

Student Housing Provision in Loughborough *Supplementary Planning Document Consultation Draft- The Preferred Option*

October 2005



Contents

	Page
Introduction	1
The Role and Purpose of Supplementary Planning Documents	3
Policy Framework	3
Background	6
Student Numbers	6
Bed-space Projections	8
In Search of a Balanced Community	9
Powers Under the Planning Act	10
Powers Under the Housing Acts	12
The Threshold Approach	13
Methodology	13
Opportunities for Purpose Built Student Housing	15
Policy Matrix	16
Complementary Measures	17
Glossary	18
Appendix I Worked Example of the Threshold Methodology	19

Consultation Draft Supplementary Planning Document

Student Housing Provision in Loughborough

The Preferred Option

Introduction

“In Loughborough the student population is making positive contributions to the Borough’s economy and diversity. Steps to manage and reduce adverse impacts on particular parts of the town, in conjunction with Loughborough University and other partners have been successful in achieving a more balanced residential mix and a consequent improvement in those environments.”

(Leading in Leicestershire – The Corporate Plan)

This is our vision for the future of the Borough; it is what we want to be able to say when we look back in the year 2015 upon the progress that we have made in tackling the major issues of today.

We recognise and understand the increasing local concern over the impact of high concentrations of students in parts of Loughborough. At the same time we recognise that Loughborough University and College help make Loughborough the vibrant and thriving town it is.

In short, the presence of the University brings clear cultural and economic benefits, but also brings additional pressures. We need a clearer strategy to manage student housing provision and its impact on the town.

During February and March 2005 we consulted on six policy options. Some 319 individual responses were received which we considered carefully in Cabinet on 21st July 2005. In the light of those considerations we decided to select as the preferred option a variant on the Threshold approach (Option 5). That approach relies not upon any mapped policy area but rather upon an assessment of the proportion of student households in any given area. Based upon that assessment a range of policy responses will be taken into account in determining any application. Stricter policies restraining development which would provide more student bed spaces will be applied in localities experiencing high levels of student occupation with less restrictive policies being applied in areas with low levels of student occupation. Purpose built student housing is to be encouraged in and around the town centre and on campus.

The approach is innovative, but designed to tackle effectively the desire to retain and restore balance within the communities that collectively define the town. The relatively small scale of Loughborough in relation to the size of the University suggests strongly that existing solutions designed to encourage balanced communities in large cities simply could not successfully be transplanted here. Loughborough needs its own local solution tailored to local circumstances and flexible enough to keep up with the pace of change.

The resulting policy solution relies very heavily upon the methodology promoted under Option 5 but various amendments to the policy responses initially proposed in connection with that option have been made to reflect concerns and comments received through the consultation process. For that reason we are keen invite and listen to the views and opinions of all interested parties before finalising this policy guidance.

I look forward to hearing what you have to say.



Councillor Cameron MacLeod
Cabinet Lead Member for Development
October 2005

Comments forms have been prepared to ensure that your views and opinions can most effectively and efficiently be presented and considered. Please return completed forms:

By post to: Directorate of Development
Charnwood Borough Council
Southfields
Southfield Road
Loughborough
LE11 2TN

By e-mail to: localplans@charnwood.gov.uk

Or fill out and return the form on line at: www.charnwood.gov.uk

**To ensure that your comments can be taken into account please respond by:
28th October 2005**

If you would like to obtain copies in Braille, on audio tape or large print, please contact us:

- telephone 01509 634769 or
- email localplans@charnwood.gov.uk

If you would like to have the content of any part of this document explained to you in your own language, please ring 01509 634769

Gujarati

આ દસ્તાવેજના સમાવેશમાથી જો તમને કોઈ પણ ભાગની તમારી ભાષામા સમજણ જોઈતી હોયતો, મહેરબાની કરી અને 01509 634769 પર ફોન કરશો.

Hindi

यदि आप चाहते हैं कि आपको इस दस्तावेज़ के किसी भी भाग का विवरण आपकी अपनी भाषा में बताया जाए, तो कृपया 01509 634769 पर फ़ोन कीजिए।

Bengali

আপনি যদি এই দলিলের (document) যেকোন বিষয়ের ব্যাখ্যা আপনার নিজস্ব ভাষায় পেতে চান, তাহলে অনুগ্রহ করে 01509 634769 নাম্বারে টেলিফোন করুন।

The Role and Purpose of Supplementary Planning Documents

- 1.1 A Supplementary Planning Document (SPD) is intended to expand upon policy or provide further detail to policies in Development Plan Documents. It does not have development plan status, but it will be accorded significant weight as a material planning consideration in the determination of planning applications.
- 1.2 The provisions of any SPD cannot, therefore, be regarded as prescriptive but they can provide a powerful indicative tool in the interpretation and application of policy. This distinction is particularly important within the context of this SPD and the methodology upon which it relies. The Council cannot adopt an overly rigid mathematical and mechanical approach to decision making. The product of the “Threshold” approach which lies at the heart of this SPD will be an important material consideration, but it cannot be regarded as **the** determining factor in deciding any planning application.

Policy Framework

- 1.3 National planning policy, articulated through Planning Policy Guidance Note 3: Housing (PPG 3) confirms the Government’s intention that everyone should have the opportunity for a decent home. PPG 3 offers no particular guidance in respect of student housing but it does seek to encourage the creation of mixed and balanced communities.

“The Government believes that it is important to help create mixed and inclusive communities, which offer a choice of housing and lifestyle. It does not accept that different types of housing and tenures make bad neighbours. Local planning authorities should encourage the development of mixed and balanced communities: they should ensure that new housing developments help to secure a better social mix by avoiding the creation of large areas of housing of similar characteristics.”

(PPG 3 paragraph 10).

- 1.4 Regional Planning Guidance for the East Midlands (RPG 8) adopted in January 2002, now accorded the status of the Regional Spatial Strategy for the purposes of the Planning and Compulsory Purchase Act 2004, offers no particular guidance on the provision of student housing, but acknowledges the importance of the region’s universities and higher education establishments to the economy.
- 1.5 The Leicestershire, Leicester and Rutland Structure Plan (adopted in February 2005) under Housing Policy 5, concerning density and design, seeks to encourage development which makes provision for, “.....a mix of house types to establish socially mixed communities.”
- 1.6 The Borough of Charnwood Local Plan (adopted in January 2004) recognises specifically the implications of reconciling the accommodation needs of a major University with a relatively small host community.
- 1.7 Policy H/12 defines a generally permissive context for the development of purpose built student halls of residence:

Planning permission will be granted for new buildings or the re-use of non-residential properties specifically for student accommodation at locations on, or readily accessible by cycle, public transport or on foot to the University and college campuses.

Planning permission will be granted for developments which include reduced parking standards where it can be shown that there would be no adverse impact in the vicinity of the site.

1.8 In the determination of applications and appeals related to student halls of residence the Council and the Planning Inspectorate have also had regard to policies EV/1 relating, in part, to the need to safeguard the amenities of adjoining residents, and EV/39 in so far as that policy extends to the control of excessive noise and disturbance.

1.9 The adopted Local Plan makes specific reference to the types of unsupervised housing traditionally occupied by students under Policy H/13:

Planning permission for the conversion of properties within primarily residential areas to hostels, self contained flats, cluster flats or to any use within Class C1 (hotels) of the Town and Country Planning (Use Classes) Order 1987 (as amended) will be granted provided the proposal would not:

- i) introduce a potential source of noise and disturbance greater than that normally associated with a dwelling to the detriment of neighbouring residential amenities which could not be mitigated by careful planning of room layout and the use of sound insulation; and/or*
- ii) adversely affect the general character and appearance of the surrounding area; and/or*
- iii) necessitate associated extensions or external alterations inconsistent with the appearance of the property or its setting to the detriment of the street scene or neighbouring residential amenities; and/or*
- iv) lead to a concentration of such uses damaging to the character and amenity of a street or residential area; and/or*
- v) provide an external layout, design, and space standards which do not meet the needs and safety of residents, including people with mobility problems.*

1.10 The written justification accompanying the policy makes it clear that this policy cannot be applied to houses occupied by up to six individuals living as a single household, for which planning permission is not required. It notes the degree to which concentrations of student housing have already occasioned some injury to residential amenities within areas of dense terraced housing in close proximity to the University and seeks to direct investors and developers towards conversion opportunities afforded by larger detached and semi-detached houses with generous gardens and off street parking potential. It is recognised that the conversion of a large number of houses in any locality to more intensive residential use is likely to harm unacceptably the residential character of an area and the balance of the community. In those situations the plan commits the Borough Council to the preparation of further detailed policy statements.

1.11 In addition to the statutory Development Plan the Borough Council, in pursuing other policy initiatives and in reviewing its planning policy is guided by the Community Strategy. That document, in pursuit of “A Borough with Decent Homes” identifies as a short term

action the need to contribute to an investigation of the impact of student housing in Loughborough and to devise a strategy for its management in the long term.

- 1.12 “Leading in Leicestershire” – the Council’s Corporate Plan to 2011/12, under the strategic aim of a “Sustainable Environment” sets out as a priority the need to work through the Loughborough University / Loughborough College Community Joint Liaison Committee in developing a multi agency approach to manage the environmental and social impact of the student population with the intention of achieving a more balanced residential mix and consequent environmental improvements. That commitment is reflected also within the aims set out under “A Clean, Safe and Healthy Environment,“ where actions linked to “Improved Community Cohesion” include working with Loughborough University and other partners to actively address the effects of a large body of students on the Borough.
- 1.13 It is these policies and commitments, then, which provide the foundation for the development of this Supplementary Planning Document.

Background

- 2.1 Loughborough University and Loughborough Collage are important contributors to the local economy, both in terms of the number of people whom they employ and the investment that they attract into the town. Their reputation for excellence in research and education ensures for Loughborough particular recognition in the national and international arena. However, that success has supported the growth of the institutions which has in turn imposed additional demands and pressures upon the “host” community.
- 2.2 Over recent years those demands and pressures have been manifest in the degree to which increasing numbers of students have fuelled the buy for rent housing market, primarily in locations conveniently located in relation to the two main institutions. Local communities increasingly have become frustrated by the impact of those trends upon the quality of life enjoyed by the residual resident population. Frequently cited concerns include:
- The erosion of the sense of community and social interaction normally engendered in a stable, balanced community.
 - Exclusion of first time and young family buyers to the detriment of the social balance and community facilities, especially schools.
 - Congestion and disturbance during term time, sharply contrasted with an air of abandonment during vacations.
 - Higher incidence of anti-social behaviour, particularly at unsociable hours.
 - Increased levels of crime and the fear of crime.
 - Poorer standards of property maintenance and repair.
 - Accumulations of waste and rubbish, particularly towards the end of the academic year.
 - Littering and fly-posting.
 - The proliferation of letting signs, adding to the impression of transience and detracting from the character of the street scene. (This last point has been addressed within the Ashby Road Conservation Area following a successful application to the Office of the Deputy Prime Minister (ODPM) to bring such signs within the control of the planning system).
- 2.3 While acknowledging that there are a great many responsible and considerate students and landlords within the community, the problems impinging upon the “host community” are indicative of the social stress and imbalance occasioned by the concentration of a substantial number of essentially transient residents within relatively small neighbourhoods.

Student Numbers

- 2.4 Evidence from the 2001 Census affords an indication of the number and distribution of the term time student population at that time by the type of accommodation occupied. (See Table I)
- 2.5 The data can give a general indication only; the ward is a fairly crude unit of measurement and neighbourhoods within them will demonstrate higher proportions of student

occupation than indicated, while others will show lower levels of concentration. Additionally, statistics provided by Loughborough University (Table 2) indicate that the number of full time Loughborough based undergraduate and post graduate students registered in 2003/04 was 20% greater than the figure for 2000/01.

Table 1 – Distribution of Students in Loughborough by Ward and Accommodation Type: 2001

18-24 Students present by Ward	At Home	% of pop	In Hall	% of pop	In House	% of pop	All	% of pop.	Total Pop
Ashby (inc Campus)	26	0.4%	3,255	47.1%	281	4.1%	3,562	52%	6,913
Storer	26	0.5%	334	6.0%	1,221	21.9%	1,581	28%	5,570
Nanpantan (inc Campus)	48	0.9%	1,294	23.9%	127	2.3%	1,469	27%	5,410
Lboro Southfields	34	0.6%	273	5.2%	698	13.2%	1,005	19%	5,275
Outwoods	81	1.5%	149	2.7%	52	0.9%	282	5%	5,561
Lemyngton	64	1.2%	0	0.0%	203	3.8%	267	5%	5,351
Hastings	77	1.4%	0	0.0%	99	1.8%	176	3%	5,464
Garendon	90	1.5%	0	0.0%	66	1.1%	156	3%	6,073
Shelthorpe	48	0.8%	0	0.0%	68	1.1%	116	2%	6,322
Dishley and Hathern	85	1.5%	0	0.0%	8	0.1%	93	2%	5,742
Loughborough	579	1.0%	5,305	9.2%	2,823	4.9%	8,707	15%	57,681

(Census 2001)

Table 2 – Loughborough Based Student Numbers 2000/01 and 2003/04

Loughborough based students	2000/01	2003/04
Under Graduate f/t	8,111	9,147
Post Graduate f/t	1,289	2,011
Total f/t	9,400	11,158
Under Graduate p/t	164	186
Post Graduate p/t	1,502	1,794
Total p/t	1,666	1,980
Total	11,066	13,138

(Loughborough University 2004)

- 2.6 While some of those students will have found accommodation in purpose built managed halls of residence the evidence suggests that the provision of additional managed bed-spaces has not matched the growth in student numbers. It follows that more students will have been compelled to seek accommodation in the private rented sector.
- 2.7 Evidence from the Electoral Register for 2003/04 supports that assessment. Polling District W, the southern half of Storer Ward, contained an estimated 36% of households comprising unrelated people. The Burleigh Road area (District T) contained an estimated 25% while the Park Road area contained about 15%. Other districts in Loughborough returned estimated proportions of 7% or less.

- 2.8 Overall, assuming that 95% of full time under graduate and post graduate students choose to make their home in Loughborough (including Hathern), it is calculated that that group represented about 18% of the population of the town in 2004, estimated at 59,400. (Care should be exercised in comparing this figure with that presented in Table I as that is based upon *all* resident students aged 18-24 at the time of the Census).
- 2.9 Research indicates that when considering the impact of student needs upon the demand for private sector housing in Loughborough, it is the total number of full time students that needs to be taken into account. Part time students may attend only once or twice a week and tend to live in family homes across a much wider area, while Further Education students are largely local teenagers living with their parents.
- 2.10 However, when considering issues of neighbourliness, such as late night behaviour and homes being left empty, it is the number of full time undergraduate students which is the more relevant factor.
- 2.11 The University advises that it intends to increase its intake of full time higher education students over the period up to 2006/07. Allowing for adjustments to take into account students who will attend satellite institutions, the estimated number of those students resident in Loughborough will be as follows:
- | | |
|---------|--------|
| 2003/04 | 11,158 |
| 2004/05 | 11,592 |
| 2005/06 | 11,901 |
| 2006/07 | 12,168 |
- 2.12 The University further advises that it will retain under graduate intake at 2003/04 levels for the foreseeable future and that almost all of the identified growth will be in post graduates from both home and overseas. While these additional students will need to be housed, their patterns of behaviour are unlikely to lead to the same levels of disruption to the life of the town that might be occasioned by an equivalent number of under graduates.

Bed-space Projections

- 2.13 At present, around 43% of under graduate students are accommodated in managed housing, with the remainder living in traditional dwellings out in the community. The term "managed housing" refers to purpose built, warden controlled accommodation and covers both University run and privately run halls of residence and self catering flats.
- 2.14 In October 2005 there were outstanding planning permissions off campus for a total of 319 student bed-spaces in managed housing:

Curzon Cinema site, Mill Lane	166 spaces
Schofield Centre, Geenclose lane	88 spaces
105 Forest Road (net increase),	38 spaces
Extension to Westbridge, Forest Road	27 spaces
Total	319 spaces

- 2.15 It is anticipated that these developments will be ready for occupation by December 2006.
- 2.16 In addition to these schemes the University obtained outline planning permission on 12th May 2005 for the development of about 2,500 additional student bed spaces on campus in six separate phases. The University is unable at present to be specific about the timetable for the development of the new housing,
- 2.17 The University guarantees a place in managed housing to all first year full time students, of whom there were 3,288 in 2003/04. The remaining places are taken up by second and third year under graduates and post graduates. (Table 3) With the numbers of new under graduates each year predicted to remain the same over the next few years, any additional bed-spaces in managed housing will be available for post graduates and second/third year under graduates presently living in unmanaged housing. It therefore follows that over time the numbers of under graduates living in private rented houses may be expected to decline appreciably.

Table 3: Student numbers and bed-spaces in Loughborough 2003-04

	Under graduates			Post graduates	Total
	First years	Second / third years	Total		
Managed	3288	1044	4332	433	4765
Unmanaged	0	4815	4815	1578	6393
Total	3288	5859	9147	2011	11158

(Atkins / Loughborough University 2004)

In Search of a Balanced Community

- 3.1 Newcomers to an established neighbourhood often bring with them a different set of values to those of the host community. Human nature is such that, where they remain a small minority, these newcomers generally will try to conform to the values of existing residents. However, where the newcomers form a large minority or majority, they will tend to behave to their own values rather than those of the host community. At some point a threshold must be reached at which this changeover occurs. This observation accords with comments made by residents concerned to encourage a more "balanced" community, where students live among permanent residents in smaller numbers, respecting their values.
- 3.2 Consultation undertaken in connection with the preparation of this SPD specifically invited residents to define what proportion of student households might be accommodated within any particular neighbourhood before affecting adversely the balance of that community, 218 respondents (68%) were of the view that this should be no more than 2 in 10 properties. Half of all respondents considered student rented properties should make up no more than 1 in 10 properties.

- 3.3 The evidence from Table I confirms that which is widely appreciated by those who live in the town: the most popular localities for student housing in the private rented sector are to be found in parts of Storer and Southfields wards. The evidence also supports, in modest measure, anecdotal evidence to the effect that student households may be on the increase in areas of Ashby and Nanpantan wards located in close proximity to the University campus.
- 3.4 Unlike larger cities with significant student populations, the large swathes of Victorian terraced housing that students have tended to favour are rather more limited in those areas of Loughborough close to the University. Many Loughborough students, therefore, have sought out accommodation some distance from the University, or in house types that they would not normally prefer, such as those found to the north of the New Ashby Road, and between the campus and Forrest Road.
- 3.5 Providing a greater number of managed bed-spaces than there are new students has the potential to draw students out of the private rented sector, but this will only happen if living in managed housing is perceived to be preferable to living in private housing. One of the key issues is cost. It might be assumed that managed housing would be considerably dearer than unmanaged housing, but this is not the case in Loughborough; the two are actually very similar.
- 3.6 Managed housing is also more likely to be able to provide such benefits as broadband internet and cable television. According to the University, students value these services very highly. This gives managed housing an advantage over many traditional houses.
- 3.7 If there is a net movement back into managed housing, it is likely that students will choose to leave the more peripheral areas first where levels of student occupation are modest. This would take the pressure off housing in Ashby and Nanpantan wards but may well have little impact on Storer and Southfields wards, where there is a plentiful supply of older terraced housing close to the University. Simply providing more housing may not, therefore, lead to the return of balanced communities in the most popular student areas.
- 3.8 It should be borne in mind that not all problems associated with students are due to numbers alone. Many are behavioural issues which may well be carried out only by a minority, for example late night noise, untidiness and threatening behaviour. However, it does follow that the more students there are in an area, the greater the chance of this sort of behaviour occurring.

Powers under the Planning Acts

- 3.9 Attempts to control the occupation of family dwellings by groups of up to six people living together as a single household are limited by the fact that, under planning law, such “conversions” do not constitute development. As such they do not require planning permission.

- 3.10 It follows that within the framework of national legislation the local planning authority may intervene only when a house is to be occupied by more than six people living together, other than as a family group. Such “dwellings” do not fall within any of the designated use classes recognised by the planning system but stand alone. (*sui generis*). In the interests of clarity in setting out below an approach for the control of student housing, such “dwellings” are designated, “Large Unmanaged Residences for Students” (LURS). But it should be appreciated that relatively few planning applications in Loughborough are likely to fall into this category.
- 3.11 Additionally many extensions to dwellings, while constituting development, benefit from deemed consent under the Town and Country Planning (General Permitted Development) Order 1995. Subject to certain limitations planning permission is not required for extensions to dwellings measuring 50 cubic metres in respect of terraced properties and 70 cubic metres in other cases.
- 3.12 Control can be won back through the approval of an Article Four Direction, which removes permitted development rights. However, these Directions were never intended to be used widely and setting them up is a lengthy and cumbersome process involving, in most cases, an application for the approval the Office of the Deputy Prime Minister.
- 3.13 Circular 9/95 advises that permitted development rights should only be withdrawn in exceptional circumstances and that, in the case of dwelling houses, this should only happen where the house is of outstanding quality. In addition, any person with an interest in the land who has a planning application refused or conditioned due to an Article Four Direction may claim compensation. Section 107 of the 1990 Act states that this can include compensation for lost land value. Therefore, anybody whose proposals may be frustrated by an Article Four Direction could claim from the Council the value that their proposed extension would have added to the house. Accordingly such Directions should be considered only in exceptional circumstances in specific sensitive locations.
- 3.14 Where planning permission is required the Council must have regard to national and local planning policies, relevant planning guidance and other material considerations. National guidance promotes the development of balanced and mixed communities and local policies seek to avoid the concentration of hostels, self contained flats and cluster flats damaging to the character and amenity of a street or residential area.
- 3.15 By the same token new housing which could accommodate students together with extensions to dwellings to provide additional student bed spaces within the more densely occupied areas of the town are responsible for increasing incrementally the proportion of students relative to the “resident” community, exacerbating and extending the degree of imbalance within the neighbourhoods concerned and raising the incidence of noise and disturbance damaging to residential amenities.
- 3.16 In consideration of those policy issues planning permission may be refused or conditions imposed to overcome or mitigate potentially harmful aspects of the development proposed. Within areas where levels of student housing already adversely affect the balance of the community the Council may seek to impose conditions to stem the growth

in student numbers. Where conditions are considered inappropriate or insufficient to deliver the measure of control and self regulation required the alternative of a Planning Agreement under Section 106 of the Town and Country Planning Act 1990 may be negotiated.

- 3.17 Supplementing additional regulatory action the most positive contribution the planning system could make would be to identify sites through key Development Plan Documents within the Local Development Framework for managed student housing in locations which would ease the pressure on private housing stock. Typically, these would be former commercial and industrial sites within and adjacent to the town centre and on the fringes of residential areas.
- 3.18 Given the scope for exercising greater control over student housing provision within the powers afforded by the national legislative and regulative framework, this SPD provides a local response founded upon the adopted policies of the Borough of Charnwood Local Plan.

Powers under the Housing Acts

- 3.19 The Housing Act 2004 introduces a new definition of a House in Multiple Occupation (HMO). In terms of private student lets that definition will include any dwelling occupied by three or more students (none of which are living as a couple) that are undertaking a course of full time education. This is likely to capture the vast majority of student lettings.
- 3.20 Under the new Housing Act, local authorities have a duty to licence any HMO's that are three storeys or over and are occupied by five or more persons. This is known as mandatory licensing. Local authorities will also have the option of applying to the Secretary of State to extend licensing (additional licensing) to other types of HMO or to specific areas, under certain conditions. However, no designation for additional licensing will be approved unless the authority can demonstrate that it has considered any other courses of action available to them that might provide an effective means of dealing with the problem that has been identified. Other such actions might include a landlord accreditation scheme or street/community wardens to deal with anti-social behaviour. It must also be demonstrated that the designation will significantly assist the authority in dealing with the problem, whether or not they take additional measures as well.
- 3.21 However, the majority of student lets will not be required to apply for mandatory licenses, but they will be covered by the HMO Management Regulations. This will significantly increase the enforcement powers available to environmental health officers irrespective of whether the property is licensed or not.
- 3.22 The exercise of the powers available under the Housing Act 2004 will not directly control the scale and distribution of student housing but it will afford opportunities for greater intervention to secure improvements in the manner in which properties and managed and maintained.

- 3.23 As such the Housing Act presents the Council with the opportunity to pursue complementary measures to support its planning policies. But those measures cannot be developed through this SPD and must instead be progressed under separate legislation.

The Threshold Approach

- 4.1 Most authorities which have attempted to date to introduce specific policies to better control student housing provision have relied upon the designation of a specific policy area within which more rigorous planning policies have been applied. Leeds and Nottingham City Councils have pursued such an approach. But the concept does not easily transfer from a major provincial city to a relatively small town such as Loughborough. In such a situation the designation of a specific restraint area might be expected to have little impact as the whole town is easily within comfortable walking and cycling distance of the University campus.
- 4.2 Rather than relying upon a specifically designated area of restraint the Threshold Approach is founded upon an assessment of the proportion of households within the “neighbourhood” surrounding an application as informed by information gathered from the Council Tax records. Subject to the outcome of that assessment, one of three different policy sets will be applied to assist in the determination of the application.

Methodology

- 4.3 The “neighbourhood” is nowhere defined; it is a shifting, amorphous area dictated by geography, social interaction and individual perceptions of members of the community. A more consistent and robust definition, related to available statistical information and sufficiently large to be statistically significant is required for the purposes of applying a policy.
- 4.4 The Small Output Areas, defined by the Office of Population Census and Survey provide the only independently defined and convenient geographical units for the purposes of such an approach. Each captures all relevant data for approximately 125 households. Clearly, that unit is too small to properly to represent a neighbourhood and accordingly the assessment will be based upon a cluster of contiguous Small Output Areas.
- 4.5 To ensure consistency in the approach the Small Output Area in which the subject property is located will be defined as the “Home Output Area.” The cluster will then be defined by the Home Output Area plus all other Small Output Areas sharing a boundary with that area. The number of contiguous Output Areas will vary depending upon local circumstances but typically clusters will be comprised of between 5 and 7 capturing 625 to 875 households, although some may be considerably larger.
- 4.6 Having defined the relevant Small Output Area Cluster the Council Tax Service will be requested to advise upon the total number of households registered within that area and the number of households benefiting from Class N exemptions and discounts on the grounds of all but one occupant being students. The information will be made available to

the planning authority in aggregate form only, precluding the identification of individual “student households” and their occupants.

- 4.7 Data held by the Council Tax service may be expected to change over the course of the calendar year as houses and households move into and out of the private rented sector. Accordingly the calculations must be based upon a single point in time and the date which is most suitable for that purpose is 1st April in any given year being the commencement of the new financial year and well within the academic year by which time all “student households” may be expected to have been captured on the database. Since the database will be updated automatically with the passage of each tax year so the information informing the policy response will be up to date and relevant too.
- 4.8 Essentially the Council Tax information will indicate that there are for any given year “x” households within any defined Small Output Area Cluster of which “y” derive some discount by virtue of being either wholly or largely occupied by students allowing the simple calculation of the proportion of “student households” expressed as a percentage.
- 4.9 However, this calculation captures only households registered for Council Tax; it does not take into account the potential presence within the relevant Small Output Area Cluster of any student halls of residence which have the effect of increasing significantly the volume of student representation within the community adding to the overall imbalance within the neighbourhood increasing the probability of anti-social behaviour and other problems attendant upon a disproportionate student population. In order to address that factor a weighting factor is to be applied.
- 4.10 Since a dwelling, under the Planning Acts, may be occupied without the need for planning permission by up to six people living together as a single household it is considered reasonable to apply an assumed rate of six bed spaces as being proportionate to one dwelling. Therefore, for example, a hall of residence providing 120 bed spaces would represent 20 additional households, all of which would be factored into the calculation as “student households.”
- 4.11 A worked example to demonstrate how the relevant Small Output Area Cluster is defined and the calculation of the proportion of student households within that area, including a hall of residence weighting factor, is presented at Appendix I.
- 4.12 That process will permit the identification of three broad bands corresponding to thresholds identified the consultation process on the draft guidance:
- A) Where the proportion of households in student occupation exceeds 20%.
 - B) Where the proportion of households in student occupation falls between 10 and 20%.
 - C) Where the proportion of households in student occupation falls beneath 10%.
- 4.13 This approach enables the direction policies of different weight to different neighbourhoods proportionate to the level of student occupation in a targeted fashion. The relevant policies are set out in the matrix below.

Opportunities for Purpose Built Student Housing

- 4.14 In the absence of a significant decline in the number of students undertaking studies in Loughborough, the only mechanism with the potential to restore balanced communities over time is the development of purpose built student housing which can compete effectively in terms of cost, quality and convenience with the private rented sector.
- 4.15 Strictly applied across the town the tests set out in the preceding section could frustrate otherwise acceptable and potentially beneficial student housing schemes. Local examples of successful urban regeneration schemes incorporating student housing include “The Printhouse” on Woodgate and the restoration of the former Towles Factory off Queens Road.
- 4.16 Clearly additional student housing provision within the campus is to be encouraged in principle. The extent of the campus is defined by policy CF/4 on the Proposals Map within the adopted Borough of Charnwood Local Plan.
- 4.17 Within the expanded town centre, as defined by policy CA/3 of the adopted local plan along with the adjacent identified opportunity sites for redevelopment at Leicester Road (CA/4(b)) and the area around Loughborough Wharf (RT/21), the proportion of permanent residential housing is low with commercial uses predominating. The opportunity for conflicting life styles is therefore diminished to a point where it would be unreasonable to preclude purpose built student housing as a matter of policy. The town centre enjoys excellent public transport linkages with the University and the opportunity to include in redevelopment schemes elements of student housing may play an important part in ensuring that redevelopment projects of wider benefit to the town are financially viable.
- 4.18 Elsewhere in the town where the proportion of student households is modest there may be opportunities to provide new purpose built and well managed student housing. Suitable sites cannot be allocated through SDP but must await the Allocations Development Plan Document. In the interim proposals may be considered within the guidance contained in this SPD and, where appropriate within the defined thresholds, may be permitted subject any potential injury to the amenities of neighbouring residents adequately being mitigated or controlled.

Policy Matrix

4.19 Having defined the proportion of student households within the relevant neighbourhood through the methodology described previously the Borough Council will have regard to the following policy matrix in the determination of applications where student housing is proposed and where student occupation is anticipated.

Threshold Categories (% Student Households [Weighted])	A >20%	B 10%-20%	C <10%
a) Planning permission will not be granted for the development of purpose built student housing and extensions to existing student halls and flats. *	✓		
b) Planning permission will not be granted for the development of purpose built student housing and extensions to existing student halls and flats where that development would give rise to excessive noise or disturbance to neighbouring dwellings.	✓	✓	✓
c) Planning permission will not be granted for the conversion of Class C3 dwellings and other buildings to provide Large Unmanaged Residences for Students (LURS) housing more than six people living together as a single household*	✓	✓	
d) Planning permission will not be granted for extensions to Class C3 dwellings where the development proposed would provide additional habitable rooms for occupation by students. (Occupancy conditions will be attached to authorised residential extensions to preclude their occupation by students).*	✓		
e) In approving the development of new houses and flats the Council will impose conditions or seek a Section 106 agreement to prevent their uncontrolled occupation by students*	✓		
f) Adoption of a Planning Enforcement regime in partnership with Building Control and local communities to ensure permitted development complies with the provisions of the General Permitted Development Order and to ensure that landlords and developers are aware of national and local policies before commencing operations on site.	✓	✓	

* - excluding University / College Campus and the Town Centre with adjoining opportunity sites

Complementary Measures

4.20 Issues associated with student housing do not relate exclusively to matters which can be addressed through the Planning Acts, demonstrating the need for a cross cutting multi-agency approach to the issues presented in managing the impact of a large student population on a relatively small town. In recognition of the need for additional action across a broad front the Council has resolved to support the following complementary measures:

- a) To encourage the University authorities to provide a greater proportion of student housing on campus through the development of purpose built halls of residence.
- b) To examine through the Loughborough Master-Plan and Local Development Framework Allocations Development Plan Document opportunities to identify and promote suitable sites for the development of purpose built halls of residence, particularly within the Town Centre and in locations where they can contribute to physical regeneration.
- c) To examine through the Local Development Framework Generic Development Control Policy Development Plan Document policy options for linking to the development of additional research and teaching facilities a requirement to make provision for a commensurate number of additional student bed spaces.
- d) To take further steps to lobby the government for an amendment to the Town and Country Planning (Use Classes) Order 2005 to provide for the sub-division of Use Class C3 to bring within the control of the local planning authority “changes of use” between standard dwellings and houses let to students.
- e) To work closely with the community and Loughborough University to ensure that the spirit of this policy approach is followed.
- f) To establish corporate procedures to ensure the complementary implementation of the Student Housing SPD and the roll out of the Council’s preferred HMO management strategy following the enactment of the relevant section of the Housing Act 2004, introducing revised provisions for the mandatory and discretionary “additional” licensing of Houses in Multiple Occupation.
- g) To appraise other Borough Council services and external service delivery agents of the specific comments received through the consultation undertaken in connection with this SPD in order that those concerns may be taken into consideration in any review of policy or current management practices.

Glossary

Article Four Direction	A power available to local authorities under Article 4 of the Town and Country Planning (General Permitted Development) Order 1995 to seek the approval of the Secretary of State to remove “permitted development” allowances in order to bring such development within the control of the local authority.
Dwelling	The Town and Country Planning (Use Classes) Order 2005 defines a dwelling as a property where: i) Occupation is by a single person or by people living together as a family, or ii) Occupation is by not more than six residents living together as a single household (including a household where care is provided for residents).
House in Multiple Occupation (HMO)	In terms of private student lets, the new definition as set out in the Housing Act 2004 will cover any dwelling occupied by 3 or more students (none of whom are living as a couple) that are undertaking a full time course or higher education.
Large Unmanaged Residences for Students (LURS)	Houses occupied by more than six unrelated people without provision of on site management.
Permitted development	Minor development, including extensions to dwellings, which do not require planning permission under the provisions of the Town and Country Planning (General Permitted Development) Order 1995

Worked Example of the Threshold Methodology

a	b	c	d	e	f	g	h
Output area	No of houses	Student households	Bed spaces in halls	Household equivalent	Adjusted no of houses	Adjusted no of student households	% Student households
				(d/6)	(b+e)	(c+e)	(g/f x 100)
Example 1: Application within an area of high student occupation with several large halls of residence							
Home	160	96	60	10	170	106	62.35
2	145	24	0	0	145	24	16.55
3	156	73	240	40	196	113	57.65
4	201	68	0	0	201	68	33.83
5	210	75	210	35	245	110	44.90
6	195	93	0	0	195	93	47.69
	1067	429	510	85	1152	514	44.62
Example 2: Application within an out of centre location with a single modest hall of residence							
Home	145	12	0	0	145	12	8.28
1	120	15	0	0	120	15	12.50
2	144	35	0	0	144	35	24.31
3	151	13	0	0	151	13	8.61
4	200	15	120	20	220	35	15.91
	760	90	120	20	780	110	14.10
Example 3: Application within a suburban setting with no student halls							
Home	210	5	0	0	210	5	2.38
1	124	6	0	0	124	6	4.84
2	155	12	0	0	155	12	7.74
3	99	2	0	0	99	2	2.02
4	125	0	0	0	125	0	0
5	112	17	0	0	112	17	15.18
	825	42	210	0	825	42	5.09

