

Our Ref: MR/BH/23214  
Your Ref:

E-mail:   
Date: 7<sup>th</sup> November 2017

Planning Department  
Nottingham City Council  
Loxley House  
Station Street  
Nottingham  
NG2 3NG

Dear Sir/Madam,

## **NOTTINGHAM CITY COUNCIL LOCAL PLAN PART 2 PROPOSED SUBMISSION 2017 REPRESENTATIONS ON BEHALF OF FUTURE GENERATION**

I write on behalf of my client, Future Generation who is a student accommodation operating platform, to submit representations to Nottingham City Council Local Plan Part 2 'Proposed Submission' 2017. This follows the previous consultation on the publication version consultation from 29<sup>th</sup> January to 11<sup>th</sup> March 2016. Whilst Future Generation broadly supports the overall strategic approach taken towards student accommodation by the Council, they would seek to address policy points and requirements raised within the draft document. This is in regards to the implications these could have on the development potential of student housing in the City.

### **Introduction**

Future Generation designs, builds, manages and operates outstanding student accommodation and networking facilities across the UK. They have selected key university towns and cities to roll out their development programme over the next 5 years. Future Generation is keenly focused on providing students with high quality accommodation at great value for money with focus on amenity space this section of the UK market suffering from the most acute pressure of under supply. The accommodation comprises ensuite rooms and studio apartments with ultra-high speed wifi and high quality amenity spaces to socialise.

### **Background to Representations**

Southern Grove Traffic Street Ltd has aspirations to develop and operate student accommodation under their Future Generation platform within Nottingham and have a site specific interest. They are currently preparing a planning application for 113 student apartments at their site at Traffic Street/Waterway West Street (see **appendix 1**). This proposal seeks to support the Southside Regeneration Zone and will facilitate the development of this area through reconnecting the local area with the City Centre through the provision of high quality student accommodation development. The site comprises a private car park and the former Plum Center.

### **Representation to 'Nottingham City Council Local Plan Part 2 Proposed Submission 2017'**

These representations are submitted in general support of the Nottingham City Council Local Plan Part 2 'Proposed Submission' version, mindful of the development aspirations of Southern Grove Traffic Street Ltd. These representations are made with particular interest to their site at Traffic Street/Waterway West Street and the wider provision of Purpose Built Student Accommodation (hereafter 'PBSA') within Nottingham. Representations are thus submitted:

5316	1. To support the provision PBSA development within Nottingham at sustainable locations
5317	and for their specific site given its location in the Southside Regeneration Zone within the City Centre;
5318	2. To encourage the Council to amend draft policy HO5 'Purpose Built Student Accommodation' to be more flexible with regards for the requirement to identify the need for PBSA;
5319	3. To support and promote draft policy HO6 with regards to the provision of PBSA and the need for this to support inclusive communities and reduce the significant concentrations of HMOS;
5320	4. To facilitate regeneration through the development of brownfield sites and specifically support the regeneration objectives of the Canal Quarter and diversify the identified uses through the development of student accommodation;
5321	5. To recognise the need to provide developer contributions and that these will be reasonable in relation to the proposed development. We note there are no specified developer contributions for PBSA in the draft Local Plan.

Delivery of Student Housing and Accommodating Growth

The contribution of the UK's Higher Education Sector is vital for the UK economy's growth. In the last 10 years, the demand for purpose built student accommodation has more than doubled. It is therefore necessary that sufficient infrastructure is delivered to support growing numbers of students throughout the UK. The investment and yield in the student housing sector is projected only to increase further in the coming years through portfolio based activity and sustained capital investment from foreign markets. The British Property Federation (BDF) in their manifesto, *Making the Grade*, highlight the importance of PBSA in aiding the expansion of the Higher Education Sector over the past 20 years. With this expansion, the Higher Education sector in the UK has experienced an increase of both international and UK students with multiplier effects on the UK workforce and economy.

Paragraph 38 of the NPPF states that:

**“All student accommodation, whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus, can be included towards the housing requirement, based on the amount of accommodation it releases in the housing market. Notwithstanding, local authorities should take steps to avoid double-counting”.**

It is therefore vital that housing requirement is objectively assessed through the inclusion of student housing need from the outset so as to form part of the overall housing land supply over the duration of the plan period.

5316 We therefore strongly support the clear theme of support for PBSA in the draft Local Plan 'Proposed Submission'. Specifically the Council's statement at paragraph 4.48 of the draft Local Plan which outlines the principle support towards the provision of high quality PBSA which further notes that PBSA provides an alternative to the general housing stock and contributes to helping create sustainable communities.

Draft Local Plan Policy HO5 'Locations for Purpose built student accommodation'

Draft Local Plan Policy HO5 states that 'PBSA of an appropriate scale and design will be encouraged in the following locations:

1. Allocated sites where student accommodation use accords with site specific development principles;
2. University campuses;

3. Within the city centre boundary (as shown on the policy map) subject to accordance with the site and area specific policies including relevant 'quarter policies' but excluding the areas of predominantly family housing;
4. Above shopping and commercial frontages within defined Town, District and Local centres and within other shopping and commercial frontages on main transport routes where this assists in the regeneration of underused sites and premises and is consistent with relevant defined Centre policies; and
5. Sites where student accommodation accords with an approved SPD.

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We support the areas identified by the draft policy for student accommodation in terms of their sustainability and proximity to both Universities and facilities. However, the draft policy goes further to state that this is "subject to developers demonstrating there is a need for additional student accommodation or that they have entered into a formal agreement with a University or another provider of Higher Education for the supply of bed spaces created by the development". We note that this addition to the policy text has been introduced at this late stage of consultation on the draft Local Plan.

Whilst we support this policy for its encouragement of PBSA within sustainable locations, we believe it should be more flexible in terms of the requirement to demonstrate a need through formal agreements. We believe that the requirement to provide evidence to support the need for student accommodation is onerous and the policy should have consideration of the vital wider benefits that student accommodation brings to the localities identified and should therefore not be restricted.

Though Future Generation understands that the delivery of student housing needs to be managed in accordance with strategic need and local priorities and development principles, the council should look to demonstrate greater flexibility in its ability to be pragmatic towards projected increases in student numbers and the wider benefits that students bring. Given the total removal of student admission controls unsurprisingly this has resulted in an upward trend in the number of students applying to University and subsequently being accepted onto undergraduate degrees in England over the last three years since the relaxation. More importantly, this has enabled the opportunity for some Universities to expand their institutions in light of the additional numbers.

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Paragraph 4.44 of the draft 'Pre-submission' Local Plan identifies that approximately 38,500 full time students attended university in Nottingham City between 2016- 2017. This figure accounts for 12% of the population making it even more important to deliver the necessary supporting infrastructure including PBSA to consolidate their growth. Therefore there is clear evidence that there will be a continued demand for student accommodation within the city.

The draft policy should therefore have greater consideration to the wider benefits that the delivery of PBSA and that it can bring to the delivery of more conventional forms of housing. The deliverability of student housing plays an important role in meeting housing needs with student housing is known to impact on local housing markets and economies in the following ways:

- Release of market housing and the alleviation of concentrations of HMOs to family housing. This can effectively relieve the current pressure of certain areas in the City currently experiencing high concentrations of HMOs with the increase of students;
- Strong demand for higher quality university product amongst International and Post-graduate students thus stimulating further investment;
- PBSA has played an integral role in allowing the HE sector to expand over the past 20 years and supporting local economies;
- Student Housing can be far more suitable for certain central location sites, particularly wherein site circumstances would not allow for the levels of amenity space provision required in larger residential schemes.

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Therefore we would encourage the Council to allow for more flexibility within the wording of draft Policy HO5 and remove the requirement to provide evidence of an identified need for PBSA. The deemed suitable locations for PBSA as identified by the draft policy are sustainable in terms of their proximity to key facilities and universities. The overall provision of PBSA supports the localised and wider economy therefore providing significant regeneration benefits and this should further be recognised in the policy text.

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Draft Local Plan Policy HO6- HMOs and Purpose Built Student Accommodation

Draft Policy HO6 'HMOs and Purpose built student accommodation' states that HMO developments and PBSA will only be allowed if they address local objectives and contribute towards creating or maintaining sustainable, inclusive and mixed communities. The policy sets out criteria for both HMOs and PBSA to meet, these are generally supported by Future Generation with regards to the re-use of brownfield sites and supporting wider regeneration benefits. However, we still make representations to the requirement to demonstrate need for new PBSA as outlined above and this reference should be removed from this policy to allow for more flexibility.

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The supporting policy text of the draft local plan notes the increasing need for PBSA and that half of student accommodation needs are met by the general housing stock. It further notes neighbourhoods where there are significant concentrations of HMOS which have detrimental social, economic and environmental impacts. The text further states that these significant concentrations have an undermining effect on local objectives to create and maintain sustainable and mixed communities. We therefore reiterate the representation to enable a more flexible approach to the policy for PBSA and encourage the requirement to evidence the need to be removed.

An additional point to this policy which has been included through this consultation is "whether the proposal in respect of purpose built student accommodation includes appropriate room sizes and provides adequate communal space/facilities and student drop off/collection arrangements". Future Generation as a developer and operator look to provide very high quality student accommodation and one of their key development aspirations is to provide 'student hubs' within their development through the provision of common rooms, roof terraces and other social facilities/infrastructure to enhance the student experience.

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Draft Local Plan Policy RE1 'Facilitating Regeneration'

Draft Policy RE1 'Facilitating Regeneration' supports proposals for development which:

- "b) Maximise the potential of the site and are of an appropriate scale, density, design and use commensurate to with the regeneration ambitions for that area; and**
- c) Assist in enabling the appropriate wider regeneration of brownfield sites."**

We strongly support this draft policy and the consideration of the development of brownfield sites of an appropriate scale, density, design and use to support regeneration aspirations. This is in line with the NPPF, supporting development in sustainable locations and making the best use of land and resources. Future Generation's site at Traffic Street and Waterway West Street is the development of a brownfield site which will facilitate regeneration of a wider are within the city centre.

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Future Generation's site is located within the draft Policy Area 'Canal Quarter' and aspires to assist in its regeneration through their proposed development at the former plumb centre. We therefore

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strongly support Policy RE2 'Canal Quarter' and the promotion of student accommodation in regenerating the area.

Draft Local Plan Policy IN4 'Development Contributions'

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The draft Local Plan policy notes that development will be expected to meet the reasonable costs of new infrastructure of services required as a consequence of the proposal. This is generally supported and we note that the policy provides an overview of likely developer contributions. We support the inclusion of this but costs should meet the relevant planning tests.

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I trust these comments will be taken into consideration in the development of the Local Plan document. In the interim, if there are any queries please do not hesitate to contact either myself or Bethan Hawkins.

Yours faithfully,



MATTHEW ROE  
Director

# APPENDIX 1

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