

Warwick District Council

**PURPOSE**

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**ACCOMMODATION**

SUPPLEMENTARY PLANNING  
DOCUMENT

Consultation Draft, January







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## CHAPTER 1

# Introduction

**Warwick District Council acknowledges the positive contribution that the student population brings to the local economy and to the vibrancy of its communities and welcomes and encourages students to become part of the local communities in which they live. The towns of the district are well placed to serve the two universities: the University of Warwick and Coventry University, as well as Warwickshire College which is based in Leamington Spa and has subsidiary colleges at Stratford on Avon, Moreton Morrell, Rugby, Pershore and Solihull.**

The aim of the provision of Purpose Built Student Accommodation (PBSA) and the SPD is to:

- Provide a high quality and safe environment conducive to student life with easy access by public transport, walking and cycling to places of study and other facilities
- To welcome students to the district and recognise their contribution to the local economy and the richness of its communities
- To encourage students to participate in local events and activities and to continue to live and work in the district once their period of study is over
- To reduce the negative effect that concentrating the student population can have on other residents, in some parts of south Leamington in particular
- To reduce the pressure on shared accommodation\*<sup>1</sup> in family homes resulting in a return of those properties to the housing market or for rental to those other than students
- To improve relationships within existing communities between residents and the student population and encourage integration

This document does not seek to allocate specific sites for the development of PBSA but provides the criteria by which sites will be assessed when planning applications are received for consideration and is an extension of policy H6 of the Warwick District Local Plan (hereinafter referred to as the local plan).

## **University of Warwick**

Consistently ranked ninth in the top ten UK league tables, 54th in the world (QS World Rankings 2019) and voted University of the Year in 2015\*, the University of Warwick attracts students not only from the UK but from all over the world. Student numbers are given in Figure 1 below.

The university straddles the boundary between Warwick district and the city of Coventry. The majority of the university's land within Warwick district has been given over to student living accommodation, with more planned for the future. The adopted local plan considered the needs of the university as a major site within the green belt and has excluded land from the green belt to allow further development to happen

\*<sup>1</sup>Shared accommodation includes houses in multiple occupation and various forms of temporary accommodation

\* The Times Good University Guide

## Coventry University

The university is rated 12th in the UK in the Guardian University Guide 2018 and within the top 50 of the world's best student friendly cities (QS world rankings, 2015). Again, the university attracts a large number of overseas students. Student figures are given in Figure 2 below.

## Warwickshire College

Warwickshire College students are largely drawn from the local area, however, in recent years, more overseas students are being attracted to the college and although there is now some accommodation on campus, some students are living in property owned by local landlords, placing even greater pressure on the private rental housing stock. Warwickshire College does not however keep records of the number of students living locally in rented accommodation or the whereabouts of the HMO's in use.

**Figure 1 – University of Warwick**

	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	Change 2017/18 to 2020/21
Full-time Students	19,195	19,955	21,515	22,072	22,534	22,818	1,303
University Beds	6,433	6,433	6,774	6,597	6,868	7,177	403
Nomination Agreements	590	540	1,122	1,122	1,122	1,122	-
Private Rental Sector	12,172	12,982	13,619	14,353	14,544	14,519	900

(Source: University of Warwick Noms agreements for 2019/20 – 20/21 assumed to continue at 2018/19 levels)

**Figure 2 – Coventry University**

	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	Change 2017/18 to 2020/21
Full-time Students	24,655	27,160	28,518	29,944	31,441	33,013	4,495
University Beds			1,800	3,300	3,800	3,800	2,000
Other Purpose Built			5,000	7,500	10,000	12,500	7,500
Private Rental Sector			21,718	19,144	17,641	16,713	5,005

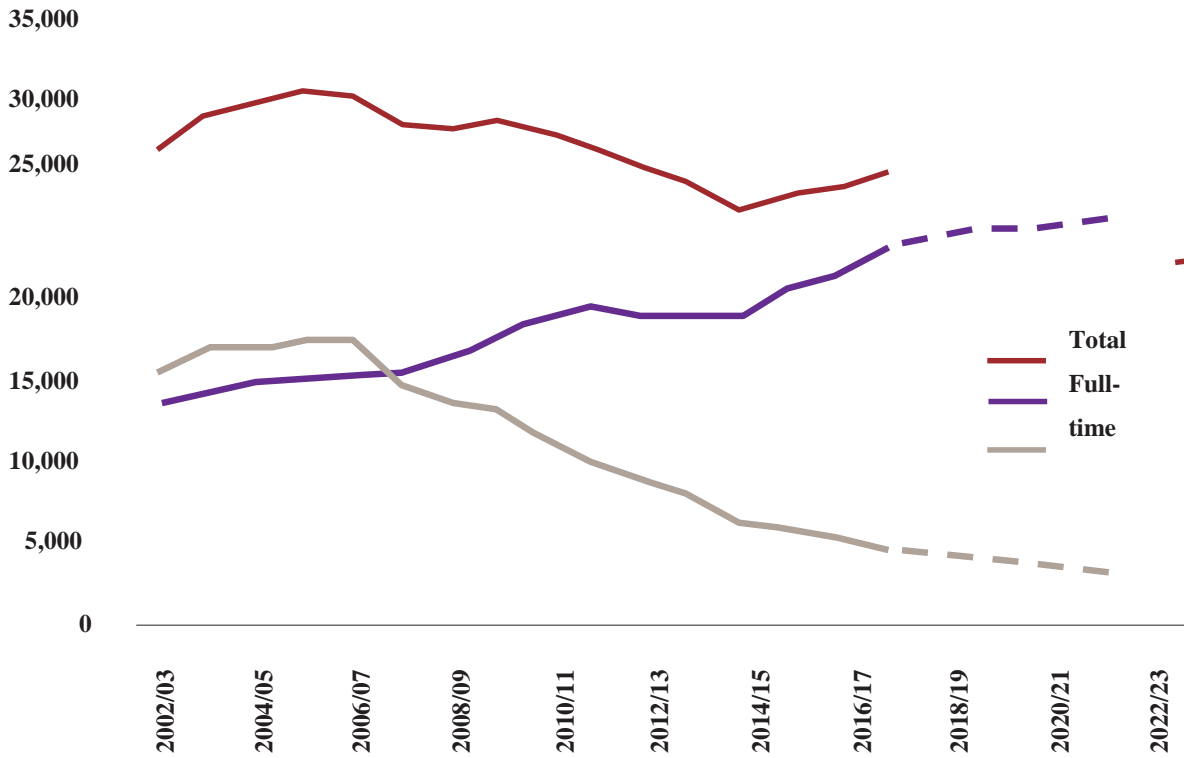
(Source: Analysts' projections based on university data)

## Projecting Student Numbers

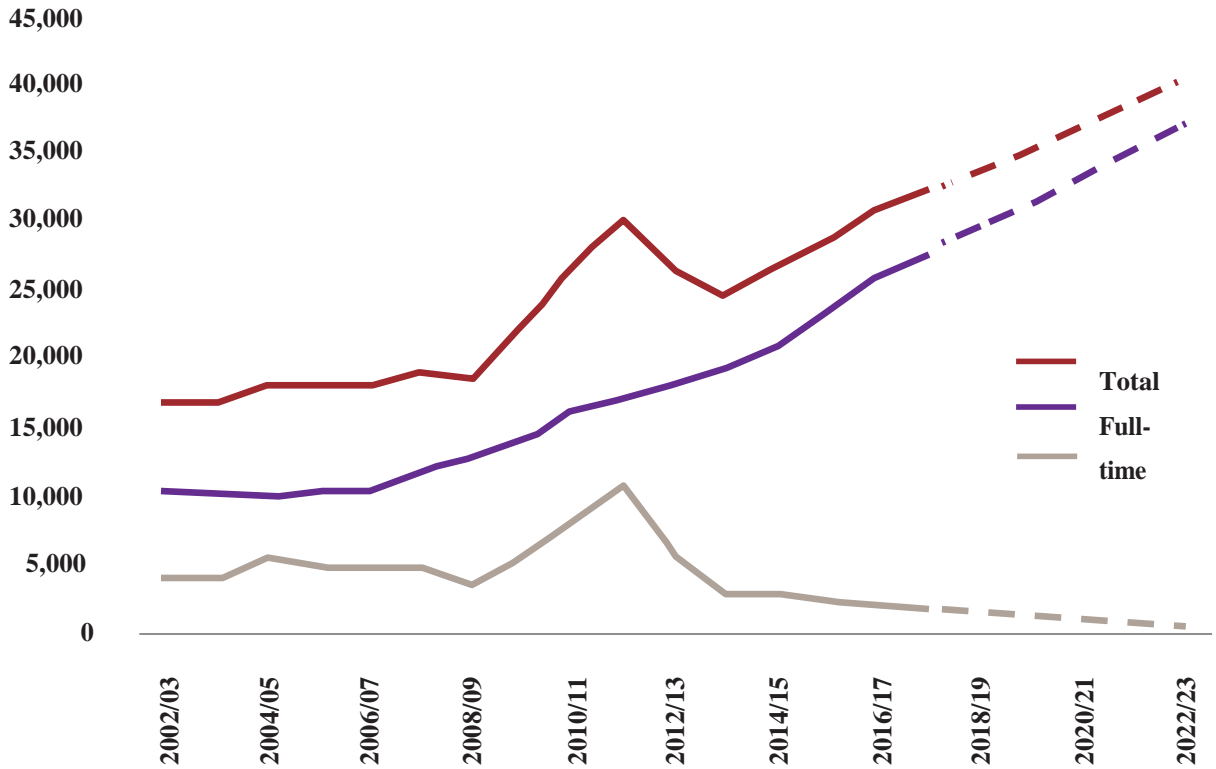
The data in Figure 3 projects student numbers forward to 2023 showing how full time student numbers will rise, with part-time student figures falling. This is perhaps more of a problem in terms of accommodation demand given that the pressure will be coming largely from full-time students who are not from the local area. Part time student numbers are therefore not considered for accommodation purposes.

Figure 3

### Warwick University



### Coventry University



**Figure 4 – University of Warwick Estimated Housing Demand**

	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	Change 2017/18 to 2020/21
Full-time Students	19,200	20,000	21,500	22,100	22,500	22,800	1,300
University Beds	6,400	6,500	6,800	6,600	6,900	7,200	400
Nom Agreements	600	500	1,100	1,100	1,100	1,100	-
Private Sector	12,200	13,000	13,600	14,400	14,500	14,500	900

Source: HESA, University, Residential Analysts Estimates

Currently (2017/18) 5782 students live in Warwick district (University of Warwick figure, August 2018, see Figure 7 of this report). This number is set to increase by 120 bedspaces per annum for the next three years and then by 2%pa until 2029.

This results in a total demand for 1414 additional bedspaces in Warwick district over the same period as shown in Table 1 below.

**Table 1**

17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29
5782	5902	6022	6142	6265	6390	6518	6648	6781	6917	7055	7196

**Figure 5 – Coventry University Estimated Housing Demand**

	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	Change 2017/18 to 2020/21
Full-time Students	24,700	27,200	28,500	29,900	31,400	33,000	4,500
University Beds			1,800	3,300	3,800	3,800	2,000
Other Purpose Built			5,900	7,600	10,500	12,600	6,700
Private Sector			20,800	19,000	17,100	16,600	4,200

Source: HESA, University, WDC, Residential Analysts Estimates

“Using available forecasts for student numbers and estimates of student housing supply, a residual number of students that would need to be housed in the private sector can be calculated (as seen in Figure 4). Based on these calculations, there will be an estimated increase of 900 University of Warwick students needing to be housed in the private sector over the next three years. The latest trends in where University of Warwick students live suggest that around 360 of these students will live in Royal Leamington Spa during that period. The forecast growth has been estimated by the University of Warwick at +2% year on year.



Meeting this increased student housing demand in the private rented sector via HMOs risks increasing the pressure on everyone in the community, including students. Additionally, it remains to be seen whether there is sufficient demand from landlords given national tax changes and other considerations limiting demand for new purchases. Recent evidence from the BBC suggests that 'buy to let' is no longer considered to be the investment it once was and for this reason, fewer landlords will increase their portfolios in this market. While the University of Warwick is encouraged to increase housing provision on campus, the purpose-built sector is ideally placed to cater for the additional student housing demand. "Relying on the purpose-built sector is not without risk but it can help accommodate more students and reduce the pressures if planned for appropriately." (Residential Analysts report Student Housing Need in Warwick District, 2018).

Coventry University student numbers are set to decline in Warwick district as there are many new PBSA schemes in the city which will be more attractive to those students based there. No additional provision is therefore forecast for this district and no additional bedspace requirements have therefore been added to the need.

Similarly, Warwickshire College students are largely already locally based and those that aren't, are almost entirely accommodated on campus. No resulting additional need has been identified therefore and no additional provision made.

CHAPTER 2

# Planning Policy

## National Planning Policy Framework (NPPF), 2018

The NPPF states in paragraph 61 that local planning authorities should consider

‘the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes’

These specific groups, include the needs of students in areas where there is a demand, such as Warwick District.



## National Planning Policy Guidance (NPPG)

Paragraph 021 reference ID:2a-021-20160401 (revised April 2016) of the NPPG 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. Student housing provided by private landlords is often a lower-cost form of housing. Encouraging more dedicated student accommodation may provide low cost housing that takes pressure off the private rented sector and increases the overall housing stock. Plan makers 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 the university-provided accommodation. Plan makers should engage with universities and other higher educational establishments to better understand their student accommodation requirements.’

Student accommodation is allowed to be counted toward the districts housing requirement, based upon the amount of accommodation released to the housing market:

‘All student accommodation, whether it consists of communal halls of residence or self-contained dwellings and whether or not it is on campus, can be included towards the housing requirement based on the amount of accommodation it releases in the housing market. ‘

(This guidance is due to be updated in line with the 2018 NPPF in due course).

## Local Policy

### Warwick District Local Plan (2011 – 2029) adopted Sept. 2016

Under Objective A of the local plan – Providing sustainable levels of growth in the District

2. Provide a sustainable level of housing growth (and balance this with economic growth) to reduce the number of people who are currently homeless or living in unsatisfactory accommodation to meet future housing needs and to help deal with the issues of need for affordable housing. The Local Plan will:
  - Identify and maintain a supply of land for housing to meet the requirements for market and affordable housing, ensuring this is of the right size, provides for the right tenure and is in the right location;
  - Make sure that the district can accommodate university students without harming the balance of existing communities;



- Allow providers to meet the special housing needs of the growing number of older people; and
- Make provision for gypsies and travellers in order to deal with local need and historic demand'

## Policy H6 Houses in Multiple Occupation and Student Accommodation

### Policy H6

'Planning permission will only be granted for Houses in Multiple Occupation, including student accommodation, where;

- a) The proportion of dwelling units in multiple occupation (including the proposal) within a 100m radius of the application site does not exceed 10% of total dwelling units;
- b) The application site is within 400m walking distance of a bus stop
- c) The proposal does not result in a non-HMO dwelling being sandwiched between two HMO's;
- d) The proposal does not lead to a continuous frontage of three or more HMO's; and
- e) Adequate provision is made for the storage of refuse containers whereby –
  - i. The containers are not visible from an area accessible by the general public and
  - ii. The containers can be moved to the collection point along an external route only.

Exceptions to a) may be made where the application site is located:

- On the campus of the University of Warwick or Warwickshire College or;
- On a main thoroughfare in a mixed use area where the proposal would not lead to an increase in activity along the nearby residential streets (for example, by way of pedestrian movements between the application site and the town centre or car parking)

Exceptions to e) may be made if alternative arrangements for the storage and movement of containers are agreed in writing by the Council's Contract Services section.'

Clearly this policy was not meant to apply specifically to PBSA and therefore this document seeks to influence the location and quality of PBSAs whilst supporting Local Plan policy H6 to address issues around existing concentrations of student accommodation in parts of the district.

In paragraph 4.66 of the Local Plan the Council outlines its support for increasing the amount of on campus accommodation at the University of Warwick; "The Council supports the provision of student accommodation on the University campus that falls within Warwick District. The number of full-time University students increased by 29% in the five years up to 2011-12. A large proportion of this increase has been in international students, who are more likely to prefer purpose-built accommodation. Since the Masterplan for the University was approved in 2009 a substantial amount of building work has taken place across the University, including in the area that falls within Warwick District. This includes 800 additional student bed spaces as well as permissions to replace older stock. The Local Plan allows for further expansion of the University within Warwick District and this is likely to include further accommodation for students."



Much of the University of Warwick campus lies within the Coventry Local Administrative Area. That part that lies within Warwick district is also within the Warwickshire Green Belt and has been designated as a major site within the green belt in the local plan, thus allowing new development to take place despite its green belt status. Paragraph 3.143 of the local plan states that “Within the district’s boundary, development has been to meet the residential needs of the university. In the past this has involved a recognition that development in the green belt will be necessary to allow the university to expand. The predominantly built-up nature of the area currently known as Central Campus West means that this land is no longer appropriate for retention in the green belt. Further, the importance of the University in supporting the local economy (as recognised in the Strategic Economic Plan), and the need for the University to be able to grow within its existing boundaries, provide the exceptional circumstances to justify amending the green belt boundary to exclude the area shown on the Policies Map from the green belt. Any further development in the green belt proposed in any future masterplan will need to be considered carefully as part of the long term plan for the University across the two local authority areas.”

Policy MS1 relates directly to the University of Warwick with regard to future development:

### **Policy MS1**

Development at the University of Warwick will be permitted in line with an approved Masterplan or Development Brief as agreed with the relevant local planning authorities. The Masterplan should set out how proposals will contribute to the University delivering a world-class educational campus including the range of uses associated with that. It will provide the framework within which further planning applications will be determined. As such the Masterplan should:

- a) identify the physical and economic context;
- b) identify the development principles to underpin future development proposals;
- c) identify the location of developments, demonstrating how proposals will mitigate any potential adverse impacts; and
- d) identify how the proposals support the vitality of the local and /or sub- regional economy

Land has been removed from the green belt to enable growth of the university through the local plan process. Developments will be considered and promoted through the masterplan. Other development proposals for the south of Coventry will need to take into account the potential for the future growth at the university as part of policy DS20, Directions for Growth South of Coventry.

Objectives within the Local Plan include:

- “Improved bus provision, including the extension of extant services and provision of additional routes where necessary
- The creation and enhancement of a network of cycle routes and paths, including safe and accessible links into the conurbation, University and to and from new rail infrastructure
- The creation and enhancement of safe and accessible pedestrian routes into the conurbation, University and adjacent development, linking wherever possible to existing public footpaths and longer distance routes”

The provision of sustainable levels of growth in the district includes ensuring that we:

- “Make sure that the district can accommodate university students without harming the balance of existing communities”

And within the objectives for education:

- “The ongoing development and expansion of the University of Warwick, with best use made of the existing landholding and the extension of the University’s built environment in accordance with an agreed masterplan that reflects the high quality of design and sustainability sought for the area.”

Within the objectives for employment and economic growth:

- “Spin-out activity from the university will be supported and delivered in close proximity to it, in line with a masterplan.”

## **Student Housing Strategy**

In May 2018 the Council’s Executive agreed a Student Housing Strategy. This strategy set out to assess and respond to the issues raised in south Leamington about the impact of student numbers and the transient nature of the population in concentrated areas.

The strategy’s policy statement is:

“Warwick District Council welcomes all students to our District and recognises the important social and economic benefits that they bring. The Council also understands that having a large student population can place stress on the settled community and has an impact upon housing demand. Our goal is to support local people while positively integrating the student population among local communities, and encouraging students to remain in the area for employment after graduation as permanent long-term residents.”

The aims of the strategy are:

- “To attract students to live in the district, during and after their studies, throughout the academic year.
- To encourage the provision of purpose-built student accommodation of an appropriate type and quality in sustainable locations thereby encouraging students to move from HMO style accommodation.
- To ensure that the necessary support services are in place for the whole community to ensure community cohesion and integration across all the generations.”

In concluding, the report stated that one of the next steps would include:

“Preparing a Student Housing Supplementary Planning Document (SPD) setting out our planning policies towards the design and location of purpose-built student accommodation”

This document fulfils this requirement and sits alongside and supports the Warwick District Local Plan policies and the Student Housing Strategy.

## Current situation

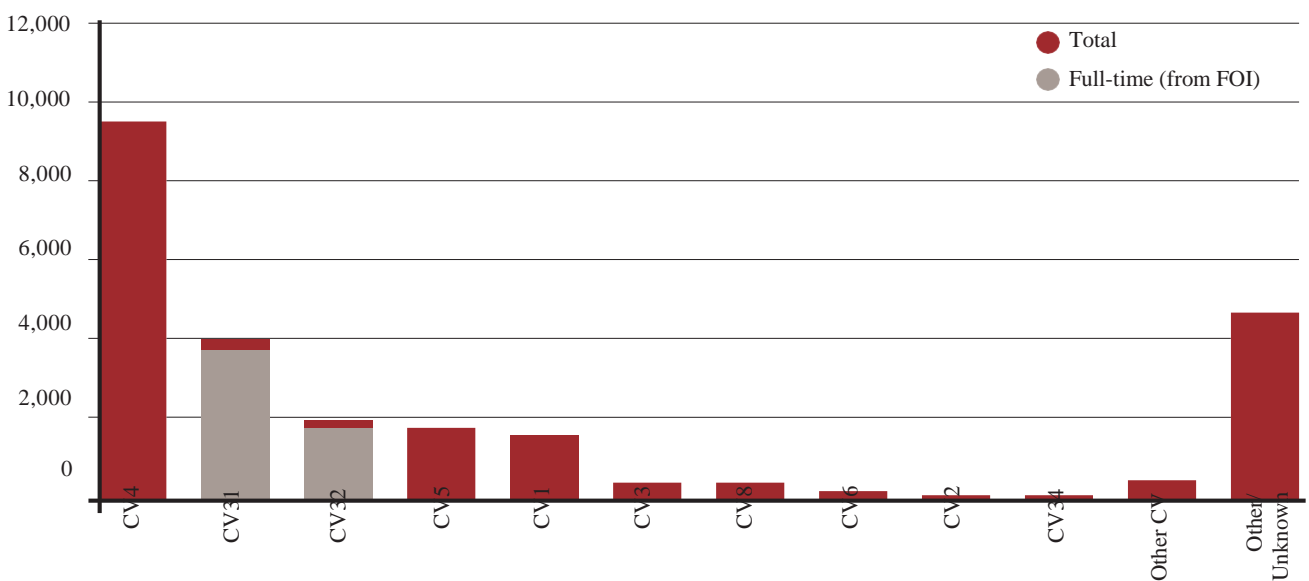
At the time that the Local Plan was examined (Sept – Dec 2017), about 81% of HMOs in the district consisted of accommodation for students, most of whom attend the University of Warwick. The concentration of HMOs is located in and around central and south Leamington Spa. The policies within this document, which expand upon local plan policy H6, aim to maintain the amenity of existing residents by restricting the concentration of HMOs in sensitive areas and by providing adequate storage of waste and ensuring student accommodation is within reasonable walking distance of a bus stop because access to public transport is essential for most University of Warwick students due to severely restricted parking arrangements on campus.

In April 2012, the Council agreed an Article 4 Direction to remove permitted development rights in Leamington Spa, for a change of use from a single dwelling to a small HMO (use class C4). This was in response to the concerns of local residents with regard to anti-social behaviour, particularly in the early hours of the morning, but also including noise, increased on-street parking and increased burglaries but also, poor attendance to waste storage and poor property maintenance.

The intention of the Article 4 Direction is to restrict further concentrations of HMO's to prevent the worsening of the situation and to ensure the need for planning permission to enable the council to control further concentrations of small HMOs, as large HMOs would need planning permission anyway.

There is a knock-on effect to the implementation of the Article 4 Direction in that there has been an increase in the demand for and planning applications for Purpose Built Student Accommodation blocks. Moreover, the availability of brownfield land within the urban area is at a premium and in order to utilise such sites, a concentration of planning applications has been directed to canalside locations where a number of opportunity sites for development exist as a result of small industrial and other employment sites which provide opportunities which are attractive to the market. This has had the effect of concentrating stand-alone student accommodation in this area, following a more linear layout. The applications received have not always been of the best design or layout and have not always addressed the sensitivity of the canalside location (the length of which is to be designated as a new Conservation Area shortly).

**Figure 6 – Student Residence 2017/18 by postcode (Warwick University)**



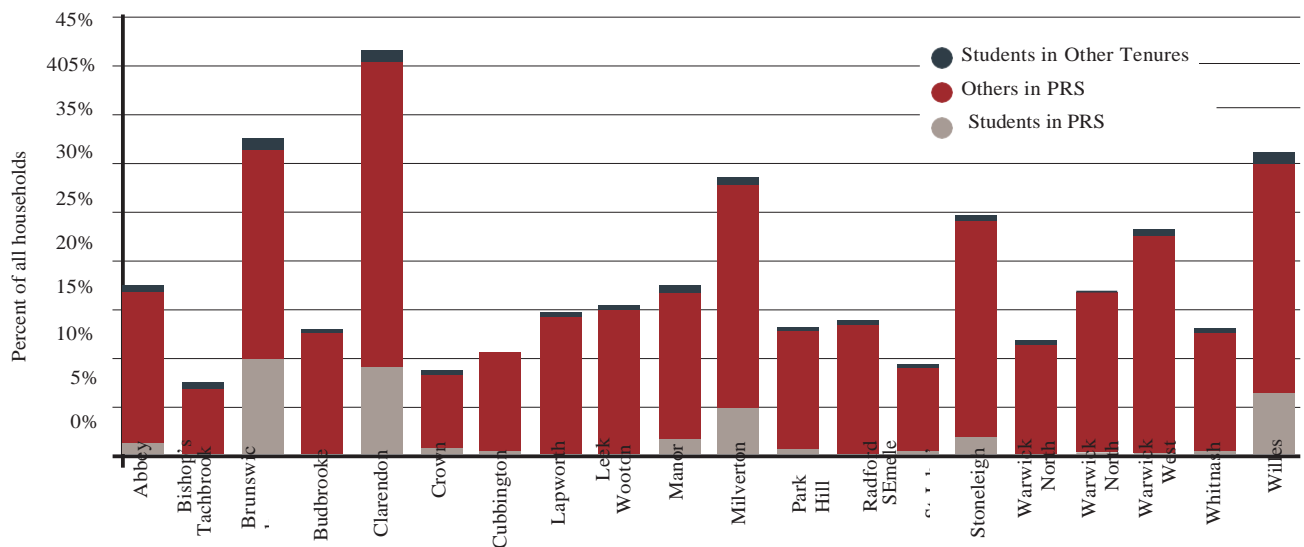
**Figure 7 - Actual figures for Leamington Spa postcodes CV31, CV32 and CV33 are as follows in the academic year 2017/18**

Number of students at the University of Warwick with Leamington Spa as their address for the academic year 2017/18	
Postcode Area	Number of Students
CV31	3,925
CV32	1,822
CV33	8
Other using LS in address CV31-CV33	27
<b>TOTAL</b>	<b>5,782</b>

These figures have been provided by the University of Warwick utilising data taken from the Student Records system on 23/11/2017. Students considered include all full-time undergraduate and postgraduate students who were fully enrolled on courses for the 2017/18 academic year.

Full-time students have been determined by reference to the “Mode of Attendance” field in the university’s student records system (all students with a Mode of Attendance of “F: Full-time” have been included in the data set; all other students have been excluded).

**Figure 8 – Concentrations of students in the private rental sector**



The number of students in the private rental sector (pale grey on the graph in Fig 8) is considerably smaller than other groups (red on the graph). (Note these are not just HMO’s, but all private rental figures).

## What is currently on offer?

### University of Warwick

Accommodation on offer: All first year students are guaranteed accommodation on campus in self-catered rooms. The rooms vary in price currently (2018/19) costing between £76-£181 per week dependent on facilities. A few families can also be accommodated in up to three bedroom houses on campus if necessary, but these are allocated to overseas staff. There are also rooms available for final year undergraduate students wishing to return to campus and postgraduate students.

The university manages over 2,000 rooms off campus in Coventry, Leamington Spa and Kenilworth supporting students post year 1, mature students and those with families, to find off campus accommodation. Properties are located either within walking distance or close to a regular bus service to the main University campus. Students are advised to look for privately rented accommodation in Coventry, Leamington Spa and Kenilworth, for such accommodation after their first year.

The University also has an Innovation Campus in Wellesbourne. There are a limited number of three bedroom houses on campus available at £595 pcm. A bus service links the main campus to that at Wellesbourne.

In terms of accessibility, the bus service runs direct to Coventry, Leamington Spa and Kenilworth. This puts particular pressure on these areas for student accommodation. Within these areas, Coventry (Earlsdon, Canley, Cannon Park and Tile Hill) and south of Leamington Spa as far as Sydenham, are the cheaper areas to live in terms of accommodation and availability of private rental properties.

The University has, for a number of years, nominated rooms in PBSA's and managed a number of properties, some including up to 100 rooms. Off-campus managed rooms in areas with direct transport links to campus are promoted as an alternative after the first year, through the University website.

Most universities including the University of Warwick, have a 'Student Accommodation Code' that lays down the minimum standards and requirements for such accommodation (e.g. minimum room sizes) to meet the needs of students. The code can be viewed at [www.thesac.org.uk](http://www.thesac.org.uk) for all of the accommodation on campus. Detailed requirements for properties managed by the University can be viewed at <https://warwick.ac.uk/services/accommodation/landlords/landlord-advice/property-requirements/>. Additionally, students are also required to sign up to a 'Code of Conduct' which includes respecting the local area and other residents in the community.

The code states that "We expect all members of the University to recognise their responsibilities and to:

- behave in a way that respects the rights and dignity of others
- treat others fairly
- display courtesy and good manners in every interaction appreciating that individuals have different styles and expectations
- value differences in others and the contribution they make
- work and study within the University on a co-operative basis
- demonstrate a commitment to upholding the University's policies on "[https://warwick.ac.uk/services/equalops/dignityatwarwick/diversity\\_and\\_inclusion\\_policy\\_may\\_2016.docx](https://warwick.ac.uk/services/equalops/dignityatwarwick/diversity_and_inclusion_policy_may_2016.docx)" Equality, Diversity & Inclusion.

This relates to behaviour on campus but also off-campus <https://warwick.ac.uk/services/equalops/dignityatwarwick/>.



## Coventry University

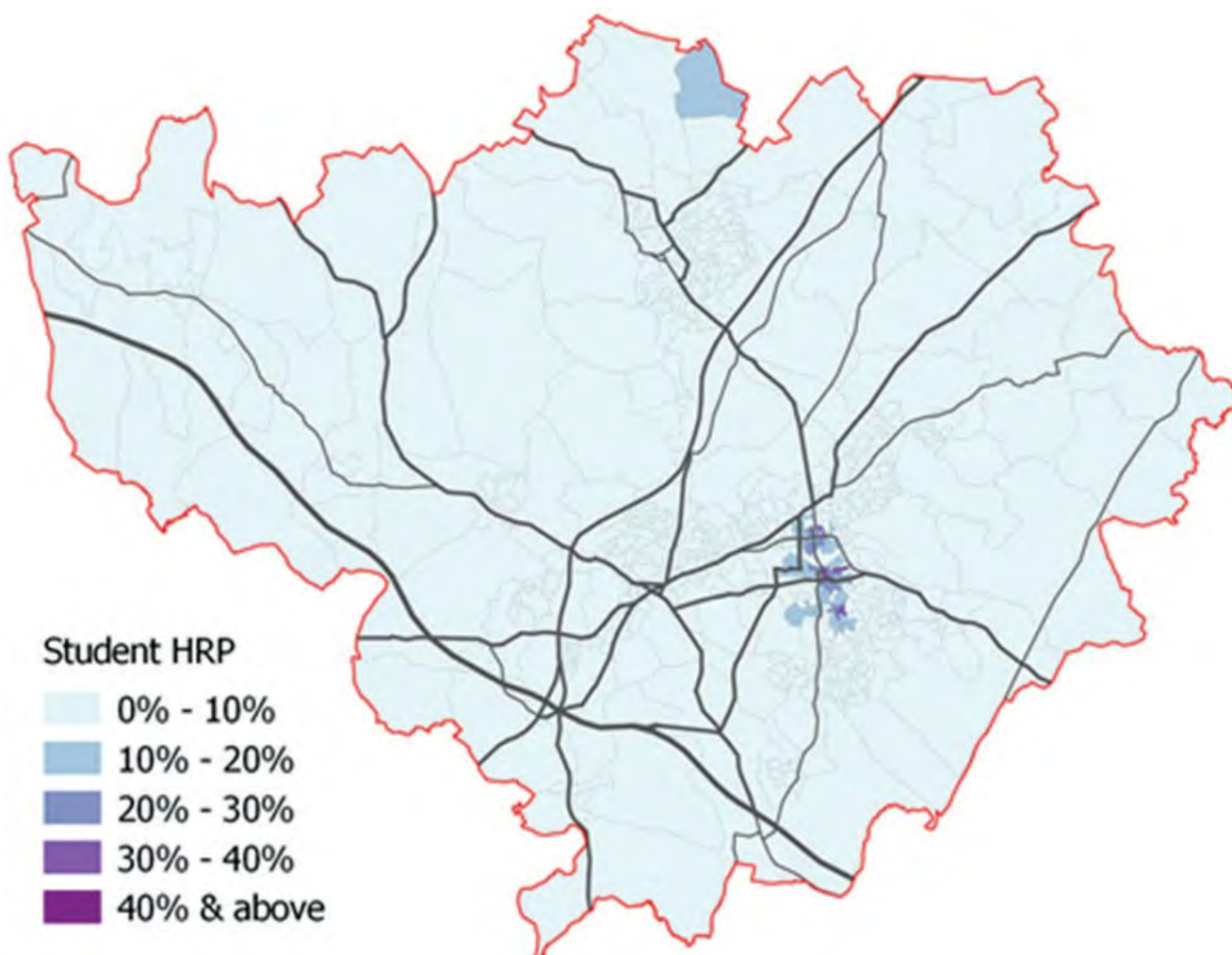
Accommodation on offer: All first year students are guaranteed university owned accommodation in their first year. The university also has a number of partners providing/managing student accommodation across a number of buildings located within or close to the city centre in purpose built blocks or conversions of older buildings. Accommodation ranges in price from £4,640 per 40 week contract to £6,794 for a 43/44 week contract. This accommodation is being promoted on the website with little mention of private landlord accommodation in HMO's. PBSA provision is growing rapidly in Coventry and there may be an overprovision according to sources beyond the university which will have to be dealt with in future years. (Information from university website)

## Where do students live currently in Warwick district?

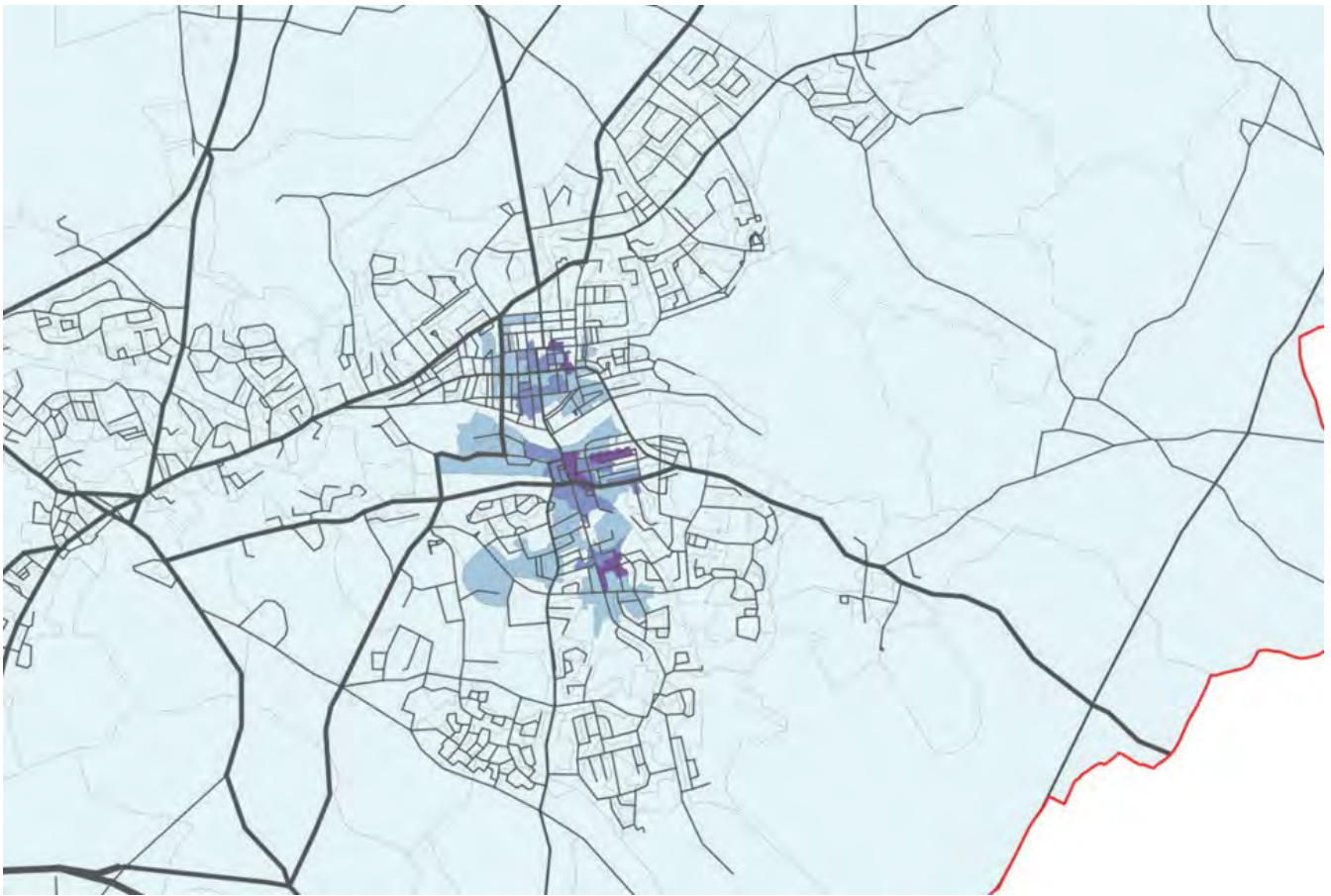
The following maps show the concentration of students in privately rented accommodation in the district. It is evident that the concentrations are along the transport corridor from Leamington Spa, through Kenilworth and then on to the universities.

The highest level of student numbers are just to the south of the central area of Leamington Spa as suggested by previous studies and public perception. This is due to the relatively cheaper rents offered in this part of the town and the suitability of properties for conversion to HMO's. It is also convenient for the town centre, for bus routes and for the railway station.

**Figure 9 Student Households as % of Total by 2011 Output Area**



Source: 2011 Census



High concentrations of private renters will typically lead to a more transient population in the local area.

### **The residents' view point:**

The views of some local residents have been provided by members of South Leamington Area Residents (SoLAR). SoLAR representatives have highlighted issues with transience in that students will soon move on and as a result do not invest in the local community to the same degree and often have a disregard or lack of understanding about the impact they have on more established communities. This happens at least on an annual basis and means that residents do not know who their neighbours will be and what affect that will have on their living conditions. In addition to this, residents are concerned that their community changes not only annually, but during non-term time when students tend to go home unless they are overseas students who cannot go home so often. During the summer months for example, residents describe their local area as a 'ghost town'. It no longer feels like the residential area that they knew and can feel intimidating.

There is also disagreement about the contribution that the student population make to the local economy and how that local economy changes to meet the demands of students. Small retail shops, or the 'corner shop' as it once was, has been replaced by a multitude of take-aways and bars. More centrally shops are also converted to additional residential development, clubs, bars and leisure uses. This has altered the character and dynamic of areas where there are concentrations of HMO's.

The problem of waste, particularly at the end of an academic year, is an additional problem with both students and landlords piling up rubbish in the street where it is an eyesore and attracts vermin. Ordinary household refuse bins are said to be wholly inadequate to deal with the amount of refuse generated by this type of accommodation.

Residents also raise the issue of noise and anti-social behaviour. Some of this can be attributed to students as the problem is reduced out of term time, however not all such instances can and the nearer the town centre, the more likely these problems are to be experienced. It is the presence of students in a concentrated area, rather than the students themselves, that has led to a perceived increase in burglaries.

Residents believe that, far from being a popular area chosen by students, their area is actually attracting more students because of the existing number of students already located there. Friends want to live close to one another and this intensifies and concentrates the demand in specific areas.

There is additional pressure put on local health services as students not living on campus are unlikely to be registered with GPs located there. They are much more likely to use doctors and dentists located close to where they are living. Exam time exacerbates these problems as stress and mental health issues are at their worst and add pressure to existing services (BBC, Sept 2017).

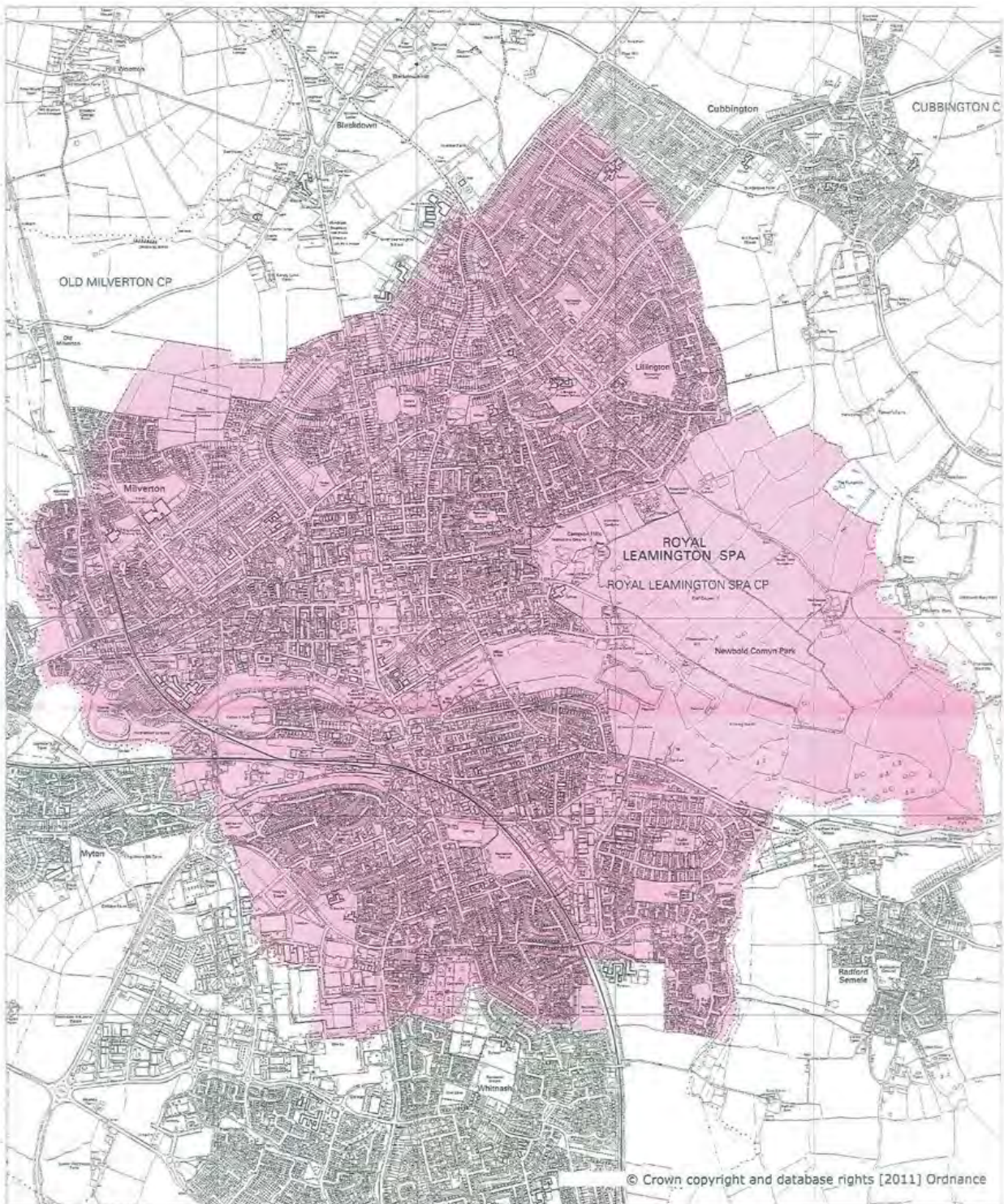
There are other effects on the local area which are not immediately apparent. School rolls are dropping for example as the number of families reduce. This could eventually force the closure of some local schools. Larger family homes are bought up by landlords and converted to HMO's which reduces the housing stock available for family occupation. A concentration of HMO's in an area therefore has considerable impact on the ability of a family to occupy a suitable house.

Policy H6 (above) of the adopted local plan and the accompanying Article 4 Direction was designed to control the number of HMO's in a designated part of Leamington Spa. This covers most of the urban area and includes all the wards that are most affected (see fig 10).

Residents feel that it is 'too little too late' as many HMO's were already established when this policy came into being. They also feel that it is not implemented strictly enough and that some planning applications are being granted consent at committee to the detriment of the local community.



Figure 10 – Article 4 Direction coverage map



Key  
Area the subject of the Article 4 Direction (this consists of the Leamington Spa wards of Brunswick, Clarendon, Crown, Manor, Milverton and Willes)

**Article 4 direction: Changes of use from uses within Use Class C3 to Use Class C4 of Town & Country Planning (General Permitted Development) Order 1995 as Amended**

SP3266 1:17500 @ A4 22/03/2011 DR. Grid Reference: 432436 E, 266054 N



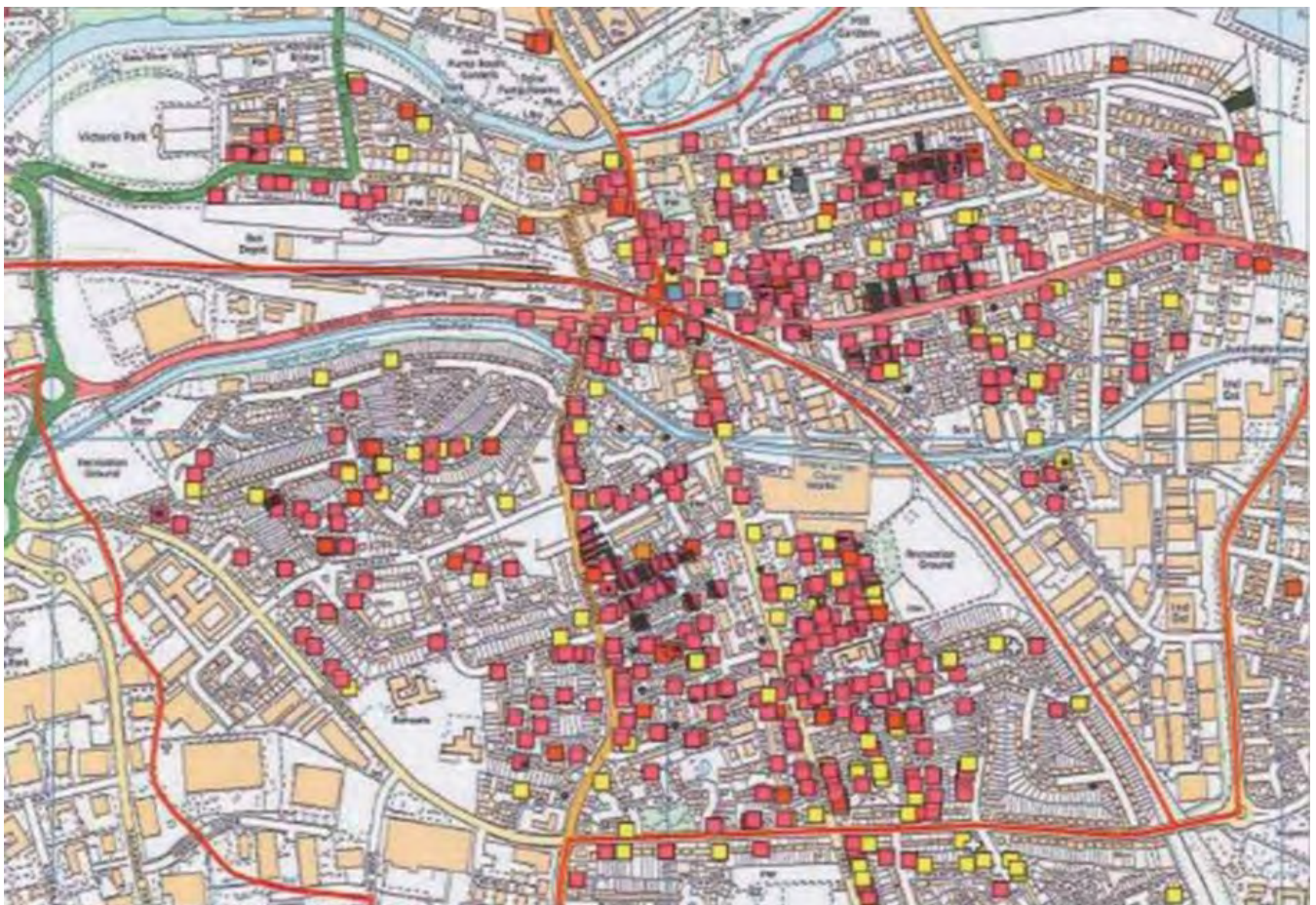
Policy, Projects & Conservation Development Services [ldf@warwickdc.gov.uk](mailto:ldf@warwickdc.gov.uk) (01926) 456504



The popularity of the south of Leamington for student HMO's is partly due to being located on a direct public transport route to the University. Residents feel that if transport routes were expanded to cover other parts of the district, the pressure for HMO's in their area would reduce and a more dispersed pattern would emerge. The cost of this travel is also an important factor and other towns and cities with this problem offer reduced travel costs to students with a pass. They also feel that the university should be doing more to promote and subsidise the use of electric buses to reduce the negative impact on air quality in parts of the district where this has become such a problem that air quality management areas (AQMA's) have been designated; in the south of Leamington Spa this is centred on High Street, Clemens Street and Bath Street.

Residents views regarding the provision of PBSA are that although it may be a good thing in that HMO's could be freed up, dispersal is unlikely and that the popularity of areas along the existing transport route and where students are already concentrated will continue increasing pressure and stress.

**Figure 11 – The Hotspot Map of Waste Issues in Leamington Spa**



Source: Warwick District Council



There is a correlation between the maps of concentration of the student population and the incidence of waste issues across the centre and south of Leamington Spa, although this is by no means conclusive evidence that students are to blame. Similarly, complaints about noise and nuisance cannot be entirely laid at the door of the student population.

In order to deal with the occupation of HMO's by students in the area in and around Leamington, it is proposed to encourage more PBSA building thus providing an alternative for students, still within a sustainable location, but built specifically to address their needs and of good modern construction and design with added facilities that will be attractive, such as communal social and study areas and managed property with on-site security.

To ensure however, that PBSA is provided in a sustainable and suitable location and to a high quality of design, the following policies provides a series of criteria against which all new proposed developments will be assessed.

## The Policies

Purpose built student accommodation (PBSA) is defined as a development, normally in the form of a single block of residential accommodation used by students in full time education at the university and colleges in the area. The accommodation can comprise a mix of cluster flats, a communal lounge and bathroom and studio flats, a single room of accommodation containing bed space, living space and en-suite facilities. The accommodation often includes communal common, gyms/games rooms and laundry rooms

NB: for the purposes of this document and policies PBSA guidance will also include all non HMO conversions which provide student accommodation in a format consistent with the above definition. Also, although the usual model for PBSA's is to provide self-catering accommodation, this document and policy will also apply to catered student accommodation.

### PBSA1

#### Location

Support will be for accommodation to be provided on campus as the preferred location wherever proposals comply with other local plan policies, however, the provision of PBSA elsewhere in Warwick district will be supported if the following criteria are met:

1. The proposal does not result in an excessive concentration of PBSA student accommodation in one locality. Developments will need to demonstrate that they do not exceed acceptable impact levels, which will vary dependent on their location (see the table below)

The development is within one of the following locations, thereby ensuring it is easily accessible to the university/college facilities by sustainable travel modes, public transport (including dedicated bus services), cycling and walking.

- a) On or adjacent to a higher education campus
- b) Within a town centre as defined by the Local Plan policy maps; or
- c) On a thoroughfare\*<sup>1</sup> within 400m of a bus stop

\*<sup>1</sup> A thoroughfare is normally defined as A or B roads (para 4.65 of the Local Plan for further explanation)

Zone	Definition	Area of Impact (AOI)	Concentration of PBSA permitted within AOI
1	Town Centre Retail Areas and in Leamington Area of Search for Major Retail (as defined by the local plan policy maps)	None	N/A
2A	Town Centres, excluding areas in residential use and those in Zone 1 (local plan policy TC13)	This will be calculated from the centre of development with the radius extending 1m for each bed space proposed	No PBSA within AOI
2B	Town Centres – area in residential use only (local plan policy TC13)	Same as 2A	No more than 25% of the total number of dwellings
3	Along all thoroughfares that comply with policy H6, para 4.64 outside of a town centre	This will be calculated from the centre of development with the radius extending 2m for each bed space proposed	No more than 10% of the total number of dwellings

- d) Where an AOI covers several Zones, the original zone criteria will be applied across the AOI, with the exception of any part of an AOI that is in Zone 1, where Zone 1 rules will apply. The concentration of student accommodation with the AOI must then be assessed;
- e) The number of individual dwellings should be calculated with the AOI excluding the proposed and any other PBSA developments
- f) Any existing PBSA's within the AOI should be calculated as follows: each kitchen in an existing PBSA will be equivalent to a new dwelling. The number of these PBSA 'dwelling equivalents' already present within the AOI should be calculated
- g) A proposal for a new PBSA will be considered not to have caused excessive concentration of student accommodation in one locality where the figure for PBSA 'equivalent dwellings' including those in the proposal do not exceed:
- In Zone 1 no concentration limit
  - In Zone 2B no more than 25% of the total number of dwellings (calculation to include proposal)
  - In Zone 3 no more than 10% of the total number of dwellings. Applications outside of the above Zones will not be supported (calculation to include proposal)
2. Proposals should demonstrate that they would not lead to an unacceptable increase in on-street parking in the surrounding area. Parking (including disabled spaces) should be provided on site where applicable and additionally for servicing and emergency vehicles, in accordance with the standards set out in table 2 of this SPD. Electric recharging points will be provided in line with the Council's adopted Parking Standards for residential property serving both electric vehicles and electric powered cycles.
- A transport assessment will accompany planning applications to include details of public transport adequacy to deal with the number of students expected in each development.
- Zone maps are attached at Appendix 3

## PBSA2

### Design and Management

3. The ground floor of new PBSA will be expected to maintain an active frontage providing a mixed use development overall. This may be for employment, retail or leisure uses for example, or for common/games rooms/gyms where retail may not be local plan policy compliant but must be appropriate for the location and compliant to the other policies of the local plan
4. The layout, design and facilities provided within the development are of a high standard and meet identified student needs including adequate laundry provision, disabled access and facilities, communal space and social learning facilities and with secure and adequate refuse and cycle storage facilities<sup>\*3</sup>. Planning applications should include appropriate CGIs/sections/street-scene drawings to demonstrate that the design is appropriate in its context.
5. Appropriate management plans are submitted ensuring that a positive and safe living environment is created for students and to minimise the potential negative impacts on the local community such that there will be no unacceptable impact upon residential amenity in the surrounding area through issues such as increased noise, excessive on street parking and disturbance. This should include details of the management of car parking spaces and how students' drop-off/pick-up will be managed at the beginning and end of terms.
6. A mix of sizes of available rooms and flats/houses, should be provided for a wide range of demand across various sectors, but at least to meet the minimum standard for rooms as outlined in the University of Warwick documents 'Information for Developers' and 'Standard Requirements'.<sup>\*3</sup>
7. The design of Purpose Built Student Accommodation should respond to the character of the area. Furthermore, it should demonstrate how the design ensures it can be adaptable to alternative uses. A planning statement demonstrating character analysis and illustrating future potential reuse is to be included with any planning application for PBSA
8. The development complies with all other requirements set out in the policies of the adopted Warwick District Local Plan 2011-2029 and any 'made' Neighbourhood Plan which relates to the specific area in which the proposal is located
9. External amenity space will be provided in line with the guidance published in the Council's adopted Open Space SPD

<sup>\*3</sup>Please contact the University of Warwick for more details

### Criterion 1

It is important to ensure that at least the current need is met locally and exceeded where evidence shows that the demand for student accommodation is likely to increase for the foreseeable future and to encourage students out of HMOs. This is to ensure that more pressure is not put onto other types of rented accommodation, particularly HMO's, where there is a need for families and others who wish to rent rooms and are prevented due to lack of supply. The aim of providing PBSA is to divert most of the student population into this type of accommodation and ease the pressure elsewhere. It is recognised that there will always be students who wish to live in HMO's, but the numbers can be reduced if provision is made in PBSA, particularly for overseas students, whose numbers are growing with the success, investment and popularity of the local universities and colleges.

Sustainable locations need to be identified to enable proper provision of PBSA's that won't have a negative effect on the local community who currently feel that there is a high concentration of students in their area which affects their lives in an adverse manner. While it is important to ensure that students are able to access their place of study along public transport routes or allow easy access by cycling or walking, there are other factors that also need to be considered. Locating PBSA away from traditional residential areas where noise disturbance and refuse issues are exacerbated will also need to be taken into account when considering the suitability of a location and a balance has to be reached.

## Criterion 2

This SPD sets out parking standards for PBSA as they are not included in the council's current adopted parking standards. They are based on the experience of other local authorities and the standards (see benchmarking exercise in Appendix 2) that they have decided and on the fact that the universities do not encourage students to have cars either at their place of study or temporary home. There is a need for some disabled parking however and parking for those dropping off and collecting students at the beginning and end of term. There also needs to be space for waste collection vehicles, emergency services and delivery/maintenance vehicles on site together with appropriate manoeuvring space.

The experience in areas of high concentrations of HMO's is an increase in on street parking. Some parking on site is therefore necessary to ensure that on street parking is kept at an acceptable level, particularly where accommodation is located further away from bus routes. Additionally, there may be on site staff to manage the building and a parking space is required to serve their need. In order to encourage the use of cycles to access study and other facilities, a method of secure storage is also required at a rate set out in table 2.

It may be acceptable to make car parking areas more attractive by demarcation without black-top and white lined spaces. This can be discussed with development management officers in advance of submission of a planning application for such a scheme.

The parking standards for PBSA are given in table 2 below

Secure cycle parking should be located within buildings or near to entrances/exits of the premises.

**Table 2 – Parking standards for PBSA**

Students	Disabled	Visitors/pick up/drop off	Emergency vehicle/servicing/maintenance	Secure, covered cycle storage provision
Zone 1: * <sup>4</sup> (within 400m walking distance of a bus stop) None	One space per 20 bedspaces	One space per 75 bedspaces	One space per 75 bedspaces	One per bedspace
Zone 2a and 2b. One space per 20 bedspaces	One space per 20 bedspaces	One space per 75 bedspaces	One space per 75 bedspaces	One per bedspace
Elsewhere: One space per 12 bedspaces	One space per 50 bedspaces	One space per 75 bedspaces	One space per 75 bedspaces	One per bedspace

\*<sup>4</sup>as defined in the adopted local plan

### **Criterion 3**

This is to ensure that not only do PBSA buildings provide accommodation for students, but also other uses which will secure an active frontage reducing the perception of a 'ghost town' when students are not in residence. This approach can also contribute to the integration of students into the community.

### **Criterion 4**

This criterion is necessary to ensure that PBSA includes all the facilities needed to ensure that students are provided with good quality designed accommodation that is conducive to study and to social interaction whilst also providing day to day living facilities in line with the universities 'Student Accommodation Code'.

UK universities and colleges are inclusive places that welcome disabled and non- disabled students. They are legally required not to discriminate against disabled students. Both private and university accommodation must adhere to the Equality Act 2010 and be fully accessible and may require bespoke furniture, such as height adjustable beds and types of mattresses, ergonomic chairs and bathroom requirements.

Externally, it is important that building design reflects any historical references locally and is built to a high standard and being sympathetic to the locality in form, massing, height and the use of materials. This is of particular concern in conservation areas and alongside the river and canals.

External amenity areas should use appropriate lighting schemes to improve the appearance of the scheme but also ensure that external lighting is designed so as not to cause nuisance to neighbouring uses.

### **Criterion 5**

An appropriate management plan will include the requirement for students to sign up to a 'Student Code of Conduct' either with the university or the provider of such accommodation.

It will also include details of the facilities and arrangement for the storage and disposal of waste and recycling materials; details of the proposed management of the building and how staff can be accessed in case of problems with the accommodation, with details of any on site staff; a proposed cleaning and maintenance regime; access and egress arrangements via a security system; control of car parking and access to secure cycle storage facilities; arrangements for arrival and departure at the beginning and end of term and arrangements for community liaison through university staff and/or the local community.

### **Criterion 6**

Peer group friendships are forged in the first undergraduate year at university and groups of students then wish to share suitable accommodation in years 2 and 3.

To ensure that these groups of up to 12 sharing, can remain together, a variety of configurations of rooms should be provided within PBSA flats/houses.

### **Criterion 7**

For the foreseeable future and certainly during the life of the current local plan (2011-2029), student population figures look set to increase year on year. PBSA is particularly popular amongst overseas students; the fastest growing sector of the student community. However, should student numbers stabilise or even decline in future years, e.g. through the unknown consequences of Brexit for example, there may come a time when not all PBSA is required for student use. In order to

future proof these buildings, it is important to ensure that, in the design process, the potential future conversion to other uses is taken into account. Modular and timber framed buildings for example cannot be changed internally once erected and this would result in the need for unsustainable demolition and replacement. To ensure that buildings can be reused, internal partitioning must be moveable/removable and ceiling heights should be similar to those in domestic houses to allow a change of use to other residential or commercial uses. External materials should be of high quality and built to last. To ensure that these issues have been considered and factored into the scheme, a planning statement should be included with any planning application for a PBSA proposal together with a plan demonstrating how the building's use could be changed in future.

### **Criterion 8**

The Local Plan is the policy document for Warwick District. All developments are governed by these policies and any review or replacement of the document will also apply. Any 'made' Neighbourhood Plan applicable to the area in which the PBSA is proposed should also be consulted for design guidance and relevant policies. This SPD is a document that supports the Local Plan and has been prepared in conformity with it. Developers of PBSA are advised that these documents should inform their design. Planning applications and all such proposals will be assessed against the criteria and policies in all relevant documents.

### **Criterion 9**

It is necessary to provide not only a pleasant landscaped area as the setting for new or converted buildings, but also to allow for a social space externally where people can sit and relax. It also allows for soft landscaping which can provide trees for screening and the provision of shady areas during warmer months.

## **Locating PBSA in the district**

There will always be a preference for student accommodation to be located on the relevant campus.

There are obviously certain parts of the district that have proven especially popular with students when looking for accommodation off campus; central and south Leamington Spa in particular. This does not mean however, that these are necessarily the areas of choice for students and are more likely to be indicative of a location away from the University campus but with good transport links and cheaper rental accommodation in older housing stock, more suited to conversion. It is however these very houses that the council wishes to see freed up for occupation by those other than students or returned to the housing market. These are the houses most likely to be purchased by first time buyers wishing to invest in a property and make home improvements to increase the value and living standards. Several options have been considered in exploring the best locations for PBSA.

1. In the Town Centres of Leamington Spa, Kenilworth, Warwick and to a lesser extent, Whitnash.
2. Along the transport corridor to the university.
3. Close to the university and within easy walking and cycling distance
4. Elsewhere in the district



Taking each of these in turn,

1. Town Centres are already crowded places, but they are also where the majority of the facilities and services are located. The advantages of Leamington Spa and Kenilworth town centres are that they are also along the main bus route to the university. Warwick is popular to a lesser extent as the transport services are not so regular and Whitnash is not as close to the relevant bus services.

Advantages of a town centre location	Disadvantages of a town centre location
Close to a direct bus route to the university	Potential increase in noise issues, particularly late at night
Close to facilities and services including entertainment venues	Potential increase in waste issues
Added surveillance	Lack of suitable vacant plots
Economic benefits to shops and other businesses	Less conducive to quiet study
Potential use of unused/vacant spaces, especially above retail and where office and other business space has failed or wouldn't be considered	Potential for increased public nuisance/vandalism issues
Reduced need for the private car	Possible increase in on-street parking with associated issues with parking unavailable on site
Possible less disturbance to the settled residential community	Could isolate the student population still further being remote from residential areas
Could lead to greater integration within the wider community	Any negative issues are likely to be blamed on student population whether or not that blame is deserved
Allows student participation in public events locally	May change the nature of the retail offer
Is likely to be popular with students given the proximity to bars, restaurants and entertainment venues	'Town centre' is likely to mean Leamington Spa and Kenilworth and to a lesser extent, Warwick

## 2. Along the transport corridor/at transport hubs

Universities do not want or encourage their students to bring their cars onto the campus where parking is limited or not available other than in car parks with a high associated cost. This however, does not prevent students from bringing their cars with them from home and leaving them parked near their accommodation in the local area, predominantly on street, until required either to go home or further afield for leisure pursuits. Very regular and well used bus services operate along the route from Leamington Spa to the university and include services U1, U2, U12, 11, 11U, 12X, 60, 43 and the ‘hopper’ service 18, 18A and 12X. Stops include Coventry railway station, University Hospital, Warwick Hospital, Coventry City Centre, Cannon Park shops and Ricoh Arena. Several services enter the campus and follow a circuitous route which serves individual parts of the university complex. It is therefore logical to provide PBSA along this route, although there are parts of the transport corridor that are less suitable as they are in the green belt or isolated from other services.

Rail services are also good and with a new station being opened recently in Kenilworth, this could add to the attractiveness of living in this area for those students attending Coventry University in particular or even travelling further afield to Birmingham.

It may be possible to extend the public transport offer if suitable sites can be found given the influence that the university has with regard to bus routes.

Advantages to locating along the transport corridor	Disadvantages to locating along the transport corridor
No need for a private car with easy access to university, towns of Warwick district and Coventry city centre	Can be isolated from other services
Potentially more land and sites that could be available	Can in part, lead to lack of integration with the settled community
Could lead to greater use/provision of cycleways and routes and linking to existing network	Runs in part, through the green belt
Reduces friction in more densely populated areas	Likely to invoke negative reaction in quieter, more rural areas
May result in an increase in bus service provision/frequency	May result in more property being purchased for HMO use
A popular choice of location amongst students	Increase in road congestion at peak times
More use of local railway stations for routes into Coventry	
Encourages students to leave their car at their non-term time address	

Figure 12 – Current public transport service links to the University of Warwick and connections forward to Coventry



### 3. Close to the University of Warwick

This approach may well be the most popular amongst local residents, particularly those who are aggrieved by the number of students living in their area. On the other hand, it is that isolation that leads to a less harmonious integration between the student population and long term local residents.

There may be private landowners with previously developed land in the green belt who are interested in providing land for this use. If a suitable, sustainable location can be found that is capable of providing sufficient footprint in terms of existing non-residential buildings to allow for conversion or redevelopment, this could be considered. This land would need to be located within easy reach of the university.

Unfortunately, such a location is unlikely to be popular with those students looking for second and third year undergraduate accommodation since it does not provide the facilities and entertainment that a town centre does, nor does it provide that break with the restrictions and conformity of campus living so desired by students after their first year in halls of residence. If such a location is likely to be unpopular with students, it stands to reason that a developer of such accommodation is unlikely to wish to provide it in that area.

Advantages of grouping PBSA close to the university	Disadvantages of grouping PBSA close to the university
Students are in close proximity to their peers	Highly likely to be in the green belt if not on an already allocated site
Close to the university	Most of student life is likely to be centred entirely on the university facilities and would not be popular with the student seeking such accommodation
Critical mass could lead to new local facility provision if associated with other new development	Perception of creating a student ghetto if too large
Close to existing local facilities	Less experience of living within the community
Would lead to more cycling/walking and possible provision of new cycle/footpaths	Lower level of contribution to local communities
May be environmentally less damaging	Lower level of contribution to local economy
Minimum negative impact on roads	Unlikely to appeal to a developer
Ease of working with peer groups on university coursework	Lack of integration into the local community
Facilities beyond the university may be accessible by public transport (Kenilworth, Leamington Spa, Coventry, Warwick)	Suitable residential sites are already allocated in Local Plan
On site (but still limited) parking provision could be considered at an early stage of design and result in a more pleasing scheme	Lack of suitable sites
Opportunity to design a good landscaped scheme providing a better environment	



#### 4 Elsewhere in the district

Having considered specific options in the previous three scenarios, the remainder of the district also needs to be considered.

A considerable area, particularly in the north of district and therefore close to the university, is within the Warwickshire Green Belt. Approaching 80% of the district is covered by green belt within which development can only take place where ‘very special circumstances’ can be demonstrated. The NPPF at para.88 states “When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.”

This very much restricts consideration of other parts of the district and allocating residential land for the Local Plan has demonstrated that it is not only difficult to find sufficient land but it is also difficult, even through the Local Plan process, to amend the green belt boundary to accommodate new uses. It is therefore those pockets of land which can be described as ‘previously developed’ sites that offer the best opportunities. These may include agricultural buildings for example which could be replaced with a building of the same footprint to accommodate this use.

Land outside the green belt remains expensive and under considerable pressure for other residential uses and will again be considered as part of the review of the local plan which is due to commence shortly. This pressure may result in little coming forward for PBSA unless part of a bigger, mixed use scheme.

Advantages of locating PBSA elsewhere in the district	Disadvantages of locating PBSA elsewhere in the district
Could be located away from existing residential ‘hot spots’	Much of the potential land is within the green belt, particularly in close proximity of the university
Could be located close to the university which would allow cycling and walking	Would be unlikely to be sustainable
Could be viewed as true dispersal	Access issues
Although mainly green belt, there may be the potential to convert/replace existing buildings	Lack of facilities and lack of critical mass to trigger need for shops, GP surgery and other community facilities
	Lack of public transport route would result in increased use of the private car and need to be reflected accordingly in the car parking requirements
	Negative impact on open countryside or on villages
	Potentially less popular with students
	Lack of potential for integration
	Few opportunities to integrate
	Land outside the green belt is under considerable pressure for other uses and is very expensive
	May not be fully utilised if not easy for access and facilities

## CHAPTER X

# Conclusion

**In order to provide a sustainable, achievable and popular location for PBSA, there are certain areas that will be more suitable locations than others. With reference to the above options, it seems likely that the best option will be one that combines 1 and 2; i.e. Town centres and the public transport corridor.**

There are potentially more areas that could be considered in relation to option 2 than is currently the case as the University of Warwick has influence over the public transport providers and can suggest new routes that would serve other parts of the district. It is also the case however that the student population are more likely to choose town centres for easy access to leisure activities and all local facilities. This could mean that Kenilworth and Warwick provide an alternative to south of Leamington town centre. Kenilworth is already coming under the scrutiny of developers in this field as a location for student accommodation. This is largely due to its proximity to the university and to the existing transport corridor. If this corridor could be extended into Warwick or to a lesser extent, Whitnash, a wider range of potential sites is opened up to such proposed developments. Links could also be made to the new Kenilworth railway station to open up a wider search area for potential sites.

Whilst option 3 is likely to prove very popular amongst the public; locating students away from existing residential areas and closer to the university, it is recognised that this is much harder to provide given the green belt designation of most of the relevant area. It would also be harder to encourage students to live in an area that relates strongly to the university but poorly to the town centres with their obvious attractions and services. Students beyond their first year on campus are looking for the separation from the university that living in towns provides. This results in a lack of interest from developers of schemes for student housing and an increasing reliance on HMO's in the existing towns, more specifically, Leamington Spa. It is considered therefore that this option is a less realistic proposition.

Option 4 is not considered to be a realistic one due to green belt and countryside status. These areas cannot offer the facilities or interest for students and are unlikely to be acceptable in village and other rural locations, particularly where there are already issues with the provision of public transport and access to the towns with their accompanying services and facilities. Rural communities would be put at risk of being outnumbered by large numbers of students who would be unable to contribute to the local community given the time spent in travel and study. It is unlikely that this option would be popular with providers, students or the local population.

CHAPTER X

# Glossary



**Amenity:** The extent to which people are able to enjoy public places and their own dwellings without undue pollution, disturbance or intrusion from nearby uses.

**Amenity space:** an area provided externally that allows occupants of dwellings to enjoy outdoor activity or relaxation within the curtilage of the dwelling or close by

**Green belt:** Land allocated within the Local Plan that is intended to prevent urban sprawl by keeping land permanently open in character and appearance. Guidance on green belt policy is contained in the National Planning Policy Framework. The Local Plan defines detailed boundaries of green belt land.

**House in Multiple Occupation (HMO or HiMO):** Generally a house or flat shared by an unrelated group of people. Usually they have their own bedroom and share the bathroom and/or kitchen facilities. Where three or more unrelated people share a house or flat in this way it is defined as a HMO. It does not include a house converted to self-contained flats. Note that many HMO's also, but not exclusively, house students.

**Houses in Multiple Occupation (HMOs) and student accommodation - 100m radius:** The 100m radius is used to calculate concentrations of HMOs and student accommodation in accordance with Policy H6. The calculations are undertaken as follows:

- Measurements are taken from the centre point of the front elevation of the application property
- All properties that fall within the 100m radius circle (whether fully or partially) are to be counted.
- For the purposes of the calculation, each flat in a block of flats needs to be counted as one dwelling unit.
- Each HMO cluster (self-contained unit) within a student accommodation block needs to be counted as one dwelling unit

**Local Plan:** The plan for the future development of the local area, drawn up by the local planning authority in consultation with the community. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004

**Neighbourhood Plan:** A plan prepared by a Parish Council or Neighbourhood Forum for a particular neighbourhood area (made under the Planning and Compulsory Purchase Act 2004)

**Nomination Agreements:** Nomination Agreements are entered into between the university and accommodation provider whereby the agreement is to nominate a minimum number of students into the accommodation each year and for an agreed period in return for a level of control on rents and some operational matters

**Purpose Built Student Accommodation (PBSA):** normally in the form of a single block of residential accommodation used solely in term time by students in full time education at the University and Colleges in the area. The accommodation can comprise a mix of cluster flats, which normally contain around 6 bedrooms, a communal lounge and bathroom and studio flats, a single room of accommodation containing bed space, living space and en-suite facilities. The accommodation often includes communal common and laundry rooms.

NB for the purposes of this document and policy, PBSA guidance will also include all non HMO conversions which provide student accommodation

**Supplementary planning documents (SPD):** Documents that add further detail to the policies in the Local Plan or expand those policies. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan.

**Sustainable transport modes:** Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultra-low emission vehicles, car sharing and public transport.

**Town centre:** Area defined on the Policies Map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in Local Plans, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres.

**Urban area:** The urban areas are identified on the Policies Map and are Royal Leamington Spa, Warwick, Kenilworth and Whitnash. These are highly sustainable locations with a wide range of services and facilities including schools, shops, cultural and recreational provision as well as jobs and transport facilities. These locations also provide the best opportunities for developing new, and expanding existing, infrastructure to meet the needs of new development.

# Appendix 1

# **Student Housing Need in Warwick District**

**Summary Report & Evidence Review**

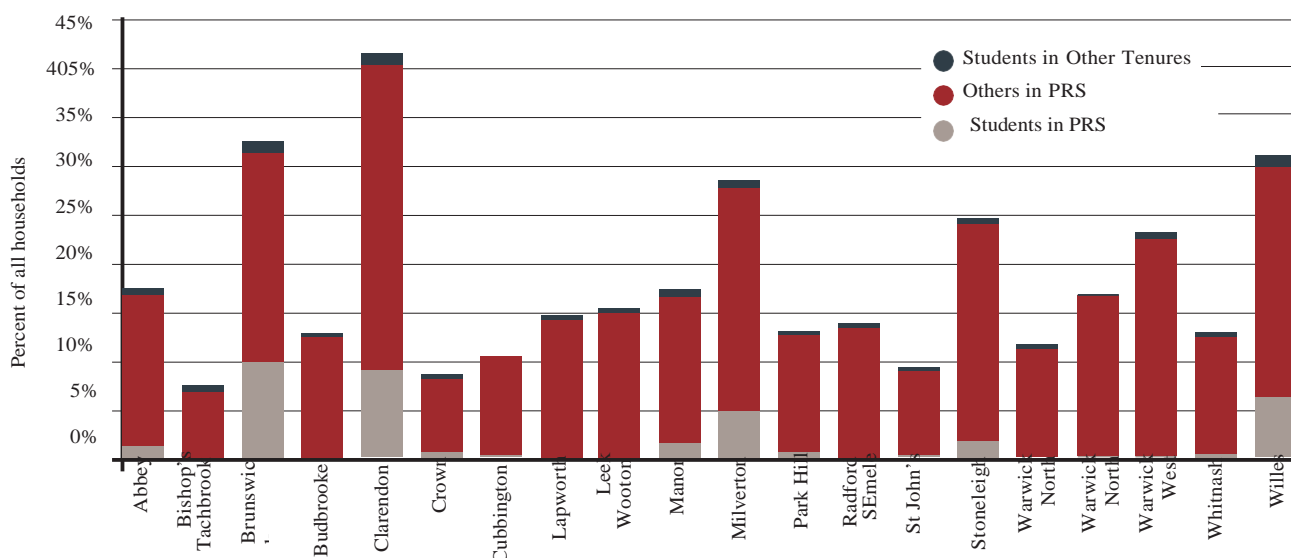
**Report for Warwick District**

**Council 16 May 2018**

## Summary Report

Warwick district is home to many students, with nearly 3% of households headed by a full-time student in 2011 compared to 1.8% across England & Wales. That may not be a significant proportion of total households across the district but, as Figure 1 shows, there are high concentrations in specific local wards (2011 based). These include nearly 10% of households in both Brunswick and Clarendon, 6.6% in Willes, and 5.2% in Milverton.

**Figure 1 – Student Households & Other Private Renters by 2011 Ward**



Source: 2011 Census (excludes students in halls of residence)

Students' contribution to the local community and economy is important but there are other implications for these areas of high student concentration. This is particularly the case in areas such as the centre and south of Royal Leamington Spa. However, as Figure 1 also shows, even in locations with high proportions of student households most private renters are non-students. Care needs to be taken to balance not just the needs of students versus the needs of home-owners but also versus those of other private renters, including the many single person and family households in the sector.

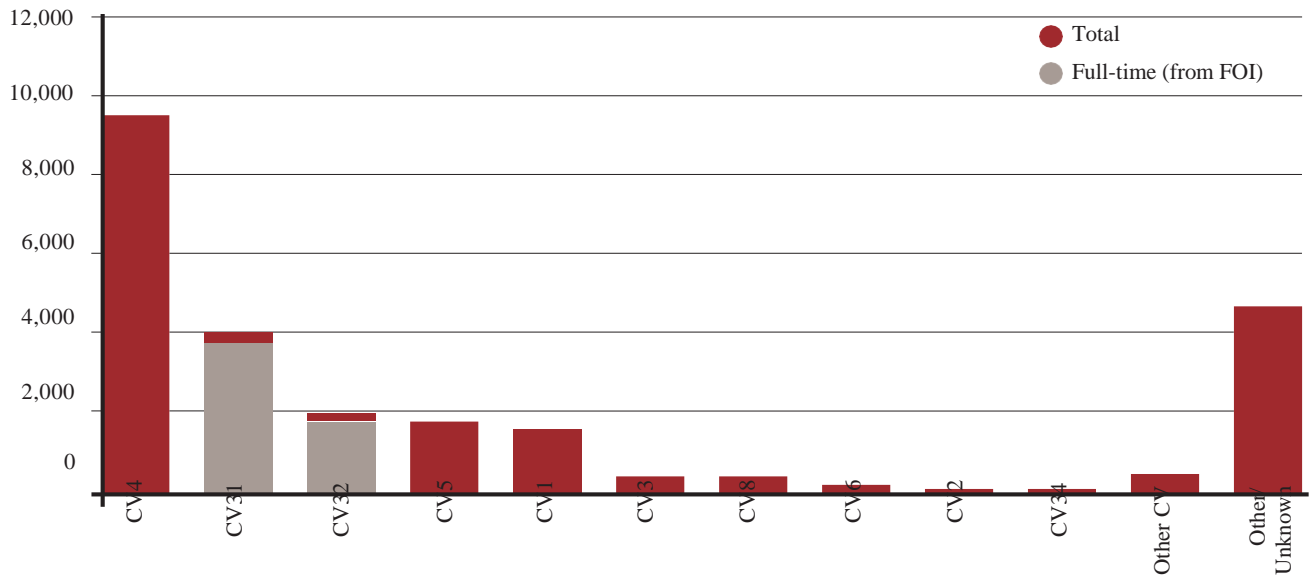
The impact of high concentrations of HMOs, often lived in by students but not exclusively, can sometimes include but is not limited to: a more transient population, noise complaints, issues with rubbish, and other anti-social behaviour. An Article 4 Direction and other initiatives have been used to help manage these issues.

To assess the potential impact of any growth in student numbers at the University of Warwick, we have looked at where existing students live and available forecasts for future numbers. The forecasts provided by the University of Warwick indicate they are seeking to grow their student numbers in future years, albeit at a relatively slow rate. This will increase demand for student housing in the district, putting further pressure on existing housing and communities.

However, it is not enough to just look at total student numbers at the University of Warwick. Warwick district is not a self-contained student housing market as it is closely linked with Coventry district. As Figure 2 shows, students at the University of Warwick live in both districts. The postcode district CV4, where the university is located, is split across the two districts. CV31 and CV32 are in Warwick district while CV1 and CV5 are in Coventry district. With a choice of where to live across the two districts, any changes to student numbers at Coventry University and student housing supply in Coventry district will have an impact on student housing demand in Warwick district.



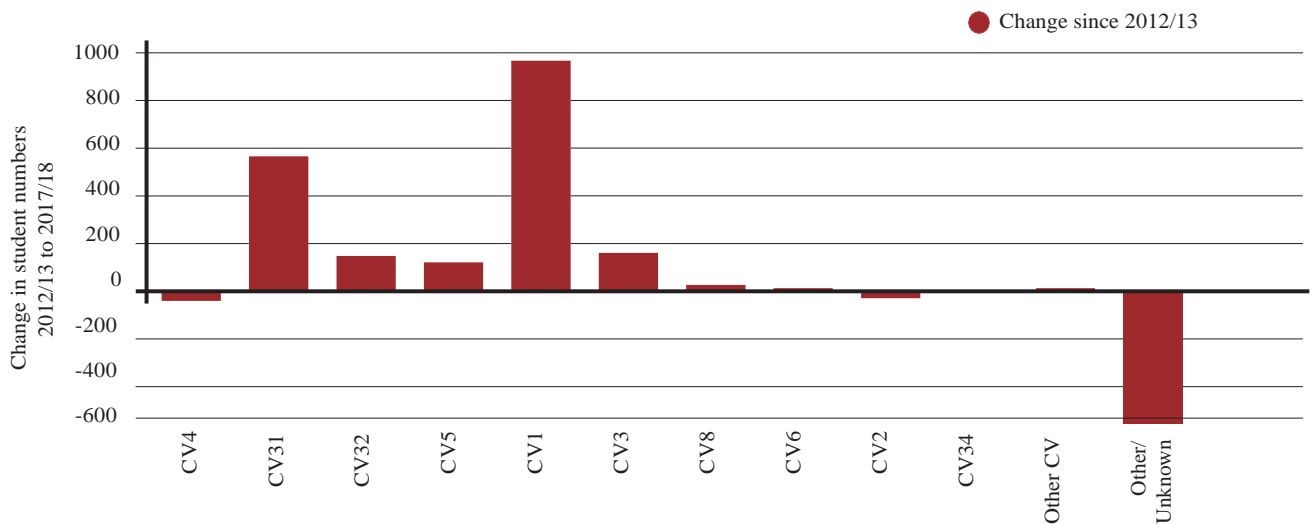
**Figure 2 – Postcode District of Residence, University of Warwick, 2017/18**



Source: University of Warwick

The links between two districts can be seen in Figure 3 which shows the change in where University of Warwick students live over the last five years. The biggest numerical increase is seen in central Coventry, CV1, which has benefitted from substantial development of purpose-built student housing in recent years. However, despite this growth, there has still been an increase in students living in Warwick district, specifically Royal Leamington Spa.

**Figure 3 – Change in Postcode District of Residence, 2012/13 to 2017/18**



Forecasts published by Coventry University suggest they are looking to continue their recent robust growth in student numbers. However, the increase in student numbers is being met by the substantial development of purpose-built student housing. Therefore, despite the increase in student numbers, the number of beds available in the purpose-built sector will increase and so demand for beds in the private rented sector is falling and will likely continue to fall. Anecdotal evidence from the Coventry market suggests that landlords are finding it difficult to find enough student tenants. It is quite likely that this surplus private rented housing will be occupied by other non-student private renters or sold to homeowners.

Despite the increased competition from Coventry, Warwick district remains an attractive place to live for many students and the council should seek to benefit from any increase in student numbers. Using available forecasts for student numbers and estimates of student housing supply, a residual number of students that would need to be housed in the private sector can be calculated (as seen in Figure 4). Based on these calculations, there will be an estimated increase of 900 University of Warwick students needing to be housed in the private sector over the next three years. The latest trends in where University of Warwick students live suggest that around 360 of these students will live in Royal Leamington Spa.

**Figure 4 – University of Warwick Student Housing Supply & Demand**

	2015/16	2016/17	2017/18	2020/21	Change 2017-18 to 2020/21
Full-time Students	19,200	20,000	21,500	22,800	1,300
University Beds	6,400	6,500	6,800	7,200	400
Nomination Agreements	600	500	1,100	1,100	-
Residual	12,200	13,000	13,600	14,500	900

Source: calculated using University of Warwick and other data

Meeting this increased student housing demand in the private rented sector via HMOs risks increasing the pressure on everyone in the community, including students. Additionally, it remains to be seen whether there is sufficient demand from landlords given national tax changes and other considerations limiting demand for new purchases. While the University of Warwick should be encouraged to increase housing provision on campus, the purpose-built sector is ideally placed to cater for the additional student housing demand. Relying on the purpose-built sector is not without risk but it can help accommodate more students and reduce the pressures if planned for appropriately.

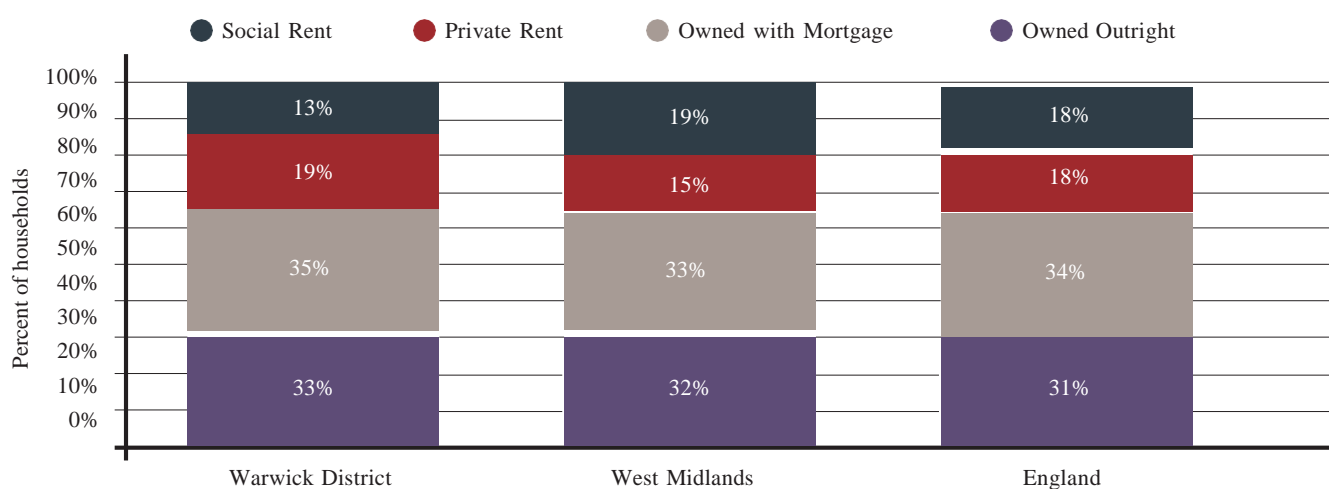
## Evidence Review

This section of the report contains further evidence used to create the summary report.

The best source for local information on demographics and housing is the Census. Unfortunately, the 2011 Census is increasingly out-dated. However, it still provides a useful reference for understanding local markets and can be cross-referenced against timelier national and regional data.

In 2011 Warwick district had a broadly similar tenure distribution to the national average, though with a slightly higher proportions living in privately owned tenures. National data suggest the private rented sector has grown by only around 2 percentage points since 2011 and so the Census data should still be broadly indicative of trends in the local market.

**Figure 5 – Housing Tenure, 2011**



Source: 2011 Census

Much of the following analysis is undertaken using 2011 wards. These do not exactly match current (2016) wards and so the two maps in Figure 6 are provided. The left-hand map shows the boundaries and names of 2011 wards while the right-hand map shows the difference in boundaries between 2011 (red) and 2016 (blue).

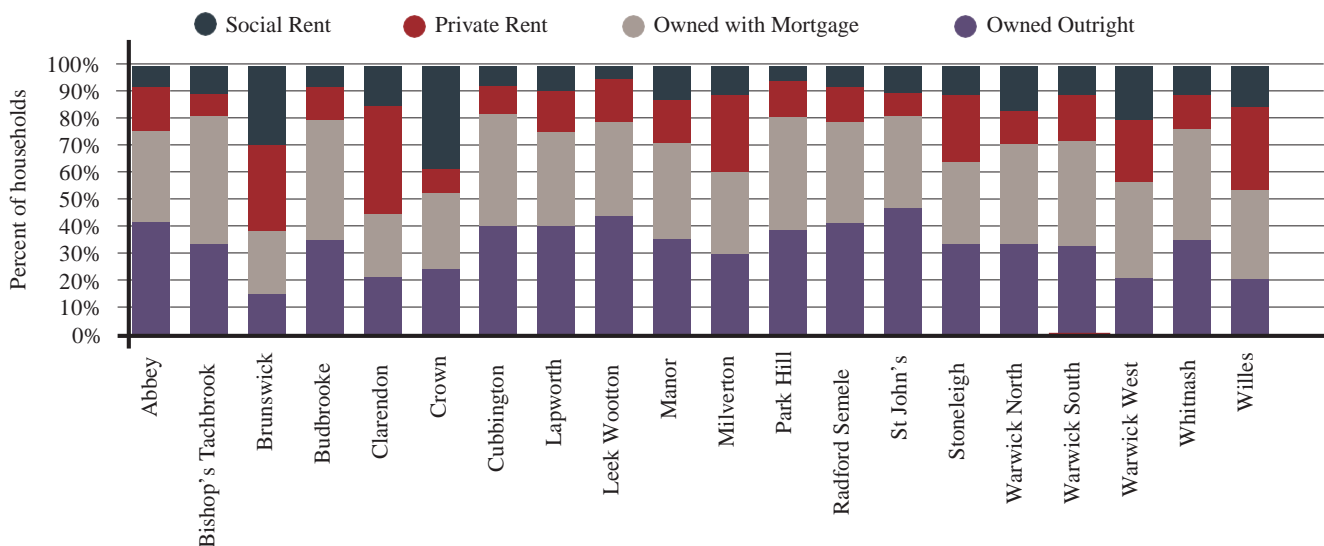
**Figure 6 – 2011 Ward Names and Comparison With 2016 Ward Boundaries**



Source: ONS

Investigating housing tenure by ward across Warwick district highlights significant variation. The wards with the highest rates of private renting were: Clarendon (40%), Brunswick (32%), Willes (30%), and Milverton (28%). In 2011 these four wards housed 44% of all private rented households living in Warwick district. These are also the four wards with the highest proportions of student households.

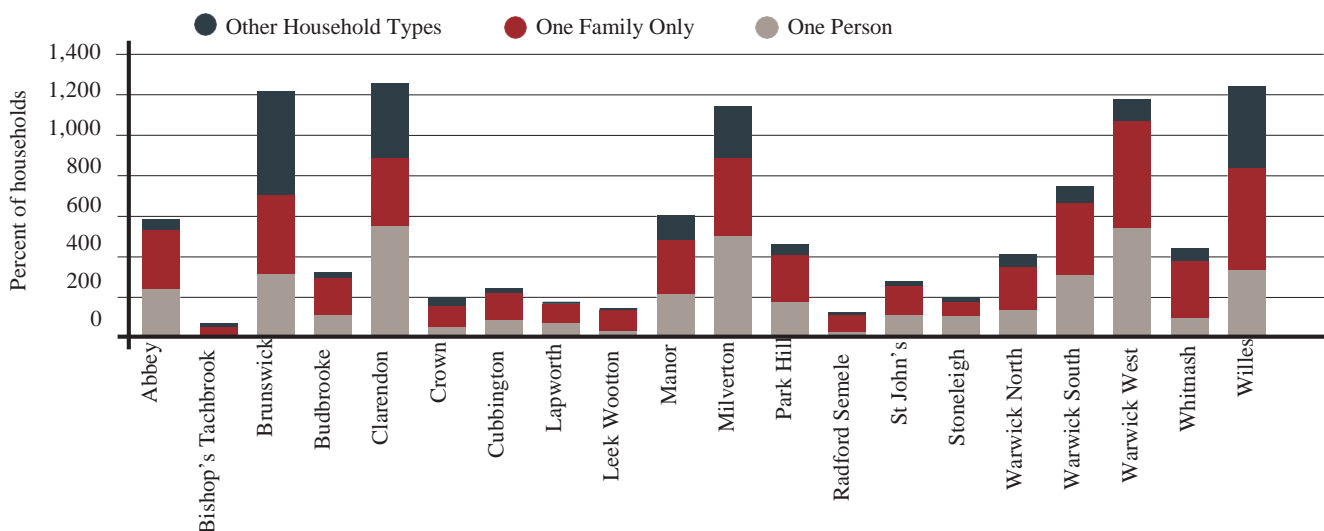
**Figure 7 – Housing Tenure by 2011 Ward**



Source: 2011 Census

Figure 1 has already shown that most private rented households are not student households. Figure 8 reinforces this point by showing that most private rented households are single family and one-person households rather than multi-family households. This is true across all wards in Warwick, even those with the highest proportion of student households.

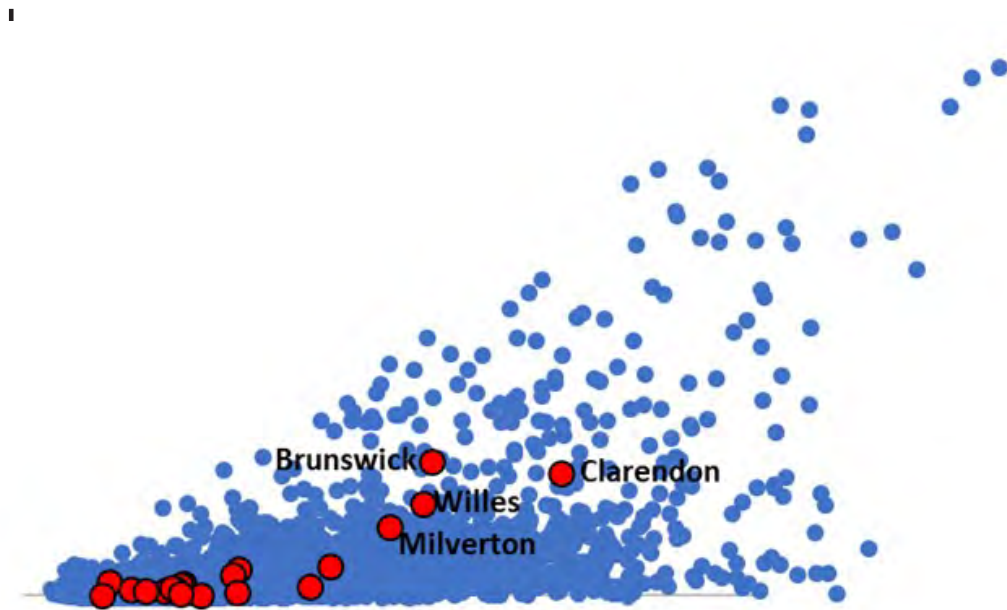
**Figure 8 – Private Renter Household Composition by 2011 Ward**



Source: 2011 Census

Figure 10 provides a comparison of all wards across England and Wales in terms of the proportion of households living in the private rented sector (x axis) and the proportion of households headed by a full-time student (y axis). All wards in Warwick are highlighted in red while the four wards with the highest rate of private renting and student households are also labelled. It shows that, while the rates are relatively high and above the typical national range, there are other local areas across the country with similar or higher proportions of private renting and student households.

**Figure 10 – Comparison of Wards Across England & Wales, 2011**



Source: 2011 Census

Students may not form the majority of households at a ward level but analysis at Output Area, the lowest publicly available Census geography, shows that there are very local areas in Royal Leamington Spa with very high concentrations of student households.

**Figure 9 – Student Households as % of Total by 2011 Output Area**

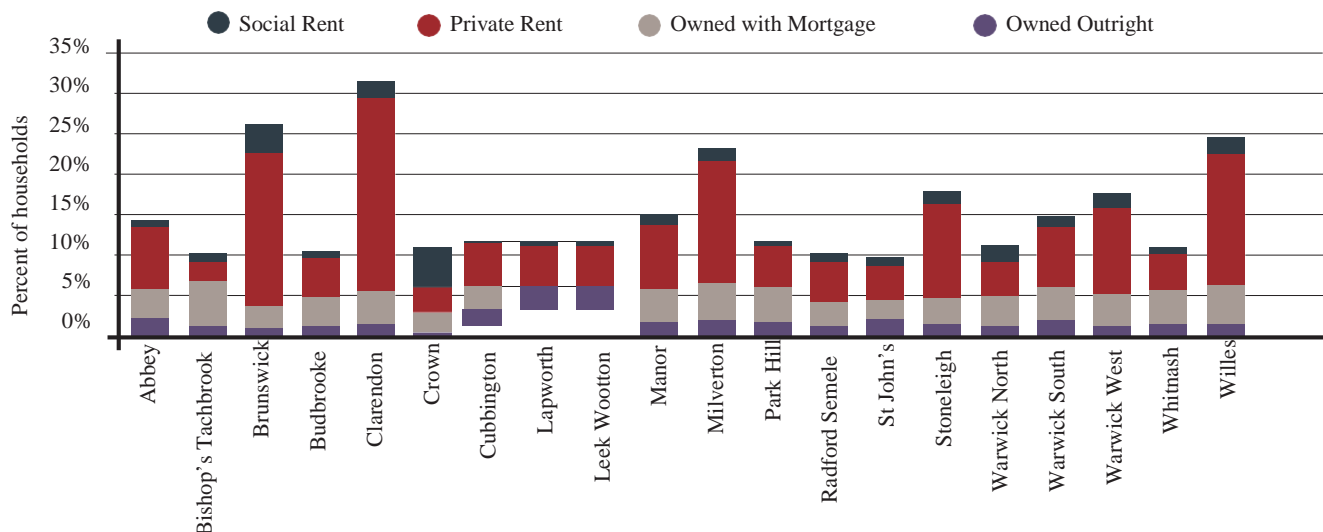


Source: 2011 Census



As noted in the summary report, high concentrations of private renters will typically lead to a more transient population in the local area. Figure 11 shows the percent of households that either partially or wholly moved in the year leading up to the 2011 Census along with the tenure of the household. The impact of the four wards with the highest proportions of private renters and student households can be seen. 31% of all households in Clarendon, 26% in Brunswick, 24% in Willes, and 23% in Milverton partially or wholly moved in the year.

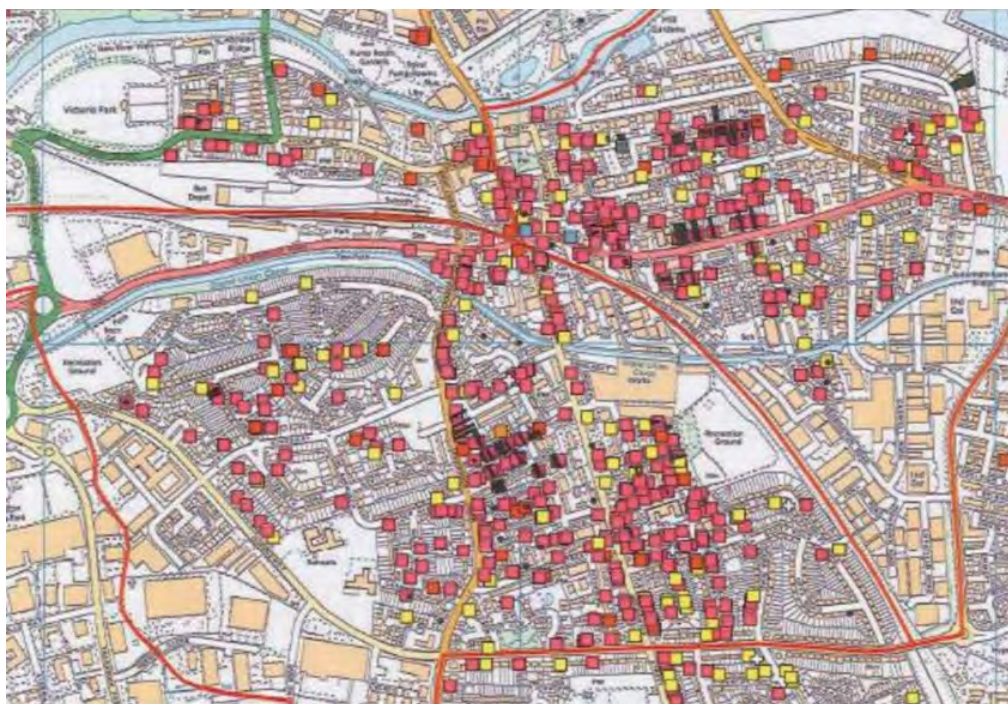
**Figure 11 – Households Partially or Wholly Moved by 2011 Ward**



Source: 2011 Census

Areas with high concentrations of HMOs may also experience more issues with rubbish. The hotspot map below, created by Warwick District Council, highlights areas in south Leamington Spa with large numbers of waste issues. There is some correlation with this map and the map in Figure 9.

**Figure 12 – Hotspot Map of Waste Issues in Royal Leamington Spa**



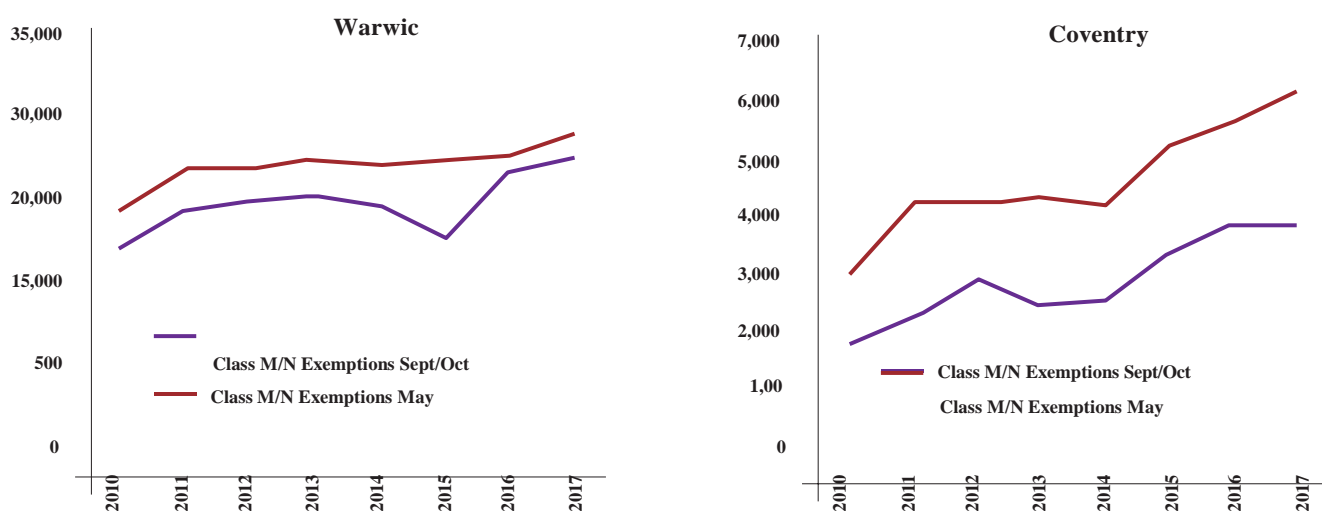
Source: Warwick District Council

Comprehensive data on the available supply of student housing is limited. However, the Council Tax base provides a useful reference, particularly the dwellings excluded due to:

- class M: A hall of residence provided predominantly for the accommodation of students
- class N: A dwelling which is occupied only by students, the foreign spouses of students, or school and college leavers.

Comparison of the number of excluded dwellings/halls of residence in Warwick and Coventry districts shows two different patterns. The number of exempted properties in Warwick has increased by 12% since 2011 while the number in Coventry has increased by 39% over the same period. All the increase in Coventry has occurred since 2014 and probably reflects the substantial increase in available student housing in the district.

**Figure 14 – Council Tax base – Class M/N Exemptions**

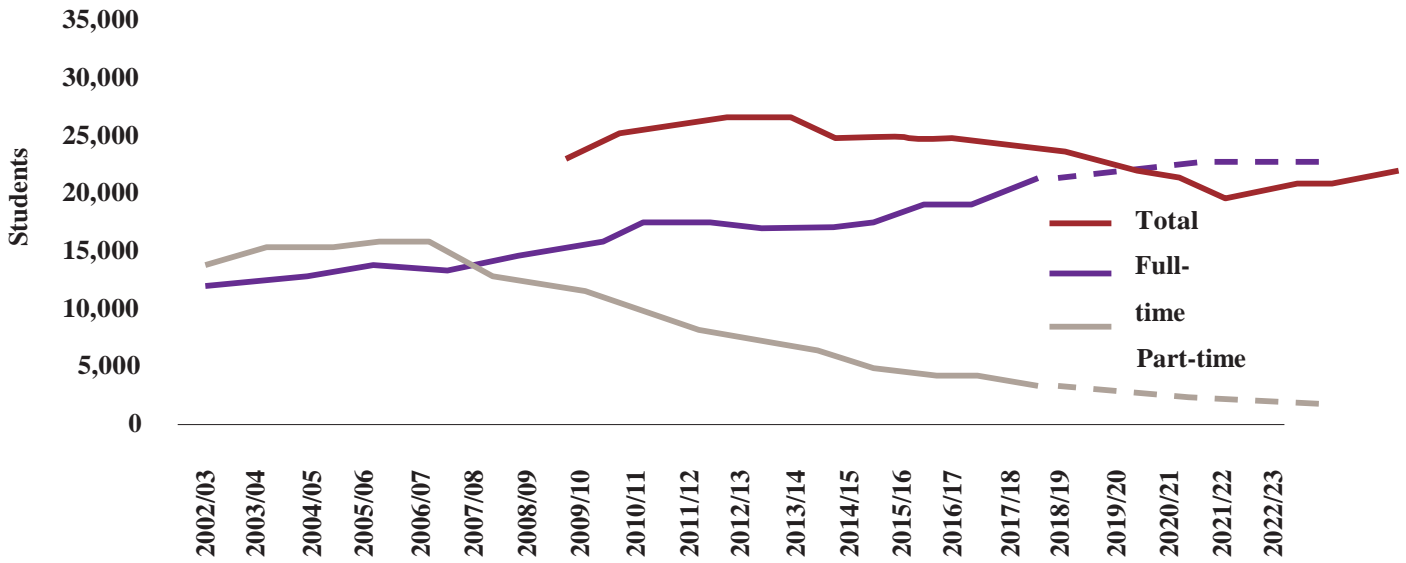


Source: MHCLG

To assess the future student housing need in Warwick district, forecasts of future student numbers are required. We have created forecasts for full-time and part-time student at both the University of Warwick and Coventry University. These are based on historic data from HESA, data provided by the University of Warwick, published documents from Coventry University, and trend-based analysis. They are the best available estimates but may be subject to change in the event of more detailed information being released.

Part-time student numbers at the University of Warwick have seen a large fall in recent years. This decline is expected to continue while full-time student numbers will continue to slowly increase over the forecast period.

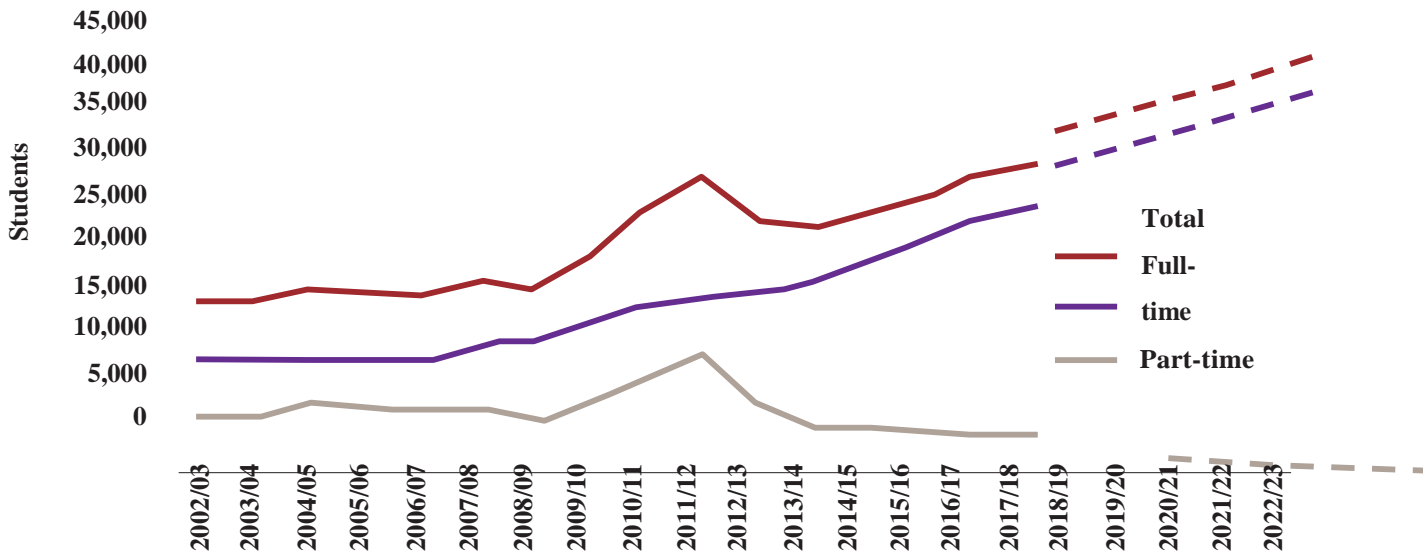
**Figure 15 – University of Warwick Projected Student Numbers**



Source: HESA, University, Author’s Estimates

Coventry University has also seen a decline in part-time student numbers but this has been more than compensated for by the rapid increase in full-time student numbers. This is expected to continue but there are significant risks to the forecast, including the expected growth in international student numbers failing to materialise.

**Figure 16 – Coventry University Projected Student Numbers**



Source: HESA, University, Author’s Estimates

Figures 17 and 18 provide a more detailed university-based breakdown of supply and demand that is summarised in Figure 4 of the Summary Report. Although the number of students at Warwick is expected to grow slower than at Coventry, the lack of identified supply increases results in a need for the private sector to absorb an additional of 900 students over the next three years. Meanwhile, the robust growth in Coventry student numbers will be met by the continued growth in both university and private provider purpose-built accommodation. That will see fewer students needing to find somewhere to live in Coventry's private rented sector.

**Figure 17 – University of Warwick Estimated Housing Need**

	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	Change 2017-18 to 2020/21
Full-time Students	19,200	20,000	21,500	22,100	22,500	22,800	1,300
University Beds	6,400	6,500	6,800	6,600	6,900	7,200	400
Nomination Agreements	600	500	1,100	1,100	1,100	1,100	-
Private Sector	12,200	13,000	13,600	14,400	14,500	14,500	900

Source: HESA, University, Author's Estimates

**Figure 18 – Coventry University Estimated Housing Need**

	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	Change 2017-18 to 2020/21
Full-time Students	24,700	27,200	28,500	29,900	31,400	33,000	4,500
University Beds			1,800	3,300	3,800	3,800	2,000
Nomination Agreements			5,900	7,600	10,500	12,600	6,700
Private Sector			20,800	19,000	17,100	16,600	-4,200

Source: HESA, University, Council, Author's Estimates

# Appendix 2



## **Benchmarking Parking Standards**

Of those LA's that were found to include bespoke standards, there is significant variation in the amount of parking spaces required, and it is unclear what evidential basis has been used in determining these. Several authorities have adopted a zonal approach to parking standards which clearly differentiates between central more accessible areas and those further toward the periphery.

The following table demonstrates that relatively few local authorities specify parking standards for this land use. Furthermore, disparate results have emerged from the benchmarking. The draft SPD is proposing a single standard for PBSA's (i.e. it is not proposing to define zones and PBSAs on campus for example, might benefit from a different standard to those located in other areas of the district. There is a wider debate regarding the desirability of students bringing cars to their place of study and management arrangements for controlling and enforcing parking in PBSAs. In addition, there is concern that over-specifying parking standards could encourage greater numbers of students to bring cars, or result in large areas of underutilised land.

## Benchmarking Table

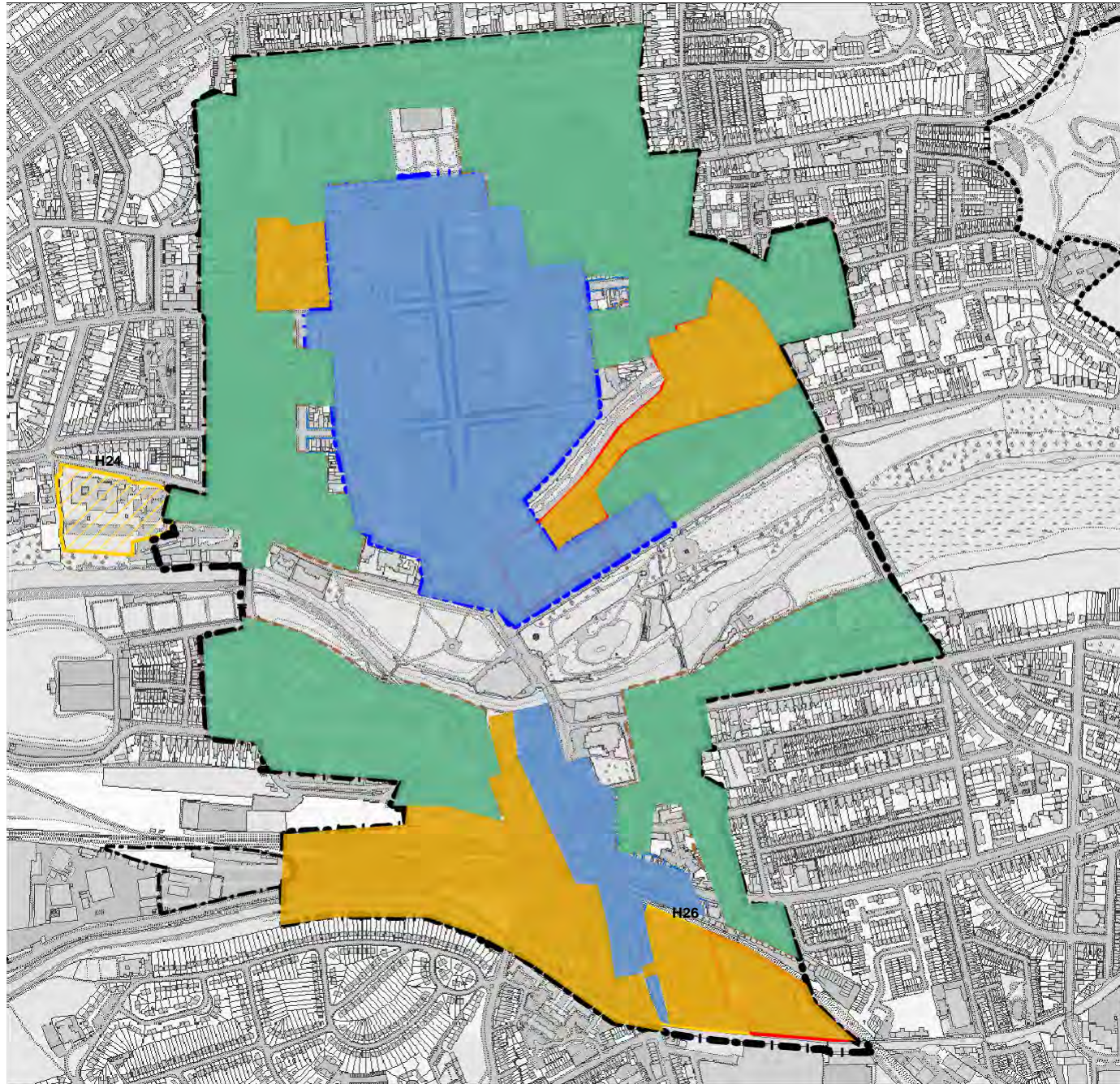
Cardiff 2010 Parking Standards	Newport 2015 Parking Standards	Birmingham 2012/Newport 2015 Parking Standards	Nottingham 2016 Emerging Parking Guidance
<p>Sui Generis PBSA in All areas: 1 space per 25 beds, and 0.25 cycle visitor short spaces in addition at 0.05 per unit</p>	<p>PBSA within the City Centre: 1 space per 25 beds for servicing, wardens and drop-off areas, with no visitor spaces.</p> <p>PBSA (under college/university control) outside of the City Centre:</p> <p>1 space per 25 beds for servicing, wardens and drop-off areas.</p> <p>The visitor car Parking requirement is 1 space per 10 beds (for students and/or visitors).</p>	<p>Purpose Built Student Accommodation (Use Class C2):</p> <p>Area 1: 1 space per 10 bedrooms.</p> <p>Area 2: 1 space per 7.5 bedrooms.</p> <p>Area 3: 1 space per 5 bedrooms (lower provision will be appropriate in campus situations)</p>	<p>C2 PBSA is differentiated.</p> <p>Notes that it is based on discussions with Planning/Highways</p>

Newcastle 2015 Parking Standards	Swansea (March 2012) (referenced in the 2017 HMO and PBSA SPD)	Plymouth (May 2013) (Maximum standard)	Derby City (2013)
<p>Limited or no car parking provision is generally acceptable in PBSA</p>	<p>1 space/25 beds for servicing, wardens and drop off areas (zone 1)</p> <p>1 space/25 beds for servicing, wardens and drop off areas + 1 space/10 beds for students and visitors (zones 2-6)</p>	<p>1 space/2 occupiers</p>	<p>1 space/ 4 bed spaces (at least 1 space per 15 bed spaces or less should be for ambulance or mini-bus parking and indicated as parking for disabled people)</p>

# Appendix 3



## Royal Leamington Spa



**Zone 1**  
Town centres, including area of search for major retail in Leamington  
**No area of impact or concentration constraints**

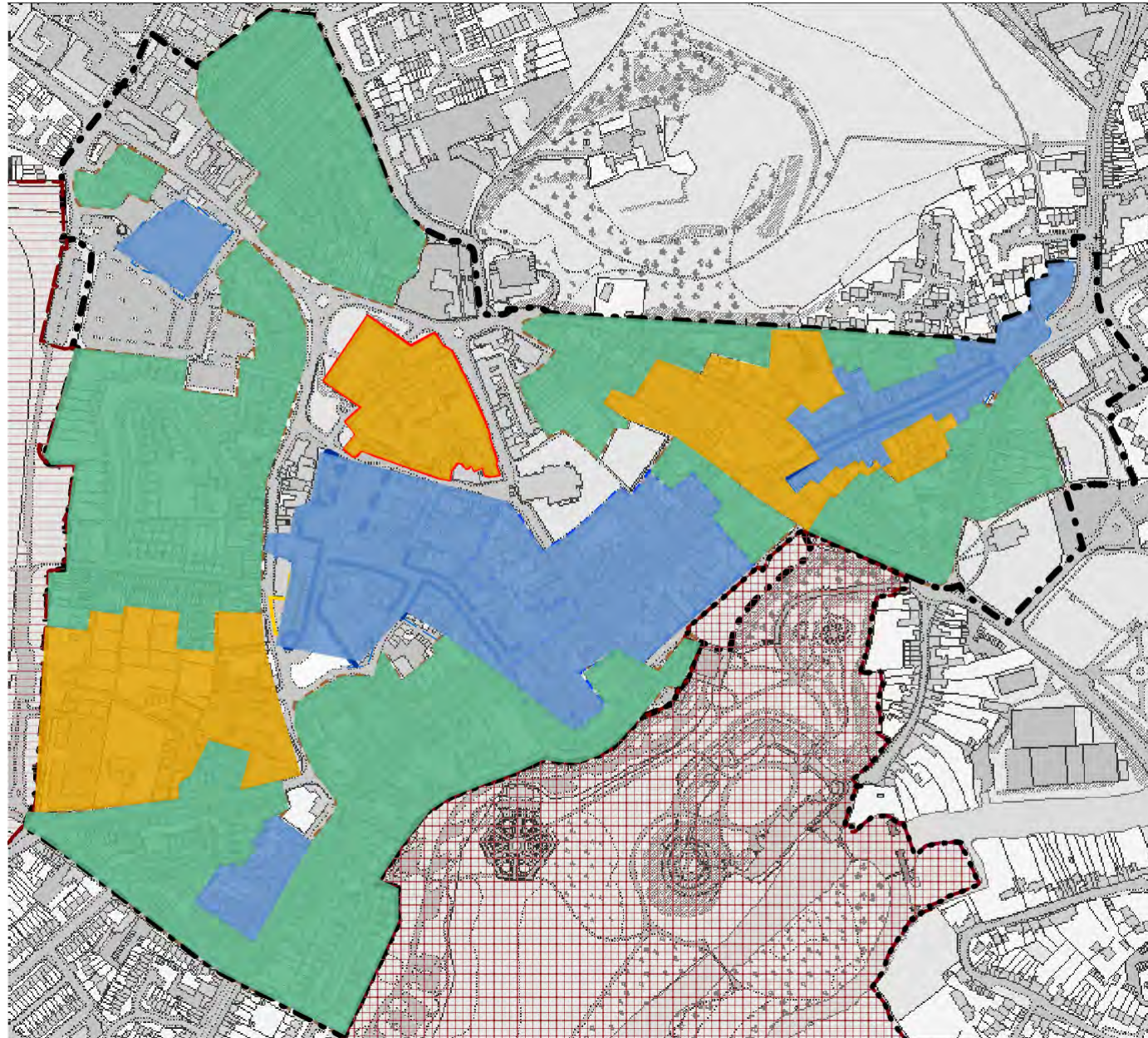
**Zone 2a**  
Non residential area of town centres  
**AOI: 1bed = 1m**  
**Concentration: No other PBSA in AOI**

**Zone 2b**  
Residential areas of town centres  
**AOI: 1bed = 1m**  
**Concentration: kitchen/dwelling 25%**

**Zone 3**  
Thoroughfares outside of town centre  
**AOI: 1bed = 2m**  
**Concentration: kitchen/dwelling 10%**



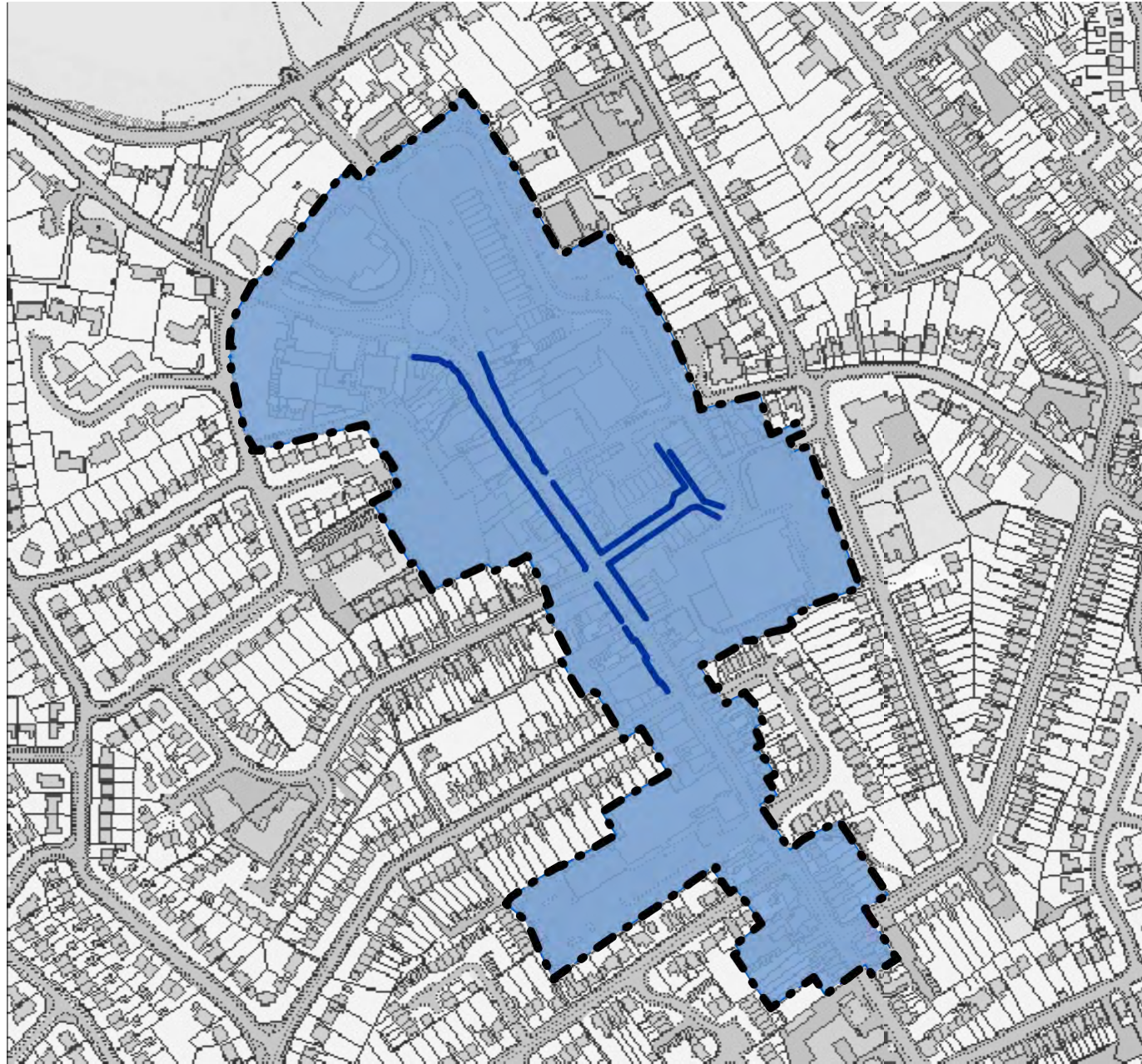
# Warwick



- Zone 1**  
Town centres
- Zone 2a**  
No residential
- Zone 2b**  
Residential areas



# Kenilworth



**Zone 1**  
Town centres





**Warwick District Council  
Riverside House  
Milverton  
Hill  
Royal Leamington Spa  
CV32 5HZ**

**[www.warwickdc.gov.uk](http://www.warwickdc.gov.uk)**



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