

Chris Banks, Programme Officer

23rd August 2016

C/O Banks Solutions

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Dear Madam Inspector,

Student Housing in Bath

Since the deadline for the receipt of hearings statements, the Federation of Bath Residents' Associations (FoBRA) has been made aware, through the National Organization of Residents' Associations, of new information. We believe it is directly relevant to Matter 13 at your forthcoming Examination in Public (EiP) of Bath's Placemaking Plan (Bath's Universities) and we wish to bring it to your attention, as follows.

There are parallels between Durham and Bath regarding the issue of 'studentification'. Both are relatively small cities with highly successful universities. Durham (population 45,000) hosts 15,000 students, 43% of whom are provided with university-managed accommodation. Bath (population 94,000) hosts 24,000 students, only 25% of whom are provided with university-managed accommodation. Both cities therefore experience severe pressure in terms of demand for private sector student accommodation in the form of Houses in Multiple Occupation (HMOs) and Private Sector Accommodation Blocks (PSABs).

FoBRA and others have argued in representations and hearings statements that, in the absence of a joined-up Student Housing Strategy, policies B5, SB19 & SB20 in the draft Placemaking Plan which attempt to control the domination of private sector student accommodation across Bath are unlikely to succeed alone in preventing further imbalance of communities and the threat to achieving Government housing targets, particularly affordable housing.

FoBRA now discovers that Durham County Council is preparing a County Durham Local Plan for the second time, having had to withdraw the Plan submitted in April 2014 subsequent to a Judicial Review. The submitted, now withdrawn, County Durham Local Plan offered a policy on student accommodation that drew derision from residents' groups and rejection by the Inspector at Stage 1 of the EiP in October 2014. That policy was found lacking in the effective control of PSABs and HMOs.

The Inspector invited Durham County Council to work with residents' groups, the University and other stakeholders around the EiP table to develop a better policy. This resulted in two submissions - one from Durham County Council, the other from residents' groups.

In February 2015 the Inspector published his Interim Report in which he found the County Council's version potentially unsound, commended the alternative version and advised the County Council to withdraw the Plan. Submission of the new County Durham Local Plan is planned for December 2017.

Residents' groups suggested to Durham County Council that waiting so long for an effective policy on student accommodation would be 'shutting the stable door after the horse had bolted'. Instead, an Interim Policy should be adopted as soon as possible, accompanied by an effective Article 4 Direction. To its credit, Durham County Council agreed, and in July 2015 (after formal consultations) agreed an Interim Policy with almost entirely the wording submitted by residents' groups. An Article 4 Direction limiting HMOs to no more than 10% of properties in a given location (as proposed by FoBRA for Bath) will come into force on 17th September 2016; and significant changes are being made in the treatment of PSABs.

FoBRA regrets the fact that it was unable to bring the above to your attention within the designated timescale, but feels that the principle demonstrated in Durham is highly relevant to Bath's situation; ie that B&NES should heed Durham County Council's lesson and work urgently with stakeholders to produce a workable Student Housing Strategy that is so desperately needed.

Yours sincerely

Robin Kerr, Chairman