

From: Colin Quinney
Sent: 11 March 2019 12:33
To: Planning Policy
Subject: PBSA SPD Consultation Response

The Council is to be commended for seeking to strengthen its policies on student accommodation in the District and specifically to clarify its planning position on Purpose Built Student Accommodation (PBSA's).

However the **Chapter 1** preamble and starting point for the policy is not satisfactory in five main ways -

1. It fails to set out clearly how this new policy will 'support' the existing H6 policy to limit concentration of HMO student accommodation. It does not acknowledge the need to integrate the new policy carefully with both the details and over-arching principles and aims of this long-established policy, in specific, logical ways that can be readily understood. Nor does it give confidence that it will avoid introducing further planning ambiguities (the sort of ambiguity in H6 which both Planners and landlords have been able to exploit in recent years, to the dismay of councillors and residents – see 5.a below)
2. It fails to provide any evidence that encouraging PBSA's will in fact reduce the pressure on HMO conversion of family houses, rather than simply suck in a higher proportion of students to the town as capacity is added. Nor does it indicate the scale of PBSA's which will be needed simply to absorb planned growth in student demand if not other action is agreed with Warwick University.
3. It does not address the affordability issue, although there has been much public debate on the issue. Unless WDC policy encourages it, experience suggests that PBSA's will tend to maximise rents and cater for the more affluent students, with HMO's continuing to meet demand for more affordable student housing – this with diminished or zero impact on HMO demand.
4. It does not address the challenges and risks of building PBSA's to minimum permitted room size and what may need to be done from a policy angle, to ensure the future-proofing aspiration will actually work (residents have eloquently pointed out the similar problem of off-site parking for any future conversions from student use, in what is a highly congested town centre)
5. In welcoming the student contribution to the local economy and life of the town, it does not adequately reflect growing unease across the community, and in particular in South Leamington, about -
 1. Planning failure to prevent further over-concentration of students in some areas both before and after the H6 policy was introduced in 2012, as is clear from the maps supplied and the steady rise in numbers of HMO's and student numbers over the years.
 2. the real impact this has had on the amenity of settled residents (whatever the objective of sustaining 'balanced communities' in the approved local Plan which is quoted).
 3. their view, experience and the actual data that Warwick University has been 'outsourcing' at zero cost its accommodation requirements for a growing student population mostly on the District – and continues to do so.
 4. the economic downsides of a large student population which is mostly absent for up to 40% of the year and whose spending power is limited both in size and breadth.

5. the very limited land available for any new accommodation in the central/South Leamington areas favoured by students; compared with the Warwick University campus area.
6. Increasingly poor service and lack of capacity in peak period bus services from Leamington to campus; the lack of influence of local authorities on the private bus companies (in spite of the good intentions outlined in our local Plan); and the adverse impact that has on car ownership, use, congestion and pollution levels.

Figure 1 gives figures for the amount of 'social outsourcing' outlined in 5c above, now amended and extended in the Warwick University supplement. It's a stark picture. From 17/18 to 21/2 with over 2000 more students planned in the five year period, probably 1500 will come into the private sector, many in Leamington. Table 1 indicates this number would be spread over 11 years and therefore needs to be revised. Paul Cox's submission questions the accuracy of the analysis and overall numbers quoted in the SPD which also makes the numbers problem larger and more urgent than the document indicates.

The Student Housing Strategy recently approved by WDC and quoted in the document, did not reflect the views of large numbers of Leamington residents and was opposed by many Leamington Councillors. The Council's role, surely, is principally to protect and nurture the long-term interests of settled residents and the overall community, not simply accept the plans of one body within the District, ie the University of Warwick, whatever clear detriments they may have for the community.

Residents' views and facts are clearly set out in **Chapter 2** but it is a serious weakness that they are not covered in the opening statement of objectives, which undermines the balance of the overall document. It seems unwise to base a Planning policy on aims and assumptions not reflecting the views of the community for which it is primarily designed.

Throughout the document there is no acknowledgement of the role strong Planning policies can play, in establishing a framework for Universities in their area to be required to match planned growth in student numbers with accommodation on or close to campus. Oxford is one example of such an approach. The positive impacts on traffic, pollution and student welfare – as well as relief of housing pressures and protection of diverse, balanced communities - of adopting such policies are obvious. And it is elsewhere acknowledged that Warwick University has far better access to land, no doubt more cheaply, than anywhere in the favoured areas of our Towns, especially Leamington.

Comment on Policies proposed.

PBSA1 is very difficult to understand, even for Councillors who have been briefed on the proposals during their development.

It seems clear that the overall concentration of student accommodation will, effectively, be permitted to rise above the 10% trigger point in certain circumstances, for example the retail areas of Town.

However there also seems to be a loosening of this ceiling in other areas, especially 2A and 2B. Before decisions are made it would be very helpful if clear worked examples could be provided of

possible PBSA proposals in each of the four areas, both at boundaries and centrally in each area, so that the overall impact on concentration can be clearly assessed.

If the addition of a PBSA in certain circumstances will effectively add to an already over 10% concentration, this should not be permitted and the policy should be reframed accordingly.

One suggestion would be for a two step assessment to be made – check against current concentration within the PBSA radius and if over 10% already, development is refused.

A related adjustment suggested by others would be to put a blanket ban on all PBSA developments in the areas where concentration is already over 10% and for an area around it, to encourage dispersal of any proposed developments.

Has the legal advice that banning PBSA's from certain areas for a period, in favour of wider dispersal, could be seen as discriminatory, been reversed, as some of us have received advice it should be ? If not, is a second legal opinion being sought ?

Condition c. The 'main thoroughfare' criterion in H6, referred to here is one of the key ambiguities which has recently emerged in its application. It is currently being urgently reviewed and clarified, we expect for approval by Councillors as responsible for policy, and the agreed policy definition should also therefore be applied in the PBSA policy.

Condition f. Does this per-kitchen criterion also apply to new proposed PBSA's or only existing (it is not clear) ?

Has any assessment been made with Private Sector Housing about the possible risk of any unintended consequences of encouraging developers to offer only minimal required kitchen facilities ?

PBSA2

See points 3 & 4 above which should be added to this policy.

Should minimum standards be set for shared Living, storage and socialising spaces, both for students and perhaps most importantly to ensure practical future-proofing will work ?

May I suggest the consultation document be revised, corrected and clarified, to take in the new data and the many comments, and a further consultation with residents be arranged before any proposals are made to Councillors ?

Colin Quinney
District Councillor - Leam Ward

