

Appendix B – PBSA Policy Review

Area	Wording	Other <i>detail in policy</i>	Notable Differences / Matters of Note
London Plan (2021) Policy H15	Boroughs should seek to ensure that local and strategic need for purpose built student accommodation is addressed, provided that: 1. at the neighbourhood level, the development contributes to a mixed and inclusive neighbourhood 2. the use of the accommodation is secured for students 3. the majority of the bedrooms in the development including all of the affordable student accommodation bedrooms are secured through a nomination agreement for occupation by students of one or more higher education provider 4. the maximum level of accommodation is secured as affordable student accommodation as defined through the London Plan and associated guidance: a. to follow the Fast Track Route, at least 35 per cent of the accommodation must be secured as affordable student accommodation or 50 per cent where the development is on public land or industrial land appropriate for residential uses in accordance with Policy E7 Industrial intensification, co-location and substitution b. where the requirements of 4a above are not met, applications must follow the Viability Tested Route set out in Policy H5 Threshold approach to applications, Part E c. the affordable student accommodation bedrooms should be allocated by the higher education provider(s) that operates the accommodation, or has the nomination right to it, to students it considers most in need of the accommodation. 5. Boroughs, student accommodation providers and higher education providers are encouraged to develop student accommodation in locations well connected to local services by walking, cycling and public transport, as part of mixed-use regeneration and redevelopment schemes.	The overall strategic requirement for PBSA in London has been established through the work of the Mayor's Academic Forum, and a requirement for 3,500 PBSA bed spaces to be provided annually over the Plan period has been Identified The strategic need for PBSA is not broken down into borough-level targets as the location of this need will vary over the Plan period with changes in higher education providers' estate and expansion plans, availability of appropriate sites, and changes in Government policy that affect their growth and funding. To demonstrate that there is a need for a new PBSA development and ensure the accommodation will be supporting London's higher education providers, the student accommodation must either be operated directly by a higher education provider or the development must have an agreement in place from initial occupation with one or more higher education providers, to provide housing for its students, and to commit to having such an agreement for as long as the development is used for student accommodation.	Affordable housing policy (not standard definition, instead links rents to the maximum London maintenance loan) All "affordable rooms" must be located within the nominated bed-spaces (see below) to ensure the educational institution can allocate those rooms to students most in need and align that process with their various policies and strategies on mental health, access and participation etc. Set annual target number of bed spaces, but no borough level targets Nomination agreement policy much more specific than existing Manchester requirement to <i>'demonstrate that 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 all or some of the bedspaces'</i> Nomination agreements are contracts between the PBSA provider and a university where there is a commitment from the university to provide a minimum number of students each year for a fixed period, typically 5 years (although agreements can be for as many as 25 years). Prior to this 2021 policy, according to Cushman and Wakefield's 2019/20 UK Student Accommodation Report; only 26% of privately owned PBSA had Nomination Agreements in place.
Camden Policy H9	The Council will aim to ensure that there is a supply of student housing available at costs to meet the needs of students from a variety of backgrounds in order to support the growth of higher education institutions in Camden and Camden's international academic reputation.	Estimated the need for additional student housing in Camden by multiplying the London requirement by the borough's share, giving a range	Specific reference to supporting new development that provides a range of accommodation that is affordable to the student body as a whole.

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	We will seek a supply of student housing to meet or exceed Camden’s target of 160 additional places in student housing per year and will support the development of student housing provided that the development: a. will not involve the net loss of 2 or more self-contained homes; b. will not prejudice the Council’s ability to meet the target of 742 additional self-contained homes per year; c. will not involve a site identified for self-contained housing through a current planning permission or a development plan document unless it is shown that the site is no longer developable for self-contained housing; d. complies with any relevant standards for houses in multiple occupation (HMOs); e. serves higher education institutions that are accessible from it; f. includes a range of flat layouts including flats with shared facilities wherever practical and appropriate; g. has an undertaking in place to provide housing for students at one or more specific education institutions, or otherwise provide a range of accommodation that is affordable to the student body as a whole; h. will be accessible to public transport, workplaces, shops, services, and community facilities; i. contributes to creating a mixed, inclusive and sustainable community; and j. does not create a harmful concentration of such a use in the local area or cause harm to nearby residential amenity Where proposed student housing development is not robustly secured as student housing that provides accommodation affordable to the student body in accordance with criterion (g), the Council will expect the development to provide an appropriate amount of affordable housing for general needs having regard to Policy H4 Maximising the supply of affordable housing. We will resist development that involves the net loss of student housing unless either: k. it can be demonstrated that the existing accommodation is incapable of meeting contemporary standards or expectations for student housing; or l. adequate replacement accommodation will be provided that satisfies criteria (a) to (j) above;	of from 117.5 to 204.6 places per year. Concern around not limiting homes available for other residents through providing student housing	Also states that more general affordable housing policy will be applied to those developments where developments are not robustly secured as student housing. Furthermore, advises that loss of student accommodation will be resisted unless it can be proven that it is not up to standard or that appropriate replacement accommodation will be provided.

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	m. it can be demonstrated that the accommodation is no longer needed because the needs of students at the institutions that it serves can be better met in existing accommodation elsewhere. Where the Council is satisfied that a development involving the loss of student housing is justified, we will expect it to create an equivalent amount of floorspace in another permanent housing use, such as self-contained housing (in Use Class C3), including an appropriate amount of affordable housing, having regard to Policy H4.		
Reading Policy H12	New student accommodation will be provided on or adjacent to existing further or higher education campuses, or as an extension or reconfiguration of existing student accommodation. There will be a presumption against proposals for new student accommodation on other sites unless it can be clearly demonstrated how the proposal meets a need that cannot be met on the above sites.	The justification for policy H12 is set out in section 4.43 (p138-141) of the Local Plan Background Paper (EV002). This looks at the evidence for the need for new accommodation, from both the Strategic Housing Market Assessment and information prepared on behalf of the University of Reading and sets this in the context of the planning pipeline for new student accommodation. It is considered that this existing need should mainly be met on campus or through reconfiguration and redevelopment of existing halls of residence, subject to considerations of amenity and character. This Local Plan identifies two sites for student accommodation in locations which do not comply with the above policy. In both cases, there are specific circumstances which justify these allocations. One site has planning permission for student accommodation and the other is a listed prison building of considerable historic sensitivity which may be a challenge to re-purpose and therefore use options are being kept open.	Less criteria based than Manchester but still seeking to influence the spatial pattern of new PBSA to those sites closest to the University Campus. We understand that a recent appeal has been dismissed where a developer sought to challenge this policy. Key issues included conflict with Policy H12 and also highways safety concerns associated with the proposed development.

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Leeds Policy H6	b) Development proposals for purpose built student accommodation will be controlled: i. To help extend the supply of student accommodation taking pressure off the need for private housing to be used, ii. To avoid the loss of existing housing suitable for family occupation, iii. To avoid excessive concentrations of student accommodation (in a single development or in combination with existing accommodation) which would undermine the balance and wellbeing of communities, iv. To avoid locations which are not easily accessible to the universities by foot or public transport or which would generate excessive footfall through residential areas which may lead to detrimental impacts on residential amenity; v. The proposed accommodation provides satisfactory internal living accommodation in terms of daylight, outlook and juxtaposition of living rooms and bedrooms.	The City's universities and specialist colleges are an important part of the Leeds economy, but significant growth in student numbers in the past has led to high concentrations of student housing in areas of Headingley, Hyde Park and Woodhouse. This generated concerns about loss of amenity to long term residents as well as wider concerns about the loss of housing suitable for families. Growth in this accommodation is to be welcomed in order to meet need and to deflect pressure away from private rented houses in areas of over-concentration. Nevertheless, care is needed to ensure that purpose built accommodation does not itself become over-concentrated and is located with good access to the universities.	Emphasis on the role of PBSA in terms of relieving pressure on private housing. No affordability requirement Some wellbeing criteria with regard to point v No reference to University support or sponsorship Not much of a spatial dimension to the policy other than accessibility to the universities via foot or public transport and a preference to avoid excessive footfall through established residential areas.
Nottingham Policy HO5	Purpose built student accommodation of an appropriate scale and design will be encouraged in the following locations, subject to developers demonstrating that 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 bedspaces created by the development: a) allocated sites where student accommodation use accords with site specific Development Principles; b) University campuses; c) within the City Centre boundary (as shown on the Policies Map), subject to accordance with site and area specific policies, including relevant 'Quarter Policies' but excluding the areas of predominantly family housing; d) 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	The preferred locations for purpose built accommodation have been informed by a range of factors including accessibility and convenience for users, regeneration potential, relationship with surrounding neighbourhoods and uses, compatibility with Town Centre policies and any relevant site or area development strategy, suitability/safeguarding of areas or sites for alternative beneficial uses, viability considerations and views generated through consultation processes. The evidence of 'need' for additional student accommodation should include, but not be limited to, capacity	Broader than Manchester in terms of spatial criteria. Nottingham has also recently adopted Affordable Housing Contributions from PBSA document (2021)

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	sites and premises and is consistent with relevant defined Centre policies;	assessment of existing stock (both University and privately owned stock) including any waiting lists for existing places, an appraisal of schemes in the planning pipeline (under construction, with planning permission and current applications), consultation with Higher Education providers and reference to the Council's latest Authority Monitoring Report which contains information on student numbers and completed bed spaces.	
Policy H06	1. Planning permission for the following development will only be granted where it does not conflict with Policies HO1 and HO2 and does not undermine local objectives to create or maintain sustainable, inclusive and mixed communities: a. changes of use and / or the erection of buildings to create new Houses in Multiple Occupation (HMOs); b. extension / alteration of existing HMOs including development that facilitates an increase in the number of occupiers / bedspaces; c. changes of use and the erection of buildings which include the creation of residential accommodation for exclusive occupation by students (e.g. purpose built student accommodation); d. extension / alteration of purpose built student accommodation resulting in an overall increase in the number of student bed spaces. 2. In assessing the development's impact on local objectives to create or maintain sustainable, inclusive and mixed use communities, regard will be given to the following criteria: a. the existing proportion of HMOs and / or other Student Households in the area and whether this proportion amounts or will amount to a 'Significant Concentration' (calculated using the methodology shown in Appendix 6) apart from	Areas with a 'significant concentration' of HMOs / Student Households are identified using Council Tax information to map the properties where student exemptions apply combined with Environmental Health records of properties known to be in use as HMOs. Where there is already a 'Significant Concentration' of HMOs and/or student households in an area, calculated using the methodology in Appendix 6, planning permission will therefore not usually be granted for further HMOs or Purpose Built Student Accommodation unless the PBSA complies with Policy HO5. A 'Significant Concentration' is considered to be 10%. 'Significant Concentrations' do not exist in the majority of the Nottingham City area, which is a highly urban authority with excellent	The idea of defining a threshold for the proportion of students in an area as a means of maintaining "<i>sustainable, inclusive and mixed use communities</i>" and potentially using that as a mechanism for refusing planning permission. Nb. this is based on defined output areas and situations where 10% or more of households are PBSA / Student HMOs.

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	PBSA within areas identified in Policy HO5 where new PBSA is encouraged; b. the individual characteristics of the building or site and immediate locality; c. any evidence of existing HMO and purpose built accommodation provision within the immediate vicinity of the site that already impacts on local character and amenity; d. the impact the proposed development would have on the character and amenity of the area or site having particular regard to the criteria set out in Policies DE1 and DE2; e. whether the proposal would incorporate adequate management arrangements, and an appropriate level of car and cycle parking having regard to the location, scale and nature of the development f. whether the proposal would result in the positive re-use of an existing vacant building or site that would have wider regeneration benefits; g. whether adequate evidence of the need for new purpose built student accommodation of the type proposed has been provided; h. whether new purpose built student accommodation is designed in such a way that it can be capable of being re-configured through internal alterations to meet general housing needs in the future; and i. whether the proposal in respect of purpose built accommodation includes appropriate room sizes and provides adequate communal space/ facilities, and student drop off/ collection arrangements.	public transport serving all areas. The application of a 10% threshold is considered to strike an appropriate balance between meeting HMO and student accommodation needs within the City and supporting the objective of creating sustainable, inclusive and mixed communities.	
Birmingham Policy TP33	Proposals for purpose built student accommodation provided on campus will be supported in principle subject to satisfying design and amenity considerations. Proposals for off campus provision will be	N/A	No specific reference to University sponsorship for sites off campus No affordability criteria.

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	considered favourably where: • There is a demonstrated need for the development. • The proposed development is very well located in relation to the educational establishment that it is to serve and to the local facilities which will serve it, by means of walking, cycling and public transport. • The proposed development will not have an unacceptable impact on the local neighbourhood and residential amenity. • The scale, massing and architecture of the development is appropriate for the location. • The design and layout of the accommodation together with the associated facilities provided will create a safe, secure and welcoming living environment.		Criteria less broad ranging than MCC's criteria.
Liverpool CC25	1. Proposals for purpose-built student accommodation will be supported within the Knowledge Quarter (KQ Liverpool) area. 2. Planning permission will not be granted for student accommodation within the Marybone neighbourhood as shown on the City Centre Policies Map. 3. Elsewhere in the City Centre, proposals should clearly demonstrate that the proposal: a. Accords with the objectives of the City Centre Strategic Investment Framework; b. Is located in close proximity to the University Campus locations; c. Does not have an adverse impact, including cumulative impact on long-established residential communities; d. Does not conflict with neighbouring uses / activities and does not lead to the displacement of existing uses / activities to the detriment of the local area; and e. Does not adversely impact on the commercial role of the City Centre. 4. Particular encouragement will be given to schemes that incorporate cluster accommodation, support regeneration initiatives and are designed to be capable of future adaptation to other uses.	A key recommendation of the Student Accommodation Review (2015) was that the City Council should introduce zones of opportunity to encourage/ direct purpose built development into the most suitable areas of the City Centre. This policy therefore develops a locational approach to student accommodation in the City Centre to ensure it is focussed in the most suitable locations and does not conflict with existing business and residential uses. The most suitable area' is considered to be in the Knowledge Quarter (KQ Liverpool) area of the City Centre. This area should therefore be the primary focus for student accommodation.	Like Manchester, favours a specific location for PBSA and is more directive in advising that PBSA will not be supported in other area of the city centre. Makes specific reference to encouraging designs that are capable of future adaption to other uses.

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	5. All proposals should also comply with the requirements in Parts 2 and 3 of Policy H5	The Marybone neighbourhood is considered to be the least suitable area for further student accommodation. It is a low-rise, small close-knit residential community which has experienced significant growth of high-rise purpose-built student accommodation to such an excess that community cohesion is being undermined.	
Sheffield	Mixed communities will be promoted by encouraging development of housing to meet a range of housing needs including a mix of prices, sizes, types and tenures, and - providing housing for a broad range of smaller households in the City Centre and other highly accessible locations where no more than half the new homes in larger developments should consist of a single house type; - requiring a greater mix of housing in other locations, including homes for larger households, especially families; - providing new purpose-built student accommodation as part of a mix of housing development, with a mix of tenures and sizes of unit on larger sites, primarily in the City Centre and the areas directly to the north west and south of the City Centre; - limiting new or conversions to hostels, purpose-built student accommodation and Houses in Multiple Occupation where the community is already imbalanced by a concentration of such uses or where the development would create imbalance	The objectives of this policy will be partly achieved by limiting the forms of housing set out in part (d) where more than 20% of residences within 200 metres of the application site are shared housing, and by working with the universities and providers of student accommodation to ensure that their needs are met in appropriate locations, including those identified in the policy	Quite broad spatial locations identified, following the pattern of where PBSA currently exists within Sheffield.
Newcastle	Promoting lifetime neighbourhoods with a good range and choice of accommodation, services and facilities to meet varied and changing needs, will be achieved by: - Requiring 60% of new private housing across the plan area being suitable for and attractive to families, with a minimum target of 16,000 new homes to have three or more bedrooms. - Encouraging provision of Lifetime Homes and Wheelchair-Accessible Homes. - Increasing the choice of suitable accommodation for the elderly population and those with special needs including bungalows, sheltered accommodation and extra care accommodation.	It is expected that at least 2,000 units of purposed built student accommodation will also be built in the short term. The universities envisage continued growth in student numbers (albeit at a slower rate) over the plan period but it is difficult to predict what the level of growth is likely to be or how this may translate into demand for student accommodation. However, there is a sizeable, flexible supply of land available within the Urban Core to accommodate	Directs PBSA to the urban core. The development plan policy does not set out the same level of criteria as in Manchester however there is an SPD which provides this criteria. It is noted that PBSA is subject to s106 contributions for essential infrastructure including transport and open space and also CIL payments

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	4. Providing adequate space inside and outside of the home to meet the needs of residents. 5. Providing 15% affordable homes on all developments of 15 or more dwellings subject to development viability. 6. Focusing the provision of purpose built student accommodation within the Urban Core	different scenarios of future demand for purpose-built student housing. It is expected that a further 2,000 bedrooms will be constructed in the short term. For the purposes of establishing the housing requirement in the Plan and the availability of housing land through the SHLAAs28 purpose-built student housing is specifically excluded from the demand and supply equation. This approach recognises that student housing is a niche market, with future growth rates uncertain, and accommodation can take many forms.	
Bristol [DRAFT] Policy H7	The amount and location of purpose-built student accommodation will be carefully managed to ensure that: • There are no adverse impacts on existing residential areas; • Proposals are consistent with other planning policies, including the delivery of new homes and workspace; and • Appropriate growth in student population is matched by the provision of purpose-built accommodation. All proposals for purpose-built student accommodation will be expected to demonstrably meet identified needs, to have the support of the University of Bristol and to be in accordance with the provisions set out below. Purpose-built student accommodation provision - defined locations Development of purpose-built student accommodation should be located at the following locations provided the total number of additional bed spaces indicated is not exceeded: • Up to 800 bed spaces within the existing University of Bristol precinct,	Proposals for purpose-built student accommodation should not result in adverse impacts on existing residential areas. To avoid adverse impacts development should either be located in the defined locations set out in the policy subject to stated bed space limits and the policy's general provisions, or, when located elsewhere should avoid primarily residential areas and not exceed guideline thresholds in commercial areas Development should also demonstrate how the accommodation needs of the University of Bristol are being met in terms of the quantity, type and quality of accommodation to be provided. All development will need to have the support of the University of Bristol. The supply of bed spaces will be monitored against the University of Bristol's projected growth needs.	Specific policies by location/ local neighbourhood Requires agreement with Uni of Bristol for all new developments 30% Affordable Housing provision (but where development comprises self-contained (Use Class C3) accommodation) Policy DM2 of DM Management policies: https://www.bristol.gov.uk/files/documents/2235-site-allocations-bd5605/file - Residential amenity - concentration

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	- up to 200 bed spaces within the existing Clifton residential campus and up to 1,000 bed spaces within the existing Stoke Bishop residential campus; - At appropriate locations identified and demonstrably supported by local communities, including through Neighbourhood Development Plans. Development of purpose-built student accommodation in the following locations that support the development strategy for the area will be permitted provided the total number of bed spaces indicated is not exceeded: - Up to 3,000 bed spaces at Bristol Temple Quarter (2,300) and St. Philip's Marsh (700); - Up to 1,000 bed spaces within Bristol Shopping Quarter (Broadmead) and Frome Gateway; - Up to 1,000 bed spaces within Central Bedminster; - Up to 500 bed spaces at Western Harbour; Development at the above locations will be expected to include a proportion of affordable student housing to meet identified need. Purpose-built student accommodation provision - other locations At other locations any proposals for purpose-built student accommodation should only form part of mixed use developments comprising a proportion of other residential uses. Development should: - Avoid areas with a primarily residential context; - Not result in harmful impacts or a harmful concentration of purpose-built student accommodation within any commercial area; - Not conflict with the delivery of other planning objectives for the area in which it is proposed; - Where the development comprises self-contained (Use Class C3) accommodation provide a contribution towards general purpose affordable housing in line with Joint Spatial Plan Policy 3.	To ensure the best use is made of established and proposed university facilities, appropriate defined locations for single use purpose-built student accommodation include the University of Bristol's existing city centre precinct and residential sites at Clifton and Stoke Bishop. Other appropriate locations will include those identified by local communities, including through Neighbourhood Development Plans, Neighbourhood Development Orders and other published strategies or community plans To ensure accommodation in these locations is affordable to all, the policy seeks a proportion (at least 30%) of bed spaces within the development as affordable. Affordable student housing is defined as a bedroom within the development that is provided at a rental cost for the academic year equal to or below 50 per cent of the maximum income that a new full time-student living away from home could receive from the Government's Maintenance Loan (or any replacement state funding mechanism) for living costs for that academic year.	

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	Purpose-built student accommodation provision – general provisions In all cases, proposals for purpose-built student accommodation should: • Ensure that there will be no adverse impacts on surrounding communities and areas; • Should be subject to an appropriate management regime; • Be car-free and deter occupants from the parking of cars elsewhere in the city; • Make provision for disabled access and disabled parking for occupants and visitors; • Include active frontages and incorporate active ground floor uses wherever possible and appropriate. Development will be expected to provide a good standard of accommodation by meeting relevant requirements and standards set out in other development plan policies.		
Bristol Adopted	<u>Policy BCAP4: Specialist student housing in Bristol City Centre (Bristol Local Plan – Bristol Central Area Plan)</u> Specialist student housing schemes that contribute to the diversity of uses within the local area will be acceptable within Bristol City Centre unless it would create or contribute to a harmful concentration of specialist student housing within any given area. <u>Bristol Local Plan Site Allocations and Development Management Policies DM2: Residential Sub-divisions, Shared and Specialist Housing</u> Proposals for: - the sub-division of existing dwellings to flats; the conversion of existing dwellings or construction of new buildings to be used as houses in multiple occupation; the intensification of existing houses in multiple occupation; specialist student housing; and other forms of shared housing will not be permitted where:		

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	i. The development would harm the residential amenity or character of the locality as a result of any of the following: Levels of activity that cause excessive noise and disturbance to residents; or Levels of on-street parking that cannot be reasonably accommodated or regulated through parking control measures; or Cumulative detrimental impact of physical alterations to buildings and structures; or Inadequate storage for recycling/refuse and cycles. ii. The development would create or contribute to a harmful concentration of such uses within a locality as a result of any of the following: - Exacerbating existing harmful conditions including those listed at (i) above; or - Reducing the choice of homes in the area by changing the housing mix. Where development is permitted it must provide a good standard of accommodation by meeting relevant requirements and standards set out in other development plan policies. Specialist Student Housing – Location Criteria Specialist student housing schemes will be acceptable within the city centre. Other locations may be suitable subject to the general criteria set out above.		