



NORWICH
City Council

Purpose-built student accommodation in Norwich

Supplementary Planning Document

Draft for consultation



Norwich City Council
April 2025

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Executive summary

Norwich has excellent higher education facilities which include the University of East Anglia and Norwich University of the Arts. It is important to both the city of Norwich and the higher education establishments based here that an attractive range of good quality accommodation is offered to students which can take both the form of purpose-built student accommodation (PBSA) and private rented accommodation (which includes Houses in Multiple Occupation - HMOs).

As part of policy 5 of the Greater Norwich Local Plan (GNLP) there is a specific policy on purpose-built student accommodation. The main purpose of this Supplementary Planning Document (SPD) is to supplement GNLP policy 5 and in particular to set out the current position with regards to the need for additional PBSA within the plan period to 2038 as well as providing guidance in order to encourage good quality accommodation in appropriate and sustainable locations where the need for future PBSA is established.

Norwich's student population has been expanding steadily over recent decades as has the provision of purpose-built student accommodation. Whilst PBSA traditionally took the form of halls of residence provided by the universities themselves, in more recent years PBSA has predominately been delivered by the private sector in the city centre and, to a lesser extent, in peripheral neighbourhoods.

It is now anticipated that the current stock and expected pipeline of PBSA in Norwich will comfortably meet the future demand of students to 2038/39, including ensuring an element of choice within the market. Indeed, the scale of expected supply exceeds estimated demand which points to the potential for oversaturation in the market, with possible repercussions for occupancy levels, provider finances, and student quality of life. Therefore, it is concluded that the evidence suggests that there is no further need for PBSA as the needs of the existing student population and projected future population can be met by the existing and pipeline supply.

Notwithstanding this whilst the current evidence would suggest that there is no need for any further PBSA over the GNLP plan period, the Council acknowledges that the situation can and may change over time. There is therefore the opportunity for applicants to submit an assessment of need as part of a future planning application, with section 5 of this SPD setting out what a needs assessment must cover. Section 5 also lists the factors that the Council will take into consideration in the assessment of relevant planning applications. This includes need, location, scale, external building design, external amenity and landscape design, internal building design, cycle storage, management, partnership/support from Higher Educational Institutions in Norwich, provision of a mix of accommodation, sustainability and energy consumption and flexibility and robustness. The SPD also sets out how an offsite

contribution for affordable housing will be calculated and gives details of conversion rates.

This version of the document is a draft for consultation. A five-week period of consultation is due to take place in April/May 2025. Following the public consultation, amendments to the document will be made as appropriate/necessary.

The document in its amended form will then be presented to Sustainable Development Panel with a recommendation to note the summary of consultation responses, and comment on the revised document. The finalised document will be presented to cabinet, then full Council for adoption.

Draft for consultation

1 Purpose

- 1.1 Norwich has excellent higher education facilities which include the University of East Anglia and Norwich University of the Arts. Over the past few decades both universities have grown, and both have plans to expand further. It is important to both the city of Norwich and the higher education establishments based here that an attractive range of good quality accommodation is offered to students which can take both the form of purpose-built student accommodation (PBSA) and private rented accommodation (which includes Houses in Multiple Occupation - HMOs).
- 1.2 In November 2019 Norwich City Council produced an evidence and best practice advice note for purpose-built student accommodation in Norwich as the city had been experiencing a significant rise in demand for PBSA in the preceding years. The 2019 guidance note sought to develop a better understanding of both the need for such accommodation and of the key factors that should be taken into consideration as part of the planning application process.
- 1.3 Since November 2019 a significant amount of PBSA has been delivered in Norwich. Whilst PBSA traditionally took the form of halls of residence provided by the universities themselves, in more recent years PBSA has predominately been delivered by the private sector in the city centre and, to a lesser extent, in peripheral neighbourhoods.
- 1.4 At the time that the 2019 guidance note was produced, the adopted local plan (the Norwich development management policies plan, 2014) did not contain a specific policy relating to PBSA. Therefore, it was not possible to produce a Supplementary Planning Document (SPD) to guide planning decision making as there was no policy basis for such a document. The purpose of the guidance note was to inform both applicants and decision makers by pulling together relevant policy, evidence, best practice and information about student development.
- 1.5 Since the publication of the 2019 guidance note, not only has a significant amount of student accommodation been delivered, but also the Greater Norwich Local Plan (GNLP) was adopted in March 2024. As part of policy 5 (Homes), there is a specific policy on purpose-built student accommodation.

- 1.6 The 2019 guidance note is therefore out of date, and it was considered necessary to update the evidence base and guidance on PBSA. This SPD on purpose-built student accommodation in Norwich provides updated guidance and will assist developers, educational institutions and the Local Planning Authority (LPA) in implementing policy 5 of the GNLP. The main purpose of this SPD therefore is to supplement GNLP policy 5.
- 1.7 The SPD takes account of the most recently available information and evidence set out within the Norwich Purpose Built Student Accommodation (PBSA) Study¹ produced by AECOM and published in November 2024.

¹ [PBSA Study | Norwich City Council](#)

2 Introduction

- 2.1. Higher Education Institutions (HEIs) and their students have many positive economic impacts for Norwich, boosting the city's national and international profile, providing local companies with skilled graduates, and purchasing local goods and services. The universities have an important role to play in delivering a creative city as part of the Norwich 2040 City Vision.

Norwich student population data

- 2.2. Norwich's student population has been expanding steadily over recent decades alongside the expansion of higher education, with both the University of East Anglia (UEA) & Norwich University of the Arts (NUA) likely to continue to grow over the coming years.
- 2.3. The Higher Education Statistics Authority (HESA) provides data on students and Higher Education Institutions (HEIs). This is a key starting point for understanding student numbers in Norwich. The latest available dataset is for 2022/23 which records 21,375 students in Norwich (full and part time students from UEA and Norwich University of the Arts). Of these 18,540 are full time students, with 15,185 being full time undergraduate students. In 2022/23 4,800 were full time undergraduate entrants. Table 1 shows a breakdown of student numbers for each university.

Table 1: Student Number in Norwich 2022/23

	UEA	NUA	Total
All students	18,540	2,835	21,375
Full time students	15,775	2,765	18,540
Part time students	2,765	65	2,830

Source: HESA

- 2.4. Table 2 shows how student numbers in Norwich changed between 2014/15 and 2022/23. Overall, the number of full-time students in Norwich increased by 19.8% between 2014/15 and 2022/23, with the number of full-time undergraduate students increasing by 20.9% over the period, and entrants by 10.1%. The number of full-time students increased year on year until there was a slight decline (-215 students) in 2021/22, and a further decline (-510 students) in 2022/23. Overall, there was an increase of 3,065 full-time students between 2014/15 and 2022/23.

Table 2: Student Numbers in Norwich 2014/15 – 2022/23

	2014/ 15	2015/ 16	2016/ 17	2017/ 18	2018/ 19	2019/ 20	2020/ 21	2021/ 22	2022/ 23
Full time (all)	15,475	15,980	17,315	17,870	18,280	18,330	19,265	19,050	18,540
Full time (undergraduate)	12,560	13,015	14,105	14,835	15,005	15,185	15,895	15,795	15,185
Full time (undergraduate, entrant²)	4,360	5,060	5,395	5,080	5,340	5,585	5,495	4,945	4,800

Source: HESA, AECOM Calculations

- 2.5. Over the past decade the Government has made a number of changes to admissions and funding policies for higher education which has the potential to affect the number and demographic characteristics of students studying and living in Norwich. This can affect both the number of domestic and international students. In addition to government policy change, student numbers may also have been impacted by the covid-19 pandemic and the UK leaving the European Union (EU).
- 2.6. Of the 21,375 students in Norwich, 18,540 are full time, accounting for nearly 13% of Norwich's total population of 143,922 residents (2021 census)³, and potentially in need of accommodation. This usually takes the form of purpose-built student accommodation (both provider-maintained property and private sector halls) or other private rented accommodation (predominately Houses in Multiple Occupation - HMOs). Some students will stay within their parents' homes or have their own residence.

Defining PBSA

- 2.7. Purpose-built student accommodation (PBSA) is a type of housing dedicated to accommodating full-time students. This specific function distinguishes PBSA from mainstream residential development and other specialised housing products, such as Build to Rent. Within the planning system, PBSA is considered 'sui generis' which means that it does not fall within any of the use classes. PBSA can range significantly in size: typical developments have a capacity of between 250 - 500 rooms but can exceed 1,000 in some cases⁴. Their most common ownership and management arrangements include:

² A small number of undergraduate entrants may be transfer students from other universities, meaning although they would be an entrant at the Norwich universities, they may not be 1st year students.

³ [Norfolk - Population - District | Norwich | InstantAtlas Reports \(norfolkinsight.org.uk\)](https://norfolkinsight.org.uk/reports/norfolk-population-district-norwich/)

⁴ Higher Education Policy Institute 'Student Accommodation: The Facts' (2020) <https://www.hepi.ac.uk/wp-content/uploads/2020/08/HEPI-Student-Accommodation-Report-FINAL.pdf>

- Halls of residence – owned and managed by a Higher Education Institution (HEI). In Norwich the majority of student halls are located on the UEA campus and University Village.
 - Direct let PBSA – owned, managed, and let by private operators.
 - Partnership/nominations PBSA – generally owned and managed by private operators but with agreements or links to one or more HEIs. In Norwich a number of PBSA developments are privately managed but linked through nominations agreements to Norwich University of the Arts.
- 2.8. Bedspaces within PBSA are usually provided as one of the following two categories:
- Communal/cluster flats: individual bedrooms (either with an en-suite or shared bathroom) contained within larger flats that often house between 4 and 6 students (but exceed this in some cases). Kitchens and other communal spaces are shared.
 - Studio apartments: self-contained units accommodating a single student, typically with a kitchenette and private bathroom.
- 2.9. The precise composition of these accommodation types varies. Cluster flats may have a greater range of bedroom options (e.g. single bed, double bed, shared bedrooms, en-suite, shared bathroom), and some larger studio apartments are capable of accommodating two residents.
- 2.10. In addition to their private bedrooms or flats, PBSA tends to offer a range of onsite amenities and larger communal spaces, which can include:
- Lounges and social spaces;
 - Study rooms or quiet zones;
 - Gyms, cafes, games rooms, cinemas or other recreational/entertainment facilities;
 - Onsite laundry facilities; and
 - Bicycle storage.
- 2.11. PBSA, whether student halls or privately managed, typically offers an all-inclusive rental model, in which the costs of all utilities and on-site amenities are built into the rent. Rental payments can be weekly, monthly, termly or annually. Tenure arrangements can also differ from the wider private rented sector (PRS), including shorter contracts aligning with the academic calendar, options for remaining over the summer break, and provisions for breaking leases where students need to drop out.

The Private Rented Sector (PRS)

- 2.12. Private rented housing including HMOs currently fulfil a large proportion of the need for student accommodation in Norwich with approximately 39.5% of all full-time students living in this form of accommodation (HESA, AECOM).
- 2.13. HMOs are properties occupied by multiple unrelated individuals who share living space or amenities. Whilst standard residential dwellings fall under use class C3, HMOs fall under their own use class (C4), defined as “small, shared houses occupied by between 3 and 6 unrelated individuals, as their only or main residence, who share basic amenities such as a kitchen or bathroom”⁵. HMOs containing more than 6 unrelated individuals are excluded from classification and are considered “sui generis” in planning terms.
- 2.14. The precise number of HMOs in Norwich is not known as not all HMOs need an HMO licence or planning permission. It is understood that HMOs are found in all of the city’s wards, with higher concentrations in those to the west of the city centre.
- 2.15. Whilst this SPD does not cover student HMOs, the provision of PBSA and HMOs are intrinsically linked as the provision of PBSA is likely to take some pressure off the private rented sector. It is important that a joined-up approach is taken to PBSA and HMOs; this SPD will therefore help inform the council’s policy response to HMOs.
- 2.16. This SPD also aims to continue to encourage closer working with both universities and other relevant bodies (such as students unions), to encourage development of well managed appropriate student accommodation and reduce the potential for conflict arising between students and their neighbours. By encouraging good quality and appropriate student accommodation in Norwich with a positive student experience, Norwich City Council will help support the continuing success of the Higher Education Institutions in the city, and increased retention of graduates in Norwich following their studies thereby boosting the city’s reputation and economic prospects.

⁵ Planning Portal Use Classes (updated 01/09/2020)

3 Policy Context

National Planning Policy Context

- 3.1 The National Planning Policy Framework 2024 (NPPF) sets out the Government's policy approach to achieving sustainable development. In relation to delivering a sufficient supply of homes, the NPPF requires that the needs of groups with specific housing requirements are addressed and reflected in planning policies (paragraph 63). Students are specifically listed as a particular group whose needs should be addressed.
- 3.2 Planning Practice Guidance (PPG)⁶, updated in May 2021, advises that local planning authorities should plan for sufficient student accommodation whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus. It states that encouraging more dedicated student accommodation may provide low-cost housing that takes pressure off the private rented sector and increases the overall housing stock. The PPG encourages plan makers to consider options which would support both the needs of the student population as well as local residents before imposing caps or restrictions on students living outside of university-provided accommodation. Plan makers "need to engage with universities and other higher educational establishments to ensure they understand their student accommodation requirements".
- 3.3 The 2024 NPPF places increased emphasis on housing delivery with a new standard method for calculating housing being introduced which is much more ambitious than its predecessor. Considering PBSA in the context of housing supply and delivery, PPG (Housing supply and delivery) sets out that student accommodation can count towards an authority's housing land supply where the delivery of PBSA will allow other housing (e.g. HMOs) to be released into the general market and/or where it will allow general housing to remain as such, rather than being converted into student accommodation.

⁶ [Housing needs of different groups - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/housing-needs-of-different-groups)

- 3.4 Guidance relating to the Housing Delivery Test (HDT) includes communal student accommodation in the calculation of housing need, with an assumption that 2.4 units of student accommodation equate to one unit of general market housing. This ratio (which was last updated in December 2024) should be used when monitoring residential completions and housing delivery as this is a consistent baseline mandated for use across the country in the Housing Delivery Test (HDT) Rulebook⁷. The Greater Norwich Local Housing Needs Assessment (LHNA) used a ratio of 2.5 as this was the ratio set out within the HDT at the time.
- 3.5 However, when forecasting future housing supply, the ratio of 1:2.85 can be used. This ratio reflects Planning Practice Guidance (PPG)⁸, which repeats the same baseline given in the HDT Rulebook, but states that authorities may need to adjust it based on census data indicating the average number of students living in student-only accommodation in the local area.⁹ Norwich City Council introduced the adjusted conversion ratio of 1:2.85 for communal/cluster accommodation (for the purpose of assessing future housing supply) during the GNLP examination process. An Update Note set out the new ratio in November 2021¹⁰, which has been applied since. The Inspectors' Report on the GNLP applauds this adjusted approach for aligning with PPG, and states that it is considered to be justified¹¹.
- 3.6 For PBSA which takes the form of studio flats, each net student bedroom is counted as 1 net new dwelling.
- 3.7 The NPPF also aims to build a strong and competitive economy, stating that significant weight should be placed on the need to support economic growth and productivity, and aims to ensure the viability of town centres.

Local Planning Policy Context

- 3.8 The GNLP¹² (adopted March 2024) asserts that PBSA will be of strategic importance for the growth of the city over the plan period, due in part to historic and expected increases in the student population. The GNLP notes that over the lifetime of the plan, Norwich city centre and other accessible and sustainable locations are likely to see the delivery of a higher density of flats, and this may also include an increase in PBSA developments.

⁷ HDT Rulebook: <https://www.gov.uk/government/publications/housing-delivery-test-measurement-rule-book/housing-delivery-test-measurement-rule-book>, para 10.

⁸ PPG: <https://www.gov.uk/guidance/housing-supply-and-delivery>, para 025.

⁹ PPG: (as above), para 033.

¹⁰ Additional housing supply evidence: https://www.gnlp.org.uk/sites/gnlp/files/2021-11/D3.2B%20TP%20Policy%201%20Appendices%20Update%20to%20Housing%20Trajectory%20Tables%20and%20Graphs%2022.11.21%20Final_0.pdf, paras 8-10.

- 3.9 Policy 7.1 sets out that development at the UEA will cater for up to 5,000 additional students by 2038 through intensification of uses within the campus and some limited expansion. In terms of the provision of PBSA at the UEA campus, policy 5 of the GNLP sets out that this will have regard to the UEA Development Framework Strategy (DFS) or any successor documents. Furthermore, PBSA within the boundaries of the UEA campus will be exempt from affordable housing provision.
- 3.10 Away from the UEA campus, Policy 5 of the GNLP sets out that PBSA will be supported where the need for the development is justified by the current of proposed size of Norwich's higher educational institutions. Furthermore, any proposal for PBSA must:
- Be in a location suitable for residential development with sustainable access to the institutions served;
 - Be of a scale large enough so that services and amenities are provided on-site to ensure high standards of student welfare;
 - Contribute to a mixed and inclusive neighbourhood, not dominating existing residential communities;
 - Provide a mix of accommodation types to meet a range of needs in the student accommodation market;
 - Be required to pay a commuted sum sufficient to provide an off-site policy compliant level of affordable housing for which a supplementary planning document will give more detailed guidance on the methodology for calculating equivalent dwellings from student accommodation.
- 3.11 In terms of Norwich's Development Management Policies¹³, policy DM13 relates to communal development and multiple occupation. Part of the policy relates specifically to residential institutions and student accommodation and sets out a number of criteria that such proposals need to satisfy in addition to satisfying the overall objectives for sustainable development in policy DM1, and criteria for residential development in policy DM12. The requirements of DM13 are summarised as follows:
- the site must not be designated or allocated for an alternative non-residential use;
 - if allocated for housing, it can be demonstrated that the proposal would not compromise the delivery of a 5-year housing supply for the city;

¹¹ Inspector's Report: <https://www.gnlp.org.uk/sites/gnlp/files/2024-02/Greater%20Norwich%20LP%20-%20Inspectors%20Report%20-%20FINAL%20%281%29.pdf>, para 337.

¹² [Adoption | GNLP](#)

¹³ [Development management policies | Norwich City Council](#)

- the location provides convenient and direct access to local facilities and bus routes;
- the provision of shared amenity space is satisfactory; and
- applicants can demonstrate provision of satisfactory servicing and warden / staff accommodation.

3.12 Policy DM12 sets out principles for all residential development, not all of which are relevant to student accommodation. Relevant criteria are summarised below:

- proposals should not compromise delivery of wider regeneration proposals and should be consistent with the objectives for sustainable development set out in the JCS and in policy DM1;
- proposals should have no detrimental impacts upon the character and amenity of the surrounding area (including open space) which cannot be resolved by the imposition of conditions; and
- proposals should contribute to a diverse mix of uses within the locality.

3.13 The GNLP Sites Plan contains several relevant allocations. The plan allocates three development sites at the UEA campus (NOS.09, NOS.10, NOS.11) which are expected to be developed for university related development and student accommodation within the local plan time-period up to 2038. In addition, the UEA Grounds Depot Site (NOS.12) is identified as a strategic reserve for future student accommodation development at the campus by the university. This reserve site will only be released after the completion of the development of the other sites allocated for student accommodation.

3.14 The UEA Development Framework Strategy was updated in 2019 and sets out a growth vision for the university, which plans to accommodate an extra 5,000 students by 2035. A revised Development Framework Strategy (DFS refresh) is being prepared by the UEA. Once finalised and endorsed by Norwich City Council as Local Planning Authority, the DFS refresh will provide additional detailed evidence and guidance to inform development proposals for the specific sites allocated in the GNLP and for elsewhere in the campus. Whilst the draft UEA Strategic Development Framework (November 2021) states that “It is still conceivable that by 2040, the UEA student population will climb to 22,000 FTEs” it does qualify this by saying that the future of higher education is precarious and uncertain.

- 3.15 Other site allocation policies that also mention the provision of student accommodation include STR.02 (Land at and adjoining Anglia Square), NCC.04 (Land at Mountergate/Prince of Wales Road), NCC.12 (Land adjoining Sentinel House) and NCC.14 (The Former Eastern Electricity Headquarters, Duke's Wharf).
- 3.16 The Council last revised its affordable housing Supplementary Planning Document¹⁴ (SPD) in 2019 to reflect the 2018 NPPF and the latest evidence at the time for housing need which was set out in the 2017 Strategic Housing Market Assessment (SHMA). The Affordable Housing SPD is a material consideration in determining applications for new student accommodation on sites allocated for housing or housing-led development. The SPD requires updating to account for subsequent changes to legislation and guidance, and to reflect the recently adopted GNLP.
- 3.17 The Community Infrastructure Levy (CIL) applies to all new development which adds 100m² of new floorspace, the creation of a new dwelling, or the conversion of a building no longer in lawful use. Section 106 agreements and planning conditions may also be used where necessary. The CIL Charging Schedule¹⁵, adopted by Norwich City Council on the 25 June 2013, sets out the charge per square metre that will apply to each category of new development. Privately developed purpose-built student accommodation is regarded as 'sui generis' which falls under the category 'All other types of development covered by the CIL regulations'. This currently returns a charge of £8.50 per m². The Charging Schedule rate is index linked which is updated annually.

¹⁴ [Affordable housing supplementary planning document | Norwich City Council](#)

¹⁵ [Community Infrastructure Levy \(CIL\) charges | Norwich City Council](#)

4 Need for additional purpose-built student accommodation

4.1. This section pulls together current data on the student population and the distribution and characteristics of PBSA in Norwich. It then factors in projected growth in the student population at the city's Higher Educational Institutions (HEIs), whilst noting the factors that might affect growth in student numbers and future demand for PBSA. Based on this information and experience elsewhere it reaches a conclusion on the need for additional PBSA until 2038/39.

Current Student Population

4.2. The most recently available data (Higher Education Statistics Agency - HESA, 2022/23) on student numbers for UEA and Norwich University of the Arts is shown in Table 3, along with the breakdown between undergraduates and postgraduates, and UK and non-UK students. Table 2 (chapter 2) shows how student numbers in Norwich have changed between 2014/15 and 2022/23.

Table 3: Student numbers in 2022/23

Total Students – 2022/23				Full-time students – 2022/23		
UEA	Undergraduate	13,320	18,540	Undergraduate	12,460	15,775
	Postgraduate	5,225		Postgraduate	3,320	
	UK	15,490		UK	12,855	
	International	3,055		International	2,925	
NUA	Undergraduate	2,740	2,835	Undergraduate	2,725	2,765
	Postgraduate	95		Postgraduate	45	
	UK	2,660		UK	2,595	
	International	175		International	175	
Total	21,375			18,540		

Source: HESA

Student number projections

4.3. Past trends are an important indicator when projecting forward the potential future number of students in Norwich. The projections within this report are based on past trends and population projections as opposed to the future strategic plans of the UEA and Norwich University of the Arts. Neither have specific up to date¹⁶ targets for future student numbers, rather looking for a general growth trajectory over time. Whilst the draft UEA Strategic Development Framework states that “It is still conceivable that by 2040, the UEA student

¹⁶ The 2019 UEA Development Framework Strategy identified a target of an additional 5,000 students by 2035, but this is a dated strategy which the projections are not based upon.

population will climb to 22,000 FTEs” it goes on to qualify this somewhat by saying that the future of higher education is precarious and uncertain.

4.4. The past student numbers highlighted in Table 2 (chapter 2) are a baseline for the level of growth forecast, with the average annual growth between 2014/15 and 2022/23 used to project student numbers to 2038/39, shown in Table 4 and summarised below:

- 24,670 full-time students in Norwich;
- 20,435 of the full-time students being undergraduates; and
- 5,680 of the full-time undergraduate students being new entrants.
- For all full-time students in Norwich this is an average increase of 383 students per year.

Table 4: Student Number Projections, Norwich, 2023/24 – 2038/39

	2023 /24	2024 /25	2025 /26	2026 /27	2027 /28	2028 /29	2029 /30	2030 /31	2031 /32	2032 /33	2033 /34	2034 /35	2035 /36	2036 /37	2037 /38	2038 /39
Full time (all)	18,923	19,306	19,689	20,073	20,456	20,839	21,222	21,605	21,988	22,371	22,754	23,138	23,521	23,904	24,287	24,670
Full time (UG)	15,513	15,841	16,169	16,498	16,826	17,154	17,482	17,810	18,138	18,466	18,794	19,123	19,451	19,779	20,107	20,435
Full time (UG, entrant)	4,855	4,910	4,965	5,020	5,075	5,130	5,185	5,240	5,295	5,350	5,405	5,460	5,515	5,570	5,625	5,680

Source: HESA, AECOM Calculations

4.5. As a sense check, the number of full-time students in Norwich in 2022/23 was compared to the number of individuals aged 15-24 in Norwich (Office for National Statistics (ONS) population projections 2022) to establish what proportion of this population cohort are students. The resulting percentage (64.3%) was then applied to the ONS projection for this cohort in 2038. This calculation suggests that there would be around 20,274 full-time higher education students in Norwich at this time. This produces an increase of 1,734 students between 2022 and 2038, or 108 per annum. This is a lower figure but on the same scale as the projections above, which are taken forward through this report.

International students

4.6. As a key demand stream for PBSA it is important to understand the current and future number of international students. This group, alongside first year undergraduates, constitutes the primary market for PBSA in Norwich and nationwide.

- According to HESA data and as shown in table 3, in 2022/23 there were 2,925 international full-time students at the UEA and 175 international full-time students at Norwich University of the Arts (totalling 3,100 students which is around 16.7% of the total full-time student numbers within Norwich). Of these 12.7% were from the EU and 87.3% were non-EU.
- The equivalent UK data shows that 69.4% of full-time students of full-time students were domestic in 2022/23, with 30.6% international (11.9% EU and 88.1% non-EU).
- When looking at the average between 2018/19 and 2022/23 for the UK, 73.1% of full-time students were from the UK, with 26.9% non-UK (20.8% EU and 79.2% non-EU). This shows that Norwich generally has a greater proportion of domestic students than the UK as a whole.
- The proportion of international full-time students is quite heavily influenced by postgraduate students, with the national average (2018/19-2022/23) rate of international full-time undergraduate students 17.0%, compared to 26.9% across all full-time students. When looking at Norwich specifically, in 2022/23 9.7% of full-time undergraduates were international students, compared to 16.7% across all full-time students.

4.1 The uncertainties are generally greater when projecting international student numbers because of less predictable factors such as future travel restrictions, Government policies and global events. AECOM have used two methodologies for projecting forward the number of international students in Norwich with the first row applying the average national proportion of international students between 2018/19 and 2022/23 (26.9%) to projections for all students in Norwich whereas the second row relates only to the proportion of full-time students in Norwich in 2022/23 (16.7%). This estimates the number of international students at HE institutions in Norwich by 2038/39 as 4,125 - 6,644 as shown in table 5 below.

Table 5: International Student Number Projections, Norwich, 2023/24 – 2038/39

	2023 /24	2024 /25	2025 /26	2026 /27	2027 /28	2028 /29	2029 /30	2030 /31	2031 /32	2032 /33	2033 /34	2034 /35	2035 /36	2036 /37	2037 /38	2038 /39
Full time (all) 26.9% non-UK	5,096	5,199	5,302	5,406	5,509	5,612	5,715	5,818	5,922	6,025	6,128	6,231	6,334	6,437	6,541	6,644
Full time (all) 16.7% non-UK	3,164	3,228	3,292	3,356	3,420	3,484	3,548	3,612	3,677	3,741	3,805	3,869	3,933	3,997	4,061	4,125

Source: HESA, AECOM Calculations

Demand for Purpose Built Student Accommodation

- 4.2 To understand the potential future demand for PBSA in Norwich, it is essential to establish how many of the projected students are expected to live in this accommodation type. Not all full-time students need to live in rented accommodation as they may live either in their parental/guardian home, a house or flat bought for them by their parents, or may own their accommodation.
- 4.3 The starting point therefore is to establish the living situation of current students and HESA data breaks down the type of accommodation full-time students live in. Table 6 shows that in 2022/23 29.6% of full-time students lived in PBSA, compared to 30.6% of full-time undergraduates, and 63.6% of full-time undergraduate entrants. This demonstrates that first year undergraduates are much more likely to live in PBSA than students as a whole in Norwich, although over a quarter of full-time students live in this type of accommodation. This is above the proportion of full-time students living in PBSA across the UK (22.6%) in 2022/23.

Table 6: Term time address of full-time students, Norwich, 2022/23

	Provider maintained property	Private sector halls	Parent's home	Own residence	Other rented accommodation ¹⁷	Other
Full-time students (all)	19.6%	10.0%	11.0%	15.8%	39.5%	4.2%
Full-time students (UG)	20.7%	9.9%	11.5%	13.5%	41.0%	3.3%
Full-time students (UG, entrant)	50.3%	13.3%	12.5%	8.2%	15.0%	0.7%
Full-time students (UG, not an entrant)	6.5%	8.3%	11.0%	16.1%	53.5%	4.6%

Source: HESA, AECOM calculations

4.4 Applying the proportion of each student type to the student number projections based on HESA past trends data gives an estimate for the demand for PBSA in Norwich to 2038/39. Table 7 shows, based on current occupancy patterns, that by 2038/39 there may be a need for:

- 7,293 PBSA beds to meet the demand of all full-time students;
- 6,267 PBSA beds to just meet the demand of full-time undergraduates;
- 3,612 PBSA beds to just meet the demand of full-time undergraduate entrants.

4.5 The Council seeks to meet PBSA bed demand for all full-time students in order to give students studying at all levels a choice, and to ensure that those postgraduate students that want to live in PBSA are able to.

Table 7: Estimated PBSA bed demand, Norwich, 2023/24 – 2038/39

	2023 /24	2024 /25	2025 /26	2026 /27	2027 /28	2028 /29	2029 /30	2030 /31	2031 /32	2032 /33	2033 /34	2034 /35	2035 /36	2036 /37	2037 /38	2038 /39
Full time (all)	5,594	5,707	5,821	5,934	6,047	6,160	6,274	6,387	6,500	6,613	6,727	6,840	6,953	7,066	7,180	7,293
Full time (UG)	4,757	4,858	4,958	5,059	5,160	5,260	5,361	5,462	5,562	5,663	5,763	5,864	5,965	6,065	6,166	6,267
Full time (UG, entrant)	3,087	3,122	3,157	3,192	3,227	3,262	3,297	3,332	3,367	3,402	3,437	3,472	3,507	3,542	3,577	3,612

Source: HESA, AECOM Calculations

¹⁷ This is assumed to mainly be HMOs

4.6 It is important to note some caveats to these projections:

- The projections are based on 2022/23 trends in student occupancy and assume that they will continue in the future (i.e. the proportion of students living in PBSA will remain broadly the same over time.)
- Potentially, the 2022/23 proportion of students living in PBSA may be limited by the existing stock (quantity and quality) and that increasing the stock may in turn increase demand. However, as discussed later in this section, existing PBSA stock is not fully occupied which suggests that there is currently excess supply. This would indicate that all PBSA bed demand is being met and the level of demand is not being constrained by the current supply.
- International students are more likely to live in PBSA than the wider student population. However, it is not possible to precisely quantify future demand due to continued uncertainties in international student numbers, which can be so quickly and significantly influenced by external factors. If in the future international student numbers increase significantly, then the demand for high-quality PBSA may also increase. On the contrary, if government policy or international students' desires (i.e. other countries become more attractive) change, occupancy rates may fall short of expectations, leading to oversupply or saturation in the market.

Distribution and characteristics of existing PBSA

4.7 The term 'purpose-built student accommodation' (PBSA) refers to both university-maintained property and private sector halls. As of October 2024, there were 6,349 student bedspaces in Norwich in PBSA¹⁸. This figure however does not include the Ziggurats (Norfolk and Suffolk Terrace) at the UEA as these halls of residents were closed in 2023 due to Government guidance on Reinforced Autoclave Aerated Concrete (RAAC). This also affected parts of Nelson Court and Constable Terrace, but these were fully reopened by September 2024. It is unclear when the Ziggurats will reopen (but this is unlikely to occur in the next 3 years) meaning there are 663 bedspaces¹⁹ currently unusable. If these were available, there would be 7,012 PBSA bedspaces in Norwich.

¹⁸ This assumes that any twin rooms advertised as both single and double occupancy are the same rooms. It also assumes that the 35 twin rooms in UEA halls of residence are occupied by two people as the maximum possible occupancy. It also assumes that the 2-bedroom apartments are fully occupied. This total also excludes the 40 family apartments available at UEA as these are not considered traditional student accommodation, and most students will not be eligible, meaning they are not meeting general student needs. They are, however, an important resource for postgraduate or mature students with families.

¹⁹ This assumes that any twin rooms advertised as both single and double occupancy are the same rooms. It also assumes that the 86 twin rooms in the Ziggurats are occupied by two people as the maximum possible occupancy. It also assumes that the 2-bedroom studio apartments are fully occupied.

4.8 When looking at the breakdown in type of the current stock of 6,349 bedspaces, 85.4% (5,423) are within cluster flats, 8.9% (568) are studios, 4.4% (280) are classed as 'other'²⁰, and information is lacking or unknown for 1.2% (78).

4.9 Table 8 provides a full breakdown of the current stock of PBSA, including numbers of bedspaces, the type of PBSA (e.g. halls of residence, nominations, direct let), and provides additional relevant information.

Table 8: Stock of PBSA in Norwich, 2024

PBSA	Bedspaces	Halls of Residence / Nominations / Direct Let	Type of Room	Additional Information
UEA – Ensuite twin	35	Halls of Residence (UEA)	Cluster flats	-
UEA – Ensuite sole use	35	Halls of Residence (UEA)	Cluster flats	Assumed to be same rooms as above
UEA - Ensuite campus	1,752	Halls of Residence (UEA)	Cluster flats	-
UEA – Ensuite campus plus	50	Halls of Residence (UEA)	Cluster flats	Newly refurbished
UEA - Standard campus (postgraduate 50-week license)	112	Halls of Residence (UEA)	Cluster flats	Shared bathroom
UEA – The Village ensuite	715	Halls of Residence (UEA)	Cluster flats	UEA student village
UEA – Two bedroom unit	168	Halls of Residence (UEA)	2-bedroom apartments	Shared bathroom & kitchenette (between 2)
UEA – Barton Hickling Crome	744	Halls of Residence (UEA)	Cluster flats	Newest UEA accommodation

²⁰ This includes 2-bedroom units and larger apartments (i.e. not studios).

Ensuite INTO	100	UEA partnership with INTO	Cluster flats	INTO manage the PBSA but located on UEA campus
Rochester Court	48	Halls of Residence (NUA)	Cluster flats and studios (split unknown)	New in 2024
Duke Street Riverside	100	Halls of Residence (NUA)	Cluster flats	All ensuite accommodation
All Saints Green	228	Nominations (NUA)	225 rooms in cluster flats and 3 studios	25-year agreement (from 2015) to exclusively cater to NUA students
Beechcroft	77	Halls of Residence (NUA)	Cluster flats	Washbasin and ensuite rooms
Crown Place	705	Direct let and nominations (NUA)	404 rooms in cluster flats, 189 studios, 112 apartments	Received nominations from closed Ziggurats (UEA)
St Crispin's House	684	Direct let and nominations (NUA)	429 rooms in cluster flats and 225 studios	Opened September 2023. Received nominations from closed Ziggurats (UEA)
Shoemakers Court	73	Direct let	69 rooms in cluster flats and 4 studios	-
Somerleyton House	59	Direct let	56 rooms in cluster flats and 3 studios	-
Benedict's Gate	302	Direct let	189 rooms in cluster flats and 113 studios	All cluster flats are ensuite
Heathfield	44	Direct let	43 rooms in cluster flats and 1 studio	All cluster flats are shared bathroom
Portland House	40	Direct let	Cluster flats	All ensuite

Velocity Student	34	Direct let	Cluster flats	All ensuite
Pablo Fanque House	244	Direct let but with UEA partnership	214 rooms in cluster flats and 30 studios	All cluster flats are ensuite

PBSA pipeline

4.10 Alongside the existing stock of PBSA, as of October 2024 there were 2,342 PBSA bedspaces in the planning pipeline which includes 933 which have planning permission and 1,409 with a planning decision still pending.

4.11 The total volume of existing and near-term future supply could therefore amount to 7,945 bedspaces, including existing PBSA, the pipeline schemes approved or under construction, and assuming the reopening of Ziggurats. If also taking into consideration the pipeline schemes that still have a decision pending, this figure could total 9,354 bedspaces if all are approved and constructed. It should however be acknowledged that not all pipeline development will necessarily be approved and/or delivered. Table 9 gives details of the pipeline PBSA (as of October 2024).

Table 9: PBSA pipeline in Norwich, 2024

PBSA	Bedspaces	Additional Information
The Blackdale Building, Bluebell Road (Phase 2)	401	Approved
Car park adjacent to Sentinel House, 37-43 Surrey Street	252	Commenced
Car park to the rear to Premier Travel Inn, Duke Street	139	Commenced
11 Normans Building	141	Approved
Former Eastern Electricity Board site, Duke Street, Duke's Wharf	480	Decision Pending
Land adjacent to former Shoe Maker public house, Enfield Road	33	Decision Pending

Debenhams Building, Orford Place	405	Decision Pending
Nelson Hotel, Prince of Wales Road	491	Decision Pending

4.12 Figure 1a illustrates the distribution of existing and pipeline PBSA in Norwich. It shows that the majority of the PBSA pipeline is located in the city centre, with 5 schemes within 800m of Norwich University of the Arts and just one within 800m of the UEA. However, much of the private PBSA (outside of those with nominations agreements with Norwich University of the Arts) caters for students from both institutions. This is likely in part due to the introduction of permanent hybrid learning from the UEA post-Covid, meaning students are on campus fewer days than previously and so some prefer to live in the city centre rather than prioritising being close to campus. The two distinct areas of PBSA shown in figure 1a are likely due to the UEA campus being a 20+ minutes bus journey outside of the city centre, with PBSA development either on or very close to the UEA campus or in the city centre, with the areas between more residential in character and therefore less likely to be appropriate for PBSA development.

Figure 1a: Map of PBSA Schemes in Norwich

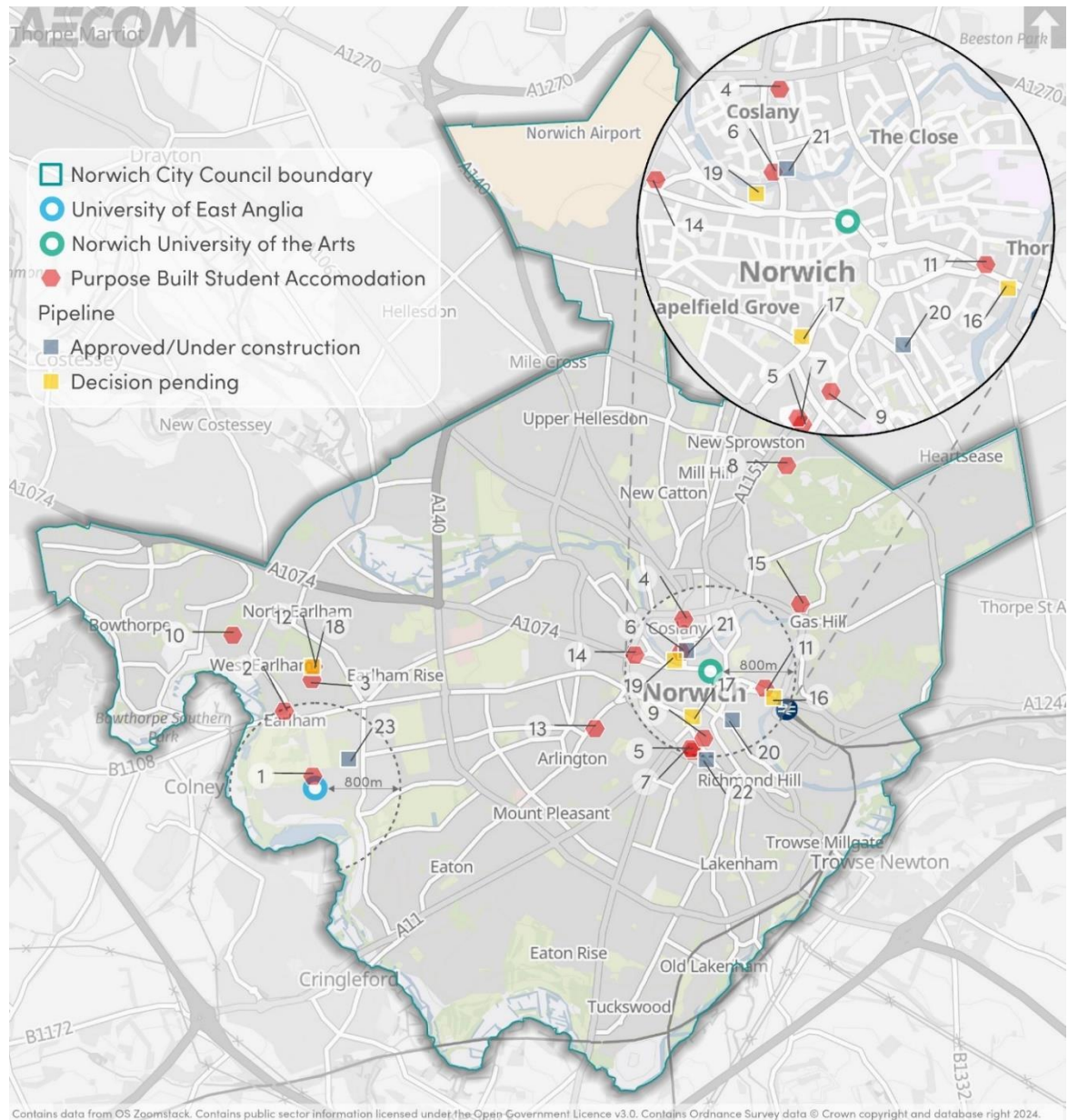
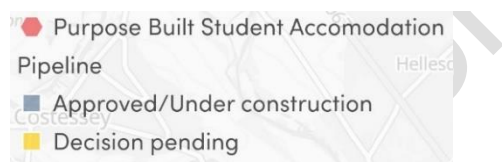
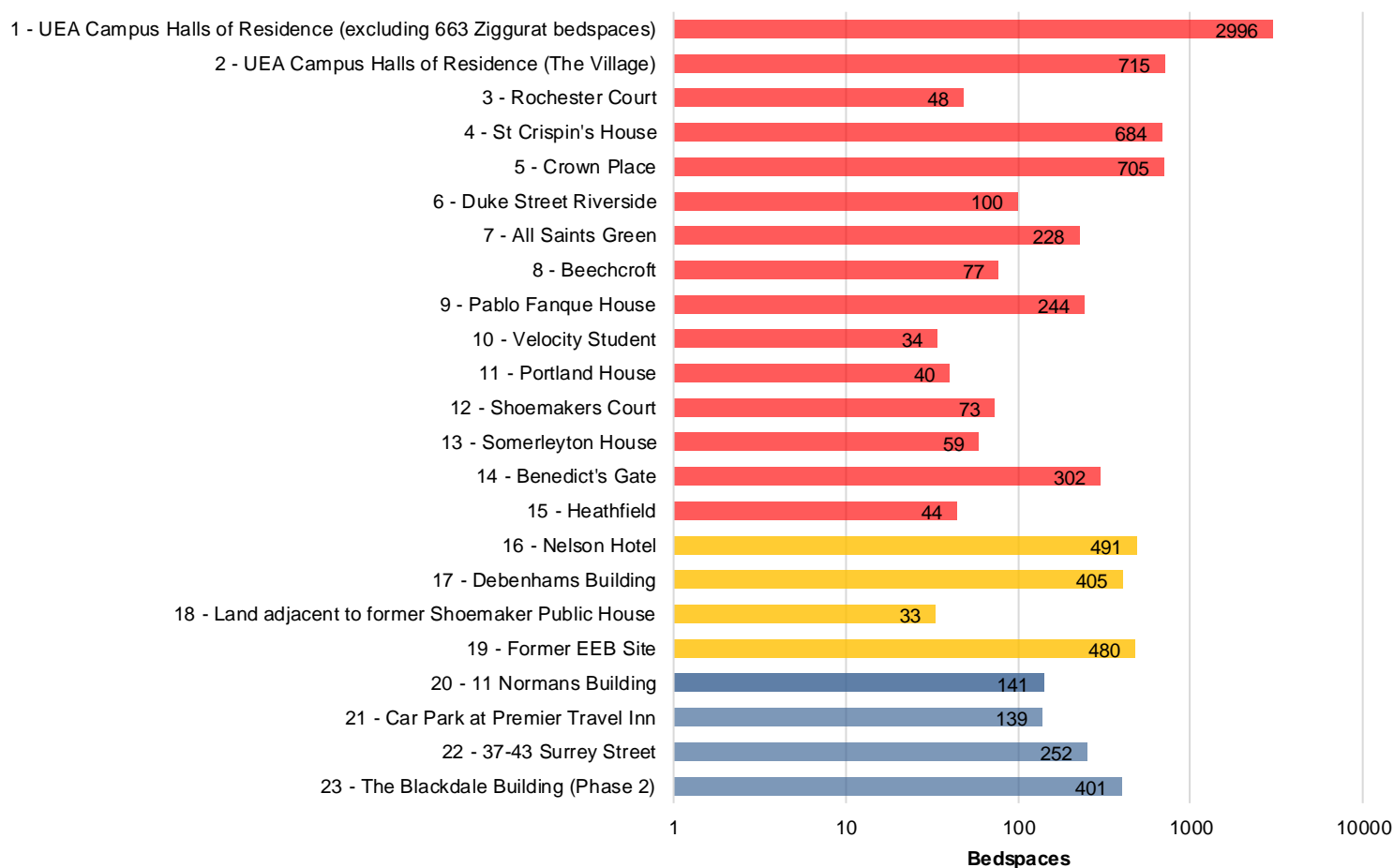


Figure 1b: Map numbering and scheme name



Occupancy levels and future PBSA need

4.13 In order to determine whether the current and pipeline PBSA stock will meet the needs of existing and future student populations, it is important to understand PBSA occupancy rates. To inform the 2024 PBSA study, AECOM contacted the two universities and the private PBSA providers to establish their current occupancy rates.

4.14 Of the providers that gave details on occupancy, rates ranged from fully occupied to approximately 62% occupied, pointing to significant variation. One provider noted that the 2024/25 academic year is the first that the scheme has not been fully occupied, with 96% occupancy for this academic year.

- 4.15 Overall, providers and stakeholders were generally of the view that there is sufficient, if not excess, PBSA provision in Norwich at present. Consultation also identified that a number of direct let/nominations PBSA providers struggled particularly with occupancy for the 2024/25 year, but that nominations from the closed UEA Ziggurats and significant price reductions have helped to fill empty rooms. It is not known what level of occupancy some providers would have without the 663 students transferred from the Ziggurats, but it is very likely to be lower.
- 4.16 Discussions with both UEA and Norwich University of the Arts were also undertaken. UEA representatives expressed the overall view that there is currently enough provision of PBSA in Norwich, with underoccupancy in their halls of residence rising as a result. This is a more recent development as, previously, PBSA outside of the University was seen as a helpful resource for meeting excess demand unable to be met by halls of residence, which tended to be filled first.
- 4.17 Norwich University of the Arts were also of the view that there are adequate PBSA bedspaces in Norwich to meet their needs for the short term (the next 2 years). Despite owning and operating fewer halls of residence, Norwich University of the Arts does not welcome over-provision of PBSA. While it might appear to widen choice and guarantee available spaces, underoccupied schemes are seen as detrimental to the student experience due to the vibrancy of accommodation and the financial position of providers, which is linked to their offering of amenities and events.
- 4.18 The above occupancy rates were taken in 2024 and are likely to vary across sites and over time. Therefore, any PBSA needs assessments submitted in support of applications must include up to date information on occupancy.

Student choice and factors influencing occupancy rates

- 4.19 There are a number of key factors that influence a student's decision about their accommodation options with one of the key factors being affordability, particularly as tuition fees and accommodation costs rise. Research suggests that students are not willing or able to pay any price for PBSA rooms and the associated facilities (Cushman & Wakefield, 2023²¹). Inflation and the cost-of-living crisis has also impacted students considerably, with the amount they are able to spend on accommodation reducing alongside other increased living costs.

²¹ Cushman & Wakefield. (2023). *UK Student Accommodation Report*. Available at <https://image.comm.cushmanwakefield.com/lib/fe37117171640578741271/m/1/CW+Student+Accommodation+Report+2023+Low+Res.pdf>

4.20 Table 10 shows the cost of PBSA and HMOs (based on the 2024 Norwich HMO Study) in Norwich alongside 2023/24 student maintenance loans. This is a key housing option to consider alongside PBSA as the generally most common form of alternative student accommodation, with 39.5% of full-time students in Norwich living in HMOs in 2022/23. Table 10 shows that a room in an HMO in Norwich is more affordable than all forms of PBSA, with the exception of the lowest cost halls of residence, which is a twin room at UEA and therefore not completely equivalent.

Table 10: Norwich PBSA Affordability

		Annual ²² Cost	Average Monthly Cost	Maximum Student Loan £9,978	Average Student Loan £7,950	Minimum Student Loan £7,125
PRS ²³	Room (HMO)	£5,700	£475	Yes	Yes	Yes
	Studio	£7,200	£600	Yes	Yes	No
	1-bedroom	£8,256	£688	Yes	No	No
PBSA ²⁴ 2024/25	Upper Cost of Halls of Residence	£8,226	£686	Yes	No	No
	Lower Cost of Halls of Residence	£3,828	£319	Yes	Yes	Yes
	Average Cost of Halls of Residence	£7,397	£616	Yes	Yes	No
	Upper Cost Private PBSA (Studio)	£12,374	£1,031	No	No	No
	Upper Cost Private PBSA (Cluster)	£9,200	£767	Yes	No	No
	Lower Cost Private PBSA	£6,061	£505	Yes	Yes	Yes

Source: Norwich HMO Study 2024, AECOM calculations

²² Annual refers to the length of tenancy rather than annual year. Students in PBSA if not moving back to the family home would have to potentially pay further rent for the months not covered by PBSA tenancies.

²³ Data from AECOM's 2024 Norwich HMO Study

²⁴ All costs are based on 2024/25 academic year. Halls of residence prices are based on UEA and 40-week tenancies. Private PBSA is calculated on the basis of 46-week tenancies as the most common option.

- 4.21 When looking at the affordability of PBSA in comparison to student maintenance loan payments, the lowest cost halls of residence and estimated lower cost private PBSA rents are covered by the minimum student maintenance loan. The average student maintenance loan also covers the average cost of halls of residence. The maximum student maintenance loan will cover all forms of accommodation with the exception of higher cost studios in private PBSA.
- 4.22 Although the student maintenance loan is sufficient to cover the cost of most PBSA options, this is just the cost of rent and utilities, with minimal residual income for living costs. For example, based on the average student maintenance loan and the average cost of halls of residence, students would have £553 remaining for the whole academic year. This is clearly insufficient to cover their other living costs and students would need to find additional funds either through paid work alongside study and/or contributions from parents, caregivers or other sources.
- 4.23 By comparison, students living in an HMO would have £2,250 remaining. This is a clear incentive for students to choose to live in HMOs in Norwich, especially after their first year of study. Without a reduction in the cost of PBSA in Norwich, it may not be realistic to expect increased PBSA delivery to reduce students' reliance on HMOs and to move to PBSA accommodation. Consultation with providers shows that some are aware of this issue and the need for PBSA pricing to better reflect student loan incomes.
- 4.24 Furthermore, whilst affordability is a key factor in students' decision making about accommodation, it is not the only factor that dictates their preferences. Whilst first-year and international students are much more likely to live in PBSA than the wider student population, students in their later years of study tend to more commonly live in HMOs (53.5% of full-time undergraduate non-entrant students in Norwich in 2022/23). Research in both Sheffield²⁵ and Scotland²⁶ found that students often move away from PBSA seeking greater freedom from restrictions and rules. Consultation with lettings agents in Norwich also identified that some students moving from PBSA to HMOs found PBSA to be lonely. This may be linked to occupancy, with lower occupancy having an impact on the student experience and sense of community.

²⁵ Stevenson R and Askham P. (2011). Purpose Built Student Accommodation: Changing Face of Student Accommodation in Sheffield. *Sheffield Hallam University Built Environment Research Transactions*. 3(1). Pp. 6-16.

²⁶ Campbell A, Gibb K, James G, Martinico L, McCaskell A, Roberts N, Robins T, Williams L. (2024). Student Housing Options and Experiences of Homelessness in Scotland: a Report by the Cross-Party Group on Housing. *UK Collaborative Centre for Housing Evidence*. Pp. 1-37.

- 4.25 Students often also have greater choices about location in the private rented sector than through PBSA. For example, a large proportion of PBSA schemes in Norwich are located in and around the city centre and Norwich University of the Arts. Conversely, whilst there are still some HMOs in the city centre, a significant proportion are near but not within the UEA campus, where there are fewer PBSA schemes. HMOs and PBSA are therefore meeting different geographical needs in Norwich and so it may not be possible to replace HMO demand with additional PBSA, and it may not be appropriate to deliver PBSA in the more residential locations surrounding UEA. Consultation with lettings agents in Norwich also identified that for students moving from PBSA to HMOs, location and proximity to the university (particularly for UEA) were key considerations.
- 4.26 Therefore, whilst increasing the stock of PBSA may result in a further shift of students from the private rented sector into the PBSA sector, the gap in cost between PBSA and cheaper private rented accommodation is likely to constrain the choices of many students. Furthermore, whilst a larger stock of PBSA may reduce prices as providers compete for filling bedspaces, it is not known to what extent oversupply would impact the viability of schemes and too much supply may lead to closures.

Conclusion on need for additional PBSA

- 4.27 AECOM and Norwich City Council have liaised with both higher education institutions and PBSA providers to inform this document. Neither university have up-to-date targets for future student numbers and therefore student number projections are based on a general growth trajectory over time with past trends helping to project the potential future number of students in Norwich.
- 4.28 As reported in the sections above, it is anticipated that the current stock and expected pipeline of PBSA in Norwich will comfortably meet the future demand of students to 2038/39, including ensuring an element of choice within the market. Indeed, the scale of expected supply far exceeds estimated demand which points to the potential for oversaturation in the market, with potential repercussions for occupancy levels, provider finances, and student quality of life.

- 4.29 The estimates for the demand for PBSA in Norwich to 2038/39 is based on current accommodation occupancy patterns of students. It is acknowledged that potentially, the 2022/23 proportion of students living in PBSA may be limited by the existing stock (both its quantity and quality) and that increasing the stock may in turn increase demand. However, current PBSA stock is not fully occupied which suggest that there is currently excess supply. This would indicate that all PBSA bed demand is being met and the level of demand is not being constrained by the current supply. Furthermore, the importance of HMOs in the local market is also acknowledged with HMOs offering a uniquely affordable accommodation option that is not matched by the available alternatives.
- 4.30 It is concluded that the evidence suggests that there is no further need for PBSA as the needs of the existing student population and projected future population can be met by the existing and pipeline supply. However, going forward, ongoing data collection, regular monitoring and review of data in association with higher education institutions in Norwich is essential to improve the understanding and accurate forecasting of such developments and to gain more detailed information about changing student preferences.

5 Best practice principles

Introduction

- 5.1. The purpose of this document is to supplement GNLP policy 5 and to better inform both applicants and decision makers in relation to proposals for purpose-built student accommodation. Whilst the current evidence would suggest that there is no need for any further PBSA over the GNLP plan period, the Council must acknowledge that the situation can and may change over time. There is therefore flexibility in policy 5 which provides the opportunity for applicants to submit an assessment of need as part of a future planning application.
- 5.2. The objective of this SPD therefore is to encouraging good quality accommodation in appropriate and sustainable locations where the need for future PBSA is established. This will ensure that the needs of Norwich's student population can be met and that any future PBSA will contribute to mixed and inclusive neighbourhoods.
- 5.3. This section lists the factors that the council will take into consideration in the assessment of relevant planning applications. It pulls together existing policy, evidence, best practice and information about student development into a series of guidelines to inform the planning application and assessment process.
- 5.4. Individual proposals will be assessed on a case-by-case basis. Applicants are encouraged to engage with the council's Pre-application service²⁷.

Need

- 5.5. GNLP policy 5²⁸ sets out that away from the UEA campus, proposals for purpose-built student accommodation will be supported where the need for the development is justified by the current or proposed size of Norwich's higher educational institutions. The evidence set out in section 4 concludes that there is currently considered to be no need for additional PBSA in Norwich during the plan period. If no evidence to the contrary is provided it is unlikely that planning applications for further PBSA development away from the UEA campus will be supported.
- 5.6. Notwithstanding this, the Council acknowledges that various factors, such as the universities' growth plans, PBSA supply, HMO supply, affordability, occupancy levels and student preference, which can all influence the quantum of need, can change over time. Information on need will be kept up-to-date and will be

²⁷ [Pre-application planning advice | Norwich City Council](#)

²⁸ [GNLP Policy 5](#)

informed by ongoing council engagement with the higher education institutions. Any subsequent updates on need will be publicised on the council's website or included in a future iteration of this Supplementary Planning Document.

5.7. Furthermore, as part of the planning application process, applicants can submit PBSA needs assessment if they consider the Council's evidence is out of date. It is however important that any needs assessment covers the following factors and that the applicant engages with both universities:

- Current and future student numbers
- Existing PBSA supply and future pipeline supply
- Current occupancy rates (through engagement with the universities and existing PBSA providers)
- Student preference (which should include an affordability assessment).

5.8. Whilst it is recognised that it is important to ensure that the accommodation needs of the current and future student population can be met through both the provision of PBSA and the private rented sector, there remains a need in Norwich for development of market and affordable housing as defined in the Greater Norwich Local Housing Needs Assessment ²⁹(July 2021). This means that, while it is important to consider the merit of additional student accommodation, due consideration should be given to the opportunity to deliver much needed housing.

5.9. Student housing should not be prioritised to the detriment of other forms of housing or development undermining the provision of mixed and balanced communities in Norwich. Student accommodation in the city centre may be competing with other, high value commercial interests. Care needs to be exercised in ensuring sites used for student accommodation do not impact on the overall commercial potential of the city.

Location

5.10. Historically the majority of university accommodation for students has been located on the UEA campus but in more recent years the majority of PBSA has been provided in the city centre to serve both the UEA and Norwich University of the Arts.

5.11. If the need for further PBSA arises then the key locational focus for future provision of any new student accommodation will be the UEA campus and the city centre where the two key higher education institutions are situated. This does not rule out provision of PBSA to serve the future needs of Norwich City College, should that need arise.

²⁹ [B22.3 Greater Norwich LHNA.pdf](#)

- 5.12. Policy 5 of the GNLP sets out that proposals for PBSA at the UEA campus will have regard to the UEA Development Framework Strategy (DFS) or any successor document and the policy does not set out the requirement to demonstrate 'need' for any proposed student accommodation on the campus. Furthermore, policy DM26³⁰ of the Development Management Policies is also relevant and this sets out that development within the UEA campus will be supported subject to proposal being in accordance with any masterplanning documents currently in place and subject to development:
- a) conserving the landscape and architectural significance of the UEA, retaining a green edge, safeguarding and enhancing biodiversity and geodiversity and protecting significant vistas;
 - b) implementing the UEA Travel Plan; and
 - c) Promoting public access to open spaces.
- 5.13. Proposals at the UEA should also take into account the other considerations set out within this section of the SPD as appropriate.
- 5.14. Away from the UEA campus proposals must be in a location otherwise suitable for residential development with excellent sustainable access to the higher education institutions served.
- 5.15. Proposals must also be located with good access to existing local facilities and amenities, such as shops, cafes, and leisure uses appropriate to the student market, to ensure a high quality of student experience.
- 5.16. PBSA will not be acceptable on sites allocated or designated for other purposes, except in exceptional circumstances and subject to not undermining planning policies in the Greater Norwich Local Plan or Development Management Policies Plan (such as DM 12,13, 15, 16, 17, 18, 19, 20).
- 5.17. For city centre located PBSA developments, mixed-use development is encouraged, with active frontages provided at street level to maintain vibrant streets for the wider community throughout the year.
- 5.18. As stated above proposed new PBSA developments must demonstrate that the site is in an accessible location for higher education institutions and accessible by sustainable transport modes (including bus transport, cycling and walking). For all applications it should be demonstrated that bus provision runs at times and with capacities appropriate for the number of students requiring the service to fulfil their educational needs. Secure cycle storage should be provided on site for occupants and their visitors.

³⁰ [DM26 Supporting development at the University of East Anglia](#)

- 5.19. Proposed developments should be appropriately located to enable them to be car free in accordance with policy DM32 'Encouraging car free and low car housing' of the adopted local plan. If sites are appropriately located there should be no need or desire for residents to use a private car (with the exception of appropriate provision of car parking spaces for disabled people). Further to this, management of sites and contractual arrangements should be agreed with residents to discourage/prohibit private car parking/use whilst in residence.
- 5.20. Access to Norwich Car club or provision of a Norwich Car Club bay or bays close to proposed development may contribute to a successful car free development.

Scale

- 5.21. In recent years the council has received proposals for PBSA for a range of sizes. Table 8 (chapter 4) shows the stock of PBSA in Norwich (as of October 2024) and Table 9 (chapter 4) shows the PBSA pipeline in Norwich (also as of October 2024). Excluding the halls of residents, existing PBSA ranges from 34 units at Velocity Students (St Mildred's Road) to 705 units at Crown Place (Surrey Street). In terms of schemes in the pipeline, this ranges from 33 at Land adjacent to former Shoe Maker public house, Enfield Road (pending decision) to several schemes which have over 400 units (which includes the Former Eastern Electricity Board site (Duke Street), the Debenhams Building (Orford Place) and Nelson Hotel (Prince of Wales Road) which are all pending decisions.
- 5.22. There are a number of factors considered relevant to the appropriate scale for provision of new purpose-built student accommodation:
- (a) The development must be of sufficient scale to be capable of providing for high standards of student welfare, including 24-hour staffing on-site. Student resilience and emotional wellbeing are of great concern to the higher educational establishments as well as to the council. Good quality accommodation has an important role to play in student wellbeing, with issues such as provision of on-site maintenance, reception and security being key considerations for students, and identifies the ability to talk to wardens and counselling services as very valuable in times of difficulty.
 - (b) New PBSA development should ensure that adequate infrastructure and on-site amenities, as described in these guidelines, can be provided and serviced effectively.
 - (c) New PBSA development should achieve appropriate densities, and planning decisions should support development that makes efficient use of land (NPPF, paragraph 124). On the one hand proposed PBSA should be of sufficient scale to represent an efficient use of land; low-density

developments are unlikely to be able to demonstrate this. On the other hand, proposed PBSA should contribute to mixed and inclusive neighbourhoods, and should not be so high density that it dominates existing residential developments.

5.23. In line with these considerations, Norwich City Council regards developments within the range of 200-500 student bed-spaces as acceptable in principle for new PBSA developments in Norwich. It is considered that developments below the 200 threshold are less likely to be able to viably provide the appropriate level of management and facilities required to ensure a high quality development. Proposals within the 200-500 bed-space range are likely to be relatively high-density which would be most suited to city centre or campus locations. PBSA development in excess of 500 bedspaces may have negative impacts on neighbourhoods and existing residential communities.

5.24. There may be valid reasons why applications for PBSA developments outside the 200-500 range are appropriate, for example such development might include a mixture of educational uses within the site in addition to student accommodation. In any case, PBSA applications outside this range should provide appropriate justification to address the issues set out above.

External Building Design

5.25. Norwich is a historic city with many important cultural landmarks. The appearance, scale, height and massing of proposed developments are highly important considerations and must be sympathetic to relevant positive characteristics of the site and its setting. Norwich local authority area has 17 designated conservation areas, approximately 1,500 statutory listed buildings and 25 scheduled ancient monuments of international importance; as well as many locally listed buildings. It is important that regard is paid to safeguarding the historic environment.

5.26. Developments should respect the existing form and grain of the local area, including the historic skyline, and must be designed sympathetically to respect their immediate and surrounding environments to minimise any adverse impacts. Inappropriate design at scales influenced by economic factors alone will not be supported. Building design must accord with policies and guidance laid out in paragraph 5.28 below. Specific advice on individual projects can be provided by Conservation and Design officers as part of a pre-application advice request.

5.27. Buildings should be designed with minimal impact upon the amenity of its surroundings and neighbouring residents, with regards to noise, loss of light, overshadowing and loss of privacy and shall be assessed against relevant local

planning policies. Proposed developments should also address the cumulative impact of the new development.

- 5.28. Local Planning Policies relevant to design and building form include:
GNLP Policy 2: Sustainable Communities
GNLP Policy 3: Environmental Protection and Enhancement
GNLP Policy 7.1: The Norwich Urban Area including the Fringe Parishes
DM2: Ensuring satisfactory living and working conditions (Amenity),
DM3: Delivering High Quality Design,
DM9: Safeguarding Norwich's heritage
- 5.29. Local heritage and conservation design guidance³¹ can be found on the council website. Conservation area appraisals³² are of particular relevance as is the Heritage Interpretation SPD³³.

External Amenity and Landscape Design

- 5.30. Creating sustainable communities depends, amongst other things, on the relationship between the design of buildings, their location, and the quality of the outdoor space. Successful places, where people are attracted to live, have successful provision of external amenity and green spaces offering lasting economic, social, cultural and environmental benefits.
- 5.31. External green space is a vital component of good design and healthy living. Given the increase in high-density residential developments in recent years, it is essential that a sufficient supply of high-quality external space is included to minimise impacts on biodiversity and provide net gains in biodiversity and green infrastructure as required. Appropriate landscaped external space for use by occupants is an essential requirement of successful applications for PBSA. City centre developments in particular must facilitate this, preventing increasing pressure on existing public amenity and green space.
- 5.32. General guidance relating to local landscape design and information expected to be provided in support of a planning application can be found in the adopted Landscape and Trees SPD³⁴.
- 5.33. Policies relevant to landscaping include:
GNLP Policy 2: Sustainable Communities
GNLP Policy 3: Environmental Protection and Enhancement

³¹ [Heritage and conservation | Norwich City Council](#)

³² [Conservation area appraisals | Norwich City Council](#)

³³ [Heritage interpretation SPD \(Adopted December 2015\) | Norwich City Council](#)

³⁴ [Landscape and Trees SPD \(Adopted June 2016\) | Norwich City Council](#)

GNLP Policy 7.1: The Norwich Urban Area including the Fringe Parishes
DM2: Ensuring satisfactory living and working conditions
DM6: Protecting and enhancing the natural environment
DM7: Trees and development,
DM8: Planning effectively for open space & recreation

Internal Building Design

- 5.34. Purpose-built student accommodation is typically occupied by students for the majority of a year (contracts are often between 46 and 48 weeks in length). Therefore, it is critical that design is of a high quality with adequate amenity to contribute to healthy sustainable lifestyles including daylight, sunlight, privacy and outlook. Appropriate amenities and facilities must be provided for the occupants including sufficient communal space, private and shared facilities, for example kitchens and dining rooms should be designed to be of a sufficient size for all occupants to dine together. Sufficient on-site laundry facilities are often regarded as important facilities for students.
- 5.35. Student accommodation has unique characteristics differing from other residential accommodation. Student accommodation should provide an appropriate environment in which to study as well as live, socialise and sleep. It is likely that elements of the buildings will be in use for 24 hours a day. In high density developments where the occupants are unable to select their neighbours, the provision of private space is also important.
- 5.36. The government has provided guidelines for space standards in general market housing in the “Technical housing standards – nationally described space standard”. However, there are no equivalent guidelines for student accommodation.
- 5.37. The ‘Metric Handbook – Planning and Design Data’³⁵ is a well-recognised source of planning and design data for all types of development. In the absence of government technical standards for student accommodation the council has used the Metric Handbook as the basis for the following guidelines which it advises proposals for PBSA should meet:

Room Sizes

- A standard study bedroom without en-suite bathroom should have a minimum area of 10m².
- A standard study bedroom with en-suite bathroom should have a minimum area of 13m².

³⁵ ‘Metric Handbook – Planning and Design Data’, seventh edition (2021), edited by Pamela Buxton (Chapter 24 Housing for students and young people)

- Appropriate provision must be made for accessible rooms and wheelchair access in accordance with the *Building Regulations, Access to and Use of Buildings: Approved Document M*. Requirements for accessible rooms are also addressed in BS 8300:2018 Volumes 1 & 2. Wheelchair users require larger study bedrooms, with room for a wheelchair turning space between furniture and provision of an appropriate ensuite bathroom. Circulation, social and communal spaces should also be accessible. The proportion of rooms designed for wheelchair users shall be agreed with the Local Planning Authority.
- Studio 'room' for one student with en-suite bathroom and kitchen area should have a minimum area of 18m². Studio rooms could arguably be comparable to a bedsit flat with additional space sufficient to accommodate the appropriate furniture to use for study purposes as well as an en-suite bathroom.
- Studio 'flat' for one student or a couple with en-suite bathroom and kitchenette should have a minimum area of 30m². Studio flats could arguably be comparable to 1 bed 1 person flats for minimum internal space requirements. Other shared facilities such as laundry and communal spaces may contribute to the acceptability of the comparably smaller space in a studio flat. However, there must be sufficient space to accommodate the appropriate furniture to use for study purposes as well as an en-suite bathroom
- Sizes of communal rooms will need to be determined against the number of people sharing them. The figures in table 11 below are indicative only, for guidance:

Number of Residents	3	4	5	6	7
Living room in a dwelling with dining kitchen	13m ²	14 m ²	15 m ²	16 m ²	17 m ²
Dining Kitchen	10 m ²	11 m ²	12 m ²	13 m ²	14 m ²

Table 11: communal spaces – indicative minimum sizes

5.38. Overall accommodation satisfaction is important for student wellbeing and is a significant contributing factor to general life satisfaction. Supporting students to integrate well in their accommodation and socialise with housemates helps to ensure an overall satisfactory student experience which can result in a greater level of retention of students and increases wellbeing.

5.39. The Student Academic Experience Survey³⁶ is an annual survey conducted by Advance HE & Higher Education Policy Institute (HEPI), which seeks to understand and track undergraduate student experience in UK higher education. Analysis of loneliness by accommodation shows that the highest frequencies of

³⁶ [Student Academic Experience Survey 2024_1718100686.pdf](#)

loneliness are not experienced by students staying in university halls. However, it is important to note that occasional loneliness is actually very prevalent, with students living in and around others (in halls, in shared accommodation) being quite likely to say they feel lonely once a week. It appears that living in close proximity to others can mitigate the worst effects of loneliness, but the very nature of this experience for students of a young age can still lead to some students requiring support.

- 5.40. The benefits of 'sharing accommodation' with communal areas and shared kitchens/dining spaces are more likely to allow students to engage in peer-to-peer discussion, support and collaboration either of an interdisciplinary or cross-disciplinary nature. These positive attributes are unlikely to be achieved through residing in studio flats and there is therefore some concern that such accommodation does not encourage interaction with fellow students. As set out within the 'Metric Handbook – Planning and Design Data'³⁷ the nature of self-containment provided in studios can lead to a sense of isolation. Furthermore, PBSA that is delivered as studio flats is unlikely to be affordable for a large proportion of the student population. Therefore, developments seeking provision of studio flats should do so only in conjunction with specific nomination rights from an institution. Care must be taken to ensure that other means of social interaction are provided in order to encourage a sense of community.

Cycle storage

- 5.41. Secure cycle storage must be provided on site for occupants and their visitors. Whilst policy DM31 sets out that cycle parking is provided to at least the levels prescribed within appendix 3 of the DM policies plan, appendix 3 does not address the specific requirement of cycle storage provision within PBSA as when the Development management policies plan was adopted in 2014 the provision of PBSA still took the form of halls of residence provided by the universities themselves and was primarily focused on the UEA campus.
- 5.42. As PBSA does not fall within any use class and is 'sui generis', the housing standards do not apply but instead for each planning application the provision of cycle storage has been and will continue to be assessed on a case-by-case basis. Notwithstanding this, the 'Metric Handbook – Planning and Design Data'³⁸ sets out that the level of cycle storage will typically be 1:2 – 1:4 (cycle space: student) which should be used as a guide and starting point. Approximately 5 per cent of the total amount are typically required to be enlarged spaces for a range of accessible options.

³⁷ 'Metric Handbook – Planning and Design Data', seventh edition (2021), edited by Pamela Buxton (Chapter 24 Housing for students and young people)

³⁸ 'Metric Handbook – Planning and Design Data', seventh edition (2021), edited by Pamela Buxton (Chapter 24 Housing for students and young people)

5.43. In order to gain a better understanding of whether existing cycle storage provision in PBSA is sufficient to meet the demand AECOM were asked to address this matter within their PBSA study. The findings are set out within the paragraphs below.

5.44. Table 12 shows the amount of cycle storage at PBSA schemes in Norwich, how this compares to the number of bedspaces, and how well used the cycle storage is, based on consultation with providers. There is some variation in provision, with scheme 4 providing more cycle storage spaces than bedspaces, whilst scheme 2 has a cycle storage space for every 7.6 residents. The level of use also varies across schemes, with scheme 2 at c.90% occupancy and schemes 3 and 5 reported to be fairly well used. However, the PBSA schemes with provision of cycle storage closer to the number of bedspaces (schemes 1, 4, and 6) record much lower rates of usage, up to just 25%. No providers identified a lack of cycle storage.

Table 12: PBSA Cycle Storage Usage

PBSA Scheme	Volume Cycle Storage	Cycle Storage : Bedspaces	% of Cycle Storage Used
1	40	1 : 1.1	Maximum 25%
2	40	1 : 7.6	c. 90%
3	Unknown	Unknown	"Very well used"
4	80	1 : 0.9	20%
5	200	1 : 3.5	"Used quite a lot"
6	160	1 : 1.4	9% - 19%
7	Unknown	Unknown	6/7 bikes each year

Source: PBSA Providers, Norwich

5.45. Table 12 solely relates to direct let and nominations PBSA, not halls of residence. However, consultation with UEA identified no undersupply of cycle storage, with it considered to be well used but not oversubscribed. UEA noted that a lot of students use the bus as well as the electric bike and scooter schemes, with the latter also identified as growing in use by some PBSA providers.

5.46. Based on the AECOM findings, it would appear that if the Council were to require cycle storage to be provided at the same level as general needs housing (i.e. on a 1:1 basis) there would be a significant amount of oversupply and this could be detrimental to the overall design and layout of the scheme. As such to help determine an appropriate level of provision applicants should undertake a travel survey. In order to inform this travel survey (and the number of cycle parking spaces that should be provided for students on site) an up-to-date

survey should be carried out of other student accommodation in Norwich in order to get an understanding of how many students walk, cycle, or travel by public transport. For those that cycle it will be important to gain an understanding of how many own their own cycles and how many use the electric bike scheme (Beryl).

5.47. As part of the travel plan regular surveys and checks of cycle parking demand should be undertaken which should help address any problems should they occur. Furthermore, it will be important to future proof schemes so if cycle use increases and demand approaches capacity, additional cycle parking can easily be provided on site.

5.48. In addition, visitors cycle spaces must be provided within the public realm.

Management

5.49. Given the recent trend for increased provision of privately developed PBSA in the student housing market, it is important that the quality of management of PBSA is on a par with university managed accommodation. Proposals for new student accommodation should be accompanied by a management plan which displays how the accommodation will be managed during operation; this should include (but not exclusively):

- **Arrangements for moving in/out days:**

To ensure that impacts on traffic network are managed effectively. A schedule of how this will be operated will be expected.

- **Control of Car use:**

It is expected that proposals for new PBSA will be located in the city centre or the UEA campus, and will be expected to be car free developments, (with the exception of provision for students with disabilities). Applicants should provide details of measures to ensure that a car free policy shall be adhered to (such as clear advertising as a car free site prior to moving into the property, terms of tenancy agreements, restrictions on parking within a one-mile radius of the property amongst local residences, parking inspection patrols, procedures for dealing with tenants who do not abide by the agreement, measures to positively promote alternative sustainable transport methods).

- **On site security, cleaning and maintenance procedures:**

Security: Details of appropriate security measures, such as a security door and window locks, intercom entry systems, lighting, wardens and CCTV, which can all help to make the local environment safer for occupants and reduce opportunities for crime.

Cleaning: Nature and frequency of provision including the responsibilities and expectations for all parties involved and how this information shall be conveyed. (e.g. what areas will be cleaned by professional cleaners & expected frequency; what areas are the responsibility of the occupants to

clean)

Maintenance: Details of commitment to a 'planned maintenance schedule' as well as procedure for reporting and dealing with unexpected maintenance events.

- **Refuse storage and collection arrangements:**

High densities of students living together can produce a large amount of refuse. Refuse storage and collection arrangements must be clearly defined, along with guidelines for responsibilities of occupants including refuse minimisation and positive recycling protocols.

- **Compliance and Standards:**

Details to be provided to demonstrate that compliance with relevant safety standards (Fire, Health and Safety etc.) and how this will be managed and updated.

Details of key personnel and their responsibilities.

Method of conveying information to occupants including detailing their responsibilities.

Paragraph 0.16 of 'Building Regulations Approved Document M: access to and use of buildings, volume 2 – buildings other than dwellings³⁹' indicates that purpose-built student living accommodation should be treated as hotel/ motel accommodation in relation to space requirements and internal facilities for wheelchair users.

- **Neighbour/Community liaison to address & mitigate concerns:**

- Details of proposed measures to ensure that occupants of the accommodation integrate effectively into the host community. (Existing example initiatives in Norwich could include UEA SU 'Good Neighbour' scheme)
- What procedures, measures and guidance will be provided to address or mitigate issues that may arise?
- How will expectations of occupants be conveyed to them & what may be the repercussions of not abiding by expectations.
- Details of method of how neighbouring residents may report concerns, and expectations for resolution management.

- **Appropriate soundproofing:** to address both internal and external noise transmission.

- **Pastoral care and welfare:**

24-hour staffing on site is required to provide for high standards of student welfare. Pastoral care is of high importance in PBSA to ensure the wellbeing of the occupants. Details as to how this shall be provided will be required, including details of partnership with external bodies or Higher Education Institutions where appropriate. (e.g. Issues that may arise: debt management,

³⁹ Source: Building Regulations Approved Document M – Volume 2.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/441786/BR_PDF_AD_M2_2015.pdf

health issues, criminal behaviour). Methods of delivery may include personnel on site, senior resident/resident tutor scheme, and/or a telephone helpline. The level of provision is expected to vary dependent upon the scale of the proposed development and whether the accommodation provided is on or off campus.

- **Provision of onsite wardens** is beneficial to ensuring that there is a point of contact to address concerns relating to all of the above issues as and when they arise.

5.50. Provision of a well thought out and detailed management plan may assist in building community confidence in proposed developments and promote a positive experience for students as residents. Developments subject to management and supervision arrangements appropriate to the size, location and nature of occupants of schemes may be supported.

Partnership/Support from Higher Education Institutions in Norwich:

5.51. Higher education institutions and their affiliated Students Unions are best placed to understand and represent the needs of their students. It should be demonstrated that proposals for new student accommodation have involved consultation with, and meet the needs of, higher education institutions in Norwich and representatives of their students. Agreement should be sought relating to appropriate: location, facilities, amenities, tenure type, cost, and management. It should also be demonstrated that accommodation meets either a current need or accurately projected future growth of HEIs in Norwich.

5.52. A planning application for proposed new student accommodation developments should demonstrate that contact has been made with at least one of the HEIs in Norwich through the following means (in order of preference):

- (a) Proposed new student accommodation can be demonstrated to be in collaboration/partnership with one of Norwich's HEIs.
- (b) Proposed new student accommodation has agreed nomination rights from at least one of Norwich's HEIs.
- (c) Consultation with at least one of Norwich's HEIs can be demonstrated with a written response from the institution(s) confirming support in principal for the proposal as submitted.

5.53. The City Council has established a working group which contains representatives from the City Council, Higher Education Institutions and Students' Unions. It should continue to meet to provide improved assessment and monitoring of student numbers and accommodation needs.

Providing an accommodation mix for a wide range of students

- 5.54. Planning Practice Guidance (PPG) Housing needs of different groups⁴⁰, updated in May 2021, advises that local planning authorities should plan for sufficient student accommodation and states that encouraging more dedicated student accommodation may provide low-cost housing that takes pressure off the private rented sector and increases the overall housing stock. The information presented in section 4 raises a degree of caution that recent delivery of PBSA may not be in accordance with PPG guidelines. Rather than delivering low-cost accommodation, development has largely been targeted at the high-cost luxury market aimed at the overseas/mature student sector. This potentially upwardly affects rental rates in *all* areas of student accommodation delivered through the private sector.
- 5.55. The cost-of-living crisis was a recurring theme within the most recent Advance HE/HEPI study⁴¹. With finances being squeezed, accommodation costs are likely to be a key consideration for many students. Most frequently mentioned within the surveys were requests around reduction and/or provision of more flexible payment plans for accommodation and tuition fees in combination with more financial support opportunities such as bursaries or providing paid jobs for students.
- 5.56. The National Union of Students (NUS) has a policy (set out within Accommodation Costs Survey 2021)⁴², that an affordable rent for PBSA is no more than 50% of the maximum amount of student finance available in England, and that providers should ensure that at least a quarter of their portfolio sits within this cap. Care must be taken not to saturate the market with high-end high-cost provision.
- 5.57. The following methods to improve affordability of student accommodation should be considered by applicants when developing proposals for PBSA:
- offer a range of room types
 - offer rents at a range of prices
 - increased amount of low-priced rooms, offer some at a percentage of rent below market value
 - vary tenancy lengths
 - external protocol for affordability criteria (Unipol/students' union etc.)
 - include other bills in rent cost (internet, energy etc.)
 - offer subsidies/bursaries/scholarships

⁴⁰ [Housing needs of different groups - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/92424/Housing_needs_of_different_groups.pdf)

⁴¹ [Student Academic Experience Survey 2024_1718100686.pdf](https://www.advance-uk.ac.uk/Student-Academic-Experience-Survey-2024-1718100686.pdf)

⁴² [accommodationcostsurvey_2021.pdf](https://www.nus.org.uk/media/1020/accommodationcostsurvey_2021.pdf)

5.58. Applicants should demonstrate that contact has been made with HEIs & their Student Union organisations in Norwich and agreement/support has been reached on the level of low-cost provision of accommodation or affordability policy of the development.

5.59. Alongside the mixture of tenure types there is increasing demand nationally for an element of 'specialist' accommodation types including:

- alcohol-free, single-sex, quiet blocks
- rooms that can be adapted for ambulatory disability
- safeguarding accommodation
- accommodation for families.

Sustainability and energy consumption

5.60. Consideration should be given in the design of PBSA to all aspects of sustainability including reducing energy consumption, carbon emissions and the inclusion of renewable energy sources. Other issues for consideration include reducing water consumption, rainwater harvesting, the use of LED lighting and intelligent controls, waste and recycling facilities in both construction and use, sustainable urban drainage and sustainable transportation.

Flexibility and robustness

5.61. Whilst all planning applications for PBSA will be scrutinised to ensure that they are genuinely accommodation solely for use by students, and not C3 (i.e. general market) housing, it is important that in the event of an oversaturation of the PBSA market, it is possible to easily convert units into other accommodation types. Sui Generis PBSA does not have any permitted development rights for change of use, as such any future change of use would require formal planning consent. It is therefore not guaranteed that that conversion would receive planning permission.

5.62. A particular barrier to easily converting student accommodation to mainstream (non-student) accommodation is that C3 housing is required by GNLP policy 5 to meet space standards that student accommodation is not. This presents the risk that it may not be financially viable to undertake a costly conversion process to expand any rooms/units that do not meet the required standards and to repurpose unwanted or needed communal areas.

5.63. Therefore, as set out in The 'Metric Handbook – Planning and Design Data'⁴³ it is important that provision of future flexibility is incorporated into the design so

⁴³ 'Metric Handbook – Planning and Design Data', seventh edition (2021), edited by Pamela Buxton (Chapter 24 Housing for students and young people)

it is easy to adapt accommodation if the demand for student residences reduces. As a result, any new application for PBSA should provide evidence of how the development could be converted into other residential uses if needed in the future.

Affordable housing provision

5.64. Policy 5 of the GNLP requires development proposals for PBSA away from the UEA campus to “pay a commuted sum sufficient to provide an off-site policy compliant level of affordable housing”. It goes on to say that an SPD will provide further guidance on the methodology for calculating equivalent dwellings from student accommodation.

5.65. The rationale for requiring commuted sums for affordable housing from PBSA is as follows:

- New student accommodation is often proposed on sites that could otherwise be developed for general purpose housing which would include affordable homes as part of the wider tenure mix. The GNLP acknowledges the importance of new residential development providing for a mix of housing types and tenures, which in turn contribute to mixed and balanced communities.
- PBSA represents a notable proportion of the housing delivered in Norwich in recent years, and the current pipeline suggests this trend is not (yet) in decline.
- The city has significant ongoing needs for affordable housing. The Greater Norwich LHNA identifies a need for 15,762 units of affordable housing over the period 2018-2038 (788 per annum).⁴⁴
- Since PBSA counts toward the achievement of Norwich’s overall housing requirement but does not currently contribute to affordable housing delivery, a gap is created between the amount of affordable housing that might be expected by applying the Council’s policy-compliant housing percentage to its overall housing requirement, and what is delivered in practice.
- The volume of PBSA schemes seen in recent years and the current pipeline suggests that this form of development is financially attractive to developers and investors (rather than simply the function of unmet needs for student housing).

⁴⁴ Greater Norwich LHNA: [B22.3 Greater Norwich LHNA_0.pdf](#), Figure 2.

- To create a level playing field, PBSA should provide affordable housing contributions in line with other forms of development, if viable.
- This would also help to meet the needs of a wider range of groups, in line with the GNLP's broader vision and objectives,⁴⁵ and would bring clear community benefits from a form of development that only caters for the needs of a subset of the local population.

5.66. Policy 5 of the GNLP requires financial contributions (rather than on-site delivery of affordable housing) for PBSA. It also requires contributions only on sites outside of the UEA campus. The Inspectors' Report on the GNLP recommended both of these specific provisions,⁴⁶ and expressed overall support to the principle of Policy 5 and to the approach of providing further detailed guidance in a new SPD or similar document.

5.67. To calculate the value of commuted sums for PBSA, it is considered appropriate to keep the approach consistent with the existing calculation that is applied to other mainstream residential schemes on which financial contributions for off-site affordable housing provision are sought.

5.68. The current methodology for calculating payments for off-site affordable housing provision is set out in Appendix 3 of NCC's Affordable Housing SPD, adopted in July 2019⁴⁷. At the time of writing and adopting this SPD on PBSA this is therefore the methodology that should be used. However, the 2019 Affordable Housing SPD is due to be updated in due course and therefore the methodology in any updated SPD will apply.

5.69. The following points should be taken into account when calculating the off-site affordable housing contribution.

- The payment schedule is set at a level that will enable the Council to deliver a unit equivalent in type to those that would otherwise be provided on site.⁴⁸ The 85% social rent and 15% shared ownership percentages reflect the affordable housing tenure mix policy expectation. The final blended figure of £1,020.05 should be used in all calculations.
- The figures presented in the Affordable Housing SPD are accurate for July 2019 and should be index linked using the BCIS all-in tender price index⁴⁹ to bring them up to date.

⁴⁵ GNLP: <https://www.gnlp.org.uk/>, Vision for Greater Norwich in 2038, page 34.

⁴⁶ Inspectors' Report (as above), paras 113, 127 and 128.

⁴⁷ Affordable Housing SPD (as above), Appendix 3.

⁴⁸ Affordable Housing SPD (as above), para 6.8.

⁴⁹ [BCIS Tender Price Index | Estimate of Tender Price Inflation](#)

- The updated figure is then applied to the floorspace of the foregone affordable housing – i.e. the floorspace of the scheme multiplied by the affordable housing policy quota.
- Whilst the 2019 Affordable Housing SPD would require 30% affordable housing for schemes of 10-15 dwellings and 33% affordable housing for schemes of 16+ dwellings), the GNLP now requires 33% on all sites across the plan area with the exception of Norwich city centre, where the requirement is at least 28% (subject to viability). The GNLP requirements should be used.
- Regarding the floorspace input to the calculation, shared amenity or communal space (lobbies, corridors, or gyms for example) shall not be included. The shared common space within cluster accommodation shall, however, be included.
- A flat fee of £1,000 is added to cover legal costs. This is paid per scheme rather than per unit.
- Where PBSA takes the form of conversions from other uses it may benefit from Vacant Building Credit.

5.70. The Viability Appraisal supporting the GNLP did not include PBSA within its scope. In accordance with paragraph 59 of the NPPF and practice guidance paragraph 10-007-20190509, viability can be considered at the application stage if the applicant can demonstrate that particular circumstances justify the need for a decision stage viability assessment. All viability assessments should reflect the recommended approach in national planning practice guidance, including standardised inputs, and should be made publicly available.

Conversion rates

5.71. The existing affordable housing contribution is based on floorspace (rather than units) and therefore a conversion rate is currently only needed to ascertain whether the proposal is 'major' i.e. 10 units or more although a different methodology may be developed in the future. In this instance a conversion rate of 1:2.4 shall be used for clusters and 1:1 for studios as this would be considered the number of units that would be delivered on a scheme.

5.72. Conversion rates are needed however when monitoring residential completions and when forecasting future housing supply. The rates set out below should be used.

5.73. For PBSA which takes the form of studio flats, each net student bedroom is counted as 1 net new dwelling. However, for PBSA which takes the form of communal/cluster accommodation (with bedrooms clustered around common

areas), the precise conversion ratio employed differs depending on the purpose of the calculation.

- 5.74. When monitoring residential completions and housing delivery, the ratio is 1:2.4, where 2.4 net PBSA bedrooms equates to 1 net new mainstream dwelling. This means that 24 net student bedrooms of this type equate to 10 mainstream residential dwellings.
- 5.75. When forecasting future housing supply, the ratio is 1:2.85. This means that 24 net student bedrooms of this type equate to 8 mainstream residential dwellings (rounded).
- 5.76. The former ratio (1:2.4) is a consistent baseline mandated for use across the country in the Housing Delivery Test (HDT) Rulebook⁵⁰. The Greater Norwich LHNA⁵¹ used a ratio of 2.5 as this was the ratio set out within the HDT at the time. The latter ratio (1:2.85) reflects Planning Practice Guidance (PPG), which repeats the same baseline given in the HDT Rulebook,⁵² but states that authorities may need to adjust it based on Census data indicating the average number of students living in student-only accommodation in the local area.⁵³
- 5.77. NCC introduced the adjusted conversion ratio of 1:2.85 for communal/cluster accommodation (for the purpose of assessing future housing supply) during the GNLP examination process, based on Census data for average student household sizes. An Update Note set out the new ratio in November 2021,⁵⁴ which has been applied since. The Inspectors' Report on the GNLP applauds this adjusted approach for aligning with PPG, and states that it is considered to be justified.⁵⁵

⁵⁰ HDT Rulebook: <https://www.gov.uk/government/publications/housing-delivery-test-measurement-rule-book/housing-delivery-test-measurement-rule-book>, para 10.

⁵¹ [B22.3 Greater Norwich LHNA_0.pdf](#), para 9.20.

⁵² PPG: <https://www.gov.uk/guidance/housing-supply-and-delivery>, para 025.

⁵³ PPG: (as above), para 033.

⁵⁴ Additional housing supply evidence: https://www.gnlp.org.uk/sites/gnlp/files/2021-11/D3.2B%20TP%20Policy%201%20Appendices%20Update%20to%20Housing%20Trajectory%20Tables%20and%20Graphs%2022.11.21%20Final_0.pdf, paras 8-10.

⁵⁵ Inspectors' Report: <https://www.gnlp.org.uk/sites/gnlp/files/2024-02/Greater%20Norwich%20LP%20-%20Inspectors%20Report%20-%20FINAL%20%281%29.pdf>, para 337.

6 Implementation

6.1. Moving forward / next steps:

- The draft Supplementary Planning Document was presented to Sustainable Development Panel, with a recommendation to comment on the document prior to public consultation.
- Authorisation to consult was sought from full Council (based on a recommendation from Cabinet).
- The document shall be subject to public consultation for a minimum period of four weeks in accordance with the Statement of Community Involvement for Norwich and the Local development Regulations (as the consultation takes place over the Easter period, additional time will be required).
- Following the period of public consultation, amendments to the document shall be made as appropriate/necessary.
- The document in its amended form will be presented again to Sustainable Development Panel with a recommendation to note the summary of consultation responses, and comment on the revised document.
- The finalised document shall then be presented to cabinet, then full Council for adoption.

6.2. Monitoring and data collection

As mentioned throughout this document, there are areas of this report that require ongoing monitoring to establish a greater understanding of the current climate and developing picture of student accommodation in Norwich. These include:

- student numbers at both institutions relevant to institutional growth plans with accurate estimations of those requiring accommodation.
- international student numbers
- new consents and delivery of consented accommodation
- student accommodation preferences (in association with students union representatives)
- available tenure types
- occupation levels of institutional and private PBSA
- At present there are no post-graduation co-housing developments in Norwich, this is something that has been seen in other University cities; emergence of accommodation of this nature should also be monitored.

6.3. It is proposed that the PBSA working group meets regularly to collate share information to provide an accurate response to the changing climate of student accommodation to best meet the needs of the students, the institutions and the city.

7 Details of public consultation

7.1. A 5-week period of consultation on this document will commence at 9am on Wednesday 2nd April 2025 and end at 5pm on Wednesday 7th May 2025.

7.2. Copies of the consultation document will be available in City Hall.

7.3. Please submit comments on the consultation by the closing date in one of the following ways:

- In writing to: Norwich City Council Planning Service, City Hall, St Peter's Street, Norwich NR2 1NH; or
- By email to: LDF@norwich.gov.uk
- Online using Get Talking Norwich

7.4. Representations cannot be made anonymously. Please provide your name, company name (if applicable). Please note that your representations will be made publicly available along with your name.

7.5. All consultation comments will be assessed and taken into consideration in a revised version of the document which will be considered by Sustainable Development Panel, likely to be in July 2025. The final version of the document will be reported to Cabinet and then full Council for approval, likely to be in September 2025.

APPENDIX 1: Glossary

C2 Residential institutions - Residential care homes, hospitals, nursing homes, boarding schools, residential colleges and training centres.

C3 Dwellinghouses - this class is formed of 3 parts:

- C3(a) covers use by a single person or a family (a couple whether married or not, a person related to one another with members of the family of one of the couple to be treated as members of the family of the other), an employer and certain domestic employees (such as an au pair, nanny, nurse, governess, servant, chauffeur, gardener, secretary and personal assistant), a carer and the person receiving the care and a foster parent and foster child.
- C3(b): up to six people living together as a single household and receiving care e.g. supported housing schemes such as those for people with learning disabilities or mental health problems.
- C3(c) allows for groups of people (up to six) living together as a single household. This allows for those groupings that do not fall within the C4 HMO definition, but which fell within the previous C3 use class, to be provided for i.e. a small religious community may fall into this section as could a homeowner who is living with a lodger.

C4 Houses in multiple occupation - small shared houses occupied by between three and six unrelated individuals, as their only or main residence, who share basic amenities such as a kitchen or bathroom.

Sui Generis - Certain uses do not fall within any use class and are considered 'sui generis'. Such uses include: betting offices/shops, pay day loan shops, theatres, larger houses in multiple occupation with more than six persons sharing, hostels providing no significant element of care, scrap yards. Petrol filling stations and shops selling and/or displaying motor vehicles. Retail warehouse clubs, nightclubs, launderettes, taxi businesses and casinos.

Purpose Built Student Accommodation (PBSA) - housing specifically built for university students by private developers, further education institutions or higher education institutions. Properties may be provided in a variety of forms, including: Multiple bedrooms with shared facilities, modern halls of residence containing en-suite bedrooms with shared kitchen, dining and living facilities. Self-contained studio or flats with private kitchens but shared living space.

APPENDIX 2: List of Acronyms

CIL	Community Infrastructure Levy
EU	European Union
DFS	Development Framework Strategy
GNLP	Greater Norwich Local Plan
HEI	Higher Education Institution
HESA	Higher Education Statistics Authority
HMO	House in Multiple Occupation
HDT	Housing Delivery Test
LHNA	Local Housing Needs Assessment
LPA	Local Planning Authority
NPPF	National Planning Policy Framework
NUA	Norwich University of the Arts
NUS	National Union of Students
ONS	Office for National Statistics
PBSA	Purpose Built Student Accommodation
PPG	Planning Practice Guidance
PRS	Private Rented Sector
RAAC	Reinforced Autoclave Aerated Concrete
SHMA	Strategic Housing Market Assessment
SPD	Supplementary Planning Document
UEA	University of East Anglia

APPENDIX 3: Relevant Local Planning Policy

Relevant Local Planning Policies/Documents	
Greater Norwich Local Plan adopted March 2024 (GNLP)	
Policy 1	The sustainable Growth Strategy
Policy 2	Sustainable Communities
Policy 3	Environmental Protection and Enhancement
Policy 4	Strategic Infrastructure
Policy 5	Homes
Policy 6	The Economy
Policy 7.1	The Norwich Urban Area including the fringe parishes
Norwich Development Management Policies Local Plan adopted Dec. 2014 (DM Plan)	
DM1	Achieving and delivering sustainable development
DM2	Ensuring satisfactory living and working conditions
DM3	Delivering high quality design
DM4	Providing for renewable and low carbon energy
DM5	Planning effectively for flood resilience
DM6	Protecting and enhancing the natural environment
DM7	Trees and development
DM8	Planning effectively for open space and recreation
DM9	Safeguarding Norwich's heritage
DM11	Protecting against environmental hazards
DM12	Ensuring well-planned housing development
DM13	Communal development and multiple occupation
DM15	Safeguarding the city's housing stock
DM16	Supporting the needs of business
DM17	Supporting small business
DM18	Promoting and supporting centres
DM19	Encouraging and promoting major office growth
DM20	Protecting and supporting city centre shopping
DM21	Protecting and supporting district and local centres
DM22	Planning for and safeguarding community facilities
DM23	Supporting and managing the evening and late night economy
DM26	Supporting development at the University of East Anglia (UEA)
DM28	Encouraging sustainable travel
DM31	Car parking and servicing
DM32	Encouraging car free and low car housing
DM34	Securing essential strategic infrastructure from development through the Community Infrastructure Levy
Supplementary Planning Documents (SPDs)	
	Landscape and Trees (June 2016)

	Heritage Interpretation (Dec 2015)	
	Open Space and Play (Oct 2015)	
	Affordable Housing (2019)	
	Main Town Centre Uses and retail Frontages (Dec 2014)	
Conservation areas		
1	City Centre	Introduction Northern city character area Anglia square character area Northern riverside character area Colegate character area Cathedral Close character area Elm Hill and Maddermarket character area Prince of Wales character area King Street character area St Giles character area St Stephens character area Ber Street character area Civic character area All Saints Green character area
2	Bracondale	Bracondale conservation area appraisal
3	Newmarket Road	
4	Heigham Grove	Heigham Grove conservation area appraisal
5	Thorpe St Andrew	Thorpe St Andrew conservation area appraisal
6	Sewell	Sewell conservation area appraisal
7	Eaton	Eaton conservation area appraisal
8	Trowse Millgate	Trowse Millgate conservation area appraisal
9	Earlham	
10	Old Lakenham	Old Lakenham conservation area appraisal
11	Bowthorpe	Bowthorpe conservation area appraisal
12	Mile Cross	Mile Cross conservation area appraisal
13	Thorpe Hamlet	Thorpe Hamlet conservation area appraisal
14	Thorpe Ridge	Thorpe Ridge conservation area appraisal
15	Unthank & Christchurch	
16	Hellesdon Village	
17	St Matthews	St Matthews conservation area appraisal