

## Aspia Jannat

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**From:** Paul Cox [REDACTED]  
**Sent:** 09 March 2019 17:56  
**To:** Planning Policy  
**Cc:** Meg Bond; Len Mackin; Bruno Eurich; ELIZABETH ILES; Suzy Reeve; Kristie Naimo; Colin Quinney; Hannah Waller; Dave Barber; Ann Morrison  
**Subject:** Response to PBSA SPD consultation draft

Dear WDC, here's my response to your consultation on the SPD for PBSA's.

1. Firstly, the consultation itself has been given no publicity, is difficult to find and is presented badly. So, it will unsurprisingly draw a very low response which you will no doubt use to support a claim that there is hardly any opposition to it!

In reality, WDC continues to wilfully ignore the massive level of unease, disenchantment and demoralisation there is with the whole issue of studentification. Your Council tax-paying citizens view the seemingly unstoppable increase in PBSA's and HMO's with cynicism, anger and despair. Burying your consultation in this way just reinforces those feelings.

2. The presentation of the document leaves a lot to be desired, and contributes to the problem outlined in 1. above. It's way, way too long, makes contentious statements which present the real and actual experiences of the community as merely 'perception' and 'opinion', and it takes until page 28 before you finally get to the point of saying what your proposed policy actually is.

3. Next to the draft SPD, you've now added some 'updated figures' for the actual and projected number of full-time students, as provided by Warwick Uni. But you haven't altered the text in the consultation in any way, so the comments I made to you weeks ago have been ignored. All I can do is repeat most of them below, whilst expecting you to ignore them again.

The actual numbers on page 8 are wrong. They refer to "bedspaces in Warwick district" but....

- the stated figure for 2017/18 (5,782) is in fact the number of Warwick Uni students living solely in Leamington, not the District as a whole (as supplied by the Uni to me under Freedom of Information i.e. the Uni says that 5,782 of their students have a **Leamington** address)

- the figure stated for 2018/19 for Warwick District is given as 5,902, yet the Uni says there are currently 6,004 of their students with a Leamington address - so 100.+ more students are actually living in Leamington than the stated figure for the whole of the District.

Your forecasts are way too low. Every year since 2010/11, the % of Warwick Uni students living in Leamington (**not** Warwick District) has ranged between 26-28%. The % is gradually creeping up, it's currently 28% and was 27% the previous two years. So, for example, in 2020/21 the Uni forecast number is 23,221 and we can reasonably expect 27-28% of these to live in Leamington i.e. 6,270 - 6,502.

Yet your document forecasts 'only' 6,265 students in Warwick District as a whole. (You have applied a figure of 27% - **which should be for Leamington only** - to your incorrect overall student number of 22,800.)

Therefore, the rest of the forecasts for the number of additional bedspaces needed across the District must also be too low, and the gap between what is stated and the reality gets bigger. For example, the number of students for Leamington alone in 2021/22 should be around 6,600 (28%

of the 23,597 figure provided by the Uni) yet the document gives 6,265 for the whole District.  
**Extrapolating from this, the stated figure for 2028/29 is too low by at least several hundred.**

4. Why do these numbers matter? In terms of your SPD, it makes your stated aim of using PBSA's "to return those properties [family homes converted to HMO's] to the housing market or for rental to those other than students" completely unattainable unless you permit the building of an absolutely enormous number of PBSA's in a way which would transform Warwick District.

As that level of PBSA-building clearly isn't going to happen, the logical conclusion is that the number of family homes lost to the student-HMO market will go on increasing but might be slightly mitigated on the margins, in some parts of the District.

Moreover, as the research clearly shows (yet strangely you don't reference or acknowledge this), if you put PBSA's in areas where there is already intensive studentification, even more students will be attracted to those areas. **Consequently, in large parts of South Leamington, PBSA's are likely to increase student demand, then meet some of that demand whilst fuelling further demand for HMO's.** What a great policy you've come up with!

5. One of the ways you should counter the effect of PBSA's in areas of already high student density simply attracting more students, is to put a complete ban on any more PBSA's in those areas. You claim this would be illegal because it would discriminate against students. This is complete nonsense and is the advice of someone so risk averse I'm surprised they dare get out of bed in the morning. You need to urgently get some legal advice from a lawyer specialising in discrimination in the housing market, who will confirm that such a policy would be reasonable, well-founded and highly unlikely to be challenged.

6. You completely ignore the well-researched phenomenon of segmentation in the student housing market. It is well known that PBSAs are more expensive to rent than HMOs and this may deter many students (particularly home students) from taking up this option, but there is nothing in the policy to address this, such as requiring developers to provide a significant proportion of affordable units as recommended by the NUS (see NUS Accommodation Costs Survey 2018 at <https://www.unipol.org.uk/acs2018.aspx?fbclid=IwAR18LiDkgiidiY5xMGIO3JLx8XZurpxWikvXL9gBfUx-LRUzpZ904xqH0H4>). Without such a requirement PBSAs could well become almost exclusively inhabited by students from abroad with the risk that they could become under-occupied and cease to be viable should the number of such students decrease.

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

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

9. **Here are some ways you could amend the SPD and other policies if you really want to make a positive difference** - though I doubt whether you'll include these in your summary of consultation responses.

A. Ban further PBSA's in areas of high student density (this would NOT be discriminatory, get some proper legal advice!);

B. Heavily 'weight' the policy so that the predominant criterion is for PBSA's to be located as near to the University campus as possible;

C. Support and protect the resident communities of Leamington by amending H6 in the Local Plan so that

- HMO conversions are not permitted where the HMO density within 100 metres is already **5%** or more (not more than 10%, which is current policy)

- the current loophole of allowing exceptions in 'mixed areas on a main thoroughfare' - which planning officers currently interpret in a way which is completely against the intention and spirit of the policy - is plugged by a tight and narrow definition of what is meant by 'mixed area' and 'main thoroughfare'

D. Start standing up for the communities you represent and who pay for your budgets, salaries and allowances, by adopting a robust relationship with the University, calling it out for its deliberate policy of exporting the social costs of its on-going expansion to neighbouring communities.

Paul Cox

