

Bristol City Council - Local Plan Review

Submission of Views

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By email, to:

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31 March 2018

1.0 Introduction

My submission focuses mainly on provisions in the Local Plan that may determine how students of the University of Bristol are accommodated, and the impact of the student population on the host community:

- 1.1. The part of Redland in which I live (Hampton Road, near Chandos Road) has a large number of HMOs (House of Multiple Occupation) that are let to students, mostly from the University of Bristol. This transient population, while creating a vibrancy and economic benefits in the area, also comes with a price: noisy late-night parties, people shouting in the streets at night, and other issues such as problems with waste collection.
- 1.2. The spread of student HMOs is already putting at risk the principle of “mixed, balanced and sustainable communities” (current Local Plan, page 24, Section 3.4 Objectives, goal number 3). To take one example, Brighton Road, off Chandos Road, contains 49 houses of which no fewer than 19 are designated as “mandatory” HMOs under the national scheme. Other properties in the street may also be HMOs, though subdivided in such a manner as to not (yet) fall within a licensing regime.
- 1.3. The University of Bristol tries in a variety of ways to persuade its students to reduce their impact on neighbours, particularly, for example, in relation to noise—whether it be loud house parties or students making noise on the streets at night. Most students comply with the party rules, but a significant minority do not, and have a disproportionate impact on their neighbourhoods. Meanwhile, rowdiness on the streets at night is commonplace. Many residents think the situation is getting worse, not better, but the university refuses to take a more muscular approach. It will not intervene to bring loud parties to a halt. Nor will the police, who say they cannot deal with noise issues. The council’s own noise enforcement procedures cannot easily be invoked late at night unless there was forewarning of the event. And HMO owners and their agents do not currently appear to be under any requirement to have a means of night-time intervention. The result is that once a loud party gets under way, there is no obvious way to stop it. In early March, residents in the Hampton Road/Chandos Road area lost sleep on two consecutive nights to loud parties, one of which continued until 4am, the other until 8am. In both cases the students responsible rejected multiple requests from neighbours to turn the noise off, or down. Over the following days, the university and the owners of the properties responded by admonishing the students, but that is of little comfort to residents, who had already borne the impact. This pattern is repeated year after year across the inner-city wards.

- 1.4. If no authority or body will intervene to stop these events, then the focus must be on prevention. That in turn begins with the mix of housing and the overall arrangements for students. In that regard, I welcome two relevant proposals in the Review document, which appear long overdue:

ULH6: Specialist Student Accommodation

ULH7: Housing in Multiple Occupation

- 1.5. I am nevertheless very concerned that this belated, strategic-level recognition of the impact of students on the community (there is no equivalent recognition in the current Core Strategy, adopted 2011) should be fully followed through and applied, and that action should not be limited solely to the impacts of *future* growth but also to redressing some of the impacts of *past* growth. I am particularly concerned that the University of Bristol's plans for a new satellite campus at Temple Meads should be scrutinised carefully, because it seems to me the current wording of the Review document is less than water-tight.
- 1.6. I also believe the University of Bristol should be required to exert closer control over those of its students who live in the community. The university will say that it has no powers or responsibility in regard to students living in private accommodation, and the planners will no doubt say that behaviour is not a planning matter. Except that, there are numerous statements in the Review document and other official documents that recognise a relationship between HMO housing and anti-social behaviour. This, indeed, is why legislation in this area requires management regimes to be in place, as does the Review document itself, in relation to future purpose-built student accommodation. Why should the residents of Redland, Cotham and other inner-city wards be left to experience the consequences of a student population that is poorly controlled simply because it is not on campus or in specialist property? Whether the necessary remedies fall within the Local Plan or outside it, the city council has a duty to ensure that effective remedies are indeed available, and the university is the obvious vehicle by which those remedies should be delivered.

2.0 ULH6: Specialist Student Accommodation

I agree strongly with this proposal for the reasons mentioned above. However, I also make the following observations:

- 2.1 The proposal states (Page41) that:

"The council will expect any increase in student numbers at the universities to be matched by the provision of sufficient, appropriately located purpose-built student accommodation."

Quite what "sufficient" means is not explained, and I am concerned that there is the beginnings here of a loophole that will make this policy less effective than it should be.

- 2.2 So far as the University of Bristol's plans for Temple Meads are concerned, the Review document anticipates 3,500 students "initially" (4.3.6, Page 42), whereas a document viewable via the Planning Portal (*) cites "c3,000 students of which 2,000 would be new

intake” and goes on to propose “c1,500 new beds for both undergraduates and postgraduates”. I believe I have seen different numbers elsewhere. Whether 1,500 beds is “sufficient” is very unclear. My main concern is that, whatever the final numbers, there should be no call for further HMOs to make up any shortfall. I would like to see tighter wording to ensure that all those studying at the new campus will be provided with purpose-built accommodation (unless they already have a permanent local home), and that no such study places will be offered until the accommodation is completed. (*TQEC OPA Design & Access Statement, Revised 2018, Part 1)

2.3 It is equally unclear what “initially” means. Is that a reference to the first stage of what may be a multi-stage development, or to the first year of operation? If students are studying for multi-year courses, then from the second year onwards there will be additional year-cohorts to accommodate. At this point, 1,500 beds starts to look well short of “sufficient”. (The university has said that most of the students at Temple Meads will be postgraduates, but the lack of clarity remains.)

2.4 I am also concerned as to whether the university can actually deliver this accommodation. My understanding is that it’s considering some kind of partnership with private developers. In those circumstances, the university may not be able to guarantee that the accommodation is built, either to deadline or at all. Again, I would not like to see HMOs or other private rented accommodation becoming the backstop for a failed policy.

2.5 ULH6 includes a suggestion that any developments of more than 100 bed spaces should be mixed-use, with students taking up a maximum of 50%. Given that students lead very different lifestyles to other residents, and particularly are more active late at night, I suggest that is a recipe for friction between different populations living in close proximity to each other.

3.0 ULH7: Housing in Multiple Occupation

I welcome this policy in broad terms, even if it seems that the planning establishment is now playing catch-up with the spread of HMOs and some of the problems associated with them.

3.1 The proposal states:

“The local plan policy will provide enhanced controls of HMO development to ensure harmful impacts and/or concentrations do not occur.”

This is presented as a forward-looking statement. I would like it to also be backward-looking, insofar as there is a need to redress some of the “harmful impacts” that residents are already suffering, but which they might have been spared if this new, more careful HMO policy had been in place earlier.

3.2 The wording of the proposal is woolly. I note that 4.3.8 (page 42) suggests a limit of 10% HMOs “in any given area”. The “area” could easily be defined in such a way as to defeat the

policy. The area must be naturally defined, such as a street. But in that case I suspect there will be a lot of places where the HMO density is already well over 10%. Earlier I quoted the example of Brighton Road: 49 houses of which 19 are “mandatory” HMOs. Does the policy aim to redress such imbalances over time? I think it should.

3.3 “Harmful impacts” is planner-speak that sanitises the real experiences residents face. Here are some recent actual examples, just so we know what we’re talking about:

- a loud student party at an HMO in Hampton Rd, March 3, from midnight to 4am
- a loud student party in an HMO in nearby Collingwood Rd, March 4, 1am to 8am. (A mother of three children says her family were kept awake both nights.)
- police called to Collingwood Rd, some weeks earlier, to deal with 30 people in the street (mentioned by residents)
- shouting in Auburn Rd, 11-30pm on March 15, as 40-50 students go to the pubs
- a dozen people, presumably students, shouting in Hampton Rd at 1-10am, March 17 (with one young man kicking every recycling box he passed, for good measure)
- a man running over the tops of parked cars in Hampton Rd (resident’s anecdote)
- student party-goers urinating in the streets (several examples)
- residents stepping over vomit and broken glass after a student party (anecdotes)

Talk to any group of residents in the areas close to campus where HMOs are densest, and you will be likely to hear similar stories. I am meanwhile told by Councillor Anthony Negus that there is a worrying new trend in student parties, towards bigger events with hired DJs, sound equipment and doormen. The party at Collingwood Road had doormen and, judging by the sound volume, hired equipment, whether with a DJ or not. This was in a mid-terrace house, the bottom floor of which is a separate dwelling. There were probably several dozen people in the house during the event, and a similar, earlier event in the area is said to have attracted more than 100. These numbers raise issues of safety as well as anti-social behaviour.

There is nothing about HMO accommodation itself that makes this kind of behaviour inevitable, so it might be argued this is not really a planning issue. The problem is that HMO accommodation appeals to temporary residents who may have no commitment to an area or their neighbours. That is exacerbated when the temporary residents all belong to a group with its own demographic characteristics and sub-culture. In the aggregate, therefore, this does become a planning issue, and the inclusion of ULH6 and ULH7 recognises as such. It is also why I hope that these policies will provide a means of reversing some of the “harmful impacts” already taking place, as well as preventing new ones.

4.0 Providing New Homes in North West Bristol

Allied to the HMO question is the provision of new homes by the subdivision of existing properties, as mentioned in Section 3, Housing Strategy: Paragraph 3.4.4, Page 29.

- 4.1 While I accept in principle the conversion of larger homes into apartments, I would like to make that contingent on preserving sufficient family-sized homes. Families are one of the bedrocks of a stable community; they are among the residents who have a long-term commitment to maintaining the amenities of their neighbourhood and making it a pleasant place to live—for all residents, both permanent and temporary. It is vital that the housing mix preserves this. In parts of Redland and Cotham, as mentioned above, this principle has already been put at risk by the density of HMOs.
- 4.2 There is a second reason to do this: I read elsewhere that there's concern that the development of apartment buildings in the central area has left a shortage of family-sized units. Places like Redland and Cotham, with their Victorian-era homes, therefore provide a valuable source of family homes within walking distance of major employers in the city centre. So a key worker such as a nurse can live close to her work at one of the city's hospitals but at the same time have a home that provides space for her family, as well as convenient access to schools for her children. We should therefore be careful about allowing unconstrained conversion of these houses. The principle of a mixed and balanced housing stock needs to be strongly upheld. It may be that if the housing stock in the central area is biased towards smaller units, then the mix in the surrounding areas should be biased towards family-sized units in order to compensate.

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