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To: Planning Policy
Subject: Comments on PBSA SPD consultation draft

Comments on PBSA SPD consultation draft 2019.

This document reveals not only the substantial rise in the number of students, including international students, at Warwick University but, in particular, the extent of the fall in part-time student numbers over the last 10 years. Warwick used to offer part-time courses which gave opportunities especially to mature students, very many of whom lived within travelling distance, unlike traditional full-time undergraduates who move away from their family homes and, after a first year on campus, occupy second (shared) homes in term-times only, leaving them unoccupied for 3 or 4 months each year. This growth in student numbers has not been matched by an increase in on-campus accommodation. It is therefore unsurprising that demand for HMOs in Leamington has grown so much over this period. This is the root cause of the problem now faced by WDC.

The consultation draft lists 6 aims which the provision of PBSAs are intended to fulfil and I will respond to each in turn. I begin from the assumptions that:

- any policy which would successfully prevent further losses of much-needed family homes in Leamington to student HMOs is to be warmly welcomed;
- there is little hard research evidence from elsewhere to demonstrate how this might be achieved;
- the stated aims of this PBSA SPD draft are laudable but unless there are measures within it which actually achieve some/all of these, the document is no more than a wish list.

1. To provide a high quality and safe environment ...

- in spite of requesting it, I have been unable to obtain information about Warwick University's minimum room sizes but it is essential that there is adequate space for living in individual rooms, including a recognition that if beds larger than single sized ones are to be provided (as seems to be the case in many HMOs) that this does not reduce the remaining unoccupied space, such that it is no better than that in a night sleeper train. In fact one of the attractions for students of living in converted Victorian properties in Leamington is that, where landlords comply with WDC's Space and Amenity Standards, they have individual and communal space sufficient for socialising, studying and living in. Were the standards in PBSAs to be much more cramped that this (as occupants of Moss House report is the case) second, third and postgraduate students could well find them unattractive.
- I welcome provision for those with disabilities but there is no reference to adjacent accommodation for those needing the support of a carer;
- storage space is so limited in many PBSAs that those operating them advertise tie-ups with commercial companies offering facilities to deal with the storage of possessions eg of overseas students who may remain here for 12 months at a time and therefore bring/accumulate a lot of stuff
- socialising spaces to hold parties should be included and, if rooms were also made available for cheap hire by outside students, it might alleviate the late night noise disturbances which are an unwelcome feature of living close to large HMOs which serve as venues of choice for individual and student society events
- given that it is a 20 mile round trip to Warwick University (and more to Coventry), it is ridiculous to provide so many cycle spaces in any Leamington PBSA, without first obtaining an estimate from the University/Students Union of the number of current students living here who cycle to the campus. It

would be more sensible to reduce this number and slightly increase allocated car parking on 2 grounds. First there are students who need to be mobile in order to meet the requirements of their teaching/social work/medical etc courses and free on-site parking might act as an incentive to them to live in a PBSA. Second this would assist with future proofing because, if the PBSA were later to accommodate new graduates staying on, almost certainly some would need/have cars to get to work at eg Gaydon or in a local hospital where shift demands preclude reliance on bus services or at Gaydon (see an example of this in Appendix A of correspondence associated with the 47 bed Moss House where in 2018 the landlord sought to widen occupancy (W/18/2212) on the basis of demand from such tenants, but was refused because the allocated on-site parking/15 space shortfall had been allowed on the basis of assumed lesser car ownership/usage by students than by single young professionals.)

2. To welcome students ...

- aside from permitting their construction, there is nothing in the document to indicate how this will be done in a commercially operated PBSA - and why should the provision of PBSAs fulfill this function unless for example Warwick University guarantees rooms in these proposed blocks for incoming students?
- is it time to consider whether welcoming - encouraging? - even more students here is of overall benefit, or do the dis-benefits outweigh these?

3. To encourage students to participate ... to live and work in the district ...

- again how will the provision of PBSAs in particular achieve this?
- the recent WSA Consultants' report recommended that wider use of social media about 'local events and activities' could increase participation by students and this would apply regardless of whether or not they live in PBSAs. There are well-established predominantly term-time volunteering opportunities/schemes already in place which involve many students to the benefit of all (though interestingly, to date, I believe that not a single occupant of The Union 197 bed canal-side block has ever turned up to help with the community gardening activities beneath their windows). But why would they, unless they are interested in gardening? Students live student lives which offer them tailor-made opportunities for engaging in a wide range of familiar and new activities so why, aside from the occasional individual intent on pursuing a particular interest, would living in a PBSA (as opposed to anywhere else) result in more students for instance going to a local choir?
- the document says nothing about housing needed to enable graduates to live and work here which, given its aim to encourage this, is a serious omission in a town where the widespread loss of family homes is causing problems for first-time buyers, and the demand for shared housing from students has pushed up rental costs generally.

4. To reduce the negative effect ...

- the 'burden' of housing students, made worse by the Council's and the University's prolonged failure to mitigate the worst effects of 'studentification', has, for far too long, fallen on south L'ton so the belated recognition of the need to do more to address this is welcome.
- this means that no more student blocks should be built in town south of the river.
- PBSA1 clause 1 (c) may need to be modified in the light of the current discussions regarding the meaning of 'main thorough fare' in H6, in the wake of the contentious 68 Clarendon Street HMO planning application.

5. To reduce the pressure ...

- I endorse entirely the points made by Nick Bond in his 7 March submission to this consultation, especially regarding the large number of PBSAs which would have to be built in order to achieve the desired impact.

- I am very surprised that there is no mention of affordable housing within this paper and no reference to the NUS Accommodation Costs Survey 2018 which stresses the significance of this for students. Equally importantly, providing such accommodation could well be a key factor in drawing students away from HMOs. If rents for PBSAs, combined with tenancy lengths, are only pitched at the upper end of the market as now, second and third year home students will be extremely unlikely to move into them, so all that will happen is that more (richer) (overseas) students will be accommodated. This issue is on the agenda of Bath and N E Somerset Council Local Plan Options Consultation Winter 2018 where both Bath and Bath Spa Universities are situated - see section 4.17.2 'BTH5 Proposed Policy approach for affordable purpose built student accommodation New PBSA should provide at least 35% of the accommodation as affordable rent. (The definition of affordable rent is a PBSA bedroom that is provided at a rental cost for the academic year equal to or below 55% of the maximum maintenance loan, which is the rate for students living away from home – outside London set by the Government)'.
- Quoting the NPPG, the WDC consultation draft refers on p11 to 'imposing caps or restrictions on students living outside the university-provided accommodation'. What exactly are the mechanisms for doing this and will WDC deploy them as part of the strategy to encourage students to opt for PBSAs?
- if more PBSAs are to be built, more students will need to travel by bus to the University, so attention must be given to the pollution impacts. Not just the routes but also the provision of electric buses must be on the agenda of developers, the University and WDC.
- the evidence (such as it is) from research on PBSAs is that, because students want to live near other students, the building of PBSAs may result in the conversion of neighbouring family houses to HMOs, and the concomitant 'studentification' of other neighbourhoods. However consistent use by the Council and University of the interventions mentioned in the second bullet point below to contain this could be effective, especially if the H6 ratio were also to be reduced from 10% to 5% across the District.

6. To improve relationships ...

- I take exception to the suggestion that relationships between permanent residents and the student population are not good, which is what this implies. I do not believe that there is any real evidence to suggest that this is the case. In general, the issue is not living alongside students: it is the over-concentration of students and the resulting wide-ranging effects of unmanaged 'studentification' which concern permanent residents. The only occasions on which, in 20 years of living surrounded by student HMOs, I have heard students complain about negative engagements with their neighbours it has been young men, worse the wear for drink, shouting in the street after midnight, and resisting a reprimand (only to apologise the following day). Indeed, such has been the concern of a number of residents involved with SoLAR (South L'ton Area Residents) about some students living in sub-standard housing that, unasked, we have been campaigning for 3 years to get WDC to more effectively use their powers to address this.
- I accept that, especially in streets with high proportions of student HMOs, periodically there are instances of night noise disturbance from student parties/comings and goings, and permanent residents have to persistently complain about poorly/unmanaged waste. But this is the result of Warwick University, to date, taking no responsibility for the consequences of outsourcing so much of its student housing supply to the town and of three failures by the Council - first to rigorously implement, from the outset, the Art 4 Dir/Policy H6 and thereby prevent HMO landlords from converting large sections of some streets to shared student housing; second to consistently enforce all the HMO license conditions/Management Regs such that landlords actively deal with such problems and maintain their properties to the required standards; and third to engage with permanent residents to find solutions to anti-social behaviour by small numbers of individual students through, for example, the introduction of a fit-for-purpose, term-time night noise service funded by the University, and the extension of the street marshal scheme to help to contain late night noise/disturbances on streets beyond the town centre.

I hope these comments are helpful - I just wish I could be as positive about this document delivering on its aims as I am about your good intentions.

Meg Bond