

From: Meg Bond [REDACTED]
Sent: 07 March 2019 23:28
To: Planning Policy
Subject: Response to PBSA SPD consultation draft

Follow Up Flag: Follow up
Flag Status: Flagged

Comments on PBSA SPD consultation draft from Nick Bond.

My comments below address the following question which is the fundamental issue - **will the provision of PBSAs achieve what the SPD claims?**

1. A major aim of the policy is clearly '**to reduce the pressure on shared accommodation in family homes resulting in a return of those properties to the housing market or for rental to those other than students**' (see Introduction bullet point 5). This is emphasised in Criterion 1 on p26 which states 'The aim of providing PBSA is to divert most of the student population into this type of accommodation'. This is an entirely laudable aim - in fact it is of vital importance in terms of making available a supply of accommodation for first-time buyers and non-student renters who are currently disadvantaged by the widespread loss of family homes to student HMOs.

However, even before including any predicted increase in students needing accommodation, to release just a quarter of student HMOs (approx 250) with an assumed average of 6 students per HMO, would require 1500 beds ie 7/8 mega blocks the size of the 200 bed Station House. To release half the student HMOs back to the market, which would be more in line with the aim of this policy, would require the building of 15 PBSAs. Moreover it is difficult to see how this policy could achieve the required impact without this level of PBSA development, as anything else would merely be tinkering at the margins. Is WDC seriously proposing this?

2. Although this major aim of returning student HMOs to family homes by housing students in PBSAs is clearly stated there is nothing in the document to explain how it is to be accomplished. Building PBSAs by itself may well not be sufficient to achieve this. For example, it is well known that PBSAs are more expensive to rent than HMOs and this may deter many students (particularly home students) from taking up this option, but there is nothing in the policy to address this, such as requiring developers to provide a significant proportion of affordable units as recommended by the NUS (see NUS Accommodation Costs Survey 2018 at <https://www.unipol.org.uk/acs2018.aspx?fbclid=IwAR18LiDkgiidiY5xMGIO3JLx8XZurpxWikvxL9gBfUx-LRUzpZ904xqH0H4>). Without such a requirement PBSAs could well become almost exclusively inhabited by students from abroad with the risk that they could become under-occupied and cease to be viable should the number of such students decrease.

Even if the above suggestion regarding affordable units is incorporated in the policy, there may have to be additional measures to restrict the availability of HMOs such as reducing the 10% figure to 5% when considering planning applications. In the last few years in south Leamington, 4 large blocks accommodating around 550 students have been built, but the number of HMO planning applications granted has continued unabated partly because, as research suggests, students want to live wherever other students live. So building more student blocks per se may attract more students to the area and paradoxically increase the demand for HMOs, unless they provide sufficient beds at low enough rents to attract not just foreign students, who typically provide the bulk of their tenants, but home based students who are more likely to occupy HMOs.

3. The introduction to Chapter 1 'welcomes and encourages students to become part of the local communities in which they live'. Bullet points 3 and 6 also emphasize the aim that this PBSA Policy will facilitate this. Nowhere in the document is it explained how the policy will achieve such 'integration': indeed it is hard to see how PBSAs could ever achieve this. They are built as separate communities imposed on their local area. By their very nature they cannot promote normal neighbourly interactions between their inhabitants and local residents such as taking in parcels, watering plants in neighbours' absence etc. Without such interactions, their residents are likely to have limited understanding of the concerns of locals about for example the effect on them of late night street noise because, in their separate blocks, they are insulated from them.

4. Criterion 7 on p28-29 stresses the importance of 'future proofing' PBSAs in case the demand for student accommodation decreases markedly. The very restricted car parking provision allocated to these blocks will seriously undermine their attractiveness to, for example, single professional and other young workers (including the recent graduates which the policy also seeks to encourage to stay and live here, but doesn't explain how this is to be achieved). This is a dilemma because to increase the level of required parking provision at such blocks would potentially encourage the student occupants to bring cars which both the University and the Council discourage on well-founded grounds.

5. Where should PBSAs be located? The draft policy on p2 endorses the aim of the Local Plan to 'make sure that the district can accommodate university students without harming the balance of existing communities'. This is reinforced by bullet point 4 which aims 'To reduce the negative effect that concentrating the student population can have on other residents in some parts of south Leamington in particular.' It follows from this policy aim that they should not be located in south Leamington which has the highest density of HMOs in the district; the greatest density of students (some of the HMOs are very large); and the greatest concentration of existing PBSAs (Station House - 202; Union Court - 110; The Union - 197; Moss House - 47) with Wise Street (c200) now granted planning permission. To meet the sustainable aspirations of the Local Plan and keep travelling time and journey length to a minimum, they should clearly be located as near to the University campus as possible.

6. Finally I fear that the outcome of this policy could well be that one or two more PBSAs will be built which will have no effect on the release of HMOs to provide more family homes but at the same time will lead to an increase in the total number of students in Leamington, with all the concomitant problems that implies.