



NORWICH
City Council

Consultation Report:

Purpose-built student accommodation in Norwich Supplementary Planning Document

May 2025

1.0 Purpose of this Document

- 1.1 This purpose of this report is to summarise how Norwich City Council involved communities and stakeholders in preparing the purpose-built student accommodation Supplementary Planning Document (PBSA SPD). It summarises the responses received to the consultation and sets out how these comments informed the final version of the plan.

2.0 Details of the consultation

- 2.1 The consultation commenced on Wednesday 2nd April 2025 and ended on Wednesday 7th May 2025. In accordance with Norwich City Council's Statement of Community Involvement (SCI) there is a requirement to consult on SPDs for the minimum statutory period of 28 calendar days. As the consultation period took in part of the Easter holiday it was considered appropriate to consult for an additional seven days over and above the statutory minimum.
- 2.2 The consultation document (Draft PBSA SPD) along with its supporting evidence in the AECOM PBSA Study were available on the Norwich City Council website for the duration of the consultation. The Council also had a dedicated Get Talking Norwich page which included a survey. The full draft SPD was available to download on the Get Talking Norwich page as was the AECOM study. In addition, a one-page summary consultation was made available.
- 2.3 Consultation methods accorded with the SCI. A variety of methods were used which included:
- Emails to all groups and individuals on the plan-making database
 - Get Talking Norwich and social media
 - Press release
 - Council's website
 - Paper documents in City Hall
 - Focus group with the Universities
 - Emails to existing PBSA providers
 - Emails to any developers with pending PBSA planning applications.
- 2.4 Feedback could be submitted by email, post and online through the Get Talking Norwich Survey.

3.0 Responses to the consultation

- 3.1 The following bodies responded via email to the consultation.
- Natural England
 - Environment Agency

- Historic England
- National Highways
- Lead Local Flood Authority
- Norfolk Police
- Broads Authority
- University of East Anglia
- Norwich University of the Arts
- Norwich BID
- Watkin Jones Group (on behalf of management of Benedict's Gate)
- Lanpro (on behalf of Orford House Development Ltd)
- JMS Planning (on behalf of the landowner of Duke's Wharf)
- Savills (on behalf of applicant for Norwich Nelson Hotel planning application).

3.2 A summary of the comments received is in Appendix 1. This also includes the Council's response to the comment and proposed changes to the SPD to take account of the comments as appropriate.

4.0 Get Talking Norwich survey

4.1 276 people visited at least one page relating to the PBSA SPD Get Talking Norwich survey. 163 of these people viewed documents and visited multiple project pages. 66 people participated in the survey itself. The breakdown in respondents was as follows:

- 2 students,
- 56 residents of Norwich
- 8 landlords or property owners
- 4 university staff members
- 4 other.

4.2 A full analysis of responses is set out in Appendix 2. Key themes identified in the survey include:

- The majority of respondents believe there is already an oversupply of PBSA in Norwich (Over 80% of respondents either strongly agreed or agreed that existing and pipeline supply is sufficient to meet the city's needs. Less than 10% disagreed or strongly disagreed.)
- PBSA is often seen as unaffordable for many students
- Student accommodation can reduce housing provision for families
- Some PBSA developments are poorly integrated into the city's architectural and social fabric.
- Whilst some respondents feel that the SPD provides sufficient details others feel that it lacks depth of consideration of community impact, affordability and long-term adaptability.

4.3 The Get Talking Norwich survey has supported the Council's finding that the current position is that there is sufficient PBSA to meet future need. Some of the changes made to the SPD as a result of the wider consultation should help alleviate concerns raised in the Get Talking Norwich survey. For example in order to address issues with affordability the SPD has been amended and will now set

out that a range of accommodation should be provided which should include lower cost PBSA such as twin rooms or shared bathrooms. Furthermore Historic England has suggested that the design section of the SPD is strengthened to make reference to the need for a contextual approach which should help integrate PBSA into the cities fabric.

5.0 Summary

- 5.1 The responses to the consultation have helped inform the final version of the SPD. The Get Talking Norwich survey in particular has supported the Council's findings that the current position is that there is sufficient PBSA to meet future need.

Appendix 1: Consultation comments

	Comment	NCC response	Changes (all paragraph references relate to the consultation version of the SPD rather than the amended version)
Natural England	Natural England does not have any specific comments on the draft PBSA SPD.	Noted	None
Environment Agency	No objection. We note, with approval, that the SPD includes reference to policy DM5 – Planning effectively for flood resilience.	Noted	None
Historic England (HE)	HE welcomes the preparation of an SPD for PBSA and broadly welcomes the best practice principles in chapter 5. In particular, HE welcomes the references to the historic environment in paragraphs 5.25- 5.29. The principles in chapter 5 could be strengthened and provide greater reference to the historic environment, sustainability and climate change resilience. A) Scale, height, mass and design, character and materiality - The SPD should be strengthened to make reference to the need for a contextual approach, the requirements for visualisations and the parameters for development in terms of scale, mass and height. Additional pointers should also be given to appropriate materials and finishes. B) Sustainability and climate resilience HE broadly welcomes the measures set out in the SPD but suggest reference to	A) Policy 2 of the GNLP sets out that development proposals should respect the character of the local area and seek to enhance it through appropriate design. Agree that the SPD could be strengthened by making reference to the need for a contextual approach and consideration of materials and finishes. The need for visualisations and parameters for development in terms of scale, mass and height will vary on a case-by-case basis so not appropriate to add specific reference within the SPD. B) The GNLP does not refer to prioritising a retrofit first approach so this should not be	Amendments made to paragraph 5.26. Developments should take <u>a contextual approach and respect the existing form and grain of the local area</u>, 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. <u>Careful consideration should be given to materials and finishes</u>. 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.

	prioritising a retrofit first approach and Adapting Historic Buildings for Energy and Carbon Efficiency .	included within the SPD.	
National Highways	Once adopted, the SPD will become a material consideration in the determination of planning applications. Where relevant, National Highways will be consulted on future planning applications and will assess the impact on the Strategic Road Network of a planning application accordingly. The details within the draft document are unlikely to have a severe impact on the operation of the trunk road and we offer no comment.	Noted	None
Lead Local Flood Authority	No comment	Noted	None
Norfolk Police	The promotion of active frontages, natural surveillance and risk assessment & mitigation at an early stage of the design process is crucial, as is attention to access control through a degree of compartmentalisation specifically required for this type of development. Over permeability with multiuse buildings introduce vulnerabilities that can reduce security and quality of life for the residents. The PBSA SPD should detail security considerations by referencing Secured by Design and should include the following principles: 1) External building design - Preventing	Policy 2 of the GNLP promotes an inclusive, resilient and safe community and sets out that the layout of development should reflect best practice to deter crime. It is considered useful to expand on this and to refer to relevant Secured by Design principles within the SPD.	New paragraph added after 5.27 “ <u>Consideration should be given to the National Police Crime Prevention Initiative, Secured by Design (SBD) principles. In terms of external building design it is important that there are active frontages and natural surveillance. Easy access to the roof must be prevented and the creation of areas or building features such as recesses (particularly doorways) that cannot be overlooked from occupied parts of the development</u> ”

	easy access to the roof and avoiding the creation of recesses. Restricting access to unobserved areas. 2) External amenity and landscape design - Landscaping should ensure sight lines and clear visibility and should incorporate defensible space. 3) Internal building design - SBD compartmentalisation principles should be included with the design of the building for security and safety purposes and communal mail and parcel delivery facilities must incorporate SBD security measures. 4) Cycle storage - Internal stores should be limited to the storing of no more than 70 bikes and visitor bike parking should be located adjacent to the primary building entrance. Management - Norfolk Police endorses the reference to 24 hour staffing on site and external lighting complying with BS 5489-1:standards.		<u>must be avoided.</u>” New paragraph added after 5.31 “ <u>Landscaping must be carefully designed to ensure it does not encourage crime and anti-social behaviour. In particular it should</u> a) <u>help direct visitors to appropriate accesses,</u> b) <u>deny easy access to the shell of the building,</u> c) <u>ensure sight lines and clear visibility, and</u> d) <u>incorporate defensible space.</u>” New paragraph added after 5.40 “ <u>Secured by Design compartmentalisation principles should be included for security and safety purposes so that only residents and permitted visitors can gain access to each zone. Unrestricted access to all areas and floors of the building can result in unlawful free movement and increase anti-social behaviour. Furthermore, communal mail and parcel delivery facilities shall be included to prevent deliveries to individual residences. These must incorporate SBD security measures</u> .” New paragraph added after 5.47 “
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			<u>The National Police Crime Prevention Initiative, Secured by Design (SBD) principles should be adhered to in the design of any internal bike store. Ideally no more than 70 bikes should be stored within one unit (if more than 70 cycle storage spaces are required within a development then the facilities should be separated into discrete units and be subject to extra mitigating security measures to prevent tailgating). The provision of charging points for electric bikes is welcomed. Internal bike storage facilities should be accessed via a security, fire and smoke rated compliant doorset in order to address concerns over the storage of e-bikes.”</u> Amendment made to paragraph 5.48 “In addition, short term visitors cycle spaces must be provided within the public realm <u>located adjacent to the primary building entrance.”</u>
Broads Authority	Para 2.7 – Is this section really a definition or could the title be looser – perhaps ‘typical characteristics of PBSA’?	Agree that it goes beyond a definition.	Amended title to ‘ <u>Purpose-built Student Accommodation</u> ’
Broads Authority	Page 9 has ‘The Private Rented Sector’ as a title but only talks about HMOs.	Agree	Amended title to ‘ <u>Houses in Multiple Occupation</u> ’.
Broads Authority	Section 1.1 says that PBSA includes HMOs, yet page 9 says this SPD does not cover	1.1 sets out that an attractive range of good quality	No change

	HMOs.	accommodation should be offered to students which can take both the form of PBSA and HMOs.	
Broads Authority	2.16 is not about HMOS or PBSA but falls under the title 'The Private Rented Sector'.	Agree. This is a concluding remark paragraph to this chapter.	Additional title added ' <u>Summary</u> '
Broads Authority	3.2 – NPPG was updated in December 2024.	Planning for the housing needs of different groups was last updated in May 2021.	No change
Broads Authority	Some student accommodation could be next to the river. As such 1) A good lighting design/strategy is required as part of planning applications as a dark river corridor benefits bats 2) Safety by the water plans and measures should be addressed in the SPD 3) Development near the river should have open space to appreciate river setting 4) Development near the river should make the most of the riverside location and face the river 5) Water source heat pumps could be used for development near to the river	All of these points are too specific for this SPD and would apply to all forms of development and not just PBSA. New policy cannot be added through the SPD.	No change
Broads Authority	The charging of electric bikes should be addressed.	Agree. The DM policies plan is out of date in terms of bike storage. Policy 2 of the GNLP sets out that provision should be made for electric vehicle charging which would include e bikes.	Additional paragraph added after 5.47 " <u>The provision of charging points for electric bikes is welcomed. Internal bike storage facilities should be accessed via a security, fire and smoke rated compliant door in order to address concerns over the storage of e-</u>

			bikes.”
University of East Anglia	The UEA strongly supports the PBSA SPD. The existing PBSA guidance note does not go far enough to regulate the supply of PBSA and the oversupply of PBSA has led to voids across the university campus. The requirement for PBSA to be designed and delivered with flexibility to convert to other forms of accommodation is welcomed. The draft SPD is informed by the AECOM report which provides up-to-date evidence on supply and demand. Considering this evidence, the UEA strongly supports the Council in placing strict restrictions on future PBSA in the city centre.	Noted	No change
University of East Anglia	Private rented sector. The SPD doesn't cover the Council's policy approach to HMOs (Section 3 of the SPD) but sets out that the SPD will help inform a coordinated approach to PBSA and HMOs. We request that the Council incorporate their policy approach to HMOs within Section 3 of the SPD.	The majority of HMOs do not need planning permission. The Council could potentially introduce an Article 4 Direction to remove permitted development rights or could introduce additional or selective licensing or other positive interventions. No decision has been made yet on these approaches. For the avoidance of doubt, it should be clarified that this SPD will help inform the <i>future</i> policy responses to HMOs.	Paragraph 2.15 amended to 'this SPD will therefore help inform the council's <u>future</u> policy response to HMOs.'
University of East Anglia	Local Planning Policy Context. The UEA development strategy has been named incorrectly. To ensure consistency, we request that the references to the UEA's strategy reference the now adopted 2019 Development	Noted	Paragraph 3.14 amended to: The UEA Development Framework Strategy (<u>DFS</u>) was updated in 2019 ('DFS Refresh') and sets out a growth vision for the university,

	Framework Strategy (DFS) which provided the evidence base to inform the allocation of University related allocations within the now adopted Greater Norwich Local Plan. Where reference to the UEA's emerging long term strategy is made, this should be changed from "the UEA Development Framework Strategy" to "the UEA Strategic Development Framework", which is currently in draft.		which plans to accommodate an extra 5,000 students by 2035. <u>The DFS Refresh comprised the evidence base which informed the allocation of sites on the UEA Campus within the adopted GNLP. The UEA are currently preparing a longer term (50 year time horizon) Strategic Development Framework (SDF).</u> Whilst the draft UEA SDF (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. Additional acronym added to appendix 2: <u>SDF - Strategic Development Framework</u>
University of East Anglia	Student projections. Support inclusion of international students within the student number projections. HESA statistics for the 23/24 academic year indicate that the total number of students enrolled in UK universities fell compared with the previous year for the first time in 10 years. Changes to student visa rules have seen a more marked decline in the number of international students. Other factors that highlight the risk in assuming that student numbers will continue to rise include the impact of the birth rate trajectory which sees the number of 18 year olds in the UK drop after 2031, alternative study routes such as degree	The policy and SPD are flexible which allows for changes in circumstances and there is also a commitment to review. Agree that there are a number of risks associated with using historic data. Additional paragraph required to set these out more clearly.	New paragraph added after 4.5 <u>"Notwithstanding the above, whilst past trends can be used to project future growth, there are risks associated with doing this and there is no guarantee that student numbers will continue to rise as there are many other factors that can influence future patterns of growth. HESA statistics for the 2023/24 academic year indicate that the total number of students enrolled in UK universities fell compared with the previous year for</u>

	apprenticeships, and more students choosing to study at universities close to home for reasons that include the cost of accommodation.		<u>the first time in 10 years with changes to student visa rules resulting in a decline in the number of international students. Other factors that highlight the risk in assuming that student numbers will continue to rise include the impact of the birth rate trajectory which sees the number of 18 year olds in the UK drop after 2031, alternative study routes such as degree apprenticeships, and more students choosing to study at universities close to home for reasons that include the cost of accommodation.”</u> Amendment made to paragraph 4.1 to include reference to <u>student visa rules</u>. Paragraph 4.27 amended to include: <u>(although there is no guarantee that student numbers will continue to rise as there are many other factors that can influence future patterns of growth).</u>
University of East Anglia	Distribution and Characteristics of Existing PBSA In relation to existing supply of PBSA, we have the following comments on Table 8: • We recommend adjusting the first row ‘UEA – Ensuite twin’ to 70 bedspaces and removing the second row ‘UEA – Ensuite sole use’ for clarity • The number of bedspaces UEA has	Agree	The suggested changes have been made to Table 8.

	through their partnership with INTO varies year on year • Pablo Fanque House. Should state 'Direct let' only, there is not a partnership with UEA.		
University of East Anglia	PBSA Pipeline & Student Choice. Some students prefer to live closer to the city centre; however, on-campus accommodation can benefit the student experience. Studies show that students place high importance on feeling a sense of belonging and community during their time at university. Extensive support for student well-being is provided on-campus. The UEA is experiencing voids due to current oversupply of PBSA. We consider that the SPD suggests more PBSA should be provided closer to the city centre due to hybrid learning opportunities with less contact teaching days. This will increase voids. Paragraph 4.12 should be revised to reflect the importance of supporting on-campus accommodation. UEA supports the conclusion in paragraph 4.30 that there is no current need for further PBSA.	Agree	Paragraph 4.12 amended to include <u>"Other students will prefer to live on the UEA campus due to the benefits to the student experience that living on campus provides, including extensive support for student well-being."</u>
University of East Anglia	Need. Support the approach of supporting PBSA development away from the UEA campus only if there is a clear and justified need for the development (paragraph 5.5). An assessment of need should be required for all planning applications currently within the planning system (not just applications that	The pending applications already include an assessment of need.	No change

	come forward after the adoption of the SPD) to prevent oversupply of PBSA. Support the approach to continuing engagement with HE institutions to ensure that any changes in growth plans, supply, affordability, occupancy levels and student preferences are kept up to date.		
University of East Anglia	Location. The location of future PBSA development should not directly compete with on-campus accommodation or dilute the benefits that on-campus accommodation provides to the student experience offered by the UEA. Paragraph 5.11 should be updated to reflect the presumption in favour of PBSA on the UEA campus. Support the approach to encouraging development within the UEA campus to take into account other considerations within the SPD, such as need, conserving landscape and architectural significance of UEA and promoting public access to open spaces. However, this should not conflict with the presumption in favour of PBSA development on the UEA campus, as emphasised within Policy 5 of the GNLP.	Policy 5 includes the presumption in favour of PBSA on the UEA campus by not requiring assessment of need for on campus applications.	No change
University of East Anglia	Scale. Paragraph 5.23 should be amended to exempt PBSA development on the UEA campus from being subject to the range of scale (200-500 bedspaces).	Agree	Both paragraphs 5.22 and 5.23 amended to include ' <u>away from the UEA campus</u> '.
University of East Anglia	External building design. The UEA supports the approach to external building design to ensure new PBSA developments are designed to a high architectural quality that respects the surrounding environment.	Noted	No change

University of East Anglia	Internal building design. It is understood that the guidelines for room sizes have been driven by the ability to easily convert PBSA into residential. This wouldn't apply to the UEA campus. We request that paragraph 5.37 is revised to exempt PBSA development within the UEA campus from been required to comply with the guidelines for room sizes.	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. The 'Metric Handbook – Planning and Design Data'¹ 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 guidelines which PBSA should meet. The room sizes have not been influenced by the need to plan for conversion to other residential in the case of oversupply. Therefore these standards should be applied for all forms of PBSA regardless of the location.	No change
University of East Anglia	Partnership/Support from HE Institutions. We support the approach set out within the SPD. However both HE institutions should be consulted on planning applications for PBSA.	Developers are being asked to have meaningful engagement with the Universities. It is important that the universities are aware of any planning applications so they can validate the outcomes of any	Paragraph 5.51 amended to: Higher education institutions and their affiliated Students Unions are best placed to understand and represent the needs of their students. As part of any PBSA

¹ 'Metric Handbook – Planning and Design Data', seventh edition (2021), edited by Pamela Buxton (Chapter 24 Housing for students and young people)

		engagement. It is understood that the universities do have a commercial interest and therefore the SPD should make it clear that appropriate weight should be given to representations.	<u>planning application, it must be demonstrated that applicants have had meaningful engagement with the UEA and/or Norwich University of the Arts. Both universities will be consulted on all PBSA applications which will enable the HEIs to validate the outcomes of any engagement. Appropriate weight will be given to representations from the HEIs.</u>
University of East Anglia	Sustainability and Energy Consumption. Whilst we support this approach, paragraph 5.60 should be amended to consider viability within the design, sustainability and energy provision of any scheme.	GNLP policy 2 sets out that development proposals should provide for the use of sustainable energy, local energy networks and battery storage where appropriate. It doesn't mention viability. Given that the paragraph within the SPD does not set out that all of the measures must be incorporate but instead that they should be considered, no change is needed.	No change.
University of East Anglia	Flexibility and Robustness. Whilst we support this approach, a framework should be incorporated into the SPD to support easy conversion of PBSA to alternative accommodation in the event of oversaturation.	The major barrier to conversion of PBSA to C3 is not meeting space standards. This barrier can be removed by requiring all PBSA to demonstrate how it could be converted to other uses. Each application will have to be determined on its own merits. It is not considered	No change.

		appropriate to set out a framework as this would be introducing a new policy.	
University of East Anglia	Implementation. Support the requirement for ongoing monitoring; however the Council should include reference to an appropriate mechanism and timeframe for document review.	Agree further details to be added regarding monitoring.	Additional paragraph added after 6.1 <u>“Consents and delivery of consented accommodation will be reported annually via the Annual Monitoring Report (AMR) (Plan indicator H8). HESA provide annual figures on student numbers so these should be reviewed on a yearly basis. The decision as to when best to carry out a wider update on the need for more student accommodation will be informed by the above and through discussions with the higher educational institutions. It may also be influenced by the number of planning applications received for PBSA.”</u>
University of East Anglia (Welfare, community and diversity officer)	Alternative maintenance loan figures should be used which are £10,227 for maximum maintenance loan, £5,820 for average maintenance loan and £4,767 for minimum maintenance loan. These figures are based on 2025 figures which can be found here: https://www.savethestudent.org/student-finance/maintenance-loans.html The average is based on the 2023 figure found here: https://www.confused.com/student/student-finance-facts	It would be appropriate to update the figures and to use £4,767 for the minimum student loan figures and £10,227 for the maximum (24/25 academic year and figures from www.gov.uk). However in terms of the average there appear to be several different figures across different sources. Having researched this and having discussed with AECOM it is considered most appropriate to use £7,202 which is the 2023/24 figure set out in	Table 10 amendments – Maximum student loan changed to £10,227, Average Student loan to £7,202 and Minimum student loan to £4,767. HMO room minimum student loan changed to No and changed from green to red. Average cost of Halls of Residence changed to No and changed from green to red. Lower Cost Private PBSA changed to No and changed from green to red. Additional sources added.

		the Save the Student report and that which was obtained via a FOI request to the Student Loans Company (SLC).	Paragraph 4.21 amended to: 'When looking at the affordability of PBSA in comparison to student maintenance loan payments, <u>only the lowest cost halls of residents are covered by the minimum student maintenance loan. The average student maintenance loan also covers the estimated lower cost private PBSA rents.</u> The maximum student maintenance loan will cover all forms of accommodation with the exception of higher cost studios in private PBSA.' Paragraph 4.22 amended to: 'Whilst the <u>average student maintenance loan is sufficient to cover the cost of the lower cost PBSA options and is nearly sufficient to cover the cost of average halls of residences,</u> 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 <u>need to find £195 from other sources in order to cover their rent for the whole academic year. On top of this there would be other living costs</u> and students would need to find additional funds either through paid
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			work alongside study and/or contributions from parents, caregivers or other sources.' Paragraph 4.23 amended to: 'By comparison, students living in an HMO would have <u>£1,502 remaining from an average student loan (although some of this may need to cover utility bills which are typically included within PBSA).</u>'
Norwich University of the Arts	Community and well-being – wellbeing must be at the forefront of the business models of companies wanting to operate PBSA. Underoccupied buildings could contribute to wellbeing concerns and dissatisfaction amongst residents. Oversupply could lead to a reduction in rental prices; however, this could result in cost cutting and a reduction in services or staffing.	Agree. Ensuring that there is not an oversupply of PBSA will help prevent underoccupancy of buildings. It would be appropriate to add a sentence highlighting the importance of student well-being.	Paragraph 5.49 amended to: '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 <u>with the well-being of students being of upmost importance.</u>'
Norwich University of the Arts	Accommodation price and room types – Affordability must be considered in the type of accommodation being built. We would like to see more shared communal living options being offered over the more expensive studio type rooms. From a developer perspective you can see the appeal of individual studio accommodation as potential rental return per square metre is higher than cluster accommodation. However demand for this accommodation is generally quite low and new incoming students are looking for a more communal environment with at least shared	Agree. Whilst planning cannot control levels of rents, it can promote a wider choice of accommodation types including accommodation with shared bathroom facilities and two person bedrooms.	Paragraph 5.56 amended to 'increased amount of low-priced rooms <u>such as twin rooms or rooms with shared bathroom facilities</u>' Delete 'offer some at a percentage of rent below market value'. Also amended paragraph 5.58 to "Applicants should demonstrate that contact has been made with HEIs & their Student Union organisations in Norwich and agreement/support has been reached on the <u>type and level of low-priced rooms.</u>" This

	kitchen and living facilities. Weight should be given to flats with fully shared bathroom facilities or shared 2 person bedrooms to ensure that a good supply of affordable rooms are available in the future. While it would be difficult to put a rental cap on developers submitting plans on what they could charge for the accommodation, encouraging shared facility rooms, in particular in the case those with shared bathroom facilities, would essentially do this as there would be a ceiling as to what could be charged for this style of room. In terms of location could lower rise PBSA be accepted in residential areas to give more options to students who like the idea of PBSA but don't want to live the city centre?		removes reference to low-cost provision of accommodation or affordability policy of the development . Paragraph 5.40 amended to 'Therefore, developments seeking provision of studio flats should do so only in conjunction with <u>a range of other types of 'sharing accommodation' and where the need for studios is demonstrated within the needs assessment to be submitted with each planning application.</u>' Delete specific nomination rights from an institution.
Norwich University of the Arts	Shrinking HMO market – with prices increasing year or year within PBSA some students might be priced out of the market and back into HMOs where rents are significantly cheaper. With the oversaturation of the market Norwich might reach its ceiling rent sooner rather than later. Will this lead to reduced maintenance/refurbishment of buildings? The renters' rights bill may push more students into HMOs where they have more rights. Students in HMOs will be able to give notice on their contracts at any time. This may possibly lower the stock of HMOs if landlords do not want to deal with this issue. This may increase demand for places in PBSA however some work may have to be done to ensure that this	Agree that there is uncertainty and therefore a need for flexible approach. Would be useful to refer to the forthcoming Renters' Rights Bill within the SPD.	Added bullet to paragraph 4.6 '<u>The forthcoming Renters' Rights Bill may lower the private rented sector stock</u>'.

	student group, who are being pushed into this market, have accommodation at a price and a service level that they are happy with.		
Norwich BID	Engagement Opportunity - BID would want to work with developers and the council to ensure new schemes include street-level enhancements and benefit local traders. Data Gathering - Request that developers provide evidence and ongoing data on student spending patterns to help target services and support for businesses catering to them. Policy Advocacy - BID proposes a balance between student accommodation and preserving mixed-use vibrancy in the city centre. Reduction of economic buildings, specifically good office space, is detrimental to the long-term growth aspirations of the city and business. At present the level of student accommodation is above the level of evidenced required need and therefore any future student accommodation would need a robust evidence base to support an application .	Engagement Opportunity - Policy 6 of the GNLP encourages active frontages to support centre's vitality and viability and policy 7.1 includes public realm works. To strengthen the SPD both of these should be mentioned acknowledging the role that the BID can play in supporting this. Data Gathering – This goes beyond the remit of the SPD. Policy Advocacy – Norwich has an Article 4 direction to protect office accommodation. The SPD sets out the requirement for needs assessments which should ensure that a good balance is retained, where possible.	Paragraph 5.17 amended to include: <u>“Early engagement with the BID is encouraged to ensure new PBSA developments include street-level enhancements (both in terms of active frontages and public realm improvements) and benefit local traders.”</u>
Watkin Jones Group (on behalf of management of Benedict's Gate)	The method for calculating 'need' is not effective. Many more second, third and later years students are now favouring PBSA over other forms of accommodation.	This is taken into account within the report with the Council seeking to meet PBSA bed demand for all full-time students. See paragraph 4.4/4.5.	No change
Watkin Jones Group	When sufficient PBSA is provided, HMOs can be returned to the market and be occupied by	There remains a need in Norwich for development of	No change

	others (e.g. families).	market and affordable housing. The delivery of PBSA reduces the opportunity to deliver much needed housing. HMOs also provide a key housing option that is often more affordable than most forms of PBSA and offers a greater choice of locations.	
Watkin Jones Group	The vacancy data is flawed as the research was carried out at the start of term when voids are higher.	More recent discussions with the universities still indicate much higher vacancy rates than in previous years. Vacancy figures will be reviewed and can form part of a needs assessment for planning applications.	No change
Watkin Jones Group	There is an undersupply of PBSA not an oversupply. Policy 5 of the GNLP is supportive of the delivery of more PBSA and the SPD should adopt a more positive stance.	The AECOM evidence base shows an oversupply. The SPD acknowledges that this may change over time so allows for the provision of needs assessments as part of the planning application process. GNLP policy 5 is clear that PBSA should be supported where there is a need.	No change
Watkin Jones Group	Only allowing studios to be permitted where there are nomination rights from an institution in effect places a moratorium on studios. Instead the Council should require that the need for any studio rooms is demonstrated within the demand statements for planning applications.	Agree that this could be overly restrictive. Paragraph to be changed to ensure that studios are provided in conjunction with a range of shared accommodation and where a needs assessment demonstrates a need.	Paragraph 5.40 amended to "Therefore, developments seeking provision of studio flats should do so only in conjunction with <u>a range of other types of 'sharing accommodation'</u> and where the <u>need for studios is demonstrated within the needs assessment to be</u>

			submitted with each planning application. Care must be taken to ensure that other means of social interaction are provided in order to encourage a sense of community.”
Watkin Jones Group	The requirement for university engagement (resulting in support, nominations agreement or partnership) should be removed for the SPD to be effective and instead should be replaced by the requirement to demonstrate the need for PBSA.	Agree that this could be overly restrictive. Whilst the aim should be that engagement results in support, nominations agreement or partnership, the SPD should be reworded slightly so it is not an essential requirement.	Paragraph 5.52 amended to “A planning application for proposed new student accommodation developments should <u>ideally</u> demonstrate that contact has been made with at least one of the HEIs in Norwich through the following means (in order of preference):”
Watkin Jones Group	The Council is trying to introduce an element of affordable PBSA in developments by requiring applicants to reach agreement on the levels of low-cost provision of accommodation or affordability policy. This is not sound.	Agree that the wording is slightly ambiguous. The intention is not that PBSA is rented at below the market value but instead a range of accommodation is provided including lower cost PBSA such as twin rooms or shared bathrooms. PBSA will be subject to an offsite affordable housing contribution.	Paragraph 5.57 amended to remove reference to below market value and to add “increased amount of low-priced rooms <u>such as twin rooms or rooms with shared bathroom facilities.</u> ” Also amended paragraph 5.58 to “Applicants should demonstrate that contact has been made with HEIs & their Student Union organisations in Norwich and agreement/support has been reached on the <u>type and level of low-priced rooms.</u> ” This removes reference to low-cost provision of accommodation or affordability policy of the development .
Watkin Jones group	A viability assessment should be commissioned by the Council to assess whether the proposed approach towards calculating an off-site affordable housing	Provision is made for the submission of viability assessments with all applications. The issue of	No change

	contribution from PBSA would be viable in most scenarios.	viability will be considered further during the review of the Affordable Housing SPD.	
Lanpro (on behalf of Orford House Developments Ltd)	The conclusion that the PBSA market is at risk of oversaturation is based on flawed assumptions and outdated projection. Oversupply of PBSA • The demand projection does not account for potential policy changes encouraging more students into higher education. • The projection for PBSA bedspaces is over-optimistic and assumes every pipeline scheme will be delivered. • The impact of hybrid learning models has shifted preferences toward PBSA, particularly in city-centre locations. • The PBSA Study assumes full utilisation of existing stock, ignoring potential decommissioning of aging PBSA. Many existing rooms offer inferior accommodation that will become obsolete at worst and simply not chosen by students at best as they are faced with better alternatives.	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 informed by ongoing council engagement with the HEIs. Applicants can submit needs assessments with planning applications. Less than half of the pipeline needs to be delivered to meet need. The SPD acknowledges that there are a number of factors that influence student preference included affordability, greater freedom from restrictions and rules, loneliness. New PBSA accommodation may be more attractive than existing PBSA. The risk is that existing accommodation will become underoccupied and will need to be repurposed for other uses which is challenging due space standard requirements. There	No change

		would be limited scope/desire to repurpose stock at the UEA so it is important that UEA stock remains at near full occupation before sites are developed in the city centre for PBSA. These city centre sites could instead be developed for much needed general needs/affordable housing.	
Lanpro	Underestimation of Future Student Growth. Projection relies on historical trends rather than future expansion plans from UEA and NUA. The UEA DFS 2019 projects growth of 5,000 additional students by 2036. AECOM have not considered international recruitment trends and government policies encouraging university participation.	Both UEA and NUA were involved in the AECOM study. Whilst the UEA DFS does sets out a growth vision for the university, the more recent draft UEA Strategic Development Framework (2021) raises more uncertainty. Whilst it 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. International student numbers in particularly are uncertain.	No change
Lanpro	PBSA Affordability. The PBSA Study does not take account of hidden costs of HMOs (utility bills, council tax for postgraduates, deposits). PBSA offers security, amenities, and convenience which justifies higher rents. Flexible rental contracts make PBSA accessible for students on tighter budgets.	All full time students are exempt from Council tax, including postgraduates. Bills will be split among occupiers so whilst they will add to the overall cost of accommodation, it is still likely to be cheaper than most PBSA.	Paragraph 4.23 amended to: By comparison, students living in an HMO would have £1,502 remaining from an average student loan (<u>although some of this may need to cover utility bills which are typically included within PBSA</u>).

Lanpro	Ageing Stock and Quality Issues. Older PBSA stock lacks modern facilities, making it less attractive than newer options. Market forces will ensure that given a choice, consumers will choose quality, price and location which will favour the right modern PBSA schemes.	If existing PBSA become underoccupied, it may need to be repurposed for other uses (which is challenging due to space standards). There would be limited scope/desire to repurpose stock at the UEA. It is important that existing PBSA remains at near full occupation before new sites within the city centre are developed which could otherwise be used for much needed general needs housing.	No change
Lanpro	The Ziggurats. There is no confirmed reopening timeline for the Ziggurats and restoration costs may in the end prove to be prohibitive for UEA. Even if reopened, these buildings may struggle to compete with newer PBSA options. These points are not highlighted by AECOM and UEA has a vested interest in their accommodation being utilised, even if much of their estate is inferior to modern PBSA.	The UEA is currently exploring all options with regards to the Ziggurats.	No change
Lanpro	Unrealistic Expectations for Private Rented Sector (PRS) Absorption. Landlords have been exiting from the PRS market due to increased regulation reducing HMO availability. PRS housing is increasingly unaffordable, making PBSA a more practical option. PRS is facing increased competition due to high demand from non-student renters which pushes prices up.	The evidence still shows that HMOs are cheaper than most forms of PBSA. Affordability is only one reason why many students want to live in HMOs for some of their time at university. Additional caveat should be added regarding PBSA bed demand.	Added bullet to paragraph 4.6 ' <u>The forthcoming Renters' Rights Bill may lower the private rented sector stock</u> '.
Lanpro	Unaccounted Demand from International	International student numbers	No change

	Students. The PBSA Study states that Norwich has a lower proportion of international students than the UK average, but this doesn't account for the fact that post-Brexit policies favouring non-EU international students are increasing these numbers which will flow through to Norwich. Both UEA and NUA have increased their outreach from a student recruitment perspective to attract these non-EU internationals.	are uncertain and can be influenced by many factors. This is one reason why NCC has selected the policy approach that provides sufficient PBSA for all students rather than just 1st years or undergraduates as this provides a 'buffer'. Furthermore information on need will be kept up-to-date and be informed by ongoing council engagement with the HEIs. Applicants can submit needs assessments with planning applications.	
Lanpro	Planning Pipeline Does Not Guarantee Supply. Many planning applications are speculative and may not materialise. Additionally, delays in construction, financing, or changing market conditions and therefore viability will reduce the actual number of delivered bedspaces. Nutrient Neutrality, will no doubt impact viability for any current or future PBSA schemes and their delivery.	The Council already acknowledges within the SPD that not all pipeline schemes are likely to be delivered. Additional sentence to be added to set out why some schemes may not be delivered.	Paragraph 4.11 amended to: It should however be acknowledged that not all pipeline development will necessarily be approved and/or delivered <u>with factors such as changing market conditions, viability, nutrient neutrality and build costs influencing developer's decisions as to whether to deliver schemes.</u>
Lanpro	Lack of clarity as to the weight to be afforded to the Draft SPD and PBSA Study. The weight to be afforded to both documents in the context of decision-making should be very limited.	Whilst the draft SPD has limited weight, the adopted SPD will be a material planning consideration and carry much more weight.	Additional sentence added to paragraph 1.6. <u>'The SPD will be a material consideration in the determination of planning applications.'</u>
Lanpro	Lack of clarity regarding the relationship between the 2019 PBSA Advice Note and 2024 PBSA Study.	The 2019 Best Practice guide will be superseded by the SPD, once adopted.	No change
Lanpro	Lack of consistency with GNLP Policy 5.	Policy 5 sets out that proposals	No change

	Away from the UEA campus, Policy 5 is clear that proposals for PBSA should be supported where the need for the development is justified by the current or proposed size of Norwich's HEIs and the proposal complies with the subsequent 'tests'. Policy 5 makes no explicit reference to needing to have regard to existing stock and pipeline of PBSA.	for PBSA should be supported where there is a need. In order to understand need, many factors must be taken into account, including: • Current and future student numbers • Existing PBSA supply and future pipeline supply • Current occupancy rates • Student preference	
Lanpro	Local Housing Need. The PBSA Study should have had regard to the increase in local housing need using the standard method as set out in the latest iteration of the NPPF.	The study was prepared prior to the 2024 NPPF. It is not felt necessary to update the study, but any future update will use the relevant methodology.	No change
Lanpro	Diversification of existing providers. The PBSA Study acknowledges that some existing providers are trying to diversify away from PBSA. It is considered that this is an important point, and unlikely to be simply a consequence of occupancy and over-supply as stated, but potentially due to stock coming to the end of its useful life and change in demand for a particular type of accommodation. Further analysis of this should be undertaken given the implications for the conclusions of the Study.	As part of our ongoing monitoring it will be important to note if any PBSA schemes are seeking to make a change away from PBSA to other uses. All schemes are however modern conversions to PBSA and include Crown Place and Graphic House.	No change
JMS Planning (on behalf of landowner of	Supports the inclusion of Duke's Wharf within the pipeline of PBSA.	Noted	No change

Duke's Wharf)			
JMS Planning	The needs assessment undertaken to supporting the planning application at Duke's Wharf took a conservative approach and found an unmet need of 5,944 student units. It didn't include the increasing population of students at City College. It also assumed the return of the Ziggurats.	The Council acknowledges that various factors, such as the universities' growth plans, PBSA supply, HMO supply, affordability, occupancy levels and student preference can all influence the quantum of need. Information on need will be kept up-to-date and will be informed by ongoing council engagement with the HEIs. Applicants can submit needs assessments with planning applications.	No change
JMS Planning	NCC should introduce an Article 4 Direction to control the amount of family-sized housing being converted into HMOs.	NCC is considering options for intervention for HMOs which could include additional and selective licensing, article 4 directions and alternative positive interventions. The PBSA SPD will help inform any future policy approach to HMOs.	No change
JMS Planning	Supportive of having an SPD for Policy 5 of the GNLP but clarity needed on whether the SPD is intended to provide guidance for the site allocations identified in the PBSA pipeline. Rather than labelling the existing pipeline as 'oversupply' it should be referred to as a 'buffer'. JMS suggest that a buffer of c. 2,000 units is a flexible and sensible approach given the numerous caveats and uncertainties in the sector to 2038 and beyond.	The SPD should be used when assessing both windfall and allocated PBSA. Agree to use term 'buffer'.	Amended paragraph 1.6 to: '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 <u>and in assessing planning applications for both windfall and PBSA allocations.</u> ' Amended paragraph 4.11 '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 <u>which will give a significant 'buffer'.</u>
JMS Planning	JMS welcomes the caveats to projections within 4.6 of the draft SPD. JMS have the following comments on how to address the caveats. • The projections are based on 2022/23 trends and assume they will continue in the future. How will changes in occupancy and population data be accommodated? • The 2022/23 proportion of students living in PBSA may be limited by the existing stock. How does the quality of stock vary – JMS would suggest analysis is carried on the quality of stock as well as affordability? Has consultation been undertaken with UEA re the Ziggurats? Has consultation with City College been undertaken? • Difficult to quantify future demand for international students. Recommend further consultation with HE establishments and PBSA providers.	• The data will need to be reviewed and there is the opportunity for applicants to submit a needs assessment with future planning applications. • Quality does vary but NCC's understanding is that there is not a correlation between quality and occupancy rates. UEA are currently assessing all options re Ziggurats. The majority of City College students live at home with parents or halls are available at Easton College (outside NCC's boundary). City College were not involved in the production of the AECOM study or SPD but had the opportunity to comment through the public consultation. • The HEIs and PBSA providers are unable to predict future international students as there are many factors	No change

		outside of their control.	
JMS Planning	Welcome joined up approach for PBSA and HMOs, but note no further analysis has been undertaken. The Council may need to consider an article 4 direction for HMOs.	NCC is considering options for intervention for HMOs which may include additional and selective licensing, article 4 directions and alternative positive interventions.	No change
JMS Planning	Query the validity of consulting estate agents given the role of estate agents have in marketing HMOs.	This only formed one part of the research process.	No change
JMS Planning	Constraints to delivering PBSA should be referenced more clearly e.g. nutrient neutrality. NCC should satisfy itself that the SPD does not require a SEA.	Agree. Additional sentence to be added. SEA scoping exercise has been undertaken.	Paragraph 4.11 amended to: It should however be acknowledged that not all pipeline development will necessarily be approved and/or delivered <u>with factors such as changing market conditions, viability, nutrient neutrality and build costs influencing developer's decisions as to whether to deliver schemes.</u>
JMS Planning	JMS welcomes that the SPD will be reviewed; however, would suggest that further details is provided on how this will take place.	Agree. Further details to be added regarding monitoring.	Additional paragraph added after 6.1. <u>"Consents and delivery of consented accommodation will be reported annually via the Annual Monitoring Report (AMR) (Plan indicator H8). HESA provide annual figures on student numbers so these should be reviewed on a yearly basis. The decision as to when best to carry out a wider update on the need for more student accommodation will be informed by the above and through discussions with the higher educational institutions. It may also</u>

			be influenced by the number of <u>planning applications received for PBSA.</u> "
Savills (on behalf of applicant for Norwich Nelson Hotel application)	Supply and Demand for PBBA The likelihood of all pipeline accommodation being delivered is uncertain which could result in a shortfall to meet demand. Currently only 33% of full-time students in Norwich live in PBSA. If the supply was increased it would free up the wider PRS market. Other comparable cities have a much higher proportion of full-time students living in PBSA (York 40%, Durham 45%, Lincoln 55%).	The Council already acknowledges within the SPD that not all pipeline schemes are likely to be delivered but there is a significant buffer. Increasing the supply of PBSA has the potential to free up properties within the PRS or it could lead to underoccupancy of PBSA.	No change
Savills	PBSA Bed Spaces to Student Numbers The balance between supply and demand in student markets can be measured by the student to bed ratio – that is the number of students competing for each available bed offered by universities or private providers. A high student to bed ratio generally indicates a lack of supply. The ratio across 20 markets studied is 2.7. The optimum level is 1.5. Norwich's ratio is 2.63. Norwich would need an additional 4,800 beds to lower the ratio to 1.5.	No evidence provided as to why 1.5 is the optimum level which is lower than all cities other than Oxford. AECOM's evidence would show that an additional 4,800 bedspaces would oversaturate the market in Norwich and could potentially affect the delivery of general needs housing.	No change.
Savills	PRS Market and Constraints The AECOM report undercounts students living in PRS. There is a lack of supply in the PRS market in Norwich. Rental homes are being let quickly which has resulted in increased rents. The provision of additional PBSA would assist to displace students from PRS to student housing to free up PRS for those in housing need and particularly with regard to family homes. The supply of PRS	Agree that there is uncertainty and therefore a need for flexible approach. Would be useful to refer to the forthcoming Renters' Rights Bill within the SPD.	Added bullet to paragraph 4.6 ' <u>The forthcoming Renters' Rights Bill may lower the private rented sector stock</u> '.

	accommodation is also likely to significantly contract over coming years. The UK has seen a reduction in PRS home with many landlords exiting the market and this is likely to worsen with rising interest rates, increased regulations, and concerns about the Renters' Rights Bill. Over reliance on PRS to provide sufficient student accommodation will be unsustainable.		
Savills	Section 5.52 suggests that contact should be made with one of the HEIs with regard to bringing forwards a PBSA scheme. We would suggest this should be expanded to include discussions with PBSA private providers. Where schemes are proposed to come forward in later years on a phased development, it is also strongly suggested that these discussions should be deferred in line with the expected delivery timeline of the scheme.	Agree that this could be overly restrictive. Whilst the aim should be that engagement results in support, nominations agreement or partnership, the SPD should be reworded slightly so it is not an essential requirement.	Paragraph 5.52 amended to "A planning application for proposed new student accommodation developments should <u>ideally</u> demonstrate that contact has been made with at least one of the HEIs in Norwich through the following means (in order of preference):"
Savills	Affordable Housing should be subject to a Viability Assessment at planning application stage.	Paragraph 5.68 sets out that viability can be considered at the planning application stage.	No change.

Appendix 2: Get Talking Norwich PBSA SPD survey responses

Introduction

This report presents an analysis of responses collected through the 'Get Talking Norwich' public survey which was conducted between 2 April 2025 and 7 May 2025.

The purpose of the survey was to gather diverse perspectives from students, residents, landlords, university staff, developers, and other community members regarding the quantity, impact, and future direction of student housing in the city.

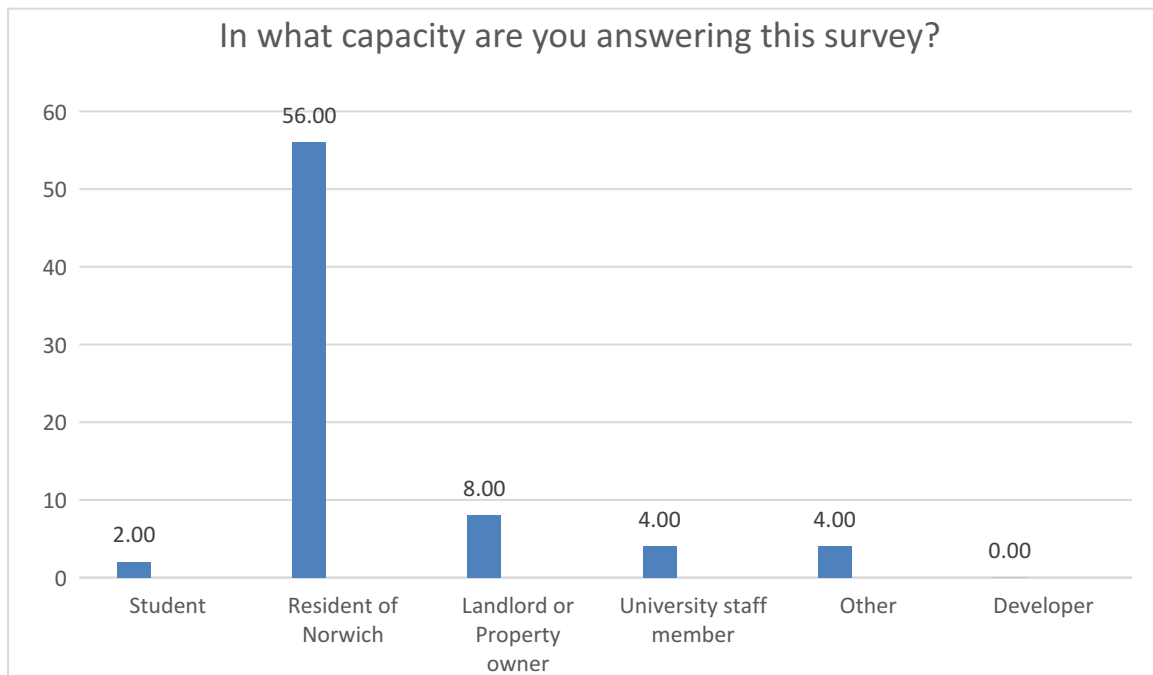
The survey aimed to:

- Assess public sentiment on the current and projected supply of student accommodation.
- Evaluate the perceived effectiveness of the Supplementary Planning Document (SPD) in guiding PBSA development.
- Understand the broader social, economic, and environmental impacts of student housing on local communities.

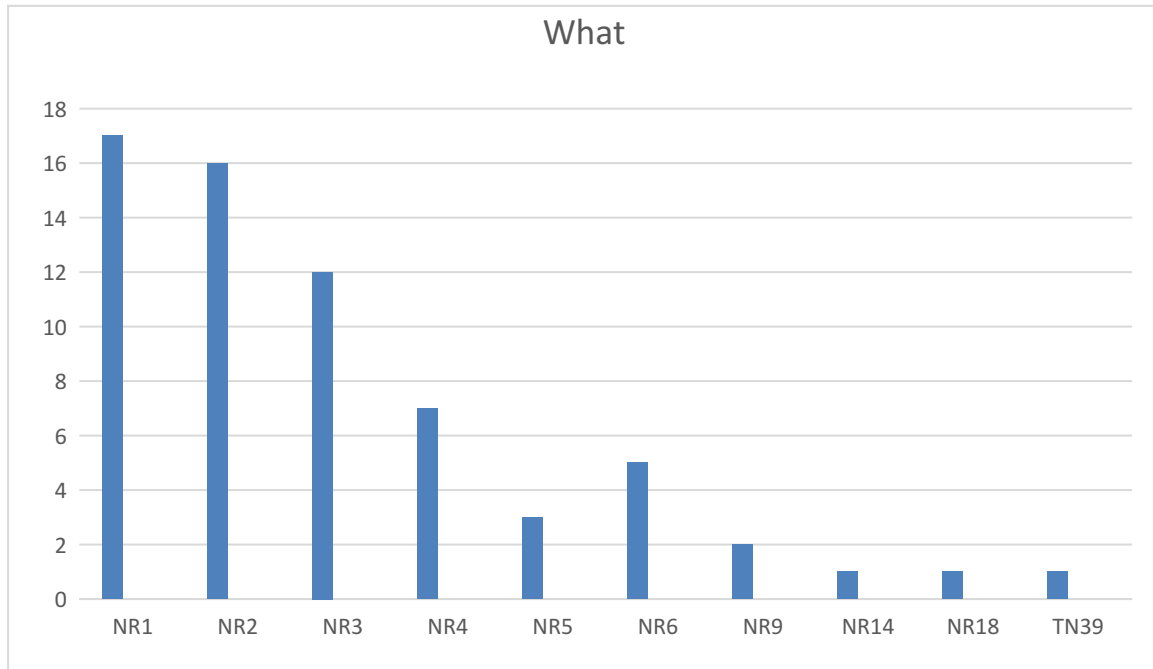
This analysis synthesises both quantitative and qualitative responses, with a particular emphasis on open-ended feedback. The goal is to identify recurring themes, concerns, and suggestions.

The findings from each question are set out in the following sections. Consultation engagement analysis is also provided.

Question 1



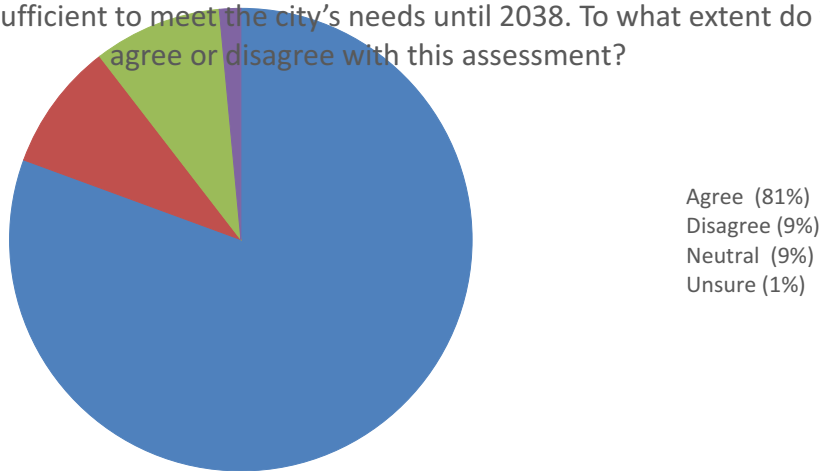
Question 2



Question 3 and 4

Question 3

The draft SPD suggests that the current and planned student accommodation supply is sufficient to meet the city's needs until 2038. To what extent do you agree or disagree with this assessment?



Question 4: Please explain why you think this.

The responses reflect a strong consensus around the oversupply of student accommodation and concerns about its impact on the local housing market and community. Several recurring themes emerge:

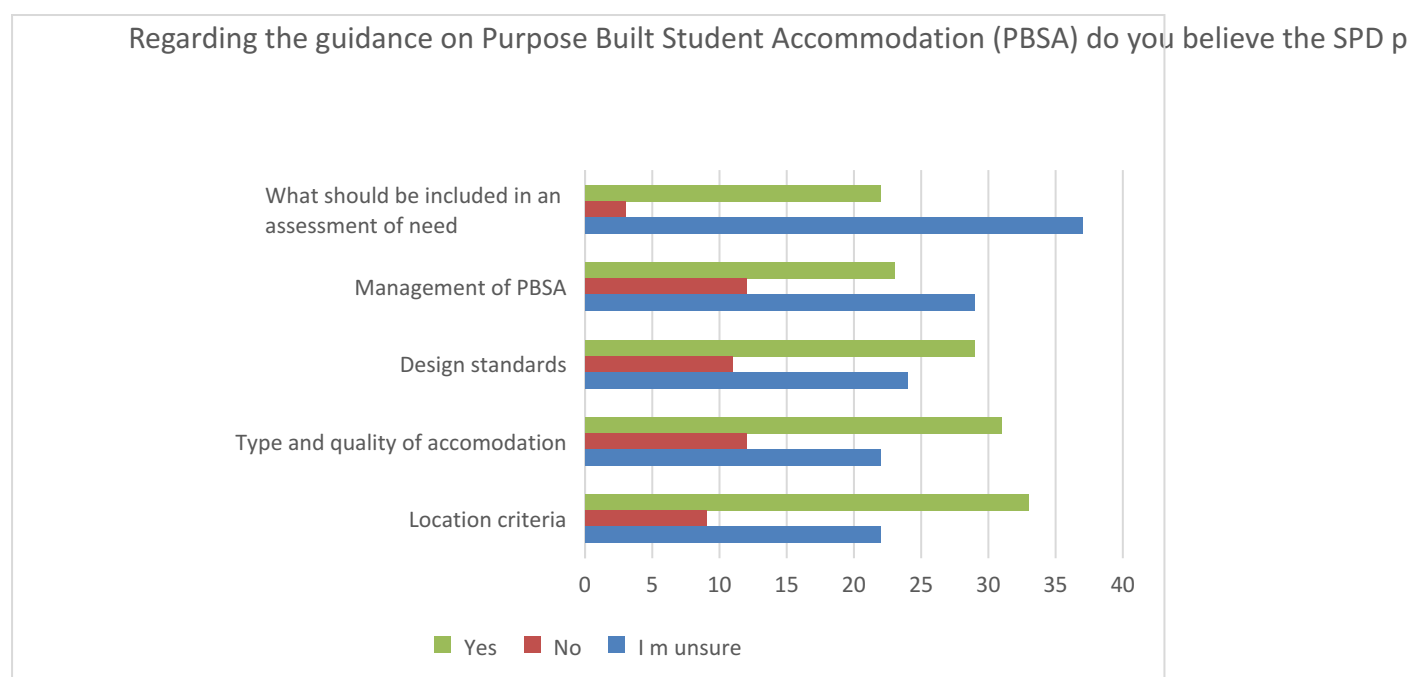
1. **Oversupply of Student Accommodation**
 - Many respondents note that new PBSA is not fully occupied.
 - There is a perception that student numbers are declining, especially international students.
2. **Affordability and Accessibility**
 - PBSA is often described as too expensive for most students.
 - Some comments highlight the need for more affordable options, especially for students with families.
3. **Impact on Local Housing Market**
 - Concerns about the dominance of student housing in prime city locations.
 - Fears that this reduces availability and affordability for local residents and families.
4. **Urban and Social Impact**
 - Some respondents feel the city is becoming too student-centric, affecting its cultural and social balance.
 - Issues like graffiti, litter, and anti-social behaviour in student areas are mentioned.
5. **Policy and Planning Recommendations**
 - Suggestions to repurpose or convert PBSAs for general housing use.
 - Calls for more social and affordable housing for non-students.
 - Some support for market-led solutions, while others advocate for stronger planning controls.

Analysis of the comments received from those who disagreed on question 3.

The comments reflect a range of concerns and perspectives on student housing. The main points include:

1. **Changing Demand Over Time:** Some believe student numbers and housing needs will fluctuate, with a potential rebound in demand by 2030–2038.
2. **Insufficient Current Housing:** There is a perceived shortage of student accommodation, especially for first-year students and those with families.
3. **Affordability and Exploitation:** Concerns about high costs and exploitative practices by private landlords are prevalent.
4. **Impact on Local Communities:** The proliferation of HMOs (Houses in Multiple Occupation) is seen as detrimental to community cohesion and housing availability for non-students.
5. **Policy and Regulation Effects:** Legislation like the Renter's Rights Bill is seen as influencing landlord behaviour and housing availability.
6. **Preference for PBSA:** Some suggest PBSA offers better oversight and accountability compared to HMOs.

Question 5



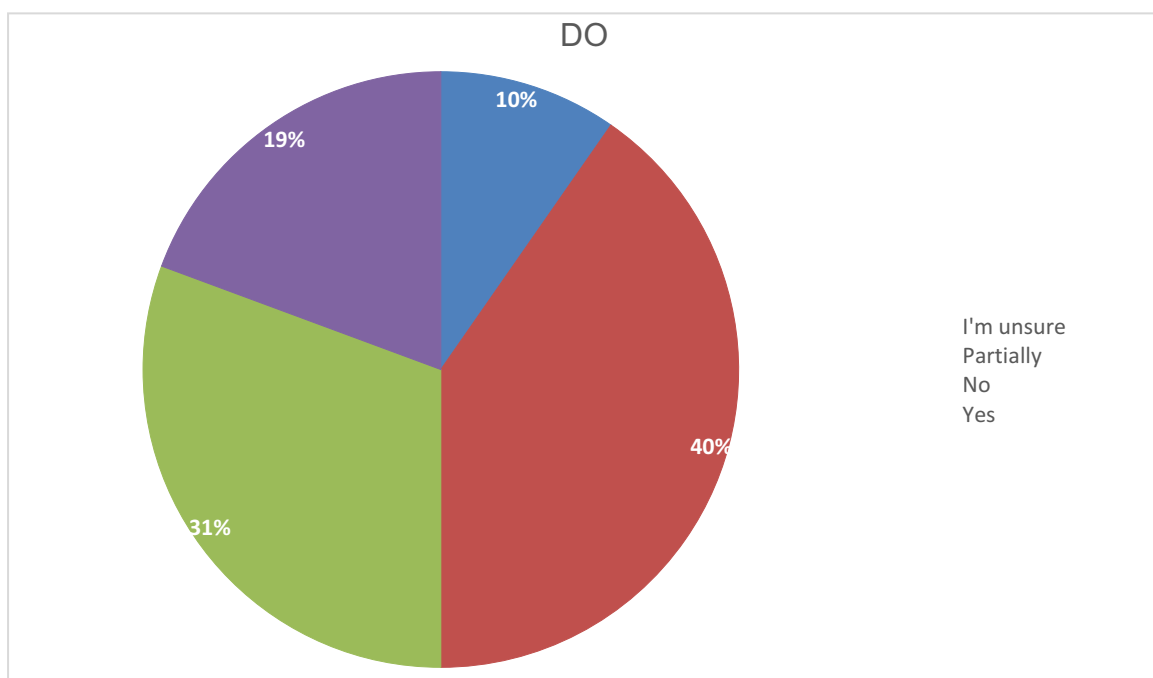
Question 6: Is there anything that we have missed?

The responses have highlighted concerns on the following key main areas.

1. **Affordability and Cost of Living**
 - Focus on ensuring accommodation is financially accessible and offers value for money.
2. **Quality and Standards of Accommodation**

- Concerns about inspection, maintenance, and design standards.
3. **Planning, Regulation, and Policy**
 - Issues around planning rules, conversions, and long-term housing strategy.
 4. **Location and Accessibility**
 - Preferences for accommodation location (e.g., near university vs. city centre) and its impact on residents.
 5. **Social and Community Impact**
 - Broader effects on local housing, council tax, and community integration.
 6. **Student Welfare and Lifestyle**
 - Emphasis on mental health, social living, and support for diverse student needs (e.g., students with families).
 7. **Sustainability and Environmental Concerns**
 - Calls for prioritising net-zero and sustainable development.
 8. **University Responsibility and Oversight**
 - Accountability for student behaviour and welfare beyond university-managed halls.

Question 7 and 8



Question 8: Why do you think this?

The analysis below focuses on the comments from the respondents who answered No to question 7 (and excludes the comments by landlords).

The responses express strong concerns about the negative impact of student accommodation on local communities. The main issues raised include:

- **Community Disruption:** Noise, parties, and lack of student integration into the community.

- **Infrastructure Strain:** Increased pressure on transport, amenities, and public services.
- **Housing Market Distortion:** Oversupply of low-quality housing, displacement of local residents, and prioritisation of profit over community needs.
- **Environmental and Aesthetic Concerns:** Parking issues, light and noise pollution, and disregard for local planning policies.
- **Economic Inequity:** Perceived unfairness in council tax contributions and the financial motivations behind PBSA development.

From the responses received by the landlord 62.5% of the landlords answered partially which makes up 20% of the responses who answered partially.

Below is a highlight of the main findings from the comments by landlords in response to question 8. The comments reflect a range of concerns and observations about student housing and its impact on communities:

1. **Student Car Ownership and Parking**
 - Students are not realistically “car-free” and still require parking, leading to spillover into surrounding streets.
2. **Housing Market Pressures**
 - Private landlords buying multiple properties is inflating housing prices and saturating neighbourhoods with HMOs.
3. **Urban and Economic Impact**
 - High concentration of students in city centres may negatively affect local businesses and traffic patterns.
 - Conversion of commercial sites (e.g., Debenhams) into student housing is seen as detrimental to city commerce.
4. **Affordability and Accessibility**
 - Student housing is perceived as too expensive and potentially inaccessible for UK citizens.
5. **Perceived Negativity and Lack of Data**
 - Some respondents feel the discourse is overly negative and lacks supporting data (e.g., on anti-social behaviour).
 - Suggestions include integrating retail units into PBSA to benefit communities.
6. **Developer Incentives and Regulation Loopholes**
 - Developers are attracted to PBSA due to tax advantages and lenient regulations (e.g., no minimum room sizes).

Question 9: Do you have any other comments or suggestions?

Summary of key themes in the responses received.

1. **Opposition to Excessive Student Accommodation**
 - Many respondents express concern about the overdevelopment of PBSA, especially in the city centre.
 - Fears include future vacancy, visual impact, and lack of integration with the wider community.
2. **Call for Balanced Housing Development**

- Strong support for more general housing, especially multi-bedroom flats, social housing, and housing for older people.
 - Emphasis on creating mixed communities rather than student-dominated areas.
3. **Affordability and Accessibility**
 - Concerns about the affordability of PBSA for average students.
 - Calls for better quality and more affordable student housing options.
 4. **Impact on Local Communities**
 - Issues raised about noise, antisocial behaviour, and parking problems linked to student housing in residential areas.
 - Suggestions for better transparency and communication between universities and local residents.
 5. **Urban Planning and Land Use**
 - Suggestions to repurpose vacant or underused sites (e.g., Debenhams) for community benefit—retirement homes, entertainment venues, or hotels.
 - Criticism of the proliferation of certain types of businesses (e.g., food outlets, nail bars).
 6. **Policy and Regulation**
 - Recommendations for stricter planning controls, landlord restrictions, and limits on student density in neighbourhoods.
 - Suggestions for developers to contribute more to local infrastructure and amenities.
 7. **Community Engagement**
 - Calls for more public consultation and inclusion of diverse voices, including recent graduates.

Conclusion and overall summary

Below is a summary of the key themes identified in the survey.

1. Perceived Oversupply of PBSA

- **Majority View:** Many respondents believe there is already an oversupply of PBSA in Norwich.
- **Evidence:** Frequent mentions of vacant units, under-occupied buildings, and declining student numbers (especially international students).
- **Implication:** Concerns about inefficient land use and potential for future dereliction.

2. Affordability and Accessibility

- **Concern:** PBSA is often seen as unaffordable for average students.
- **Comparison:** Some believe HMOs or shared private rentals are preferable due to lower costs.
- **Equity Issue:** Some respondents worry that PBSA caters to wealthier or international students, excluding local or less affluent students.

3. Impact on Local Communities

- **Displacement:** PBSA and student HMOs are perceived to displace housing for families and long-term residents.
- **Community Cohesion:** Concerns about temporary populations, noise, and lack of integration with local communities.

- **Council Tax:** Frustration that students don't pay council tax yet use local services.

4. Urban Planning and Design

- **Criticism:** Some believe PBSA developments are poorly integrated into the city's architectural and social fabric.
- **Suggestions:**
 - Convert PBSA to general housing if demand drops.
 - Ensure new developments are flexible and future-proof.
 - Prioritise mixed-use developments and social housing.

5. SPD Feedback

- **Mixed Views:**
 - Some agree it provides sufficient detail.
 - Others feel it lacks depth of consideration of community impact, affordability, and long-term adaptability.
- **Call for Action:** More transparency, community consultation, and emphasis on sustainable, inclusive development.

The survey reveals a strong consensus that Norwich currently has sufficient, if not excessive, PBSA. Respondents urge a shift in focus toward:

- Affordable housing for local residents
- Better integration of students into communities
- More inclusive and sustainable urban planning

There is also a clear call for greater transparency, community engagement, and policy reform to ensure that future developments serve both students and the wider Norwich population.

Consultation engagement analysis

The consultation was carried out on "Get Talking Norwich" which is the Council's public engagement platform. The analysis below focuses on community interaction with the "Purpose Built Student Accommodation" consultation, capturing both quantitative metrics and qualitative engagement patterns.

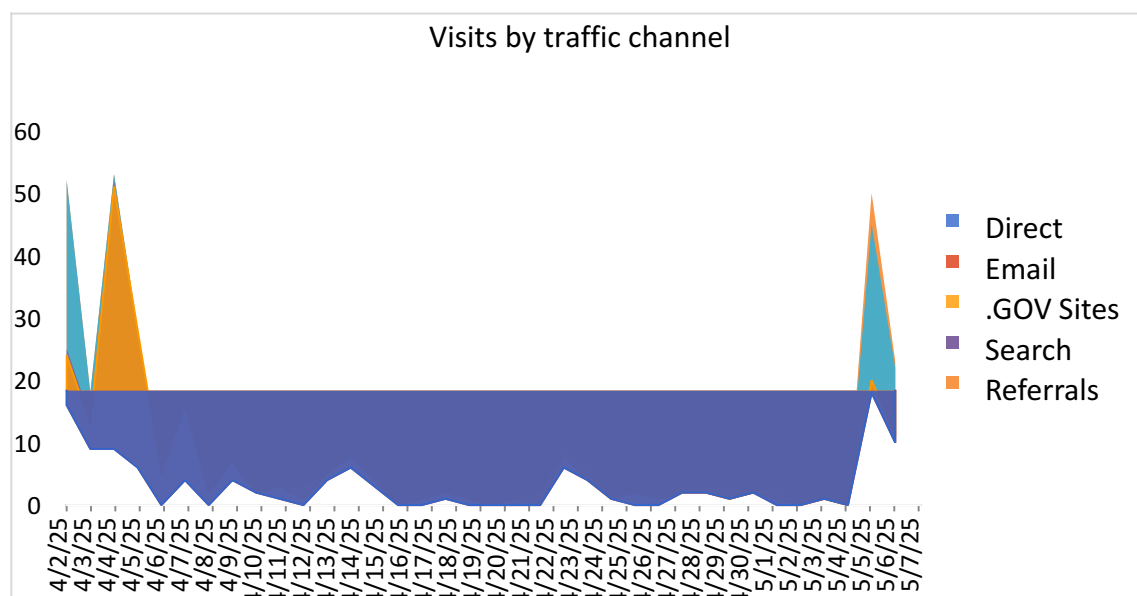
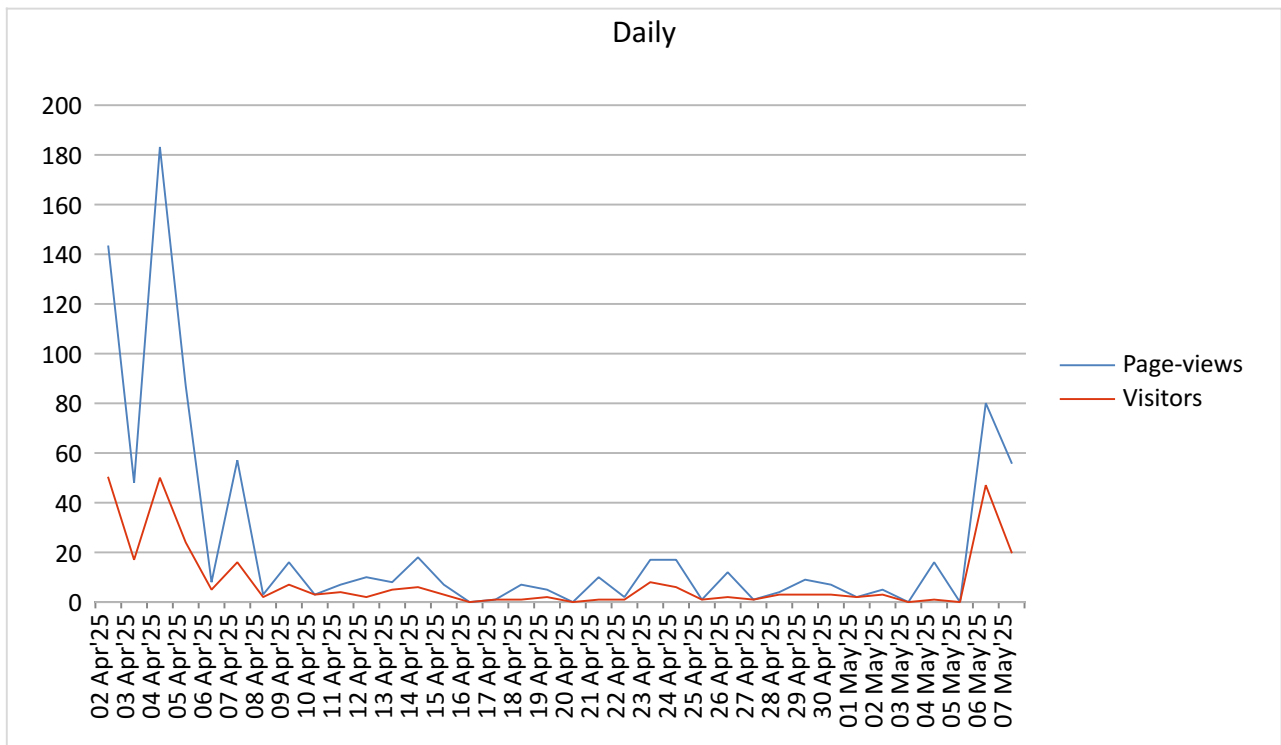
The data reflects how residents and stakeholders interacted with the project through the digital platform, tracking levels of awareness, information consumption, and active participation.

This data serves as a valuable resource for evaluating public consultation strategies, understanding community interest in urban development, and identifying opportunities to enhance public participation in future consultations.

Quantitative Summary

Overall Engagement Metrics

- Total Visits: 324
- Max Visitors in a Day: 50



Visitor Engagement Levels

Engagement Level	Count	% of Total Visits
Aware	276	N/A
Informed	163	59.1%
Engaged	66	23.9%

Note: Participants can fall into multiple categories (e.g., an engaged participant is also informed and aware).

Qualitative Engagement Insights

Engaged Participants (66)

- Participated in the survey

Informed Participants (163)

- Actions included:
 - Viewing documents (112 downloads across 3 documents)
 - Visiting multiple project pages

Aware Participants (276)

- Simply visited at least one page related to the project

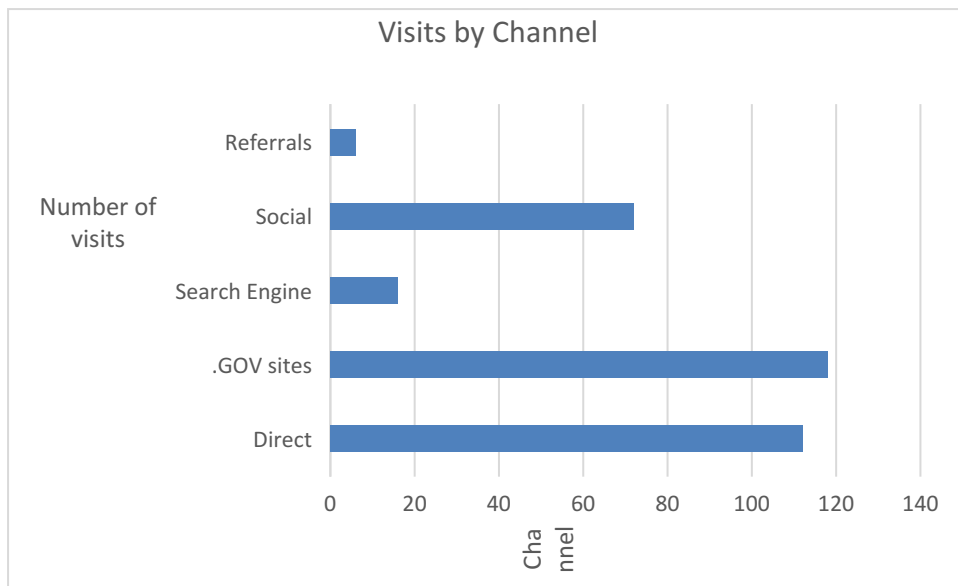
Top Downloaded Documents

1. One-page summary.docx – 53 downloads
2. Purpose-built student accommodation (SPD) draft for consultation.pdf – 49 downloads
3. PBSA Study (AECOM 2024) – Evidence base – 10 downloads

The AECOM report had the least amount of downloads. This is likely due to the fact that participants were mostly residents therefore they are least likely to engage with technical evidence report as they have less interest in the high level technical details which are included in the evidence base report.

Traffic Sources

- **Top Referrers:**
 - www.norwich.gov.uk – 118 visits
 - Facebook – 56 visits
 - Google – 13 visits
 - LinkedIn – 7 visits



Key Takeaways

- The PBSA consultation had moderate engagement, with a strong awareness level but relatively low deep engagement.
- Surveys and document downloads were the primary modes of interaction.
- Traffic was driven primarily by the city council website and social media, especially Facebook.