer led build-out of sites.</p> | <p>a) Noted</p> <p>b) Noted. The advice note aims to achieve this by provision of guidance for applicants and decisionmakers.</p> | No change |

| Organisation / individual | Ref | Summary of response | Council response | Proposed change |
|----------------------------|-----|---|--|---------------------------|
| | | <p>c) Suggest a scheme whereby private sector landlords may be able to invest in PBSA in exchange for returning their property to the general market.</p> <p>d) Future student numbers and study patterns are difficult to predict in unsettled times.</p> <p>e) Affordability ratios recommended by NUS are not currently being met by HEI accommodation in Norwich.</p> <p>f) Private PBSA welcomes both first years and returning students. This can result in a better mix which is educationally and socially beneficial</p> <p>g) PBSA should be designed with a view to adaptability should the requirement change</p> | <p>c) Noted.</p> <p>d) Noted</p> <p>e) Noted. The advice note aims to provide an accommodation mix suitable for a wide range of students and improve affordability of PBSA – see paragraphs 5.42 – 5.46</p> <p>f) Noted</p> <p>g) Noted. Adaptability is potentially beneficial however the advice note aims to ensure that PBSA is delivered to meet need and to keep this under review to avoid the need for future change of use.</p> | |
| ROK Planning (on behalf of | 18a | There is insufficient evidence to support the | Noted. The caution to be applied to the use of this ratio is addressed in the | See proposed change in 3b |

| Organisation / individual | Ref | Summary of response | Council response | Proposed change |
|---------------------------|-----|--|---|----------------------------------|
| GSA) | | precise nature of figures relating to need for additional PBSA bed-spaces. The target should be removed or made clear that they are minimum numbers. | consultation draft of the document. The figures are presented to demonstrate that there is an estimated level of need. It is in no way intended to be presented as an absolute figure, target or cap. See proposed change in relation to representation 3b to paragraphs 4.29-4.31. | above |
| | 18b | The following text included at paragraph 5.8 “student housing should not be prioritised to the detriment of other forms of housing or development undermining the provision of mixed and balanced communities in Norwich” should be removed as this is contrary to national policy and it has been evidenced that student housing in fact supports the overall delivery of housing. In addition, the advice note should recognise that student accommodation contributes to the economy significantly. | Noted. Clarification is proposed to paragraph 5.8. | Proposed change to paragraph 5.8 |
| | 18c | The cap imposed on individual scheme bedspaces between 200 – 400 should be removed from the draft practice advice note and it should be made clear | Noted. Please see the response to representation 3i, which proposes changes to paragraphs 5.21- 5.22. | See proposed change in 3i |

| Organisation / individual | Ref | Summary of response | Council response | Proposed change |
|---------------------------|-----|---|---|---|
| | | that applicants should justify the proposed development in the context of both national and local planning policies which seek efficient use of land and appropriate densities of development (paragraph 117 and 122 of the NPPF). | | |
| | 18d | Paragraph 5.21 should acknowledge that well managed accommodation (in accordance with a management plan) can ensure the amenity of neighbouring properties is not adversely affected & address wellbeing of occupants of the accommodation. | Noted. Change proposed to paragraph 5.22 to acknowledge this point. | See proposed change to 5.22, second sentence. |

| Organisation / individual | Ref | Summary of response | Council response | Proposed change |
|---------------------------|-----|--|--|--|
| | 18e | Overly prescriptive room standards should be removed as there is a lack of evidence which supports the sizes set out in the practice note. In addition, prescriptive room space standards will inevitably stifle PBSA developments coming forward as they will impact upon the viability of developments. In addition, the requirement to provide 5% of units are wheelchair accessible units should be removed as this is dictated by building regulations. | <p>Please see the response to 3j and 3k</p> <p>With regards to the reference to building regulations – this document is a best practice advice note and therefore does not create new planning policy, The reference to Building Regulations has been provided to assist applicants and decision makers of the statutory requirements relative to this sector.</p> | See proposed change to 3k |
| | 18f | The requirement of a nominations agreement to support the inclusion of studios in developments should be removed given this contradicts the NPPG and the fact that a mix of accommodation should be provided for a wide range of students. | Accepted that the advice note cannot be prescriptive on this issue. Delete final sentence of paragraph 5.36. | Delete <i>“Developments seeking provision of studio flats should do so only in conjunction with specific nomination rights from an institution”</i> from paragraph 5.36 |
| | 18g | It is recommended that a flexible approach is taken to the affordability of PBSA | Paragraphs 5.42-5.43 reference best practice from National Planning Guidelines and students union research. They do not set out requirements for local planning policy but prompt consideration from | Amend wording of paragraph 5.39 and delete |

| Organisation / individual | Ref | Summary of response | Council response | Proposed change |
|---------------------------|-----|--|--|----------------------|
| | | given the potential impacts that it can have on the supply and potential increase in pressure on the private rental sector. The rental levels are not a planning policy matter and can be regulated by the Universities through nominations agreements. Therefore, the requirement to provide rents at a range of prices and increase the amount of low-price rooms should be removed from the criteria in paras. 5.39, 5.42-5.45. | the applicant. Objection to paragraph 5.45 is noted; this paragraph is proposed to be deleted. | paragraph 5.45 |
| | 18h | Locational expectations presented in paragraph 5.11 are supported, however this should be based upon criteria set out in para 5.16, rather than described as 'excellent' as this is a term which may be misconstrued. | Noted. Change proposed to paragraph 5.11 to delete "excellent". | Amend paragraph 5.11 |
| | 18i | PBSA as part of mixed-use developments is supported. | Noted, support welcomed. | No change |
| | 18j | It is requested that the following statement "PBSA will not be acceptable on sites allocated or designated | Noted, revise paragraph 5.14 in accordance with PPG guidelines 'Supporting more effective use of land ³ ' that where it can be demonstrated that an allocated site has no realistic prospect of being developed for its intended use it will be relevant to consider the extent | Amend paragraph 5.14 |

³ <https://www.gov.uk/guidance/effective-use-of-land>

| Organisation / individual | Ref | Summary of response | Council response | Proposed change |
|---------------------------|-----|--|--|-----------------|
| | | for other purposes” should be removed from paragraph 5.14 as this is contrary to both the NPPF and NPPG. It is clear that the provision of PBSA in fact releases pressure on the private rented sector and enables these dwellings to be used for family housing and increasing the overall housing stock. | to which evidence suggests an alternative use would address an unmet need. | |
| | 18k | It is recommended that the Council prepare additional cycle parking standards for PBSA on a provision of 25% of the total number of bed-spaces, this will ensure that there are not areas of ground floor which are left vacant and underutilised, particularly in the city centre | <p>Please refer to response 1.</p> <p>Whilst it is an understandable starting point for consideration, a standardised 25% may not be appropriate & may not serve emerging needs over the lifetime of the development. The level of cycle parking will need to be assessed based on the proximity to amenities, HEI campus’ served and alternative sustainable transport provision.</p> | No change |
| UEA Student’s Union | 19a | Demand is driven by university expansion plans and economic drivers from providers rather than “demand” from students. Concerns are raised that demand could plateau & leave extensive blocks empty in the future. | Noted. The advice note proposes that ‘need’ will be kept under review in order to avoid the scenario of a fall in demand. | No change |
| | 19b | Bus and cycle infrastructure needs to be developed in | Norwich City Council in partnership with Norfolk County Council has been working on extensive improvements to the cycle network across | No change |

| Organisation / individual | Ref | Summary of response | Council response | Proposed change |
|---------------------------|-----|---|--|-----------------|
| | | line with increasing density student populations. This should be done in collaboration with network providers. | the city, providing a good level of connectivity and cycle infrastructure. Norwich City Council are unable to require improvements to the bus network as part of individual planning applications; this is why it is recommended that applicants can demonstrate sustainable transport links through locational guidance in paragraphs 5.11 & 5.16 | |
| | 19c | Not all international students are better financed, Brexit & changing visa regulation could affect the attractiveness of HE in the UK, so this should be considered carefully. | Noted, these issues have been raised in paragraphs 4.18-4.21 of the draft for consultation document. | No change |
| | 19d | We believe HMOs play a role in providing accommodation for students, young people and those who are less able to live in other accommodation types. NCC should be supportive of a measured and well maintained HMO stock as reducing this is likely to affect young people negatively and is unlikely to return stock to non-HMO dwellings in the short term. | Noted. With an increasing student population in Norwich alongside a general increase in population provision of specialist housing is considered to fulfil a need within the market. Whilst it may be agreed that HMOs play a role in providing accommodation for students, it may not be appropriate to maintain the 'status quo' of a continual loss of family homes to student housing as HEIs expand in numbers. At a time where there is rising housing needs both locally and nationally a range of provision to accommodate all needs whilst enabling mixed and balanced communities is the ideal outcome. | No change |
| | 19e | Retention rates are high at UEA – accommodation for post-graduation young professionals should be considered. | Noted. This has been raised in paragraph 6.2 of the consultation document. | No change |
| | 19f | High-end student | Noted. The document clearly supports a diverse mix of accommodation | No change |

| Organisation / individual | Ref | Summary of response | Council response | Proposed change |
|---------------------------|-----|---|--|-----------------|
| | | accommodation can be “exclusive” and isolate students from certain socio-economic backgrounds. NCC should consider a wide variety of accommodation type within a development as an important factor. We would be supportive of an approach which emphasised the need for ‘affordable’ developments. | to accommodate the needs of a broad demographic. | |
| | 19g | High end PBSA may have an inflammatory effect on the housing market in Norwich for both students and non-student housing. | Noted. The purpose of this document is to encourage a diverse mix of purpose built student accommodation, not just ‘high end’ | No change |
| | 19h | UEA SU are keen to work with PBSA management companies in the support and wellbeing of students as well as with regards to promoting positive student - community and neighbour relationships. Does Norwich City Council have plans to promote this? | Noted. It is positive that the UEA SU is keen to work alongside student accommodation providers to assist in positive living environments for students and neighbouring residents. Norwich City Council cannot be involved in organising commercial arrangements, but is supportive of initiatives to ensure a positive living environment and aims to work in partnership with the HEIs as noted in paragraphs 5.39 and 5.40 of the advice note. | No change |
| | 19i | Communal living spaces are of high importance for student well being. | Noted. | No change |
| | 19j | UEA (SU) are willing to work with Norwich City Council in data collection relating to | Noted – this is welcomed. | No change |
| | | | | |

| Organisation / individual | Ref | Summary of response | Council response | Proposed change |
|---------------------------|-----|--|--|-----------------|
| | | student accommodation preferences. | | |
| | 19k | Home Run housing information shows a transition in student preferences for accommodation moving from the golden triangle to West Earlham properties, as opposed to properties further towards Norwich City Centre. Affordable PBSA close to campus would provide a fantastic opportunity for students. | Noted. See paragraphs 5.11 and 5.16 in the consultation document which set out locational considerations for PBSA.. | No change |
| David and Kim Parker | 20a | Note should be referred to as 'good practice' not 'best practice' | Noted. | No change |
| | 20b | Comparison with Liverpool is not relevant | Please refer to response 3b | No change |
| | 20c | <p>Estimated rise in student numbers does not equate a "need" for city centre accommodation. Students merely need reasonable access to university sites, much of which is outside the centre.</p> <p>Preference should be given to brownfield sites close proximity to university</p> | <p>Noted. As the student population rises alongside general population rise this results in an overall increase in demand for housing amongst all sectors of the community. The areas around the university are established residential areas. It is not considered reasonable or desirable to expect these areas to accommodate the entirety of the student community.</p> <p>At a time where there is rising housing needs both locally and nationally a range of provision to accommodate all needs whilst enabling mixed and balanced communities is the ideal outcome.</p> <p>Paragraphs 5.11 and 5.16 in the consultation document provide</p> | No change |

| Organisation / individual | Ref | Summary of response | Council response | Proposed change |
|---------------------------|-----|---|---|----------------------|
| | | campus. | information for development outside of the UEA campus and city centre. | |
| | 20d | No consideration of broader need of city centre homes. | Noted. This document has been produced specifically to address PBSA developments. Norwich City Council's adopted local plan, including the recently adopted revised supplementary planning document for affordable housing provides a thorough assessment of the broader need. | No change |
| | 20e | No assessment of impact of students in the city on local public services such as transportation, healthcare, street cleaning etc. lack of council tax contributions | Noted. The advice note refers, in paragraph 3,8, to Community Infrastructure Levy (CIL) which applies to all new development including PBSA. CIL contributions can be used to support development and contribute towards new infrastructure such as schools, transport initiatives and leisure facilities needed to support growth in the greater Norwich area. | No change |
| | 20f | PBSA is temporary and takes up valuable prime sites that could otherwise be designated for local homes. | Noted. The universities provide many positive impacts to the city, socially culturally and economically. The national trend is for students to study away from home, and there is an increasing international student market. It is unrealistic to think that students will not require accommodation during their studies. | No change |
| Historic England | 21a | The purpose of the document to inform applicants and decision makers is welcome, particularly given number of developments in Norwich in recent years. | Noted | No change |
| | 21b | No comment on assessment of need | Noted | No change |
| | 21c | Listed buildings and historic parkland at UEA campus should be important factors when considering new buildings on the campus. HE welcome early | Noted. Amend paragraph 5.24 to reflect this comment. | Amend paragraph 5.24 |

| Organisation / individual | Ref | Summary of response | Council response | Proposed change |
|---------------------------|-----|---|--|-----------------|
| | | discussion when student accommodation sites are first brought forward so that detailed development of proposals can take place in a smooth and collaborative manner. | | |
| | 21d | It is most encouraging that paras 5.23, 5.24 and 5.26 refer to historic importance of Norwich, the NPPF requires that great weight is given to the conservation of the historic environment; it is hoped that this informs GNLP policy, particularly relating to large scale buildings which have visual impact beyond their immediate setting. | Noted | No change |
| Cllr Sandra Bogelein | 22a | The advice note goes a long way to establish necessary guidelines to ensure that PBSA is designed to benefit the students living there and minimising harm to surrounding communities. | Noted. | No change |
| | 22b | The advice note does not clearly establish the need for PBSA in Norwich. Concerned that the evidence for the need for student accommodation (of | Not accepted. The advice note is considered to establish the need clearly, although it does acknowledge that there are inevitably uncertainties about future demand and a current lack of robust data locally on student preferences. Table 2 sets out the estimated number of students requiring accommodation overall and table 3 establishes need for PBSA specifically, as opposed to other forms of | No change |

| Organisation / individual | Ref | Summary of response | Council response | Proposed change |
|---------------------------|-----|--|---|--------------------|
| | | all types) might be interpreted by developers with the need for PBSA only. Need to emphasise the lack of data and take a more cautious approach to drawing conclusions about need. | accommodation. A note of caution is raised about the need figure (see para 4.30 for example) which clearly states that the figures should be treated as a fixed target or cap (as amended under 3b above). The document also acknowledges the need for ongoing monitoring of accommodation needs and preferences, amongst other things. | |
| | 22c | Issues of cost should be taken into account when establishing need. | Rent levels cannot be established or controlled through planning policy or through this advice note. | No change |
| | 22d | The document should refer to NUS concerns about the negative effects of studio accommodation on student well-being. | This is incorrect. The document refers to NUS concerns about increase in studio rooms as a cause for concern in paragraph 4.20 (b). | No change |
| | 22e | Clarify where information in para 4.22 comes from (relating to the fact that most PBSA is fully occupied) | This data has come from publicly available information provided by student operators on their websites. | No change |
| | 22f | Reference to 'demand' in para 1.1 should be amended. It really relates to rise in applications rather than demand for PBSA. | Accepted. Change is proposed to paragraph 1.1 – 1.2 as set out in response to representation 12b above. | See change at 12b. |
| UEA | 23 | Anecdotal evidence suggests that PBSA is popular with students. Those developments already open are generally full, and there is understood to be a greater number of rooms available in the | Noted. | No change |

| Organisation / individual | Ref | Summary of response | Council response | Proposed change |
|------------------------------|-----|---|------------------|--------------------|
| | | private rented sector at this time of year than normal. Having said that, this year and next are the base years for the demographic 'dip' and populations of 18 year olds are scheduled to rise significantly from 2021 on, so UEA anticipates continued and growing demand for HE. | | |
| | | | | |

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



**Norwich City Council
October 2019**

Contents

| | | |
|---|---|----|
| 1 | Purpose | 2 |
| 2 | Introduction | 2 |
| 3 | Policy Context..... | 4 |
| 4 | Need for additional purpose built student accommodation | 6 |
| 5 | Evidence and best practice advice: | 19 |
| 6 | Implementation | 32 |
| | Glossary | 34 |
| | APPENDIX 1:Current and future supply of PBSA. | 35 |
| | APPENDIX 2: Methodology & Assumptions..... | 37 |
| | APPENDIX 3: Relevant Local Planning Policy | 39 |
| | APPENDIX 4: Mix of Tenures | 41 |

1 Purpose

- 1.1. Norwich has experienced a significant rise in 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 proposals are now coming predominantly from the private sector, with developers delivering significant levels of PBSA in the city centre and, to a lesser extent, in peripheral neighbourhoods. There are currently 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 1,930 units of student accommodation with current planning consent were to be built out this would equate to 772 units of housing. 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 5,765 student bedspaces in Norwich in PBSA. This figure will rise to 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.

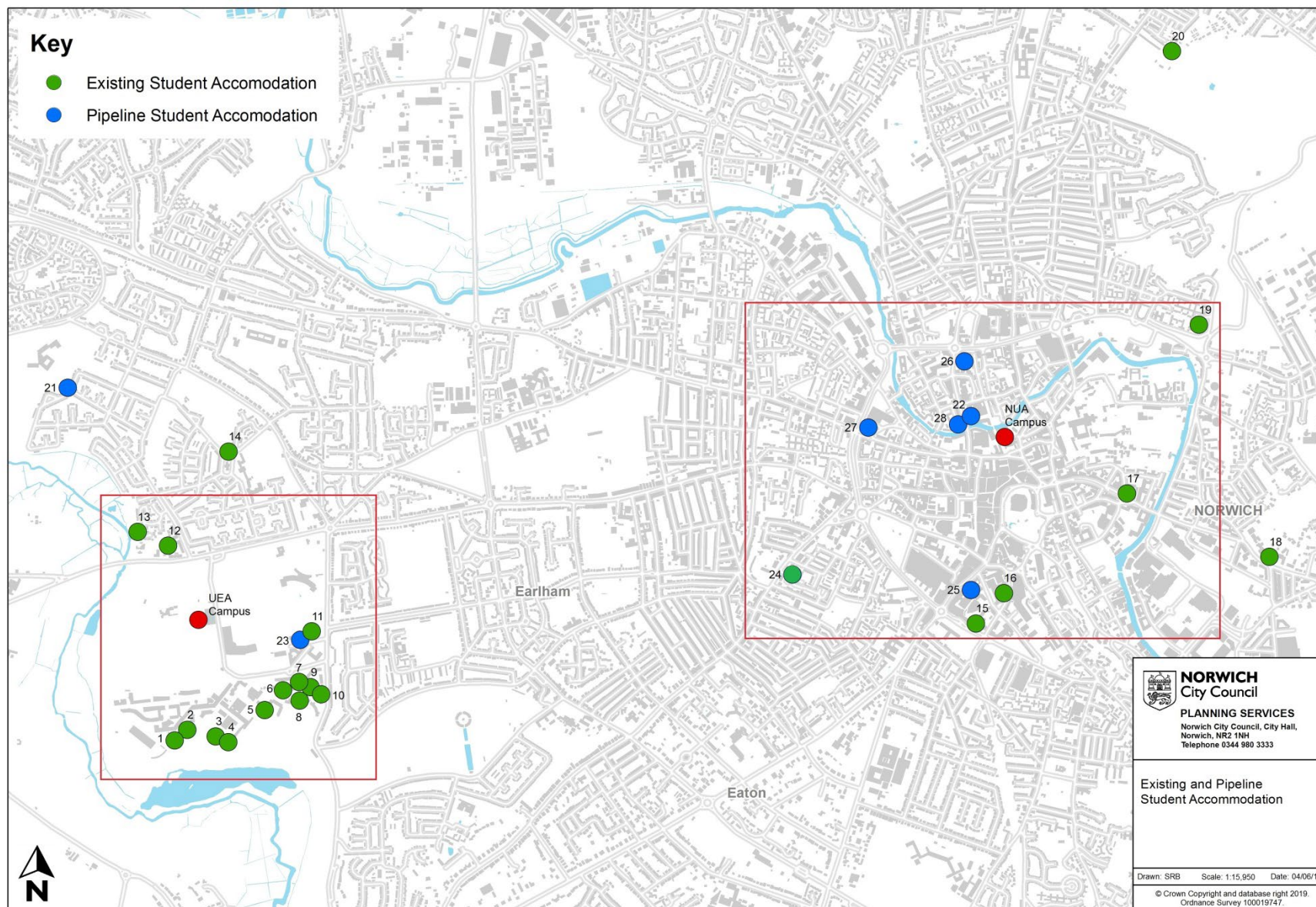


Figure 1: Distribution of Existing and Pipeline PBSA in Norwich overview

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

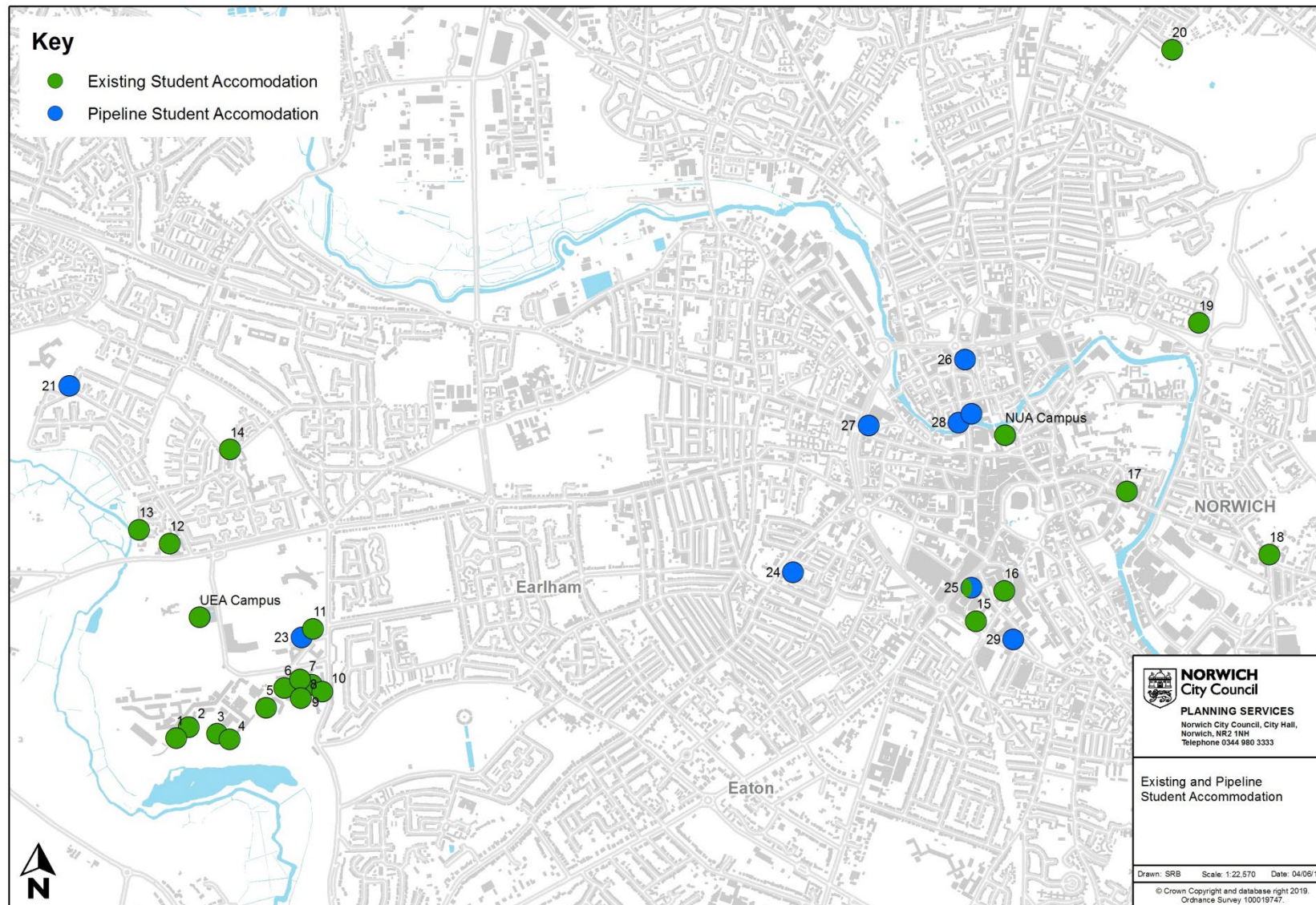


Figure 2: Existing and Pipeline PBSA at UEA Campus/Village (detail)

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

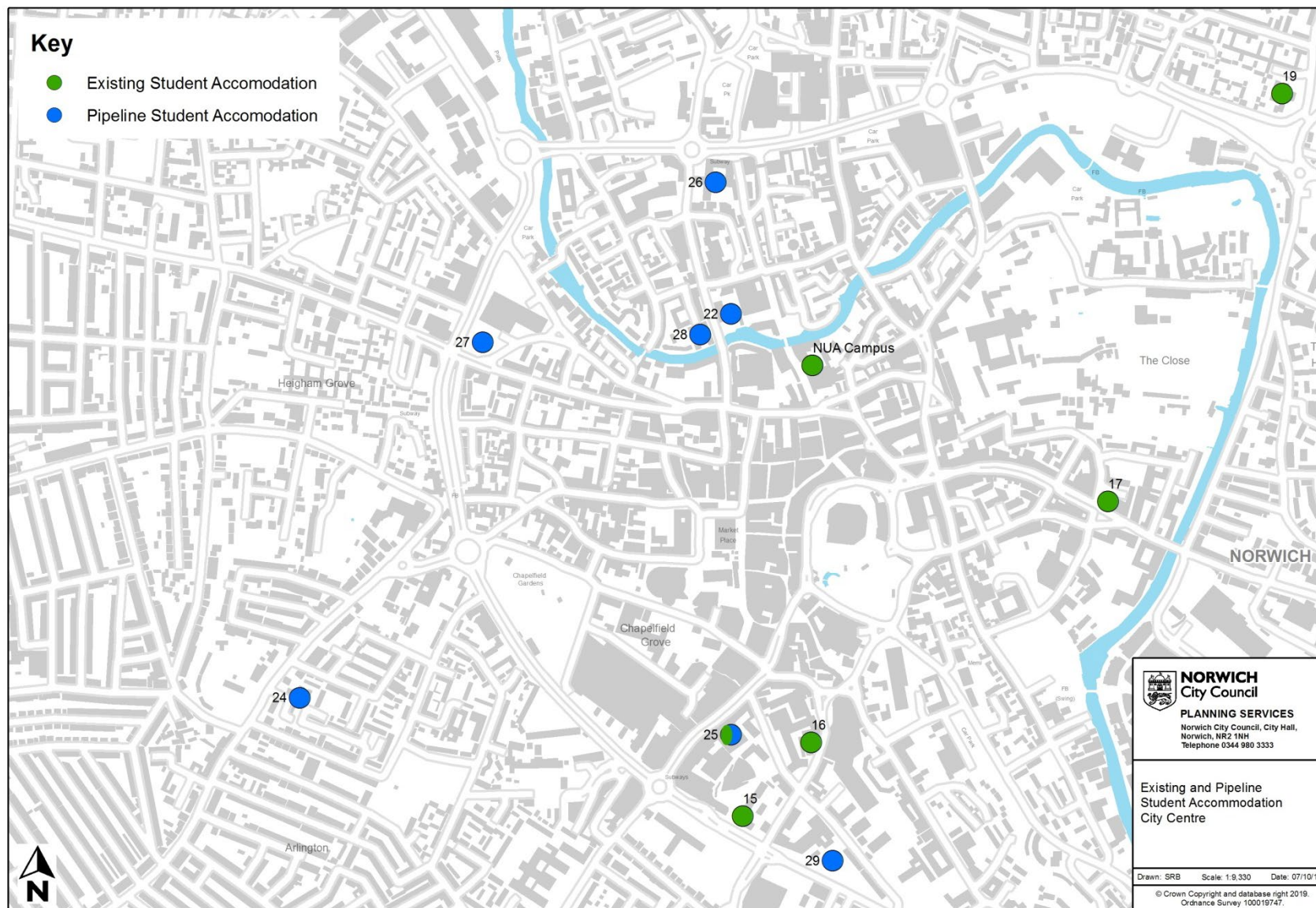


Figure 3: Distribution of Existing and Pipeline PBSA in the City Centre (detail)

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.

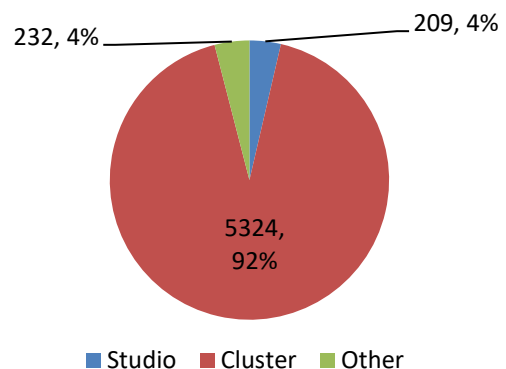


Chart 1: Existing PBSA characteristics

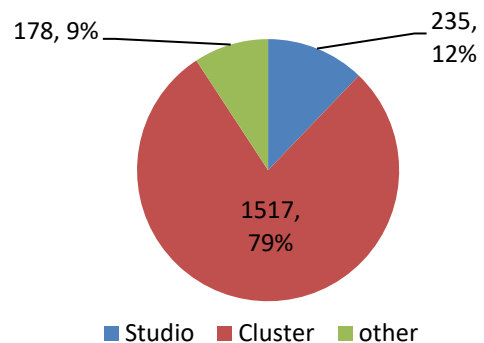


Chart 2: Pipeline PBSA characteristics

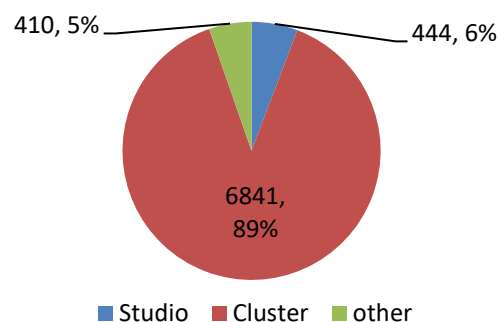


Chart 3: Existing and Pipeline PBSA characteristics

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;
- (g) the potential introduction of 2-year degrees and increased focus on vocational qualifications; and
- (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.allsop.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.

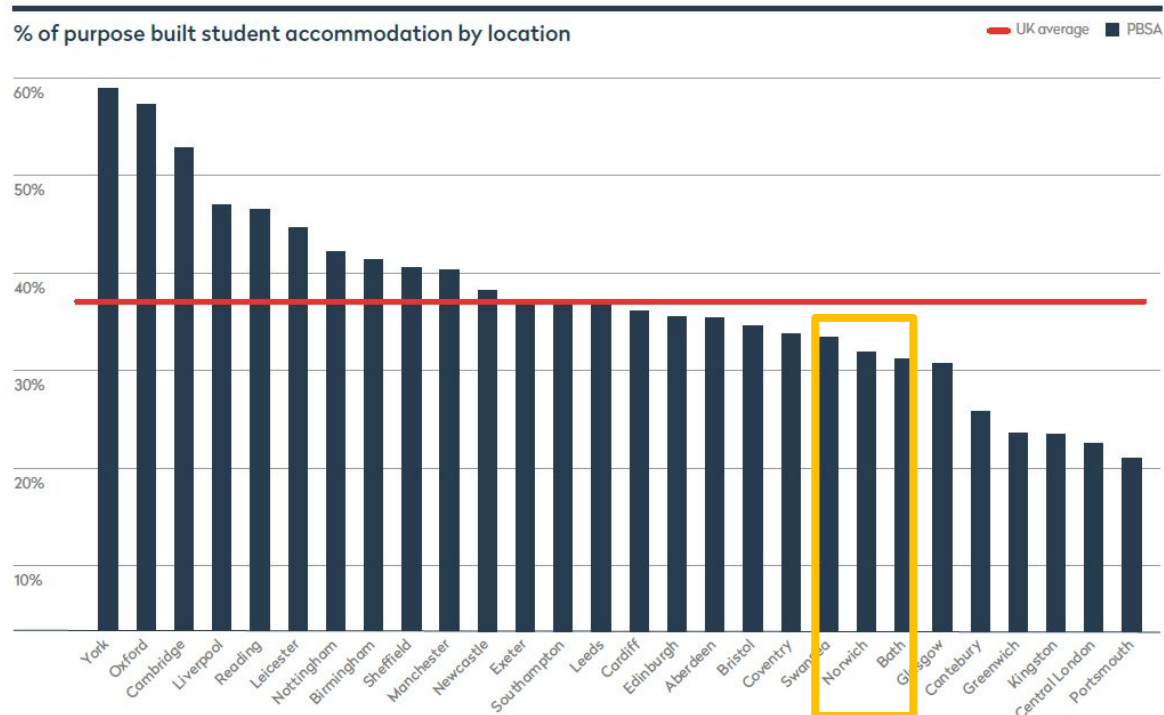
- 4.23. There is a risk that if Norwich does not facilitate the growth of its student population appropriately by providing opportunities for development of new and appropriate student accommodation, this may have negative impact upon the reputation and popularity Norwich currently enjoys as a destination 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 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 (5,765) to students | 29% | 26% | 25% |
| Percentage of existing and pipeline bed-spaces (7,692) to students (pipeline = applications pending decision, approved but un-commenced & under construction) | 38% | 35% | 34% |
| Additional bed-spaces over and above 'pipeline' to reach estimated capacity (40% of total students) | 376 | 1,050 | 1,430 |

- 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 for up to 1,000 additional units of PBSA in a 5 year period from now (by 2024) or nearly 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 accommodation is one of a number of forms of housing which may contribute to the provision of mixed and balanced communities in Norwich. However 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 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, 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 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

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

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 705 units is 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. 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. Any application for PBSA development 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)
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

DM6: Protecting and enhancing the natural environment

DM7: Trees and development,

DM8: Planning effectively for open space & recreation

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).
- 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. .

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.
- **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. Ideally proposals for new student accommodation should involve consultation with, and

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

meet the needs of, higher education institutions in Norwich as representatives of their students. This could include agreement relating to appropriate: location, facilities, amenities, tenure type, cost, and management.

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

- (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 principle 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. 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.

5.46. 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

5.47. 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.

5.48. 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](#) (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.

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 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 | 73 | | 73 | |
| 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 | | | 5765 | 209 | 5324 | 232 |

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 | | | | ✓ | 18 Units Refused |
| The Blackdale Building (PHASE 2) | 23 | 401 | | ✓ | | | |
| St Stephen's Tower, St Stephen's Street | 25 | 88 | | | ✓ | | Remainder expected to be completed by November 2019 |
| Car Park Adjacent to Sentinel House 37-43, Surrey Street | 29 | 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 | | 1930 | 149 | 1357 | 424 | - | |

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>