

Local Development Framework

Draft Supplementary Planning Document on Student Housing - Background Paper and Sustainability Report

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1 SEA and sustainability appraisal

- 1.1 EU Directive 2001/42/EC and subsequent UK regulations formally introduced what is commonly called Strategic Environmental Assessment or SEA for plans or programmes with significant environmental effects. The Directive became operational in July 2004. At about the same time the UK government made the broader sustainability appraisal (SA) process a requirement for certain documents within the Local Development Framework (LDF) through the Planning and Compulsory Purchase Act 2005.
- 1.2 Alongside these mandatory processes, there have been strong moves on a voluntary basis to introduce a better appreciation of environmental, social and economic impacts into decision making of many sorts. Within this region the Regional Assembly and SUSTAIN (the regional roundtable on sustainable development) published in the summer of 2004 what is called the Integrated Regional Framework (IRF), with at its heart a form of sustainability appraisal.
- 1.3 The City Council is preparing a framework for dealing with SEA and sustainability appraisal to the range of documents within its LDF in a consistent way. It will recognise that strategic documents such as the city-wide Core Strategy will require a more elaborate treatment than, say, a site or topic based Supplementary Planning Document (SPD). The City Council is of the view that not all proposed SPDs will require SEA under the European Directive (although all will be subject to SA as required by UK legislation) and the framework will include proposals for screening process for SPDs.
- 1.4 The SA process has five stages:
- 1 Setting the context and objectives, establishing the baseline and deciding on the scope
 - 2 Developing and refining options
 - 3 Appraising the effects
 - 4 Consulting on the plan and SA report
 - 5 Monitoring implementation of the plan
- This report effectively reports on and brings us up to stage 4 for the draft SPD on Student Housing. After the current consultation on the SPD and this document, a revised SPD and final Sustainability Report will be prepared for approval and implementation, hopefully in early 2006.
- 1.5 This report repeats some information contained in the main draft SPD itself, for completeness. Further information is still being sought on some aspects of the topic. In particular updated information on student numbers for the academic year 2005-06 will become available in December 2005. Should this further information lead to significant changes in conclusions of the sustainability appraisal process, then the Council will reconsult those who have commented specifically on this SA report.

2 General and planning policy context

General context

- 2.1 Northumbria University, the University of Newcastle upon Tyne and Newcastle College help make the city a vibrant and thriving regional centre. However there is increasing local concern over the high concentrations of students living in some parts of Newcastle. The SPD on Student Housing seeks to address some of the resulting impacts through restraint on creation of further student bedspace in certain areas. The SPD will be just one of a number of initiatives, existing and proposed.
- 2.2 Other parallel strands of work include:
- exploration of opportunities for purpose built student accommodation
 - licensing of houses in multiple occupation (HMOs)
 - voluntary accreditation schemes in the private rented sector
 - environmental management initiatives, including a night noise team
 - community safety and crime prevention
 - liaison with the Universities and College
 - integration of all these through the Newcastle Private Rented Sector Project

National policy

- 2.3 National planning policy for housing, expressed in particular through Planning Policy Guidance Note PPG3 *Housing*, confirms the Government's intention that everyone should have the opportunity for a decent home. PPG3 offers no particular guidance in respect of student housing but it does seek to encourage the creation of mixed and balanced communities. It says that local planning authorities should ensure that new housing developments help to secure a better social mix by avoiding the creation of large areas of housing of similar characteristics.
- 2.4 Planning Policy Statement PPS1 *Delivering Sustainable Development* issued in February 2005 again does not address student housing as such but does emphasise the need for development plans to promote development that creates socially inclusive communities, including suitable mixes of housing. PPS1 goes on to advise that plan policies should ensure that the impact of development on the social fabric of communities is considered and taken into account.

Regional policy

- 2.5 Existing RSS (former RPG1) for the North East as adopted in November 2002 emphasises the importance of the region's universities and further and higher education establishments to the economy (for example at paragraph 1.47), but offers no direct guidance on the private rented sector and the provision of student housing.
- 2.6 RSS is under review and the replacement submission draft was published in June 2005. It continues to encourage the development of the universities in the region (notably at paragraph 2.49 and in policy 6, point g), but again it does not

deal with the private rented sector and student housing issues as such, though as with PPG3 it stresses the need for protecting and creating balanced and sustainable communities.

City level policy

- 2.7 The development plan for Newcastle comprises:
- Regional Spatial Strategy (RSS), formerly Regional Planning Guidance RPG1, for the North East adopted in November 2002
 - the Unitary Development Plan (UDP) for Newcastle adopted in January 1998
- National policy and guidance is also important, though with lesser status in some ways than the development plan.
- 2.8 The UDP provides some context and policy assistance in judging proposals for student housing. The UDP was produced before the publication of revised PPG3 in 2002 and does not fully reflect the emphasis in PPG3 and more recently PPS1 on creating and protecting balanced and sustainable communities.
- 2.9 Although other policies may have a bearing on individual planning applications, the principal policies relevant to the SPD are contained in the section on housing and are:
- Policy H1.5 Student housing
 - Policy H2 Protection of residential amenity
- These policies and immediate supporting text are contained in Appendix 1.
- 2.10 Policy H1.5 offers help in judging planning applications for students housing and does not in itself refer to housing in the private rented sector. The supporting text does say that problems can occur when a concentration of short term tenanted private properties leads to a highly transient population, but the response in this part of the UDP is to encourage purpose built student housing rather than regulation of the private rented sector.
- 2.11 Policy H2 is central to the ability of the Council to use planning powers to protect the amenity of existing dwellings. It lists a number of factors which must be looked at in assessing whether amenity might be affected. Within point A the policy refers to the need to protect the character of localities. Policy H2 is therefore the second key reference point for this document in the UDP.

3 SPD and sustainability appraisal objectives

- 3.1 The current draft SPD does not contain explicit objectives, but this will be remedied in the final version. The SPD contains reference to national policy, notably PPS1 and PPG3, as at paragraphs 2.3 and 2.4 above and broad aims derived from these are:
- Aim 1 To achieve mixed and balanced communities and promote development that creates socially inclusive communities in the city
- Aim 2 To ensure that the impact of development on the social fabric of communities is considered and taken into account

Cascading from these aims re two objectives which are suggested for the SPD:

Objective 1 To restrain growth in student households and bedspaces in areas under most pressure from high concentrations

Objective 2 To provide greater clarity on application of UDP policies H1.5 and H2 to purpose built student housing by use of expanded criteria

3.2 The framework for SEA and SA being prepared by the Council (see paragraph 1.3 above) will confirm the sustainability objectives to be used in future exercises. These will be based very closely on the objectives in the Integrated Regional Framework, though subject to consultation and possible further amendment. The current working version of the sustainability objectives are as follows and are being used for the time being in this document.

Economic

- To ensure high and stable levels of employment so everyone can share and contribute to greater prosperity
- To achieve high and sustainable levels of economic growth

Environmental

- To ensure good local air quality for all
- To protect and enhance the quality of the City's ground and river waters
- To reduce the causes and the impacts of climate change
- To protect and enhance the City's biodiversity and geology
- To reduce the amount of waste produced and increase the amount recycled
- To make better use of our resources
- To protect and enhance the quality and diversity of the City's rural and urban land and landscapes
- To protect and enhance the City's cultural heritage and diversity

Social

- To raise educational achievement and improve skill levels across the City
- To ensure everyone has the opportunity of living in a decent and affordable home
- To reduce crime and the fear of crime
- To improve health and well-being while reducing inequalities in health
- To ensure good accessibility for all to jobs, facilities, goods and services in the City
- To promote strong and inclusive communities, involved in the decision making for their area
- To reduce adverse impacts on global communities

3.3 The usual SA process for an SPD (see appendix 1) would test the SPD objectives against the SA framework before looking at the more detailed policies. In this case, the SPD is very focussed and the policies in the SPD flow

very directly and transparently from the SPD objectives. It is therefore considered that the appraisal of the options, including the preferred option, in the next section fulfills this.

4 Baseline information

- 4.1 The current version of the draft SPD contains section 2 entitled *University growth prospects and impact on student housing*. This forms a very important part of the baseline information available at present and should be read in conjunction with this document.
- 4.2 The draft SPD says that a high proportion of students in a neighbourhood can have undesirable long term impacts, including:
- high levels of residential turnover resulting in little long term commitment to the area and a decline in community spirit
 - an imbalance in the social mix, with predominance of one sort of household
 - loss of family homes through conversion to multi-bedroom dwellings
 - emptying out of some areas during university vacations
 - falling school rolls.
- 4.3 It also says that high concentrations of young people in shared and more particularly student housing can also give rise to significant day-to-day problems, for example:
- low level anti-social behaviour resulting in noise and other forms of disturbance
 - lack of care, maintenance and investment in the housing stock by some landlords
 - a neglected or untidy look to some houses and gardens
 - high levels of car ownership with pressure on limited parking provision.
- 4.4 The Council is assembling detailed information on these aspects and this will be available in the final version of this Sustainability Report.

5 Developing and appraising options

- 5.1 The Council has considered a range of planning policy mechanisms to introduce restraint on student bedspaces. The many permutations were rationalised into a number of options which gave a clear choice in terms of both policy approach and the spatial basis for applying policy. These are set out here. The Area of Student Housing Restraint (ASHoRe) model pioneered in Leeds was taken as a key model.

5.2 *Option 1*

No change:

- no area of restraint defined
- no attempt to restrict intensification where planning permission needed (e.g. larger extensions or rooflights in Tyneside flats)
- no blanket policy against purpose built student housing - each entirely on individual merits
- however, continue ad hoc enforcement on very large shared households

5.3 **Option 2 - preferred option used in SPD**

Leeds ASHoRe-type approach:

- single broad area defined covering all areas with high levels of students plus areas around that might in future face same issues
- no purpose built student accommodation
- no planning permissions for extensions or rooflights
- consider use of occupancy condition to permit genuine 'family only' extensions

5.4 **Option 3**

As Option 2 but consider in addition:

- withdrawal of permitted development rights for some or all extensions and other external works using Article 4 Direction

5.5 **Option 4**

Targeted approach:

- similar to Option 2, but
- would define tighter areas for restrictions, based solely on current rather than possible future student occupation
- outer cordon could be defined for monitoring and possible future inclusion depending on annual review

5.6 **Option 5**

Threshold approach:

- areas not defined as such or only as general indication of problem
- annual review of Council Tax and other information to indicate proportion of student or shared households on a street by street or very small area basis
- restrictions imposed as in Option 2 but decisions taken on basis of annual street or small area information

5.7 The Council has appraised these options against the sustainability objectives. Table 1 below gives a summary version, giving comments by the three headings of economic, environmental and social. Option 2 represents the preferred option as contained in SPD policies SH POL 1 and SH POL 2. A fuller version of the appraisal, objective by objective, forms Appendix 3 to this report. It is being produced as a separate document / file and is available on request if not enclosed or attached.

5.8 An appraisal of policies SH POL 3 and SH POL 4 has not been carried out as the Council believes to these to be neutral in effect, representing a clarification of existing UDP policy rather than any new policy direction or mechanism.

Table 1: Summary of appraisal of options

SA objective	Option 1 - business as usual	Option 2 - Leeds single tier ASHoRe with boundary quite widely drawn	Option 3 - as option 2 but with withdrawal of permitted development rights	Option 4 - as option 2 but with tight boundary round key areas of high concentrations	Option 5 - threshold approach on small are basis
Economic					
To ensure high and stable levels of employment so everyone can share and contribute to greater prosperity	Significant university and college contributions to local economy generally would continue.	University and college spending relatively unaffected. Student spending overall probably unaffected but spread over a wider area with more benefits to less advantaged areas than at present. Some diversion of spend into non-local firms if larger student housing developers moved in.	As option 2, but with slightly greater diversion of student spending around the city.	As option 2, but with slightly less diversion of student spending around the city.	As option 2, but with slightly less diversion of student spending around the city.
To achieve high and sustainable levels of economic growth	Student spending would continue to be concentrated in certain areas, benefitting some locally based landlords.				
Environmental					
To ensure good local air quality for all	The current concentration of students in some areas is having relatively little measurable direct and lasting environmental affect (as opposed to transient issues dealt with under social	Greater dispersal of students to more peripheral areas might lead to greater use of car use to work, though city centre limitations on car parking would inhibit a major growth.	As option 2, but greater likelihood of change.	As option 2, but less likelihood of change.	As option 2, but less likelihood of change.
To protect and enhance the quality of the City's ground and river waters					
To reduce the causes and the impacts of					

climate change	<p>heading below). Their central location and good public transport links means that impacts due to travel by car to work are probably relatively limited, although there may be localised problems due to heavier car use for non-work uses and as a result of car parking in areas with limited capacity.</p> <p>The character of some areas will continue to suffer, though this will have social rather than environmental impacts.</p>				
To protect and enhance the City's biodiversity and geology					
To reduce the amount of waste produced and increase the amount recycled					
To make better use of our resources					
To protect and enhance the quality and diversity of the City's rural and urban land and landscapes					
To protect and enhance the City's cultural heritage and diversity					
Social					
To raise educational achievement and improve skill levels across the City	<p>High concentrations of students in some areas will continue to satisfy their own housing needs but at the expense of ensuring a balanced social mix. The erosion of cohesive</p>	<p>Greater dispersal of students will make it easier for existing communities to maintain their structure and to continue to support certain services such as</p>	<p>As option 2, but greater likelihood of change.</p>	<p>As option 2, but less likelihood of change.</p>	<p>As option 2, but less likelihood of change.</p>
To ensure everyone has the opportunity of living in a decent and affordable home					

To reduce crime and the fear of crime	communities in some areas will continue.	schools.			
To improve health and well-being while reducing inequalities in health	There will continue to be an increase in disturbance through anti social behaviour.	However those areas likely to see less students than under option 1 might lose the benefit of greater local spend and thus support for local service, e.g. convenience goods shops.			
To ensure good accessibility for all to jobs, facilities, goods and services in the City	There will continue to be a negative impact on school rolls with a threat to the future of some primary of first schools.	Areas outside the ASHoRe that might see an increase in the proportion of students could face an increase in the problems identified under Option 1.			
To promote strong and inclusive communities, involved in the decision making for their area	Some areas will continue to see higher than average rates of crime against property.				
To reduce adverse impacts on global communities					

6 Predicting and evaluating the likely effects of the options and the SPD

- 6.1 The main impacts of introducing one of the options other than the 'business as usual' Option 1 are likely to be in relation to social and the more local environmental objectives. These options involve the use of stricter planning controls on, in effect, new bedspaces for students and could potentially have a positive impact and help to address some of the physical and social impacts of the concentration of student accommodation. These options, if effective, could help to secure more balanced communities in the most affected areas.
- 6.2 The appraisal has identified a number of potential negative impacts of the options. These largely relate to the extent to which the options would result in the social and day-to-day environmental problems being transferred to a degree to neighbourhoods outside a restraint area, the potential loss of support for some services such as local shops and the possible diversion of some spend into larger companies not based locally.
- 6.3 It is difficult to be very precise in predicting the scale of such impacts, given a number of contextual unknowns, notably:
- changes in a relatively volatile sector of the housing markets due to other factors
 - uncertainties around future growth prospects of the Universities
 - uncertainties also around the contribution in future of major developers of large scale purpose built accommodation.

7 Implementation and monitoring

- 7.1 The SPD sets out an approach to guiding some aspects of student housing in Newcastle. It draws upon policy at the national, regional and local level. It will work with parallel exercises, including the new licensing arrangements for HMOs. However, the SPD will be implemented almost exclusively through the development control process. It will be monitored annually and the results presented as part of the LDF Annual Monitoring Report to be produced each year by 31 December for the preceding financial year.
- 7.2 Suggested targets and indicators for the SPD are presented here for comment. Information would generally be presented by Newcastle Neighbourhood Information System (NNIS) neighbourhoods and by wards.
- student households as a % of total households (excluding from both halls of residence and purpose built accommodation) as shown by Council Tax records
 - student households as a % of total households (including in both halls of residence and purpose built accommodation) as shown by Council Tax records
 - house prices and rental levels
 - number of vacant dwellings
 - number of formally registered reports of anti-social behaviour

Appendix 1 to draft SA report for draft SPD on Student Housing

Stages in Sustainability Report production

Stage 1: Pre-production – Evidence Gathering
Stage A: Setting the Context and Establishing the Baseline and Deciding on the Scope
A1: Identifying other relevant plans, programmes, and sustainability objectives
A2: Collecting baseline information
A3: Identifying sustainability issues and problems
A4: Developing the SA Framework
A5: Consulting on the scope of the SA
Stage 2: Production
Stage B: Developing and refining options and assessing effects
B1: Testing the SPD objectives against the SA framework.
B2: Developing the SPD options.
B3: Predicting the effects of the SPD.
B4: Evaluating the effects of the SPD.
B5: Considering ways of mitigating adverse effects and maximising beneficial effects.
B6: Proposing measures to monitor the significant effects of implementing the SPD.
Stage C: Preparing the Sustainability Appraisal Report
C1: Preparing the SA Report.
Stage D: Consulting on the preferred options of the SPD and SA Report
D1: Public participation on the preferred options of the SPD and the SA Report.
D2(i): Appraising significant changes.
Stage 3: Examination
D2(ii): Appraising significant changes resulting from representations.
Stage 4: Adoption and monitoring
D3: Making decisions and providing information.
Stage E: Monitoring the significant effects of implementing the DPD
E1: Finalising aims and methods for monitoring.
E2: Responding to adverse effects.

Appendix 2 to draft SA report for draft SPD on Student Housing

Extracts from Unitary Development Plan for Newcastle, January 1998

Student housing

H1.5 APPLICATIONS FOR PLANNING PERMISSION FOR STUDENT ACCOMMODATION WILL BE CONSIDERED AGAINST THE FOLLOWING CRITERIA:

A. PROXIMITY OF THE SITE TO THE CAMPUS, OR ITS SUITABLE LOCATION WITHIN THE CITY CENTRE OR A DISTRICT CENTRE

B. SATISFACTORY CONVERSION OR REDEVELOPMENT OF NON-RESIDENTIAL PREMISES

C. SUITABLE CONVERSION AND/ OR ADAPTATION OF LOCAL AUTHORITY HOUSING STOCK

D. CONVENIENT ACCESS TO A GOOD PUBLIC TRANSPORT SERVICE

3.74 The City's three higher and further educational institutions have already experienced large scale expansion in student numbers in accordance with national policy. Still further growth could lead to a significant increase in housing need over and above that identified under policy H1. The conversion of upper floors in the City Centre is likely to provide further opportunities for student accommodation

3.75 This policy encourages further student housing provision. The City Council will assist in identifying suitable sites and bringing forward development proposals including conversion schemes for student housing purposes. Problems can occur when a concentration of short term tenanted private properties leads to a highly transient population. The City Council's policy, set out above, is to encourage less intrusive forms of student accommodation.

3.76 Consideration will be given to proposals for purpose built accommodation on vacant sites within or near existing residential areas where appropriate, where this does not conflict with other Plan policies.

[Continued]

Protection of residential amenity

- H2 DEVELOPMENT WHICH WOULD HARM THE AMENITY OF ANY DWELLING, OR GROUP OF DWELLINGS WILL NOT BE ALLOWED. IMPACT ON RESIDENTIAL AMENITY WILL BE ASSESSED WITH PARTICULAR REGARD TO:**
- A. PROTECTING THE CHARACTER OF THE LOCALITY AND OF THE EXISTING BUILDING IN THE CASE OF ALTERATIONS, EXTENSIONS OR CONVERSIONS;**
 - B. PROTECTING TREES AND OTHER SOFT LANDSCAPING OF AMENITY VALUE; C. ENSURING SATISFACTORY DAYLIGHT, SUNLIGHT, OUTLOOK AND PRIVACY FOR ALL DWELLINGS, EXISTING AND PROPOSED, PARTICULARLY IN RELATION TO GOOD EXISTING STANDARDS IN THE LOCALITY;**
 - D. AVOIDING THE INTRODUCTION OF SUCH ADDITIONAL ACCESSES, TRAFFIC OR PARKING AS WOULD INCREASE VISUAL INTRUSION, NOISE OR DISTURBANCE, OR PREJUDICE ROAD SAFETY; AND**
 - E. ENSURING THAT NON-RESIDENTIAL DEVELOPMENT AND/ OR ASSOCIATED OPERATIONS WILL NOT HARM RESIDENTIAL AMENITY THROUGH AN INCREASE IN NOISE, DISTURBANCE, SMELLS, FUMES OR OTHER HARMFUL EFFECTS.**
- 3.83 This policy concerns the amenities of residents and their homes, including all types of permanent dwellings and residential caravan sites, such as the Lemington Gypsy Site. Development will continue to bring about changes affecting individual dwellings, groups or neighbourhoods. Where, however, the kind or degree of change resulting from a proposal would injure amenity, and there is no available remedy, such as conditions or planning obligations, then permission will normally be refused.
3. 84 Residential areas may be particularly vulnerable to development which increases building or population density through, for example, extensions, conversions, redevelopment, and sub-division of curtilages to create new building plots. The impact may arise directly from the building work itself displacing garden space or other greenery, or resulting in a lack of reasonable outlook or light from windows. It may also arise indirectly from increased activity, traffic, noise, disturbance, or overlooking of private areas.