

BELFAST: A LEARNING CITY

A framework for student
housing and purpose built
student accommodation

March 2014



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Foreword

I am pleased to present this framework on student housing and purpose built student accommodation (PBSA)¹ on behalf of Belfast City Council and its partners on the Student Housing Joint Team².

Research has shown that students studying and living within cities make a significant contribution to local and regional economies. Belfast currently has 5 Higher Education Institutions across the city and by 2018 will have 2 major University campuses close to the city centre. There is also a growing international student market which presents a significant opportunity for Belfast.

The draft of the Belfast City Masterplan Review which was published for consultation in 2013 highlights development of the Learning City as a key theme aimed at harnessing the value of the higher education institutions across the city to maximise their impact on the economy, vibrancy and diversity of the city and the region. The emerging Integrated Economic Strategy for the city also identifies the role of the higher education sector in ensuring Belfast's economic success in developing skills and access to employment.

Attracting students to study and live in the city, not only requires excellent education providers, high quality campuses and a wide choice of quality courses, but also the right city infrastructure including IT connections, transport and housing. Student housing of whatever nature needs to be attractive, high quality, safe, secure, accessible and affordable. In addition, taking the learning from experiences of areas such as the Holyland, student housing provision needs to be planned and appropriately managed to ensure that there is a more positive integration with any existing communities.

The Holyland and Wider University Area Strategic Study report highlighted that Belfast is different to most other large university cities in that the proportion of available managed purpose built student accommodation is considerably lower than elsewhere in the UK. Local students also tend to live with others from their home towns and stay in their student accommodation during weekdays only. Whilst there is a target to increase the number of international students residing in the City, current figures are relatively low. These factors mean our solution should be fairly unique.

This framework advocates a vision and direction for student housing and PBSA in Belfast and advocates a number of key criteria to be applied to proposals for purpose built student accommodation developments in the city. These criteria will be used by the Council and its partners as they engage with the planning process, and in the future may inform revisions of planning policies, following transfer of planning functions to the Council under local government reform in 2015. The framework has been jointly prepared in partnership with the relevant government departments and agencies together with input from Higher Education Institutions.

As chairman of the Strategic Policy and Resources Committee I wish to thank all the partners and stakeholders who have assisted in this work.

Alderman Gavin J. Robinson

(Chair of Strategic Policy and Resources Committee)

March 2014

¹ This framework follows on from the March 2012 report on Belfast: A Learning City - *Holyland and Wider University Area Strategic Study – Independent Consultant's Report* which outlined a range of recommendations to make Belfast a destination of choice for students and to restore the functional integrity of the Holyland. This report highlighted the need for Belfast to promote itself as a 'learning city' to maximise the economic and regenerative benefits that this can bring to the city. This framework takes the aspect of student housing a stage further.

The framework has been prepared following a stakeholder engagement exercise on a '*Discussion document on student housing and purpose built student accommodation*' which was published for consultation by Belfast City Council on behalf of the Student Housing Joint Team in September 2013. Stakeholder responses have been considered in preparation of the framework.

² Belfast City Council, Department for Social Development, Department of the Environment, Northern Ireland Housing Executive, Strategic Investment Board.

1.0 Introduction

Context for framework document

- 1.1 The framework document on student housing and purpose-built student accommodation (PBSA) has been prepared by Belfast City Council on behalf of the Student Housing Joint Team which was led by Belfast City Council and comprised DoE Planning, Department for Social Development, Strategic Investment Board and the Northern Ireland Housing Executive. The work of the Joint Team has been supported by a wider working group incorporating the Department for Employment and Learning, Queen's University Belfast, the University of Ulster, Belfast Metropolitan College and DRD Roads Service.
- 1.2 The need to address the matter of student housing and PBSA, in particular, arises from:
- the outstanding opportunity to enhance **Belfast's role as a Learning City** with, among other things, a vibrant knowledge economy, a positive international profile, a high quality of life and well-being and a revitalised and welcoming city centre.
 - the expressed desire of the city's higher educational institutions to **increase international student numbers** who traditionally prefer PBSA.
 - the **need to facilitate the development of PBSA** in Belfast which has a lower level of PBSA than most other major university cities in the UK. In 2012/13 there were **43,638 students** in Belfast and Jordanstown with just fewer than 4,000 managed bed spaces.
 - the proposed development of the **University of Ulster campus**, with some 15,000 students and staff, in Belfast's Northside area and the development of the Belfast Metropolitan College's Campus in Titanic Quarter.
 - the recommendations of the **Strategic Study of the Holyland and the Wider University Area** (*'Belfast: A Learning City, Holyland and Wider University Area Strategic Study'*, March 2012) which noted the need to make Belfast a destination of choice for students through the provision of student housing and to assist in restoring the functional integrity of the Holyland.
 - the need to address issues of potential concentration of **ad hoc private rented student housing** within local neighbourhoods whilst acknowledging **the important role of the private rented sector** in the provision of high quality student accommodation.
 - the fact that responsibilities for the student housing sector are fragmented and disjointed with **no single organisation having responsibility** for student housing and the development of policy or strategy.
- 1.3 The framework document complements the review which is currently underway of the Belfast City Council Masterplan. The Masterplan review identifies four strategic and three spatial objectives related to the aspiration of improving quality of life and well-being in the city. The seven objectives are:
- **The Learning City:** harnessing the power of cutting edge research and development and third level education.
 - **The Accessible and Connected City:** enhancing accessibility and connectivity internationally, regionally and locally.

- **The Low Carbon City:** clean technology, renewable energy and efficiency will drive growth in the economy and reduce costs for businesses and households.
- **The Digital City:** city wide ultrafast broadband and integrated smart city infrastructure driving innovation and supporting growth and efficient delivery of public services.
- **The Belfast City Region:** working together across administrative and geographical boundaries to deliver the city's growth potential.
- **The Centre City:** a vibrant and dynamic centre city and regional economy.
- **The Neighbourhood City:** neighbourhoods which provide the focus for community, social and environmental sustainability.

1.5 Student housing and PBSA are important to a number of these objectives and not just the Learning City, for example, the Accessible and Connected City by improving connectivity internationally and the Centre City though students living, socialising and working in the city.

Purpose of framework document

1.6 A strategic approach is required to address the issue of the provision of high quality student housing in the appropriate locations. An important element of any student housing strategy will be the provision of PBSA. The Joint Team work to date has focused on assessing the market and demand for PBSA, investigating financial models and developing a range of planning criteria that could be considered as requirements for PBSA. It is proposed that the latter will provide a basis for development of future planning policy for PBSA following the transfer of local planning powers to Belfast City Council in 2015. In the interim, Belfast City Council and other Joint Team members will utilise the criteria as they engage with the statutory planning process.

1.7 This framework document:

- outlines the **Learning City** concept (section 2.0).
- considers the **student housing** context, including Houses in Multiple Occupancy (HMO), in Belfast (section 3.0).
- provides an overview of the **demand and market** for student accommodation (section 4.0).
- reviews the existing strategic and planning **policy context** which is supportive, in principle, of proposals for PBSA (section 5.0).
- considers PBSA planning policies in a number of **university cities** and notes the value of a criteria-based approach to the provision of PBSA (section 6.0).
- sets out a proposed **criteria-based policy** for assessing applications and informing the preparation of proposals for PBSA based upon 5 key criteria, namely proximity, design, management, impact and need (section 7.0).
- identifies a range of **other factors, constraints and next steps** in relation to the delivery of PBSA (section 8.0).

1.8 A discussion document on student housing and PBSA, was produced by the Joint Team and a stakeholder consultation exercise undertaken in Autumn 2013. The discussion document included 5 consultation questions, namely:

1. Do you agree that the city should promote the value of students to Belfast and grow its potential as a destination of choice for students to study and live?
2. Having regard to question 1, do you agree that the current range and choice of available student accommodation within the city could be improved to allow Belfast to realise its potential as a Learning City?
3. Do you agree that there is a need and demand for more managed PBSA within the City?
4. Do you agree that the five proposed planning criteria for PBSA are appropriate?
5. Noting the next steps, what more do you think the public and private sectors should do to provide better managed accommodation for students and to promote Belfast as a destination of choice for students?

1.9 The framework document has been informed by the stakeholder consultation.

2.0 The Belfast Learning City concept

Introduction

- 2.1 The Strategic Study of the Holyland and Wider University Area referred to the emergence of the knowledge economy in reinforcing the role of cities and reviving urban areas in Europe and the US. Cities and city regions, with their diversity of people, firms and cultures, support the knowledge economy by encouraging new ideas and innovations. This diffusion of new knowledge and technology is faster in urban areas, due to the density and physical concentration of large numbers of knowledge workers and knowledge-based firms.
- 2.2 An increasing number of cities are investing in urban 'knowledge quarters' or 'creative districts', and developing them as integrated parts of the urban fabric. The trend reflects the growing conviction of policy makers that innovation and knowledge creation is an iterative process that thrives in diverse and mixed environments.
- 2.3 Belfast City Council's Investment Programme highlights the importance of having a modern infrastructure, promoting growth and revitalising the economy, supporting employability and marketing Belfast proactively on the international stage. The Investment Programme is an important driver for developing a Belfast as a Learning City.

The Belfast Masterplan

- 2.4 The publication '*Belfast: The Masterplan*' produced by the City Council is currently under review and in May 2013 a '*Consultation on Emerging Findings*' was published, identifying the Learning City as one of its key themes. Belfast's higher education institutions are recognised as important city assets which have a considerable impact upon the city and regional economy by way of:
- increasing educational attainment, the supply of skills and knowledge workers;
 - directly employing teaching, research and support staff;
 - creating start up, knowledge based businesses and providing knowledge transfer to local companies;
 - increasing Gross Value Added through student spending; and
 - attracting overseas students and enhancing the local skills and research base in the city.
- 2.5 The strategic objectives, identified in the emerging findings, are to harness the economic power of the institutions and to address low levels of educational attainment within deprived communities. In addition, enhancing skills and innovation in key sectors (for example, life and health sciences and advanced engineering) is of critical importance to enhance the city's competitiveness. The aim is to ensure that Belfast maximises the benefits from having a number of top learning establishments close to the city centre and that Belfast becomes a destination of choice for students.
- 2.6 Through the concept of Belfast as a Learning City and the recommendations from the Holyland Strategic Study (including the need to develop a strategic student housing strategy) it is considered that key stakeholders can work together to maximise the regeneration impact of university campus buildings in the city, including connectivity between campuses. The Belfast City Masterplan '*Emerging Findings*' document recognises the importance of the Cathedral area to the north of the city centre and the Shaftesbury area to the south of the city centre, identifying them as '*spatial priorities*'.

- 2.7 The Learning City concept recognises not only the value and power of the City's educational institutions in the delivery of educational and economic growth but also the need to harness the potential of the educational institutions, through their development plans, to maximise the benefits to the City and its communities and be universities 'of' the city rather than simply universities 'in' the city. This dynamic link between the university and city revival is demonstrated, for example, by the re-location of Central St. Martin's University College into King's Cross, Central London where the University College has played a critical role as a driver for urban regeneration.

Anchor institutions

- 2.8 As 'anchor institutions' (organisations which have deep economic, social, cultural and political roots in the city), universities are important assets which have a considerable impact on the city economy with undergraduate spend alone accounting for up to 10% of the total economic activity in some cities. The Higher Education sector in Northern Ireland is reported to generate over £1bn in local economic activity (Queen's University Belfast, Report to the Employment & Learning Committee, March 2011). Higher Education supports and helps sustain employment including a significant proportion in the construction industry.
- 2.9 Higher education is critical to the overall prosperity and growth of the Northern Ireland economy as the sector:
- generates over £1bn in local economic activity annually;
 - generates over 6,500 jobs directly and levers the same number again in the labour market;
 - contributes significantly to the skills base, through highly qualified graduates, a factor which plays a crucial role in attracting inward investment;
 - has supported £100m's of new investment and 1,000's of high value new jobs through knowledge transfer and innovative initiatives, including the highly successful NI Science Park; and
 - attracts research funding from external sources which doubles the public investment in research activity in the two universities (Queen's University Belfast, Report to the Employment & Learning Committee, March 2011).
- 2.10 The '*Impact of Anchor Institutions in Belfast Report*', April 2013, prepared by the Centre for Local Economic Strategies for Belfast City Council, included consideration of the impact of Queen's University, University of Ulster and Belfast Metropolitan College. The report notes a wide range of positive impacts of anchor institutions. In relation to positive economic impacts it notes the anchor institutions' role as:
- employers;
 - procurers;
 - innovators;
 - value adders through working in partnership with the private sector;
 - landowners, constructors and developers;
 - investment attractors;
 - trade gateways; and
 - tourist attractors.

- 2.11 The report also notes the positive social impact of the anchor institutions relating to their roles in:
- providing services;
 - enabling employability;
 - educating and developing skills;
 - supporting apprentices;
 - providing shared spaces;
 - maximising community benefit through corporate social responsibility; and
 - providing a cultural base.
- 2.12 Whilst anchor institutions have environmental impacts, for example, associated with high levels of energy use, the report also identifies positive environmental measures, for example, in construction contracts, environmental re-assurance and the promotion of sustainable transport measures.
- 2.13 It is recognised that to maximise the benefits of anchor institutions, including benefits in relation to the Learning City, greater collaboration is needed not only between the institutions themselves but also between anchor institutions, public sector agencies and the private sector.

The value of education exports

- 2.14 The Department for Business, Innovation and Skills (BIS) Report titled *'Estimating the Value to the UK of Education Exports'*, prepared by London Economics (2011), was prepared in the context of the UK Government's desire to support the UK education sector in developing international partnerships and continuing to attract overseas students, recognising the value of the education sector to the profile of the UK on the world stage and the UK economy.
- 2.15 The Report has been used by BIS to inform the formulation of a policy framework to allow Higher and Further Education and associated business sectors to increase their income from overseas and attract more foreign direct investment. Key findings of the Report include:
- the value of UK Education Exports was £14.1Billion in 2008/9 and this was forecast to be approximately £21.5Billion in 2020 and £26.6Billion in 2025, representing an annual growth rate of 4%.
 - this includes tuition fees, other non tuition expenditure, research grants and contracts, transnational income, income from overseas alumni, education related publishing, equipment, consultancy and broadcasting.
 - the net income from tuition fees from overseas students in 2008/09 was estimated at £2,492.2Million. The Northern Ireland share of this was £21.4Million, compared to £236.4Million in Scotland, £84.9Million in Wales and £2,149.5Million in England
 - the net income from non tuition fee expenditure from overseas students in 2008/09 was estimated at £4,344.9Million in 2008/9. The Northern Ireland share of this was £64.1Million compared to £441.1Million in Scotland; £245.9Million in Wales and £3,593.9Million in England.
 - analysis indicates that demand for overseas education will increase over time and the global market is likely to become more competitive.

The value of higher education and students to the Belfast economy

2.16 Research commissioned by Belfast City Council, prepared by Viewforth Consulting (*'The Economic impact of higher education students on the economy of Belfast', 2014*³) found that:

- the impact of off campus expenditure of students coming to Belfast from outside the city (33,397 students in total) was estimated to be £384.5million output⁴ generated, 4,212 full time equivalent jobs created and £192.32million contribution to GVA⁵;
- when off campus expenditure of students was combined with the direct and secondary/knock on impacts of Higher Education Institutions, the total output generated is £1.2 billion, creating 14,756 full time equivalent jobs, and contributing £700.3million to GVA;
- students from outside the EU had the greatest per capita impact. Each non EU student spent on average £17,804 per annum, generating £21,081 in output in the Belfast economy, creating 0.22 full time equivalent jobs and contributing £10,704 in GVA; and
- students coming to Belfast from the rest of Northern Ireland (outside Belfast) spent on average £15,397, generating (per student) £17,573 in output in the Belfast economy, creating 0.18 full time equivalent jobs and contributing £8,394 in GVA.

Connecting to communities – civic engagement and widening participation

2.17 Research, titled *'How can universities support disadvantaged communities?',* by The Joseph Rowntree Foundation (2012), outlines a wide range of mechanisms by which universities work to provide wider regeneration benefits in urban areas. The research shows that universities can support disadvantaged communities by providing access to opportunities, facilities, resources and expertise. It also shows how universities successfully engage with communities and highlights the potential for universities to do more and to do it better.

2.18 The research report focused on:

- the efforts universities are making to recruit students from disadvantaged groups;
- the provision of outreach education in the community;
- the opportunities for students to learn in the community and contribute to the community through placements and projects;
- collaborative research with communities;
- student and staff volunteering;
- the roles and responsibilities of universities as community leaders and employers; and
- the importance of institutional commitment and the factors promoting successful engagement with disadvantaged communities.

2.19 The research report found that:

³ Impacts modelled for the 2011/12 academic year from various sources including Higher Education Statistic Agency data and Student income/expenditure surveys (DELNI, 2006 and BIS 2012)

⁴ Output is the amount in £ of expenditure/turnover generated. (Direct output of HEIs is the HEI expenditure/turnover, Secondary or knockon output is the expenditure/turnover generated in other industries as a result of HEI spending)

⁵ GVA or Gross Value Added is a measure of the value created by the sector – GVA is the industry level measure of GDP (O). GDP(O) is a production measure of the *net change in wealth or prosperity in the economy as a whole* over the year.

- universities could do more to support disadvantaged communities by using their distinctive position as leading local institutions, by recognising the role they can play as major employers and through their involvement in local economic development;
- many universities had established links with schools and colleges in disadvantaged communities, aiming to widen participation in higher education;
- some universities had developed outreach programmes which had been effective in reaching marginalised groups and individuals; and
- some academics had developed collaborative research with disadvantaged communities.

Building on opportunities and connections – revitalising the city centre

- 2.20 Harnessing the capacity of the universities to anchor the ‘place shaping’ agenda in Belfast has particular relevance because of the scale of Belfast and the fact that Queen’s University, the University of Ulster and the Belfast Metropolitan College form a triangle on the edge of the city centre.
- 2.21 With the public anchors of the planned University of Ulster campus towards the north of the city centre, Queen’s University and Stranmillis towards the south, Belfast Metropolitan College towards the east and St Mary’s towards the west the connectivity within the city and its institutions becomes an important factor to support and enhance Belfast as a Learning City. In supporting connectivity and accessibility across the city and between the campuses, public transport will play an important role along with initiatives such as the public bike hire scheme, for which £700,000 capital funding has been secured to deliver Phase 1 within the city centre by 2015. Future phases of the bike hire scheme may include the Universities and Titanic Quarter.
- 2.22 There are other elements required in order to stimulate and support student life within the community and the city e.g. city centre living including student housing and community engagement. With three educational campuses in the city centre there is a prospect of being able to pilot innovative arrangements for city centre living and the development of services, facilities, amenities, cultural infrastructure and creative enterprises that will strengthen the city centre and for students to play a key role in developing city centre living.
- 2.23 Maximising the benefits and mitigating the impacts of students as consumers and citizens and protecting communities through better integration and management is essential for the reputation of Belfast and to continue to attract and retain talent in the city.

Building on Belfast’s unique characteristics

- 2.24 Universities in Northern Ireland have traditionally developed as regional institutions and therefore have a history of many local students attending from Northern Ireland. This partly contributes to the unique character of Belfast and student culture where students tend to live and socialise in their existing social groups and the tendency for student life to run from Sunday – Thursday with students returning to their familial home at the weekend.
- 2.25 To develop as a Learning City it is essential that Belfast and its universities increase their role, focus on the global stage and maximise the international market. All educational establishments have indicated an aim to increase their international market which will enhance diversity in the city, support a 7 day week student life and help Belfast to remain competitive in relation to attracting investment.
- 2.26 Belfast has a unique set of circumstances associated with the legacy of conflict. The city centre has traditionally been viewed as a shared, safe space and the creation of safe spaces

which support student life and the integration of students in the city and community will be an important feature of a Belfast as a Learning City.

2.27 It is apparent that the Learning City concept is of strategic significance in that it emphasises:

- the economic benefits of building the knowledge economy for the benefit of the city and the wider region;
- the physical and regeneration benefits of development and investment by the higher education sector to 'shape' the city through built development and better connectivity;
- the social benefits with communities benefitting from Universities and students valuing the city; and
- the policy benefits of having a coherent and ambitious vision for the city as a whole rather than just a series of isolated projects and initiatives.

3.0 Student housing

Introduction

- 3.1 The Strategic Study of the Holyland and Wider University Area noted that in 2010/11 the student population in Greater Belfast was 42,781. By 2012/13 this had increased to 43,638 (an increase of 2%). Approximately half of all students live at home. Most of the remainder live in private rented accommodation, much of which are HMO accommodation, with just under 4,000 living in managed accommodation.
- 3.2 The Strategic Study noted that Belfast differs from many other university cities in that there has been a preference among first year students for privately rented accommodation instead of managed university accommodation. This is reflected in the ratio of students to purpose built accommodation bed spaces in Belfast (12:1) relative to other university cities in the UK, for example, Cardiff 5:1, Edinburgh 8:1 and Glasgow 11:1. The HMO Subject Plan notes that the provision of PBSA when compared to student enrolment is approximately half the average rate of provision in the UK.
- 3.3 The private rented sector, including HMO accommodation, plays an important role in relation to meeting student housing needs.

Actions for student housing

- 3.4 The Strategic Study of the Holyland and Wider University Area recognised that the absence of coherent policy on student housing has not only resulted in an over-reliance on the private sector but has also reduced the capacity of the statutory sector and partners to effectively intervene or regulate the scope, scale and pattern of accommodation used by students.
- 3.5 The strategic study identified four key actions for student housing, namely:
- develop a single coherent strategy for student housing as part of a strategy for housing in Belfast;
 - identify appropriate locations, innovative arrangements and measures to attract alternative funding for housing students in the city;
 - prepare guidance on a planning policy framework in respect of shared housing and flat conversions; and
 - develop an accreditation scheme for student housing.
- 3.6 This framework document, whilst having a focus on the planning policy framework for and the provision of PBSA, is relevant to all four key actions.

Houses in multiple occupancy (HMO) licensing and accreditation

- 3.7 In relation to the private rented sector and, in particular, HMOs, the NIHE introduced a Statutory Registration Scheme for HMOs in Northern Ireland in May 2004. According to the NIHE February 2012 publication, *'The Statutory Registration Scheme for Houses in Multiple Occupation in Northern Ireland'*, registration was to be completed by April 2013.
- 3.8 In 2012 DSD undertook a consultation on a fundamental review of HMO regulation in Northern Ireland. The proposals include a revised HMO definition, proposals for HMO licensing, including potential exemptions from licensing for some categories of HMO, licensing conditions and related regulatory and enforcement powers. DSD's Facing the Future: Housing Strategy for Northern Ireland Action Plan 2012-2017 identifies, among other things:

- the implementation of HMO review proposals by 2016 with the objective of improving regulation of HMOs; and
- the commencement of a review of the private rented sector in 2014/2015 with the objective of making the private rented sector a more attractive housing option by improving the regulatory framework. (Related to the review, a private landlord registration scheme was launched in February 2014 by DSD.)

3.9 In England and Wales, under the Housing Act 2004, PBSA schemes, owned and/or managed by higher education institutions, may be exempt from licensing if they have an accredited Code of Practice, which establishes certain management standards, in operation. Accredited PBSA schemes operated by private providers are not exempt from licensing but may benefit from reduced licensing fees. (Further information on Codes of Practice in England and Wales are contained in Appendix 1.) There is, to date, no equivalent accreditation scheme in Northern Ireland. It is expected that a similar accreditation scheme will be required if PBSA schemes are to be exempted from licensing requirements or are to benefit from reduced licensing fees.

4.0 Demand and market for student housing

Projecting future trends

4.1 There are uncertainties in trying to predict student population projections as there are a range of factors which influence future trends including:

- changing demographics;
- the impact of tuition fees – both higher fees and the differential in fee across the UK (the maximum fee in Northern Ireland, for entry to Higher Education in September 2013, is £3,575. This will be uplifted by inflation to £3,685 for entry in September 2014 for Northern Ireland and non-GB EU students. For other GB students the fee for entry in 2012 was up to £9000);
- competition from other universities;
- the impact on student numbers arising from the reduction of the number of Higher Education courses that the Belfast Metropolitan College is permitted to run;
- the growing global market for international students and the associated increased demand from international students for university places across the UK; and
- the level of additional student places (in evidence to the Employment & Learning Committee it was noted that by 2015-16, Queen's will have 588 additional places, the University of Ulster 652 additional places and Higher and Further Education 140 additional places, a total of 1,350 places. The uptake of those 1,350 places is included in the Programme for Government and the decision about where the places are located lies with the particular institution.

Specific issues for Belfast

4.2 In addition to the above general factors, there are other Belfast-specific factors which include:

- the student culture in Northern Ireland with the tendency to commute on a weekly basis, returning home at weekends (and the related factor of transport costs) and live in social groups;
- the preference of first year students to live in private rented accommodation with other students whom they already know but who may be attending different Higher Education institutions; and
- the low number of students from the rest of the UK studying at Northern Ireland's Higher Education institutions (2% according to the January 2011 update to Independent Review of Variable Fees and Student Finance Arrangements; Update to Minister for Employment & Learning).

Student population

4.3 The Strategic Study of the Holyland and Wider University Area noted that in 2010/11 the student population was 42,781. By 2012/13 this had increased to 43,638 (an increase of 2%). This represents approximately 15% of Belfast City Council's population (280,962 on the 2011 Census day) or a ratio of 6.5:1 general population to students. This is a similar ratio to that of other university cities, including Cardiff, Leeds and Sheffield.

- 4.4 The following table provides a breakdown of Higher Education student numbers by institution in Belfast for 2010/11, 2011/12 and 2012/13. Queen's University, with 22,700 students, has the highest number of students in Belfast followed by University of Ulster (Belfast and Jordanstown campuses) with 15,074 students.

	Total Higher Education			Total Post Graduate			Total Undergraduate			Full-Time Undergraduate			Part Time Undergraduate		
	10/11	11/12	12/13	10/11	11/12	12/13	10/11	11/12	12/13	10/11	11/12	12/13	10/11	11/12	12/13
QUB	22,706	22,985	22,700	5,497	5,120	4,625	17,209	17,865	18,075	13,354	13,765	14,150	3,855	4,100	3,930
St Mary's	879	1,020	1,082	20	145	200	859	875	882	849	865	880	10	10	2
Stranmillis	1,163	1,340	1,460	132	145	274	1,031	1,195	1,186	831	890	869	200	305	317
UU: Belfast & J'town	14,000	15,029	15,074	1,340	3,201	3,353	12,660	11,828	11,721	8,830	8,864	8,682	3,830	3,144	3,039
BMC	4,033	3,011	3,322	-	-	-	4,033	3,011	3,322	1,842	1,491	1,547	2,191	1,520	1,775
Total	42,781	43,385	43,638	6,989	8,611	8,452	35,792	34,774	35,186	25,706	25,695	26,128	10,086	9,079	9,063

Undergraduates

- 4.5 The following table provides information on the number of full-time undergraduates who form a core market for student accommodation:

Year	QUB	Ulster (Jordanstown & Belfast)	Belfast Met	St Marys	Stranmillis
2008/09	13,082				
2009/10	13,355			870	885
2010/11	13,354	8,830	1,842	849	831
2011/12	13,765	8,864	1,491	865	890
2012/13	14,150	8,682	1,547	880	869

- 4.6 The traditional markets for PBSA are international students and first year students. However, there has been a reported increase in the number of returning students applying for university managed/provided accommodation which indicates a potential increase in demand.

International students

- 4.7 Belfast is aiming to increase its international profile and appeal and Queen's University, University of Ulster and Belfast Metropolitan College are aiming to increase their international student numbers. Belfast Metropolitan does not provide student accommodation but the predicted increase in full time courses will cater for international students who would need accommodation in the city.
- 4.8 The Department for Employment and Learning Higher Education Strategy – Graduating to Success (April 2012) encouraged institutions to review international strategies. The aims included improvement in Northern Ireland's share of the UK's international student market, a substantial increase in international engagement through collaborative teaching and research arrangements and a significant increase in inward and outward international mobility, moving towards a doubling of activity by 2020 compared to the 2010 baseline.
- 4.9 The international student profile for the Belfast's Higher Education institutes for 2012/13 was as follows:

	Undergraduate	Postgraduate	Total
QUB	1,045	1,090	2,135
St Mary's	9	5	14
Stranmillis	28	17	45
UU(Belfast & J'town)	939	729	1,668
BMC	11	0	11
Total	2,032	1,841	4,873

- 4.10 The Jordanstown campus accounts for 92% of non UK Domicile students at the University of Ulster.

Accommodation provision and location

- 4.11 In total there are just under 4,000 managed bed spaces in Greater Belfast for a total student population of 43,638 in 2012/13. The majority are provided by Queen's University which owns and manages 2,243 bed spaces in and around the university area. It also markets and promotes a further 173 bed spaces at other managed halls and a further 269 bed spaces elsewhere. The University of Ulster provides 878 bed spaces at the Jordanstown campus. Stranmillis College provides 465 bed spaces at its campus.

University/College	Address	No. Bed spaces	No. Bed spaces 2012/2013
Queen's University (owned and managed accommodation)	Elms Village, 78 Malone Road	1630	1633
	Willow Walk (<i>new</i>)		257
	Mount Charles	159	157
	Grant House, 64 Malone Rd	50	50
	76 Malone Rd	14	14
	College Gardens,	45	45
	Guthrie House Fitzwilliam	87	87
	Sub-total	1,985	2,243
Queen's University (marketed and promoted accommodation)*	Church of Ireland & Methodist Chaplaincies	38	49
	Derryvolgie Hall	88	88
	Union Theological College	26	26
	Edgehill Theological College	10	10
	Sub-total	2,147	2,416
University of Ulster – Jordanstown Campus	Jordanstown Campus	708	708
	Jordanstown Head-lease scheme	170	170
	Sub-total	878	878
Stranmillis College	Stranmillis University College Campus	465	465
	Sub-total	465	465
Total		3,490	3,759
Total (exc Jordanstown)		2,612	2,881

* Queen's University market and promote a further 269 bed spaces in addition to those noted in the table.

Occupancy rates

- 4.12 There is over-demand for Queen's University owned and managed accommodation, with applications for Queen's University accommodation also made by students attending other educational institutes. In 2013, there were 93 applicants from other educational institutes. The ability for Queen's University to accommodate non-Queens students has declined over the past 3 years due to increasing demand from Queen's University students. Queen's University report increased demand from returning students (those students in their 2nd, 3rd and 4th years).

- 4.13 Occupancy levels are high for University of Ulster (90-100%) and Queen's University owned/managed accommodation (100%). Stranmillis has also reported high occupancy levels.

Student accommodation choice

- 4.14 The Strategic Study of the Holyland and Wider University Area notes that Belfast differs from many other university cities in that there has been a preference among first year students for privately rented accommodation instead of university accommodation. The preference has been for privately rented accommodation within the wider university area. The ratio of students to purpose built accommodation bed spaces in Belfast (12:1) compared to other university cities in the UK is, for example, Cardiff 5:1, Edinburgh 8:1 and Glasgow 11:1. The HMO Subject Plan notes that the provision of PBSA when compared to student enrolment is approximately half the average rate of provision in the UK.
- 4.15 The reasons for the preference for private rented accommodation may be affordability, proximity to social activities and nightlife and being close to other students. Students like to live with other students they already know who are attending different education institutions but also because they like the freedom they get from living off campus. During consultation the issue of affordability of accommodation was raised on several occasions, particularly with respect to the provision of PBSA and concerns raised that it would not be able to compete with low cost privately rented accommodation.
- 4.16 In a May 2010 IPSOS Mori and Students Union survey (213 face-to-face interviews) of students living in the Holyland 46% of students surveyed were first year students, providing an indication of the proportion of first year students living in private rented accommodation.

Projected demand for university accommodation

- 4.17 All educational establishments have indicated their aim of increasing the number of international students. Belfast has a total of 26,128 full time undergraduate students (2012/13) and just fewer than 4,000 bed spaces within university managed accommodation, demonstrating the need for an increased level of managed student accommodation or the availability of greater choice in the student accommodation market. The *'Accommodating the Housing Needs of Students in Belfast: An Up-to-date Profile'* (Louise Brown, May 2013) identifies, in the Holylands and wider university area, that households comprising full time students have increased over the period 2001-2011 from 14% to 20% and that students are also represented in other household types (e.g. mixed with non-students and single person accommodation).
- 4.18 Whilst the current Northern Ireland student culture, where around half of students will choose to live at home, needs to be factored into any equation, tuition fee differentials across the UK may result in a change to this situation. Families who could previously afford to support children at universities in Great Britain may be willing to pay for accommodation in Northern Ireland, thus increasing demand.
- 4.19 Queen's University has a projected demand of an additional 900 bed spaces of student accommodation by 2015. The University of Ulster has no plans to increase student numbers in the Belfast area before 2015. By 2018, it expects over 15,000 students and staff will be at the new Belfast campus development.

Key conclusions

- 4.20 The key conclusions are as follows in relation to the demand and market for student accommodation:

- there is unlikely to be any decline in student numbers and the increase is likely to be incremental;
- there is limited availability of PBSA in Belfast and this may be a constraint in terms of attracting students;
- there is a need for PBSA as evidenced by the Strategic Study for the Holyland and Wider University Area and reports of increasing year-on-year demand for accommodation at Queen's University managed facilities;
- the key market groups for PBSA are international students and first year undergraduates;
- the key 'selling points' of PBSA relate to security and safety (important defining factors for parents and a key reason why existing purpose built and university managed accommodation works well), the ease of paying and the clarity of costs for the accommodation and related services; and
- there remains an important role for privately rented and HMO student accommodation.

5.0 Review of existing planning policies and other relevant strategies

Programme for Government

5.1 The Northern Ireland Executive PfG (published 2012) contains 5 strategic priorities, namely:

- growing a sustainable economy and investing in the future;
- creating opportunities, tackling disadvantage and improving health and well being;
- protecting our people, the environment and creating safer communities;
- building a strong and shared community; and
- delivering high quality and efficient public services.

5.2 The PfG recognises that these priorities mean, among other things, a better educated and a more highly skilled workforce, encouraging innovation and research and development, improving community safety, more sustainable transport, preserving and improving the built and natural environment and better relations between communities. The provision of high quality student housing and PBSA is consistent with and would contribute to delivery of PfG priorities.

Hierarchy of planning documents and other relevant development strategies and policies

5.3 There are a range of strategies and policies of relevance to housing, HMOs and PBSA contained within the hierarchy of planning documents i.e. the Regional Development Strategy 2035, regional planning policy in the form of Planning Policy Statements (PPSs), area based Development Plans and Subject Plans and other Supplementary Planning Guidance. Furthermore, Department of Social Development (DSD) and Belfast City Council strategies are also of importance.

5.4 Appendix 2 contains an overview of the hierarchy of planning documents, as well as key DSD publications and the Belfast City Council Masterplan 2004-2020.

Overview

5.5 The provision of housing for students is consistent with the priorities identified in the Northern Ireland Executive's Programme for Government, the strategic guidelines contained in the Regional Development Strategy 2035, the DSD Regeneration Policy Statement for Belfast City Centre and the Belfast City Council Masterplan.

5.6 There is no specific Use Class within the Planning (Use Classes) Order (NI) 2003⁶ for student housing. As such, housing which may be occupied by students, but which is not HMO accommodation, is subject to normal residential planning policy considerations. In relation to the regulation of HMOs, the Department for Social Development and the Northern Ireland Housing Executive have undertaken a fundamental review of HMO regulation and it is proposed that legislative proposals will be brought forward in due course.

5.7 Proposals for HMOs in the Belfast City Council area are assessed against the policies of the HMO Subject Plan⁷ which provides an area-based planning policy for HMOs. It identifies 22 HMO Policy Areas, within which permission will only be granted for HMOs where the number of HMOs will not as a result exceed 30% of all dwelling units. Only 2 of the 22 areas identified

⁶The Planning (Use Classes) Order (NI) 2004 defines a number of use classes, e.g. shopping and financial and professional services, industrial and business uses and residential uses. There are also certain uses for which no use class is specified. HMOs do not fall within a specified use class.

⁷ The 'Houses in Multiple Occupation (HMOs) Subject Plan for Belfast City Council Area 2015' was published by DoE Planning Service in 2008

were under 30% HMOs at the time of subject plan's publication. In addition, 18 HMO Development Nodes were identified where planning permission for HMOs will be granted. Outside HMO Policy Areas and Development Nodes, HMO development will only be granted where it would not exceed 10% of dwellings on the road or street.

- 5.8 The HMO Subject Plan also contains a specific PBSA policy, namely Policy HMO 7 '*Large Scale Purpose Built Student Accommodation*'. Proposals for HMO development comprising 50 units or 200 occupants or more will be granted planning permission subject to compliance when assessed against 5 criteria contained within the policy, namely:
- *Development of any complex consists of a minimum of 50 units or a minimum of 200 occupants. This will not preclude proposals for smaller incremental extensions or consolidations of existing halls of residence and phased development of larger schemes;*
 - *All units are self-contained (i.e. having a bathroom, w.c. and kitchen available for use by the occupiers);*
 - *The location is not within a primarily residential area;*
 - *Provision is made for management of all accommodation. This may require an Article 40 agreement with Planning Service;*
 - *Landscaping and amenity space is provided in accordance with a landscaping plan indicating all landscaping proposals for the scheme and, where relevant making provision for future maintenance.*
- 5.9 Proposals will also be assessed against other relevant planning policies, including PPS 1 '*General Principles*' which establishes the Department's presumption in favour of development. (The DoE published a draft Strategic Planning Policy Statement (SPPS) - which will in due course supersede PPS 1 - for public consultation in February 2014. The draft SPPS includes a presumption in favour of sustainable development.) In addition, it is noted that the draft Belfast Metropolitan Area Plan identifies a total of 78 '*Development Opportunity Sites*' in Belfast City Centre which are, in principle, suitable for development. It is considered that both the wider, strategic policy context and the operational planning policy context are supportive, in principle, of proposals for PBSA.
- 5.10 Furthermore, it is noted that as DoE assesses proposals against all planning policies and relevant material considerations, there will be occasional circumstances where certain material considerations may outweigh a specific policy failure. It is also noted that where a policy is a negative definition (i.e. stating what will not be permitted) such a policy provides a general guideline but cannot be an absolute bar to a decision that is in the public interest. In such circumstances, individual cases must be considered on their merits to see whether an exception to policy would be justified.
- 5.11 Article 40 of the Planning (Northern Ireland) Order 1991 also permits the Department to enter in legal agreements with any person who has an estate in land for the purpose of facilitating, regulating and restricting the development or use of land. The possible use of such an agreement is noted in relation to Policy HMO 7 Large Scale Purpose Built Accommodation of the HMO Subject Plan.

6.0 Case studies

Introduction

- 6.1 University cities have developed a range of PBSA planning policies to address the matter of purpose-built student accommodation. The policies address a range of issues including strategic context, need, funding, location, management, design quality, impact and planning controls. The two key objectives of policies tend to be firstly, to maximise the benefits of PBSA (for example, supporting a city's knowledge economy) and secondly, avoid or minimise adverse effects (for example, adverse effects on existing communities).
- 6.2 The university cities of Leicester, Manchester and Newcastle illustrate the objectives, scope and nature of planning policies related to PBSA including the criteria which are used to assess proposals, including planning applications, for PBSA. Details of PBSA planning policies for Leicester, Manchester and Newcastle, as well as comment on the cities of Edinburgh and Dundee, are contained within Appendix 3.

Overview

- 6.3 A number of strategic observations can be made about the context for and approaches to the provision of PBSA in the university cities namely:
- (i) the range of significant potential benefits provided by quality PBSA in the right locations including, for example, supporting economic regeneration and the regeneration of sites;
 - (ii) the range of potential disbenefits of student accommodation including adverse impact on residential areas, loss of family housing and cost of street based services;
 - (iii) the value of a criteria-based approach to assessing PBSA proposals which provides flexibility and is appropriate to the particular circumstances of the university city;
 - (iv) the importance of proximity in relation to university campuses as a criterion for PBSA; and
 - (v) the value of a strategic approach which is grounded in evidence (for example, supply and demand/need figures) and capable of facilitating delivery of quality PBSU in the right locations.
- 6.4 A recent market review of student housing (GVA Research Report, Autumn 2012) noted planning policy as a key constraint relating to the provision of PBSA alongside funding, affordable housing provision ratios and Community Infrastructure Levies. The latter two constraints are not applicable at present to Northern Ireland. The Report noted that *'forward funding'* plays a key role in enabling projects to get started and that, whilst planning policy has a key role to play, it will not, in itself, lead to the implementation of PBSA schemes.

7.0 Criteria for assessing proposals for new purpose built student accommodation

Introduction

- 7.1 The Strategic Study for the Holyland and Wider University Area noted the key role that planning will have in shaping the future development of the city in terms of accommodating students and maximising the benefits of the Learning City concept. One of the recommended actions from the strategic study was the development of a new criteria based policy for assessing applications for the provision of managed student housing.
- 7.2 The HMO Subject Plan is a development plan prepared under the provisions of Part III of the Planning (Northern Ireland) Order 1991. Policy HMO 7 Large Scale Purpose Built Student Accommodation is the only current planning policy which explicitly relates to the provision of purpose built student accommodation. Policy HMO 7 applies to proposals that are HMOs and where there are 50 units or 200 occupants or more.

Planning criteria

- 7.3 The criterion-based planning guidance for assessing applications for the provision of purpose built student accommodation, in addition to the provisions of the HMO Subject Plan, could be based upon the following:

Planning permission for purpose built student accommodation will only be granted where all the following criteria are met:

- *Proximity: the development is within 15 minutes walking distance of a university/college campus or on a high frequency public transport route.*
- *Design: the nature, layout and design of the development are appropriate to its location and context and would not result in an unacceptable impact on local character, environmental quality or residential amenity. The development should be designed to deter crime and promote personal safety.*
- *Management: an appropriate Management Plan is in place to minimise potential negative impacts from occupants and the development on surrounding properties and neighbourhoods and to create a positive and safe living environment for students. This may require an Article 40 Planning Agreement with the relevant authority prior to the issue of planning permission (or Article 76 of the 2011 Planning Act).*
- *Impact: the development would not result in an unacceptable impact upon surrounding residential neighbourhoods in itself or when considered alongside existing and approved student housing provision.*
- *Need: the development meets an identified need for the type of accommodation proposed.*

- 7.4 The following explanatory text would be provided with the 5 criteria:

- *Proximity: this criterion seeks to promote sustainable means of travel and minimise car use. Applications should be accompanied by information on the suitability of the location of the proposal. The fifteen minutes (or 1,200m) walking time could rise with the availability of good quality pedestrian and cycle routes. If reliant on public transport or shuttle buses, the PBSA must be on a high frequency public transport route.*
- *Design: this criterion seeks to promote quality in design. Applications should be accompanied by a Design Statement containing a site appraisal and concept design and*

a statement explaining the design objectives for the site, local design considerations and the relationship of the proposal to the surrounding context. Applications should take full account of the principles of 'Secured by Design', a UK project promoting the principles of designing out crime from the built environment. The amount of information and level of detail required will depend on the nature, scale and location of the proposed development. Proposals should not result in unacceptable damage to local character, environmental quality or residential amenity.

- *Management: this criterion seeks to promote well managed PBSA proposals, which provide a safe and positive environment for students, whilst reducing the risk of adverse impacts upon residential amenity. Applications should be accompanied by a Management Plan addressing general management operations, site and landscape maintenance, servicing, security features, CCTV, lighting, intercoms, soundproofing, noise control and tenant behaviour as well as providing a travel plan for staff and students. The Management Plan should include the proposed liaison arrangements with the relevant education institution, the Council and the PSNI in relation to tenant behaviour.*
- *Impact: this criterion seeks to promote and capture the positive impacts of PBSA and student populations whilst reducing the risk of adverse impacts on residential neighbourhoods. The protection of residential amenity is a concern in areas where HMOs are concentrated particularly within the 22 HMO Policy Areas identified in the HMO Subject Plan. Applications should be accompanied by information on existing student housing provision and the impact of the proposal upon demographics and local facilities/ service provision in an area. Information on the (social, economic and environmental) benefits of proposals, as well as any mitigation measures, should also be provided.*
- *Need: this criterion seeks to ensure student housing needs are met. Applications should be accompanied by evidence, as appropriate, of the specific need that is being addressed, why this need is currently unmet, the type of existing accommodation the potential student occupiers are likely to be drawn from and any recorded increase in student numbers. Evidence such as university support, waiting lists and bank funding may be helpful in demonstrating need.*

The explanatory text is subsidiary to and should not distort the meaning of the policy. Planning applications for PBSA should be accompanied by appropriate information which addresses the 5 planning criteria. Other non-residential uses in PBSA schemes, e.g. retail, gyms and restaurants, will be considered against prevailing regional planning policy.

In relation to the draft planning criteria, the following definitions are noted:

- *Purpose-built student accommodation: Accommodation built, or converted, with the specific intent of being occupied by students – either individual en-suite units or sharing facilities.*
- *Shared housing: usually built as family housing, which has changed its use to be occupied by a number of separate individuals sharing the same kitchen and bathroom facilities behind the same front door. This can include flats, apartments and HMOs.*
- *Student housing: a generic term that covers shared housing and purpose-built student accommodation.*

8.0 Comment on additional considerations

Delivery and management of PBSA

- 8.1 The identification of planning criteria for PBSA provides a planning tool to inform the preparation of proposals, assess planning applications and regulate land use in the public interest. However, planning criteria in themselves will not ensure the delivery of quality PBSA which depends on a number of factors including:
- (i) the need/demand for PBSA;
 - (ii) the availability of suitable locations/sites for PBSA;
 - (iii) the viability of individual schemes including the availability of funding;
 - (iv) planning and technical approvals for the particular PBSA scheme; and
 - (v) student management and property maintenance arrangements.
- 8.2 In the Belfast context it is noted that the need for PBSA exceeds the supply, that there is, currently, a specific planning policy for large-scale HMO PBSA (with a criteria-based approach) and that, there are a wide range of sites within walking distance of the three higher education institutions.
- 8.3 The delivery and management of PBSA requires the alignment of items (i) to (v) above. A change in any of the above can affect the delivery and management of quality PBSA. In addition, there are a number of outside factors including the level of demand from international students, the level of university fees, the availability of other development opportunities and budgetary constraints on Universities.

Financial viability

- 8.4 It is considered that a significant constraint, with respect to the provision of PBSA, is financial viability due, among other things, to the absence of a developed private PBSA market and the rents offered by the private rented sector. Initial research has indicated that significant public sector investment or support may be required, perhaps in the form of occupancy guarantees and financial assistance. Further discussions to explore if and how this could be made possible are ongoing.

Current proposals for PBSA

- 8.5 There are a number of current planning applications for PBSA, other speculative PBSA proposals are being considered by private developers and a wide range of existing planning approvals for residential accommodation within the city could be utilised for student accommodation.
- 8.6 In addition, in 2013, the DSD invited developer responses to the '*Northside Development Brief*' which identified 10 potential development sites. The DSD booklet notes that developers may seek to incorporate an element of '*student living*' within proposals for the Press/Library Quarter in Northside, highlights the need to ensure that a balanced and mixed-community is not prejudiced and states that any proposal should be supported by a recognised managing agent or landlord with a successful track record of managing student living within a city centre environment.

Opportunities for further work, regeneration and place shaping

- 8.7 As already noted, no single organisation has the responsibility for the delivery of PBSA. In light of the need for and benefits of PBSA, it is considered that each Department has a role to play in securing the delivery of high quality PBSA. Work being taken forward by the relevant agencies of the Student Housing Joint Team includes:
- use of the planning criteria by Belfast City Council and other Joint Team members as they engage with the statutory planning process;
 - develop the suggested planning criteria into a revised planning policy for PBSA and improve pre-application discussion processes following the Reform of Local Government in April 2015, in the context of a Local Development Plan for Belfast;
 - progress with ongoing regeneration work, including city centre regeneration schemes;
 - progress with legislative proposals following the fundamental review of HMO regulation in Northern Ireland; and
 - further work on understanding financial viability and exploring options for facilitating and, if necessary, assessing the private sector or partnership delivery of PBSA schemes.
- 8.8 Belfast City Council and its partners on the Student Housing Joint Team are committed to promoting equality and good relations and to improving the quality of life for everyone in the city. Actions taken forward will be equality screened as these are progressed and outcomes are identified.

APPENDIX 1 – Codes of practice and accreditation

- A1.1 Codes of Practice establish management standards, appropriate controls and offers higher and further education institutions and students clear and mutually beneficial frameworks for business arrangements.
- A1.2 Codes of Practice may exempt PBSA (owned and/or managed by higher education institutions) in England and Wales from the HMO licensing requirements of the Housing Act 2004.
- A1.3 There are three Codes of Practice related to PBSA that have been approved by the Department for Communities and Local Government, namely:
- Universities UK Code of Practice for the Management of Student Housing (www.universitiesuk.ac.uk/aboutus/AssociatedOrganisations/Partnerships/ACOP/Documents/CodeofPractice.pdf)

The Universities UK Code is structured in eight sections, namely general, health and safety, repair and maintenance management, environmental quality, landlord and tenant relationship, health and wellbeing, anti social behaviour and disciplinary procedures, code administration and compliance.
 - Accreditation Network UK National Code of Standards for Larger Developments (for student accommodation managed and controlled by educational establishments) (www.nationalcode.org/Upload/File/NationalCode_Edu.pdf)
 - Accreditation Network UK National Code of Standards for Larger Developments (for student accommodation not managed and controlled by educational establishments) (www.nationalcode.org/Upload/File/NationalCode_Private.pdf)

The two Accreditation Network UK codes are structured in nine sections, namely general, equal opportunities, marketing prior to letting, during the tenancy, tenant satisfaction, health and safety, the end of the tenancy, disputes and complaints regarding a breach of the code.

APPENDIX 2 – Existing planning policies and other relevant development strategies and policies

Regional Development Strategy 2035

A2.1 The *'Regional Development Strategy'* (RDS) 2035 (published 2012) is the *'spatial strategy of the Executive'* and its purpose is to *'deliver the spatial aspects of the Programme for Government'*. Its aims include, inter alia, supporting strong, sustainable growth, strengthening Belfast as the regional economic driver, improving the well-being of communities and strengthening links between north and south, east and west, with Europe and the rest of the world. It identifies a Spatial Framework for Northern Ireland, Regional Guidance (RG) and Spatial Framework Guidance (SFG). The Belfast Metropolitan Urban Area is the first component of the Spatial Framework and is noted as being *'the major conurbation in Northern Ireland with a thriving retail, service, administration, cultural and educational centre in the City of Belfast.'* RG and SFG relevant to the issue of purpose built student accommodation include:

- RG7: Support urban renaissance.
- RG8: Manage housing growth to achieve sustainable patterns of residential development.
- SFG2: Grow the population of the City of Belfast.
- SFG3: Enhance the role of Belfast City Centre as the regional capital and focus of administration, commerce, specialised services and cultural amenities.

Planning Policy Statement 1 *'General Principles'*

A2.2 Planning Policy Statement (PPS) 1 (published 1998) sets out the Department of the Environment's (DoE) general principles observed in formulating planning policies, making development plans and exercising control of development. It confirms that the planning system exists to regulate the development and use of land in the public interest and sets out a number of key themes central to its approach, namely, sustainable development, quality of design and mixed use development.

A2.3 It contains a presumption in favour of development, namely *'The Department's guiding principle in determining planning applications is that development should be permitted, having regard to the development plan and all other material considerations, unless the proposed development will cause demonstrable harm to interests of acknowledged importance'* i.e. planning permission for PBSA should be granted unless proposals would cause demonstrable harm to interests of acknowledged importance. (The DoE published a draft Strategic Planning Policy Statement (SPPS) - which will in due course supersede PPS 1 - for public consultation in February 2014. The draft SPPS includes a presumption in favour of sustainable development.)

Planning Policy Statement 7 *'Quality Residential Environments'*

A2.4 PPS 7 (published 2001) sets out the Department's planning policies for achieving quality in new residential development, which would include PBSA though there is no specific reference to PBSA within the document. Proposals will only be granted planning permission where it is demonstrated that they will create a quality and sustainable residential environment and conform with certain development control criteria relating to, for example, layout, scale, mass, design, open space provision, parking, restricted mobility access, relationship to adjacent uses and crime/personal safety design considerations.

Addenda to PPS 7 ‘Safeguarding the Character of Established Residential Areas’ and ‘Residential Extensions and Alterations’

- A2.5 The ‘Safeguarding the Character of Established Residential Areas’ Addendum (published 2010) sets out policy provisions which relate to the protection of local character, environmental quality and residential amenity within established residential areas (as well as policy on the conversion of existing buildings to flats or apartments). Planning permission for new residential development will only be granted in established residential areas where the proposed density is not significantly higher than that found in the area, the pattern of development is in keeping with the character and quality of the area and dwelling units are built to defined sizes.
- A2.6 Established residential areas are defined in the document as ‘normally taken to mean residential neighbourhoods dominated by medium to low density single family housing with associated private amenity space or gardens.’ Furthermore, designated city centres and along key and link transport corridors including designated arterial routes are exceptions to the policy. As such, much of the Holyland and Wider University Area, as well as other inner city areas are unprotected by this policy.
- A2.7 The ‘Residential Extensions and Alterations’ Addendum (published 2008) identifies certain criteria to control, for example the scale, massing and design of proposals.

Planning Policy Statement 12 ‘Housing in Settlements’

- A2.8 PPS 12 (published 2005) sets out the four planning control principles of the Department in relation to housing in settlements, namely, increased housing density without town cramming, good design, sustainable forms of development and balanced communities.

Other planning policy statements

- A2.9 Other PPS policies will be applicable to proposals for PBSA. PPS 3 ‘Access, Movement and Parking’ (published 2005) and the related Parking Standards document contains the Department’s policies in relation to access arrangements, parking standards and servicing. There is currently no published parking standard for PBSA. PPS 6 ‘Planning, Archaeology and The Built Heritage’ (published 1999) contains the Department’s policies in relation to listed buildings and conservation areas and, as such, may be relevant depending on the particular location as there are 13 Conservation Areas in Belfast including 4 in the City Centre. Other PPSs, for example, PPS 2 ‘Planning and Nature Conservation’ and PPS 15 ‘Planning and Flood Risk’, may be relevant to the assessment of PBSA proposals depending upon the particular location.

Belfast Urban Area Plan 2001

- A2.10 The ‘Belfast Urban Area Plan’ (BUAP) was adopted in December 1989 and remains the extant plan for the Belfast urban area. It contains a range of strategic objectives including raising the quality of the urban environment, halting population loss, improving and renewing the inner city and encouraging revitalisation and growth in the city centre and its economy.
- A2.11 The BUAP, in relation to the city centre, recognised the need to maintain and strengthen it as the leading commercial and administrative centre in Northern Ireland, noting that major development opportunities are presented by derelict and under used land, particularly on the northern side and along the River Lagan.

Draft Belfast Metropolitan Area Plan 2015

- A2.12 The draft *'Belfast Metropolitan Area Plan'* (BMAP) (published 2004) is at a very advanced stage of preparation and is expected to be adopted in 2013. The draft Plan's Settlement Strategy included recognition of the need for development of a compact and dynamic regional core, to focus development opportunities in existing urban areas and to support and reinforce the role of city and town centres.
- A2.13 Central to the plan's strategy is the identification of 78 Development Opportunity Sites in Belfast City Centre. These sites are all over 0.1h, are *'normally vacant, derelict or are currently used for surface level car parking'* and present opportunities for development.

Houses In Multiple Occupation Subject Plan for the Belfast City Council Area 2015

- A2.14 The preamble to the *'Houses in Multiple Occupation (HMO) Subject Plan'* (adopted 2008) notes that draft BMAP contained criteria for the Conversion of Buildings for Multiple Occupation. Public consultation suggested that the policy *'did not go far enough in addressing issues in relation to HMOS'* and *'lacked a spatial dimension'*. The HMO Subject Plan was prepared in response to these and other emerging concerns regarding the impact of HMOs, which are an important element in student accommodation provision across the city.
- A2.15 The subject plan notes that, under Article 75 of the Housing (NI) Order 1992, a *'house in multiple occupation'* means a house occupied *'by more than 2 qualifying persons, being persons who are not all members of the same family'*. It noted in relation to a *'qualifying person'*, that for that purpose *'a person undertaking a full time course of further or higher education who resides during term time in a house shall, during the period of that person's residence be regarded as residing there as his only or principal residence.'*
- A2.16 The HMO Subject Plan strategy included recognition of the need to protect amenity in areas where HMOs are or are likely to become concentrated, accommodate demand for HMOs whilst protecting community balance, focus HMOs where they can contribute to regeneration and promote appropriate development of purpose built student accommodation.
- A2.17 The HMO Subject Plan identified 22 HMO Policy Areas, within which areas permission would only be granted for HMOs where the number of HMOs would not as a result exceed 30% of all dwelling units. Only 2 of the 22 areas were under 30% HMOs. In addition 18 HMO Development Nodes were identified where planning permission for HMOs will be granted. Outside HMO Policy Areas and Development Nodes HMO development will only be granted where it would not exceed 10% of dwellings on the road or street.
- A2.18 Policy HMO 7 Large Scale Purpose Built Student Accommodation is the only current planning policy which explicitly relates to the provision of PBSA, stating: *Planning permission will only be granted for large scale purpose built student accommodation where all of the following criteria are met:*
- *Development of any complex consists of a minimum of 50 units or a minimum of 200 occupants. This will not preclude proposals for smaller incremental extensions or consolidations of existing halls of residence and phased development of larger schemes;*
 - *All units are self-contained (i.e. having a bathroom, w.c. and kitchen available for use by the occupiers);*
 - *The location is not within a primarily residential area;*
 - *Provision is made for management of all accommodation. This may require an Article 40 agreement with Planning Service;*

- *Landscaping and amenity space is provided in accordance with a landscaping plan indicating all landscaping proposals for the scheme and, where relevant making provision for future maintenance.*

A2.19 The subject plan states that the policy is designed to *‘facilitate the need and demand for multiple occupation, protect the amenity of other residential areas and promote appropriate development of student accommodation.’*

Development Control Advice Note 8 ‘Housing in Existing Urban Areas’

A2.20 Development Control Advice Note (DCAN) 8 (published 2002) provides supplementary planning guidance in relation to residential development. It seeks, among other things, to ensure that urban and environmental quality is maintained and amenity preserved. DCAN 8 promotes a sustainable and design-led approach, and identifies a wide range of design principles and considerations.

Facing the Future – Housing Strategy for Northern Ireland

A2.21 The DSD housing strategy document entitled *‘Facing the Future’* was subject to public consultation in 2012. It identified 5 key themes in relation to a future housing strategy for Northern Ireland, namely:

- Theme 1 – Ensuring access to decent, affordable, sustainable homes across all tenures
- Theme 2 – Meeting housing needs and supporting the most vulnerable
- Theme 3 – Housing and Welfare Reform
- Theme 4 – Driving regeneration and sustaining communities through housing
- Theme 5 – Getting the structures right

A2.22 Whilst, the document makes no specific mention of PBSA, it recognises the potential for housing to address blight, reverse community decline and support city centre regeneration.

Belfast City Centre Regeneration Policy Statement

A2.23 The DSD’s approach to regeneration, in pursuance of its statutory authority, is *‘to promote and implement a comprehensive, integrated and sustainable approach to tackling social, economic and physical regeneration and redressing disadvantage in cities and towns.’* The *‘Regeneration Policy Statement’* (RPS) is the DSD policy statement for Belfast City Centre.

A2.24 The RPS (published 2004) identified the DSD’s plans and priorities under 5 thematic heading, namely, retail, office/business, tourism/leisure, connectivity/public realm and reinforcing city communities. Whilst relating primarily to the issue of Targeting Social Need and without making explicit reference to PBSA, the *‘reinforcing city communities’* theme is relevant insofar as it recognises the need *‘to secure maximum integration between the physical development and economic growth of the City Centre’* and *‘to create a city where people enjoy interacting at all levels during business, social and leisure time.’*

A2.25 Within the context of the RPS, the DSD have prepared or are preparing various Regeneration Frameworks and Development Briefs for areas within the city centre, for example, the *‘Northside Development Brief’* and the *‘Shaftesbury Square Development Framework’*. Such documents, identifying more detailed plans and priorities for specific sites, are potential mechanisms for bringing sites forward for PBSA.

A2.26 The DSD published an *‘Urban Regeneration Potential Study – 2012 Update’* in June 2013. The Report included an assessment of the prevailing socio-economic context and a review of the core sectors considered likely to underpin Belfast City Centre’s development over the next

decade, namely commercial offices, tourism and leisure, residential, creative industries and retail. The Report recommended that the RPS be updated and place greater emphasis on urban living including increased provision of managed student accommodation. The Report recommends the agreement of *'a strategy and policy basis for managed student residential developments within the city centre'*.

Belfast: The Masterplan 2004-2020

- A2.27 The Belfast City Council publication *'Belfast: The Masterplan 2004-2020'* identified 5 key issues for the city, namely governance, growing the city, economy, transport and neighbourhoods, as well as identifying a new spatial perspective based upon an energised core, a connected middle city, integrated neighbourhood renewal, environmental assets and city presentation.
- A2.28 In relation to *'growing the city'*, the Masterplan identified a challenging population growth target of 400,000 by 2025 (the population on the 2011 census day was 280,962 representing only a 1.29% growth since the 2001 census). It identified that population decline must be reversed and to achieve this, the city had to take on a more compact urban form and utilise brownfield assets and underused properties. Population growth was recognised as *'a fundamental economic driver through its regeneration effect on investment, employment, services, infrastructure and transportation.'* The quality of the environment was recognised as critical to this end, particularly in relation to non-traditional residential areas, such as the city centre.
- A2.29 In relation to *'economy'* and the city centre the Masterplan recognised that there was a need to adapt to the changing role of city centres and to promote knowledge-based and creative industries and other mixed and integrated uses. In relation to the *'energised core'*, the Masterplan proposed, inter alia, that the cultural, residential, commercial and retail offering should be improved and diversified, city quarters developed and environmental and architectural quality improved.
- A2.30 In relation to the north and south of the city, the Masterplan recognised the existence of development opportunities, the need for improved connectivity and the need to create sustainable residential communities. The need, in the south of city, to provide for both *'indigenous'* communities and *'transient/student'* populations, in terms of both housing and service provision was also recognised.

APPENDIX 3 – Case studies

Leicester

- A3.1 The University city of Leicester has a '*Student Housing Strategic Planning Document*' (SPD) which notes the need for clear planning controls for new PBSA proposals. The aim of the SPD is to provide greater clarity to developers, universities, local residents and other stakeholders on how the Council will manage the development of new student accommodation. The context for the SPD included the concerns raised by residents regarding the concentrations of students, through PBSA, in traditional residential neighbourhoods or the cumulative impact when considered alongside shared housing.
- A3.2 The SPD noted that clear planning controls on PBSA can both mitigate negative impacts and maximise benefits, for example, through physically regenerating disused sites and buildings, supporting local businesses, generating employment and providing facilities for the wider community. It also noted that PBSA, has less impact on the private housing market and the structure of communities if it is well designed and located.
- A3.3 Leicester City Council's *Core Strategy Policy CS6: Housing Strategy* contains a brief summary of its approach to purpose built student housing. It states that proposals for PBSA will normally be accepted if they meet identified needs, are well designed and managed, can be well integrated with local built form and existing communities and are within walking distance of the main campuses. It also notes that the Council will work in consultation with the Universities to identify need, locations and devise design and management standards.
- A3.4 The *Student Housing SPD* supports *Strategy Policy CS6* by providing greater clarity on how the Council will manage the development of PBSA. The SPD outlines six criteria against which all planning applications for PBSA will be considered, thereby demonstrating their compliance with *Strategy Policy CS6*. The criteria are as follows:

1. The development meets an identified need for the type of accommodation proposed.

At the time of the SPD's adoption in June 2012, the Council considered that the provision of PBSA was nearing capacity. Proposals must, therefore, provide evidence of the specific need they seek to address and why this need is currently unmet, the type of existing accommodation the potential student occupiers are likely to be drawn from and the recorded increase in student numbers, if the proposal aims to meet this need. Evidence of bank funding or of waiting lists for another site in the same ownership would supplement but not sufficiently demonstrate an identified need. Evidence must be available during pre-application discussions and submitted along with the planning application.

2. Development will be encouraged within reasonable walking distance of the two university campuses.

Ten minutes or 800m is given as a general guide, although this would rise with the availability of good quality pedestrian and cycle routes. This criterion seeks to promote sustainable means of travel and minimise car use.

3. The scale of the development including height and massing, should be designed to not adversely conflict with the adjacent properties or the general residential environment of the surrounding area.

Under this criterion, proposals must comply with the Council's existing guidance on designing quality places (Core Strategy Policy CS3) and the Council's *Tall Buildings SPD*. Development within or adjoining existing residential neighbourhoods should be in keeping

with the area's character, massing and height. It is noted that tall, high density PBSA is usually more appropriate to City Centre locations.

4. When considered with existing nearby student housing provision, the development should not have an unacceptable cumulative impact on surrounding residential neighbourhoods.

The unacceptable cumulative impacts are noted as demographic imbalance, strain on local amenity (e.g. noise, parking, litter) and facilities (e.g. recreational spaces) which may result from the development of additional student accommodation in residential areas which already have PBSA schemes and students in shared housing. Unacceptable cumulative impact may be mitigated by limiting the number of bed spaces in new PBSA schemes and by siting schemes in areas where there are not well-established residential neighbourhoods such as the city centre.

5. The layout, standards and facilities provided in the development ensure a positive living experience.

This criterion notes that a high standard environment is important, both for the shorter term student occupants and for the long term viability of a scheme. Seven features, related to this criterion, are identified namely:

(i) Open space provision: PBSA proposals must meet identified needs for green space, sport and recreation provision arising from the development, taking into account local deficiencies. In addition to adequate on-site open space provision, off-site open space contributions may be required, as set out in the Council's *Green Space SPD*.

(ii) Layout and size of bedrooms: a mix of studios (2, 3, 4 and 5 bedroom flats/apartments) is encouraged within new PBSA schemes and bedrooms must meet the inclusive design requirements for size.

(iii) Inclusive Design and Accessibility: in line with *Core Strategy Policy CS3*, individual bedrooms, the accommodation as a whole and the particular site's key access routes must incorporate high levels of accessibility and inclusive design.

(iv) Parking: car parking standards for new student accommodation is outlined in the *Local Plan*, along with cycle, powered two wheeler and disabled parking standards. It is noted that the City-Wide Parking Strategy for Leicester is considering the issue of student accommodation and parking.

(v) Flexibility: new PBSA should be capable of being internally re-configured to meet future general housing needs. Due to differing standards of residential amenity and no requirement to contribute to affordable housing, all applications for student accommodation will be conditioned to limit occupancy to students. Approval to remove this condition at a later date will require demonstration that policy requirements for general needs housing can be met.

(vi) Energy Efficiency and Sustainable Construction: this criterion notes that the best practice energy efficiency and sustainable construction methods in *Core Strategy Policy CS2* must be met.

6. Management: appropriate management is in place to minimise potential negative impacts from occupants or the development on surrounding properties and neighbourhoods and to create a positive and safe living environment for students.

A management plan is expected, including, for example, security doors, CCTV, lighting, intercom, soundproofing and noise control and a travel plan for staff and students.

- A3.5 It is noted that other non-residential uses in student accommodation schemes, for example retail, gyms and restaurants, will be considered against national and local planning policies and guidance.

Manchester

- A3.6 Manchester City Council, as with Leicester, has recognised that the negative impact of students housing on communities is less significant and easier to manage when students are accommodated in large PBSA. The City Council also recognises the potential for PBSA to regenerate parts of the city and also reduce the encroachment of student lets into the traditional family housing sector.
- A3.7 The *'Manchester Student Strategy Implementation Plan'* was developed in 2009 in partnership between Manchester City Council, the University of Manchester and Manchester Metropolitan University. It seeks to address the key issues associated with a large student population, particularly in certain areas of the city. In addition to neighbourhood management, residents' parking schemes and measures to prevent further encroachment of student lets into areas of family housing, a key objective is to provide better student accommodation in appropriate locations.
- A3.8 The three suggested actions to meet the objective of providing better student accommodation are firstly, to put in place criteria for all new PBSA, secondly, to explore the potential for accommodation in non-traditional student areas (to encourage dispersal and support regeneration projects across the city) and thirdly, to encourage PBSA, in line with the previous action, in three specific areas of the city namely Birley Fields, Fallowfield and the Corridor Manchester area. These three areas are in close proximity to the university campuses and are expected to relieve the pressure of students occupying family homes and to reduce the cost of delivering street based services.
- A3.9 The criteria for new PBSA are set out in the *Core Strategy Publication as Policy H12: Purpose Built Student Accommodation*. The ten criteria which proposals must satisfy are as follows.
- (i) Proximity to the University campuses or to a high frequency public transport route. Close proximity is here defined as 300m or easy walking distance.
 - (ii) Compliance with Policy EN5 energy proposal plans, if the scheme is within a designated strategic area for low and zero carbon decentralised energy.
 - (iii) High density development should be sited only where compatible with existing development, where retail facilities are within walking distance and where it will not cause an increase in on street parking.
 - (iv) Preference will be given to proposals that can demonstrate (through impact assessments) a positive regeneration impact in their own right. They should contribute to providing a mix of uses, support district and local centres in line with Strategic Regeneration Frameworks, local plans and other masterplans and closely integrate with existing neighbourhoods, contributing to vibrancy without increasing pressure on services to the detriment of residents.
 - (v) Designed to be safe and secure for users, avoid causing a crime increase in the surrounding area but rather assist in improving safety of surrounding area for example through informal surveillance.
 - (vi) Appropriate design and layout of accommodation and siting of individual uses within the overall development in relation to adjacent neighbouring uses. This is to reduce unreasonable

effects on residential amenity such as noise or impact on street scene, whether from development itself or when combined with existing accommodation.

(vii) Where appropriate, proposals should contribute to the re-use of listed buildings and other buildings with particular heritage value.

(viii) Consideration to be given at an early stage to the provision and management of waste disposal within the development.

(ix) Demonstrate need in terms of waiting lists for existing places or formal agreement with University for supply of bed spaces as there is now a potential oversupply.

(x) Demonstrate to the City Council that proposals are deliverable. The Council will not support speculative proposals, where there is a possibility that planning permission will not be implemented.

A3.10 The preamble to Policy H12 states that priority will be given to schemes which are part of the universities' own redevelopment plans or which are being progressed in partnership with the universities and which clearly meet the Council's regeneration priorities.

A3.11 Manchester City Council's '*Student Housing Market Report for Resolution*' (5th February 2013) notes that large, bespoke student apartment developments has helped facilitate a shift toward the city centre and city centre fringe and also decreased the demand for traditional student halls. There has been a significant expansion in the quantity of PBSA close to the two universities. Importantly, the report also cites a January 2013 decision by the Planning Inspectorate regarding the refusal of permission as overwhelmingly supportive of the policy approach set out in the Core Strategy.

Newcastle

A3.12 Newcastle City Council's '*Interim Planning Guidance on Purpose Built Student Housing*' (November 2007) offers specific guidance on PBSA to support the objectives of the '*Newcastle Local Development Framework*' (LDF) and the '*Newcastle Housing Strategy: Homes for a Sustainable Future*' (2006). These documents sought to promote PBSA in Newcastle.

A3.13 The *Housing Strategy* states that housing provision must keep pace with University growth plans and the requirements of Newcastle's 'Science City' project. One key aim of the *Housing Strategy* is '*to build 6000 additional units of student housing, as much as possible in purpose built and managed accommodation*' by 2021. According to *Newcastle in 2021-Regeneration Strategy for Newcastle*, the provision of a mix of student housing is vital to ensuring the city remains an attractive student destination. The *Interim Planning Guidance* frequently referred to a quantitative shortfall in PBSA, since demand for bed spaces outstripped the supply which could accommodate only 21% of fulltime students. It also noted that this proportion was falling as student numbers increased and certain halls of residence reached the end of their operational lifespan. It also referred to a qualitative shortfall in PBSA, with the Universities suggesting that new, quality bed spaces, which meet students' aspirations, would create further demand for quality bed spaces, especially among continuing students.

A3.14 The overall aim of the *Interim Planning Guidance on Purpose Built Student Housing* document was to promote and enable the development of a range of purpose built student housing schemes in suitable, sustainable locations. It had four objectives namely:

(i) to develop a robust basis upon which to progress, monitor and manage delivery of PBSA;

(ii) to inform policy development in the Local Development Framework (LDF) which was under preparation at the time;

(iii) to provide a range of suitable available sites to support the growth of the Universities;

(iv) to deliver the government objective of ensuring everyone has the opportunity of a decent home.

A3.15 The Council applies the existing relevant *Unitary Development Plan* (UDP) policies until they are superseded by the relevant LDF policy. Thus, the UDP Policy H1.5 states that applications for planning permission for student accommodation will be considered against the following criteria:

(i) proximity of the site to the campus, or a suitable location within the city centre or district centre;

(ii) satisfactory conversion or redevelopment of non-residential premises;

(iii) suitable conversion and/or adaptation of Local Authority Housing stock;

(iv) convenient access to a good public transport service.

A3.16 Allied to the above, it was noted that Policy H2 on protection of residential amenity and Policy EN1.1 seeking high standards of design would also apply.

A3.17 The document's additional planning guidance takes the form of a scoring framework, developed to assess the overall suitability of sites for PBSA. However, it is noted that the site's score would not prejudice the consideration of any planning application. The limitations of site scoring are also noted e.g. the exclusion of complex additional site-specific factors for which a scoring approach is inappropriate. Approximately fifty sites were identified by the City Council, mostly within and at the edge of the City Centre. Sites are given a score between 0 and 10 for five criteria, namely accessibility to campuses, site size/capacity, planning merits, regeneration merits and availability/timescales. The totalled score indicates the site's suitability, with sites scoring nearest fifty being considered the most suitable.

A3.18 Further information is provided on the five criteria:

(i) Accessibility: accessibility is measured by recording the quickest available travel time from site to campus, including walking and waiting times if applicable. Since three campuses are being considered, the highest of the three accessibility scores will be taken. Cycle times and accessibility for the less mobile are both recognised but not included in the scoring system, due to the importance of the quality of these routes rather than simply travel time. A score of ten indicates campus is within a journey time of 5-10 minutes, while a score of zero indicates accessibility only by car or a public transport journey time of longer than 40 minutes.

(ii) Site size and capacity: this is estimated using a combination of a density multiplier approach (assuming 30m² GIA per bed space) and a design-led approach involving site-specific characteristics and allowing for a potential mix of uses. While the Council recognises smaller schemes may suit certain groups of students, the highest score is given to the site with the highest theoretical capacity i.e. a score of ten for sites with over 500 bed spaces. This is justified on the basis of substantial need for PBSA and on advice from universities and student housing developers that developments frequently become commercially viable once the threshold of 350-400 bed spaces has been reached.

(iii) Planning merit: this considers site accessibility, supporting infrastructure, whether the land was designated for a particular purpose in the *Unitary Development Plan*, compatibility with

surrounding land uses and the impact on residential amenity in the area. Sites with no conflicts with surrounding land uses and no detrimental impact on residential amenity are given a score of ten, while those with significant conflicts and impact are given zero.

(iv) Regeneration merit: this refers to a site's potential for regenerating areas by complementing existing or proposed uses, bringing forward brownfield development sites and re-using existing buildings. Constraints such as limited shopping and leisure facilities reduce a site's score.

(v) Site availability and timescale: under this criterion, a site is scored according to site ownership and current activity. An immediately available site in 100% public ownership or in single private ownership scores ten, while sites with complex land assembly issues and projected long-term activity score zero.

Edinburgh

A3.19 In Edinburgh the Council was concerned that only 2,900 bed spaces for PBSA were granted approval between 2002 and 2009 during which the student population had increased by 20,000. Thus, the Edinburgh Planning Guidance states that:

Planning permission will be granted for purpose-built student accommodation where:

- (a) the location is appropriate in terms of access to public transport and university and college facilities; and*
- (b) the proposal will not result in an excessive concentration of student accommodation in any one locality.*

A3.20 The above objectives are developed further in locational guidance:

- In and adjacent to main campuses further student housing will generally be acceptable.*
- In other locations with good access to university and college facilities by public transport or by walking or cycling, purpose built student housing will be acceptable provided it will not result in a student population of 30% or more in the locality (data zone).*
- Elsewhere student housing will generally not be permitted.*

A3.21 It is noted that in locations outside the identified campuses, proposals need to be accompanied by a Planning Statement justifying the suitability of the location for student housing.

Dundee

A3.22 In Dundee, the two universities have or are disposing of student accommodation in sites remote from the campus areas due to changing student preferences and the increasing requirements of HMO licensing legislation.

A3.23 The Local Plan identifies sites that are appropriate for student housing and the Student Housing Policy notes that student housing proposals on sites within 15 minutes walking distance of the universities will be supported where they are in accordance with other Local Plan policies. The Council notes that it may prepare a site planning brief for student housing.



Prepared by Fleming Mounstephen Planning on behalf of
Belfast City Council and partners on the Student Housing Joint Team.

For more information contact:

Belfast City Council
Cecil Ward Building
4-10 Linenhall Street
Belfast
BT2 8BP

Telephone: +44 (0) 28 9032 0202
Textphone: +44 (0) 28 9027 0405
Email: environmentalhealthservice@belfastcity.gov.uk
www.facebook.com/belfastcitycouncil
www.twitter.com/belfastcc