

# Student Accommodation

## Supplementary Planning Guidance



January 2019



**FINAL DRAFT**

## Contents

|          |   |                |
|----------|---|----------------|
| <b>1</b> | <b>Introduction</b>                                   | <b>Page 2</b>  |
| <b>2</b> | <b>Terminology</b>                                    | <b>Page 3</b>  |
| <b>3</b> | <b>Planning Policy Context</b>                        | <b>Page 4</b>  |
| <b>4</b> | <b>Location of Student Accommodation</b>              | <b>Page 6</b>  |
| <b>5</b> | <b>Design, Parking and Amenity</b>                    | <b>Page 7</b>  |
| <b>6</b> | <b>Accommodation standards</b>                        | <b>Page 11</b> |
| <b>7</b> | <b>Loss of Employment Land and Residential Land</b>   | <b>Page 12</b> |
| <b>8</b> | <b>Planning Obligations (Developer Contributions)</b> | <b>Page 13</b> |
| <b>9</b> | <b>Appendices</b>                                     | <b>Page 14</b> |

***Mae'r ddogfen hon ar gael yn Gymraeg / This document is available in Welsh***

# 1 Introduction

## 1.1 What is Supplementary Planning Guidance?

The Welsh Government (WG) support the use of Supplementary Guidance to set out detailed guidance on the way in which Local Development Plan (LDP) policies will be applied in particular circumstances or areas. SPG must be consistent with development plan policies and National Planning policy guidance. Before it is adopted, an SPG undergoes a period of public consultation and must be approved by the council. Upon adoption by Cardiff Council in January 2019, the SPG became a material consideration in the determination of relevant planning applications.

## 1.2 What is the history of the Student Accommodation SPG?

The SPG went to public consultation between 20<sup>th</sup> September 2018 and 1<sup>st</sup> November 2018. It was adopted by Cardiff Council on xx/xx.

## 1.3 What is the purpose of this SPG?

1.3.1 Student Accommodation is now a key feature in many UK cities, including Cardiff. In particular there has been significant growth of privately provided student accommodation in recent years. This is typically referred to as *Purpose Build Student Accommodation (PBSA)*. This term can also be applied to more traditional halls of residence, which are generally developed by educational institutions for the students of one specific institution, however PBSAs tend to be open for students of any higher or further education establishment. This SPG refers to both types of development and uses the term PBSA irrespective of which type of institution or student the development is provided by and for.

1.3.2 Cardiff is home to three universities, more than 40,000 students (Source, HESA, 2015/16 figures) and a number of colleges and language schools. As stated in Section 2.1 of the LDP, 10.8% (in 2011) of the population of the city are students. The need for accommodation is recognised and the social and economic benefits that students provide are fully acknowledged. In addition, the vitality of the universities themselves is underpinned by students being able to live nearby in safe and suitable accommodation. Finally, a failure to provide diversity within the student accommodation market is likely to exacerbate students residing in HMOs, which may conflict with other council aspirations, notably the *Houses in Multiple Occupations SPG (2016)*. Providing accommodation for students is an objective within the LDP, with Objective 2b stating:

*[LDP Objective] To provide a range and choice of new homes of different tenure, type and location that meets specific needs such as the provision of affordable housing, family accommodation, housing for the elderly, the disabled and students and pitches for the gypsy and traveller community.*

1.3.3 Notwithstanding the wide benefits students bring to the city, deep concentrations of one type of accommodation in small areas can create issues for other residents, particularly in terms of amenity or character of areas. As such, this SPG seeks to present guidance for the balanced development of student accommodation, ensuring they positively contribute to the communities in which they are sited, as well as the wider city. In addition, any development needs to satisfy key principles in terms of design, sustainability and scale. PBSA's are often large developments, and given the prominence of many PBSAs in recent years, this is especially important for this type of development, which can have significant impact on streetscapes and communities nearby.

1.4 Student Accommodation is treated differently to other types of residential accommodation and will not be subject to the same standards in terms of size or amenity of accommodation. The key reason for this is because while the council expect developments to be built for the long term, student accommodation is designed to cater for people who will spend less than one year in the accommodation before moving on. As such, while the accommodation is permanent, the residents are transient utilising the accommodation for a specific and time limited period of their lives.

## 2 Terminology

- 2.1 The council will define student accommodation as follows: *“Accommodation provided exclusively for students at higher or further education institutions in the form of dormitory, cluster or individual rooms”* Purpose Built Student Accommodation (PBSA) generally falls within the Sui Generis Planning use class.
- 2.2 In the wider sense, student accommodation can come in many forms. This SPG does not seek to address students living at parent’s homes, in HMOs or in small privately rented flats. The latter two of these are best dealt with by the *Houses in Multiple Occupation SPG (2016)* and the *Flat Conversions SPG (2018)* respectively.
- 2.3 This SPG therefore focuses on typically larger developments specifically aimed at the student population. These may be clusters of flats with shared kitchen facilities, or individual en-suite rooms. There is no specific size at which PBSA’s begin, but typically these developments will be larger than HMOs, and would typically contain no fewer than 10 individual bed spaces, rising into the hundreds. For the purposes of Public Open Space contributions, developers are required to contribute when numbers in a development surpass 8 units. More information on planning contributions is provided in 10.5.

DRAFT

### 3 Planning Policy Context

#### 3.1 National Policy

##### 3.1.1 Planning Policy Wales (Edition 9, 2016)

This document sets out land-use planning policies of the Welsh Government. It is supplemented by a series of Technical Advice Notes (TAN's). Procedural advice is given in circulars and policy clarification letters. There is little national policy that specifically refers to student accommodation; however Planning Policy Wales states more general principles on good development, which includes student developments.

Paragraph 9.1.2 of Planning Policy Wales states:

*Local Planning authorities should promote sustainable residential environments, [and] avoid large housing areas of monotonous character. Local planning authorities should promote:*

- *Development that is easily accessible by walking, cycling and public transport.*
- *Mixed use development so communities have good access to employment, retail and other services*
- *Greater emphasis on quality, good design and the creation of places to live that are safe and attractive*
- *Well-designed living environments, where appropriate at increased densities.*

#### 3.2 Local Policy

##### 3.2.1 LDP Policy KP10 Central and Bay Business Area states:

*The following uses are considered appropriate within the Central and Bay Business Areas*

- i) *New offices, residential and commercial leisure uses within the Central and Bay Business Areas;*
- ii) *Enhanced retail and complementary facilities within the Central Shopping Area; and*
- iii) *Other uses most appropriately located in city centres*

The accompanying Section 4.142 states:

*The Central and Bay Business Areas also contain a significant number of residential properties including high-rise apartment blocks, **student accommodation** and residential uses above commercial premises. Although the city centre and bay areas have experienced a large increase in residential development over the past 20 years, there remains the potential for further residential development.*

The Central and Bay Business Areas are therefore considered appropriate locations for student accommodation, which would complement existing uses within these areas.

##### 3.2.2 LDP Policy KP5 outlines the Council's policies in terms of good quality and sustainable design. Because student accommodation can come in a large variety of sizes, locations and styles, Policy KP5 is key to determining good practice. This policy is referenced throughout this SPG, and is listed in full below.

*To help support the development of Cardiff as a world-class European Capital City, all new development will be required to be of a high quality, sustainable design and make a positive contribution to the creation of distinctive communities, places and spaces by:*

- i) *Responding to the local character and context of the built and landscape setting so that layout, scale, form, massing, height, density, colour, materials, detailing and impact on the built and natural heritage are all addressed within development proposals;*
- ii) *Providing legible development which is easy to get around and which ensures a sense of continuity and enclosure;*
- iii) *Providing a diversity of land uses to create balanced communities and add vibrancy throughout the day;*

- iv) *Creating interconnected streets, squares and spaces as distinctive places, which are safe, accessible, vibrant and secure and incorporate public art where appropriate*
- v) *Providing a healthy and convenient environment for all users that supports the principles of community safety, encourages walking and cycling, enables employment, essential services and community facilities to be accessible by sustainable transport and maximises the contribution of networks of multi-functional and connected open spaces to encourage healthier lifestyles*
- vi) *Maximising renewable energy solutions;*
- vii) *Achieve a resource efficient and climate responsive design that provides sustainable water and waste management solutions and minimise emissions from transport, homes and industry;*
- viii) *Achieving an adaptable design that can respond to future social, economic, technological and environmental requirements;*
- ix) *Promoting the efficient use of land, developing at highest practicable densities and where appropriate achieving the remediation of land contamination;*
- x) *Ensuring no undue effect on the amenity of neighbouring occupiers and connecting positively to surrounding communities;*
- xi) *Fostering inclusive design, ensuring buildings, streets and spaces are accessible to all users and is adaptable to future changes in lifestyle; and*
- xii) *Locating tall buildings in locations which are highly accessible through walking and public transport and within an existing or proposed cluster of tall buildings*

**3.2.3 PBSAs are often brownfield developments, or utilise existing buildings. LDP Policy H6: Change of Use or Redevelopment to Residential Use states:**

*Change of use of redundant premises or redevelopment of redundant previously developed land for residential use will be permitted where:*

- i) *There is no overriding need to retain the existing use of the land or premises and no overriding alternative local land use requirement;*
- ii) *The resulting residential accommodation and amenity will be satisfactory;*
- iii) *There will be no unacceptable impact on the operating conditions of existing businesses*
- iv) *Necessary community facilities are accessible or can be readily provided or improved; and*
- v) *It can be demonstrated that the change of use to a more sensitive end use has been assessed in terms of land contamination risk and that there are no unacceptable risks to the end users.*

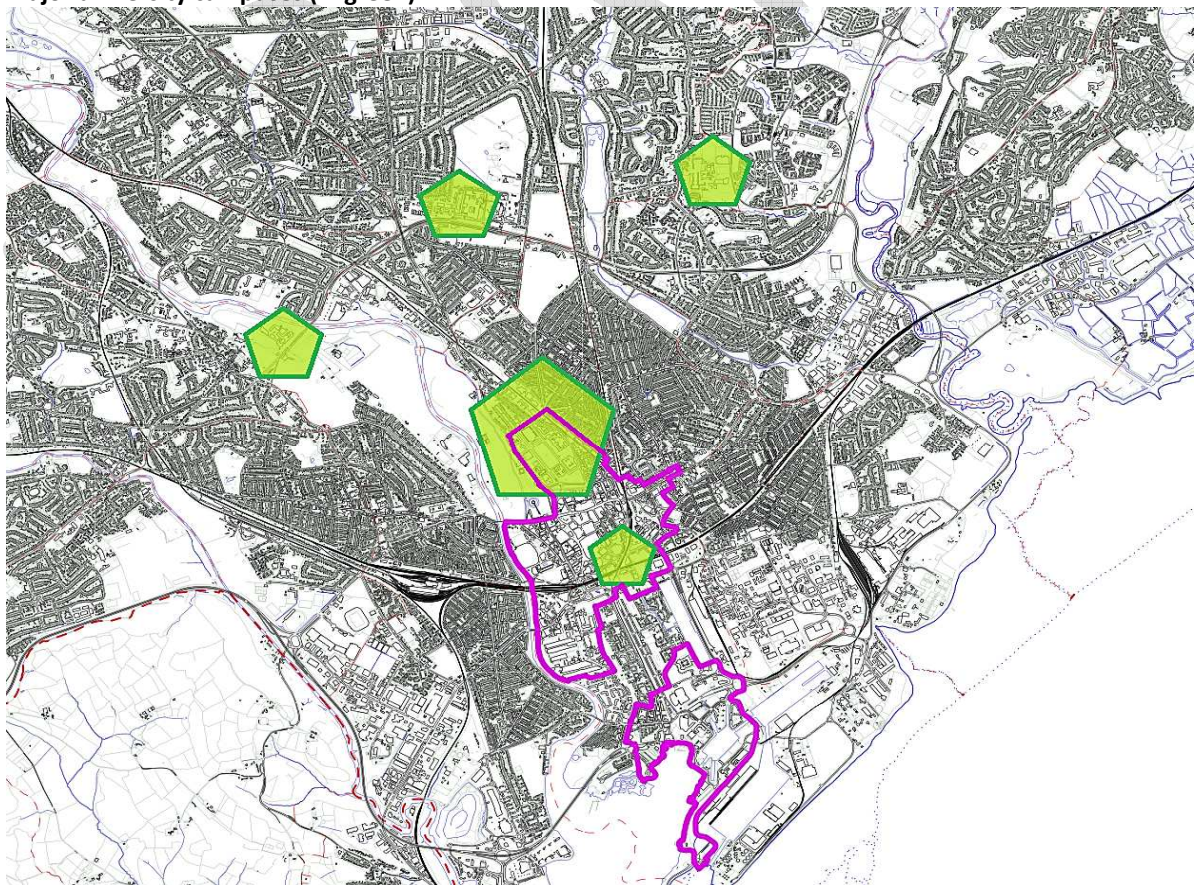
**3.2.4** Owners of properties that have been listed by Cadw for their special architectural or historic interest, or are in a conservation area should seek additional advice prior to contemplating conversion to student accommodation. Many alterations or associated facilities (such as bin stores, roof lights or floor extensions) that often form part of student accommodation, may require planning permission or listed building consent (LBC) and will be less acceptable within designated historic areas than elsewhere in the city. Additionally, early consultation with The Glamorgan-Gwent Archaeological Trust is recommended in order to mitigate for any archaeological issues associated with previous land uses.

**3.2.5** Proposals in conservation areas are required to preserve or enhance the character or appearance of the area, as set out in policies KP17 and EN9 of the LDP. Specific advice regarding each conservation area is available on the Council's website. [www.cardiff.gov.uk/conservation](http://www.cardiff.gov.uk/conservation). The location of conservation areas and listed buildings can also be checked on the website.

## 4 Location of Student Accommodation

- 4.1 Student Accommodation, particularly larger developments, can have a significant impact on the immediate surrounding area, bringing large numbers of people of a specific demographic to a locality. As stated in 1.3, the council recognises the economic benefits of suitably located student accommodation as well as the vitality and vibrancy that they can bring. It is recognised however that the development comes with a balance of impacts and that the sustainable development of such uses is critical to their success for both students and the surrounding community. The location of existing student accommodation within the city is shown in Appendix A.
- 4.2 As stated in 1.4, one of the key benefits of student developments is the economic impact that the developments can provide in terms of often hundreds of people needing goods and services in the surrounding area. Countering this, the impact of so many people of one demographic can lead to concerns over noise or disruption to existing residents within the communities in which they are located. In light of this, and in order to align with sustainability policies such as those identified in Policy KP8 of the LDP, PBSAs are generally considered more acceptable in the City centre and Cardiff Bay, as stated in 3.2.1, as well as in locations well served by public transport. A definition of the City Centre and Bay Business areas is provided in 4.3.
- 4.3 It is also recognised that not all student accommodation serve the city's universities, and that those universities also have numerous sites throughout the city. Generally speaking however, PBSAs are overwhelmingly occupied by university students attending the larger campuses, such as in Cathays Park, the City Centre, Llandaff, Cyncoed and *University Hospital of Wales*. As such, student accommodation is more acceptable (if not in the city centre or Bay) then in sustainable locations either as close to those campuses as possible, or within them.

**The map below shows the location of the City Centre and Bay Business areas (in purple) as well as the major university campuses (in green)**



## 5 Design, Parking and Amenity

### 5.1 General Principles

- 5.1.1 PBSAs are often large buildings, having a significant impact on the street scene and character. They can have a negative impact when not in accordance with principles of good design. Design is important for all developments, but this is especially so when the buildings are large in scale. As listed in 3.2.2, KP5 of the LDP states 12 principles, including three key principles in terms of design.

*To help support the development of Cardiff as a world class European Capital City, all new development will be required to be of a high quality, sustainable design, and make a positive contribution to the creation of distinctive communities, places and spaces by:*

- i) *Responding to the local character and context of the built and landscape setting so that layout, scale, form, massing height, density, colour, materials, detailing and impact on the built and natural heritage are all addressed within development proposals;*
- ii) *Providing legible development which is easy to get around and which ensures a sense of continuity and enclosure;*
- iii) *Providing a diversity of land uses to create balanced communities and add vibrancy throughout the day*

- 5.1.2 New student accommodation developments will need to have consideration in respect of designing out crime and the creation of safe environments. Applicants are encouraged to engage with Police Design Out Crime Officers and refer to secured by design principles, which can be found at [www.securedbydesign.com](http://www.securedbydesign.com). Policy C3 (Community Safety / Creating Safe Environments) of the LDP states:

*All new development and redevelopment shall be designed to promote a safe and secure environment and minimise the opportunity for crime. In particular development shall:*

- i) *Maximise natural surveillance of areas which may be vulnerable to crime such as publicly accessible spaces, open space, car parking areas and footpaths*
- ii) *Have well defined routes, spaces and entrances that provide convenient movement without compromising security*
- iii) *Maintain perceptible distinction between public and private spaces through well-defined boundaries and defensible space.*
- iv) *Provide a good standard of lighting to public spaces and routes while minimising energy use and light pollution; and  
Be designed with management and maintenance in mind, to discourage crime in the present and future.*

- 5.1.3 In addition to this SPG, further guidance can be found in the *Infill Sites SPG (2017)* and *Tall Buildings Design Guide SPG (2017)*, if applicable.

### 5.2 Height

- 5.2.1 Student Accommodation developments can often be tall buildings. The *Tall Buildings SPG (2017)* outlines preferred locations and a set of design criteria for new tall buildings. Tall buildings are generally classed as either more than eight storeys or 25m or more when in the City Centre and Cardiff Bay, and outside of these areas, as more than double the height of surrounding buildings.

- 5.2.2 The *Tall Buildings SPG* offers a variety of design and land use principles, summarised in Section 2.2 of the SPG as follows:

*All tall building proposals must demonstrate that:*

- *There would be no negative impacts on important views or vistas.*
- *The character or setting of heritage assets is not harmed.*
- *The proposal will be a positive feature in skyline and streetscape, either by*



- *complementing a cluster of tall buildings or forming a strategic landmark.*
- *There will be walking and cycling accessibility to sustainable transport and local facilities.*

*Detailed Proposals will:*

- *Exhibit exceptional architectural standards: elegance in form, silhouette and quality of materials.*
- *Maximise activity through ground floors uses and fenestration.*
- *Provide the highest standards of building performance, safety, inclusivity and adaptability.*
- *Include exemplary cycle storage, low car parking levels and integrated servicing, recycling and waste storage.*
- *Prove that the development will not create adverse microclimatic effects*
- *Deliver significant enhancements to the public realm*

### **5.3 Interaction with the street**

- 5.3.1 Student Accommodation blocks are essentially private spaces. Where they interact with the public realm, a high quality and welcoming interface is required. Policy KP5 in the LDP outlines some key principles, listed in 3.2.2.
- 5.3.2 The council would favour active ground floor uses. This is especially the case in the City Centre, Cardiff Bay or in local and district centres where retail facilities open to the public are favoured. Where this is not possible, or in locations unsuitable to retail use, internal community facilities should be based on the ground floor, providing some activity and interaction with the street. The 2017 Tall Buildings SPG states:

*“Active ground floor uses (in additional to residential or student accommodation access) including a sufficient number of entrance points are essential in city centre and urban locations at intervals along the façade at strategic places to enliven the street throughout the day and night”*

As stated, this principle is particularly important in urban locations, district centres, local centres and the City Centre and the Bay, and for taller buildings, but the principle of active ground floor uses is preferred citywide. In cases where the ground floor provides internal provisions for building occupants, the glazing and design should be such that it interacts with the street, affords visual interaction and does not prevent future potential use of the ground floor for public purposes.

### **5.4 Parking**

- 5.4.1 The impact of developments on parking and road traffic is a key issue for local communities and the city as a whole. Policy KP8 in the LDP states several key policies in achieving sustainable transport, including:
- Achieve the target of a 50:50 modal split between journeys by car and journeys by walking, cycling and public transport*
  - Reduce travel demand and dependence on the car;*
  - Enable and maximise use of sustainable and active modes of transport.*

As such, it is key that in addition to being located in sustainable locations (see section 4) developments also attempt to discourage car use. This is especially important and deliverable for the student market, where developments are both often large in nature, and whose occupants are typically less likely to own a car. Transport Assessment and Travel plans are required for student developments of 25 or more units. Any parking that is provided should be well overlooked and accord with the principles described in 5.1.2

- 5.4.2 Pick up and drop off arrangements for occupiers are especially important for student developments. Consideration will need to be given to managing potentially large numbers of

people arriving and leaving at similar times when moving into and leaving the accommodation without impacting adversely on the local area or transport network.

- 5.4.3 Reference should be made to the Council’s parking standards, which are set out in the latest *Managing Transport Impacts and Parking Standards SPG (2018)*, which provides guidance for car, cycle, motorcycle and disabled parking provision, layout and design. The standards within the SPG are set out below. Residential and long stay cycle parking must be secure and sheltered (see 6.22 of above SPG). The shelter may be in the form of accommodation within buildings, in cycle sheds or other sheltered structures and can include cycle lockers or cages located in close proximity to the main building access.

| City Location | Development Type                            | Max. Car Parking Spaces  | Cycle Parking | Max. Motorbike Parking | Disabled Parking                       |
|---------------|---|--|---------------|------------------------|--|
| All Areas     | Purpose Built, high density student housing | 1 space per 25 beds for operational parking. A condition may also be applied requiring the submission of a parking and traffic management plan | 1 per 2 beds  | Bespoke                | 1 per disabled student room + 2 spaces |

- 5.4.4 Section 6.37 of the *Managing Transport Impacts and Parking Standards SPG (2018)* outlines the Council’s support for Car Club facilities. Where appropriate developers may be required to provide Car Club facilities on or near the development for use by both the general public and any occupants.

## 5.5 Waste and Recycling

- 5.5.1 Adequate provision must be made for waste, recycling and composting facilities. Policy W2 (Provision for Waste Management Facilities in Development) of the LDP states:

*"Where appropriate, provision will be sought in all new development for facilities for the storage, recycling and other management of waste"*

- 5.5.2 Waste collections arrangements may vary on a development specific basis, but for large developments of purpose built flats and apartments for students, developers should refer to the waste storage requirements shown below. This serves as a guide, with specific provision being determined on a case by case basis.

| Number of Flats (up to 3 bedrooms) | Recycling (L) | General (L) | Garden* (L) | Food** (L) | Reuse/Bulky Storage |
|------------------------------------|---------------|-------------|-------------|------------|---------------------|
| 5                                  | 660           | 660         | -           | 240        | 5m <sup>2</sup>     |
| 10                                 | 1100          | 1100        | -           | 240        | 5m <sup>2</sup>     |
| 15                                 | 2200          | 2200        | -           | 240        | 5m <sup>2</sup>     |
| 20                                 | 2200          | 2200        | -           | 240        | 5m <sup>2</sup>     |
| 25                                 | 3300          | 3300        | -           | 480        | 5m <sup>2</sup>     |
| 30                                 | 4400          | 4400        | -           | 480        | 5m <sup>2</sup>     |
| 35                                 | 4400          | 4400        | -           | 480        | 5m <sup>2</sup>     |
| 40                                 | 5500          | 5500        | -           | 480        | 5m <sup>2</sup>     |
| 45                                 | 6600          | 6600        | -           | 720        | 10m <sup>2</sup>    |
| 50                                 | 6600          | 6600        | -           | 720        | 10m <sup>2</sup>    |

**Table 1: Waste and recycling storage capacities for purpose built student developments**

\*Garden waste is not supplied under the assumption that the flats do not have individual gardens/amenity areas that they are responsible for maintaining. If the proposed development has individual gardens, waste bins can be provided in 240L containers on request.

\*\*Receptacles for food waste must be no larger than 240L wheeled containers, due to the weight and the resulting health and safety implications for collection operatives.

- 5.5.3 In instances where student developments propose ‘cluster flats’ (ie, multiple bedrooms with a shared kitchen and living space) the storage requirements will be based on the number of

bedrooms. The below calculations are based on the following anticipated waste volumes per week per bedroom:

- 60 litres of general waste
- 60 litres of recycled waste
- 7 litres of food waste

| Number of Bedrooms | Recycling (L) | General (L) | Garden* (L) | Food** (L) | Refuse/Bulky Storage |
|--------------------|---------------|-------------|-------------|------------|----------------------|
| 10                 | 1100          | 1100        | -           | 240        | 5m <sup>2</sup>      |
| 20                 | 2200          | 2200        | -           | 240        | 5m <sup>2</sup>      |
| 30                 | 2200          | 2200        | -           | 240        | 5m <sup>2</sup>      |
| 40                 | 3300          | 3300        | -           | 480        | 5m <sup>2</sup>      |
| 50                 | 3300          | 3300        | -           | 480        | 5m <sup>2</sup>      |
| 60                 | 4400          | 4400        | -           | 480        | 10m <sup>2</sup>     |
| 70                 | 4400          | 4400        | -           | 480        | 10m <sup>2</sup>     |
| 80                 | 5500          | 5500        | -           | 720        | 10m <sup>2</sup>     |
| 90                 | 5500          | 5500        | -           | 720        | 10m <sup>2</sup>     |
| 100                | 6600          | 6600        | -           | 720        | 10m <sup>2</sup>     |

\*Garden waste is not supplied under the assumption that the flats do not have individual gardens/amenity areas. If the proposed development has individual gardens, waste bins can be provided in 240L containers on request.

\*\*Receptacles for food waste must be no larger than 240L wheeled containers, due to the weight and the resulting health and safety implications for collection operatives.

5.5.4 Alternative collection options are available (such as open and closed skips, roll on roll off containers etc. These may reduce the storage footprint required, however, they would not be available through the free domestic collection service.

## 5.6 Waste Storage

5.6.1 As shown in the table in 5.5.3, all student developments are required to provide adequate storage for a minimum of 3 dedicated waste streams; recycling, food and residual/general waste. Provision must be made for the total volume of all waste streams produced over a 14 day period. This storage must be separate from the dwelling it serves. It is not acceptable for waste to be stored for a long period within the dwelling [in this case, bedrooms, or cluster flats] itself.

5.6.2 To enable and encourage occupants of new residential units to recycle their waste, developers should provide adequate internal storage, usually within the kitchen, for the segregation of recyclable materials from other waste. Developers must ensure that residents of all flats have access to the refuse and recycling storage area. For developments of five or more units a dedicated refuse store or screened storage area for bins/bags is required. The bin store must be capable of housing the maximum number of containers required, based on an assessment of the projected waste arising. Under no circumstances can waste be stored on the highway.

5.6.3 Due to statutory targets, under cover storage for the reuse/recycling of bulky waste items is now a compulsory element for purpose built flats, (including student developments.) The proposed storage area should be a dedicated area, so that bulky items awaiting collection do not interfere with the collection of other bins. Developers should allow a degree of flexibility with the storage of waste, particularly for purpose built flats, to accommodate possible future changes to the Council's waste collection method.

## 6 Accommodation standards

- 6.1 The council recognises that one of the ways in which student accommodation providers compete is in terms of the quality of development, amenity space for occupiers and room sizes. In terms of amenity space and room sizes, it is not possible to provide a one-size fits all policy, as the scale of student accommodation can vary. Amenity can be provided on site or it may be subject to a contribution for provision off site (see section 8). Likewise, amenity space may be provided collectively or it may be broken down into a series of clusters. In addition, room sizes are subject to different considerations, such as whether bathroom or kitchen facilities are provided for each unit, or communally for a small number of flats.
- 6.2 In terms of flat sizes, Appendix B shows an analysis of recent student accommodation planning approvals in the city and the typical size of individual bedroom units within them. It is recognised that accommodation types and room sizes will vary, but average sizes for the most typical types of accommodation in those applications assessed was as follows:
- Studio flats: 14m<sup>2</sup> - 32.6m<sup>2</sup> (Average size : 20.8m<sup>2</sup>) including kitchen and utilities.
  - Double Room / Twodio / Double Studio: 27m<sup>2</sup> - 45m<sup>2</sup> (Average size 36.5m<sup>2</sup>) including kitchen and utilities.
  - Cluster 1 bed units: 11.5m<sup>2</sup> - 17.5m<sup>2</sup> (Average 14.7m<sup>2</sup>)
  - Cluster Hubs: 18.25m<sup>2</sup> – 38.5m<sup>2</sup> (Average: 26.95m<sup>2</sup>)

As stated in 6.1, it is not the intention to be overly prescriptive in this respect, but the developer would be expected to achieve the minimum sizes stated above to ensure adequate amenity for future occupiers. This is especially the case given the request for an adaptability statement (see Section 6.4) to ensure that buildings and activity is safeguarded should the student accommodation market change in future. This would align with the *Wellbeing of Future Generations Act (2015)* especially regarding the goal of *A healthier Wales* in which peoples physical and mental health is prioritised. It is also noted that cluster hubs size is dependent upon how many students they serve. Typically, they offer around 5-7.5m<sup>2</sup> per student, which should provide a standard to future developments.

- 6.3 In respect of light and outlook, all habitable rooms should have natural light, a means of outlook, and ventilation. This is in order to ensure an environment suitable for people who may spend prolonged periods of time in their rooms.
- 6.4 As stated in 1.4, student accommodation is considered a distinct form of residential accommodation. However, it is recognised that once established, it is not inconceivable that student accommodation may in the future seek to revert to standard C3 residential accommodation in the form of flats, or potentially C1 as a Hotel. Such changes would be subject to a full and separate planning application at any point in the future. Irrespective, the council would welcome an *Adaptability Statement*, which would consider how the development would not prejudice future uses, such as for residential or hotel use. This may make reference to room sizes, floor plates, access or amenity issues amongst others. As clarified in 8.3, any future change of use to residential accommodation would be subject to an affordable housing contribution.

## 7 Loss of Employment Land and Residential Land

- 7.1 Student Accommodation is often developed on, or within the confines of existing office buildings. Protection of employment land and policies is an important principle to deliver sustainable growth within the city. Policy EC3 of the LDP states:

*Development of business, industrial and warehousing land and premises for other uses will only be permitted if:*

- i) The land or premises are no longer well located for business, industrial and warehousing use; or*
- ii) There is no realistic prospect of employment use on the site and/or the property is physically unsuitable for employment use, even after adaption/refurbishment or redevelopment; or*
- iii) There is no need to retain the land or premises for business, industrial or warehousing use, having regard to the demand for such land and premises and the requirement to provide for a range and choice of sites available for such use; and*
- iv) There will be no unacceptable impact on the operating conditions of existing businesses*

- 7.2 As such, the developer may be expected to demonstrate that there is limited existing demand for the use as employment site. If the development is considered acceptable, then contributions will be sought to mitigate for loss of employment land. This is expanded upon in section 10.

- 7.3 LDP Policy H4 addresses proposed changes of use from residential land and is thus relevant in cases where residential land is proposed to be lost to student accommodation.

*Outside the Central and Bay Business Areas and District and Local Centres, identified on the Proposals Map, conversion or redevelopment of residential properties to other uses will only be permitted where:*

- i) The premises or their location are no longer suitable for residential use; or*
- ii) The proposal is for community use necessary within a residential area.*
- iii) There would be no unacceptable impact on residential amenity*

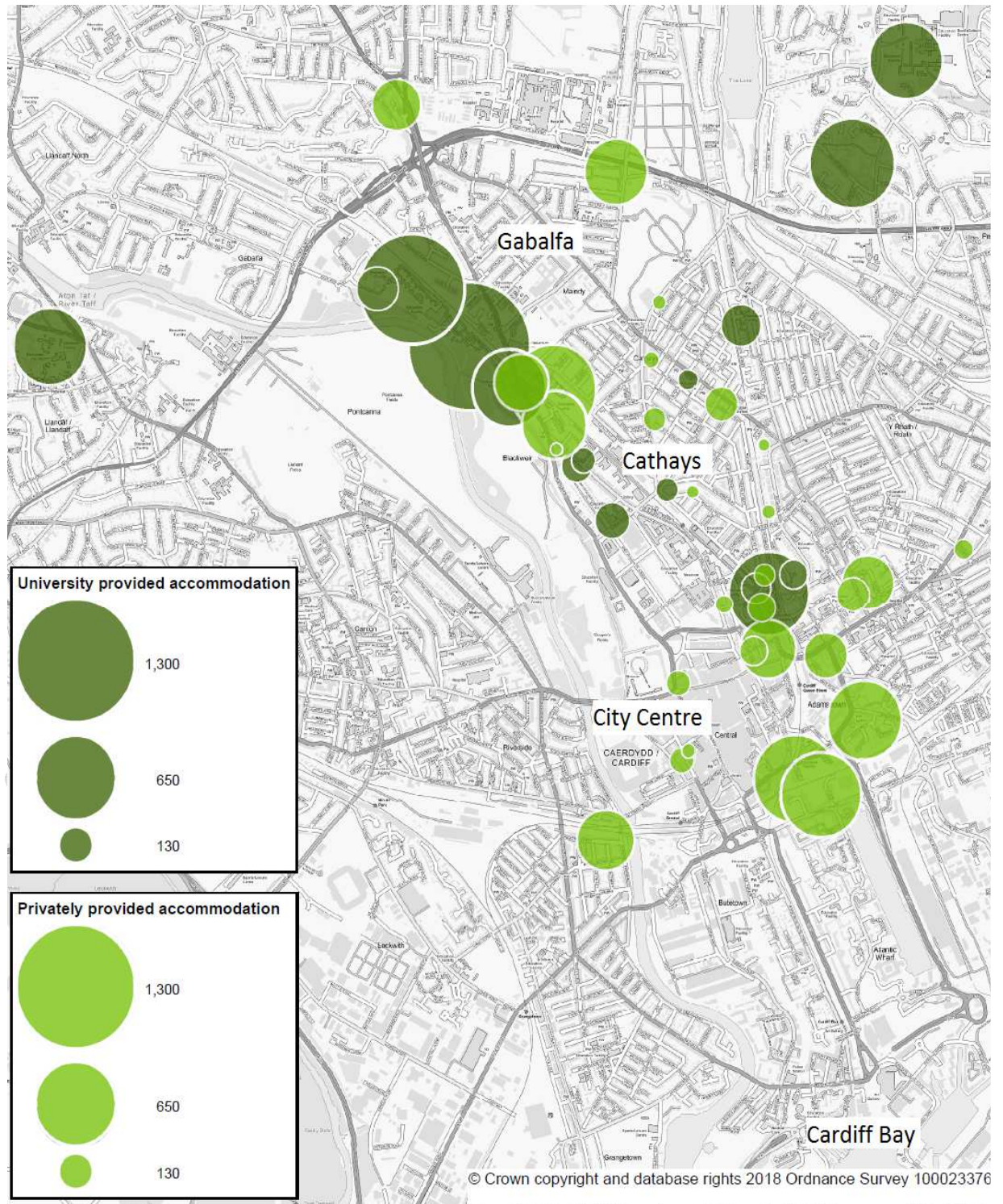
## 8 Planning Obligations (Developer Contributions)

- 8.1 New development often generates additional demands upon existing services, facilities, infrastructure and the environment. As identified in LDP policy KP7, planning obligations will be sought to mitigate any impacts related to the proposed development, where they are:
- *Necessary to make the development acceptable in planning terms*
  - *Directly related to the development; and*
  - *Fairly and reasonably related in scale and kind to the development*
- 8.2 The following contributions may be sought, either through in-kind provision or by financial contribution, toward site specific infrastructure provision which is required as a result of the development, or where it is required to mitigate the impacts of development. Affordable Housing and healthcare provision will not be sought from student accommodation developments due to the fact that the developments are defined as *Sui Generis* in the Planning Use Class system. Further details are provided in the *Cardiff Planning Obligations SPG(2017)*.
- 8.3 As recognised in Section 7 and in respect of 8.1, any permanent future changes from student accommodation to other forms of accommodation would be classed as a change of use to C3 in the Planning Use Class system. In this scenario, developers at this stage would be liable to affordable housing contributions and in the case of very large developments, a Primary and Community Healthcare contribution.
- 8.4 **Transportation and Highways:** Contributions may be sought towards specific measures in the immediate vicinity of new student accommodation that may be required to enhance access to local facilities by sustainable modes (eg bus stop enhancements, cycling or walking routes). Developers will generally be expected to pay the costs of any new Traffic Regulation Orders (TRO) needed to accommodate the development.
- 8.5 **Local Training and Employment:** As stated in 6.3, in circumstances where development proposals involve the loss of Class B1, B2 or B8 land and/or floorspace, a financial contribution towards bringing forward compensatory employment and training opportunities will be sought.
- 8.6 **Community Facilities:** Developments of more than 25 dwellings [in this instance, single bedrooms] will be subject to a financial contribution towards community facility provisions. Large developments of more than 500 units [in this instance, single bedrooms] would be subject to in-kind provision of on-site community facilities. Depending on the location and scheme specifics, developments may provide a combination of on-site facilities and contribution to facilities off-site.
- 8.7 **Functional Open Space:** A financial contribution towards functional open space will be sought on developments over eight units, and the provision of a minimum of 2.43ha of functional open space per 1000 projected population. For developments of 14 or more dwellings an element of on-site functional open space will be sought.
- 8.8 **Public Realm, Community Safety and Public Art:** Where the need arises as a result of the development, provision of, or a contribution towards public realm, public art, or community safety measures in the vicinity of the site may be requested.

## 9 Appendices

### 9.1 Appendix A Location of existing student accommodation in Cardiff.

Map shows locations of operational student accommodation as of the beginning of 2018.



## 9.2 Appendix B: Recent Planning Approvals Room Sizes

The below table is based on an assessment of typical room sizes for nine recent Student Accommodation planning applications between the years of 2012 and 2016. The applications assessed are: 12/01910, 12/00309, 13/00130, 13/01888, 14/03004, 15/01036, 15/3097, 15/02820 and 16/01808.

The developments include schemes varying in size from 34 rooms to 644 rooms, and include a mixture of new build student developments and conversions, and also a mixture of developments based on single en-suite rooms as well as cluster flats. All applications were either approved, under construction or occupied at time of writing.

The average room size is based on sampling of the typical room sizes within the developments and does not take account of the total number of units of each type within each development. Room sizes are rounded to the nearest 0.1m<sup>2</sup>.

| Accommodation Type     |  | Smallest Examples    | Average Room Size    | Largest Examples    |
|------------------------|--|----------------------|----------------------|---------------------|
| Individual Units       | Studio Apartment (1 bed)                                     | 14m <sup>2</sup>     | 20.8m <sup>2</sup>   | 32.6 m <sup>2</sup> |
|                        | 'Twodio' / Double Studio / Double Room Apartment (2 persons) | 27 m <sup>2</sup>    | 36.5 m <sup>2</sup>  | 45 m <sup>2</sup>   |
|                        | 1 Bed Apartment  | 35 m <sup>2</sup>    | 37.4 m <sup>2</sup>  | 42.9 m <sup>2</sup> |
| Units forming Clusters | Cluster Units (1 bed)  | 11.5 m <sup>2</sup>  | 14.7 m <sup>2</sup>  | 17.5 m <sup>2</sup> |
|                        | Cluster Hub (Communal facilities serving 1 bed units)        | 18.25 m <sup>2</sup> | 26.95 m <sup>2</sup> | 38.5 m <sup>2</sup> |



## 9.4 Appendix C: Consultation Comments

The following comments and responses provide a summary of the responses to the public consultation. The comments are not verbatim and reflect the thrust of responses to the SPG, rather than a comprehensive list of points made. The public consultation ran from 20<sup>th</sup> September to 1<sup>st</sup> November 2018

| Paragraph | Comment  | Responses   | Action      |
|-----------|--|---|-------------|
| General   | Welcome the SPG, but concerned by lack of reference to community safety.   | A new section has been added (5.1.2) which addresses the several concerns made regarding community safety   | SPG Amended |
| General   | Suggestion that SPG should require applicants to provide evidence of demand for accommodation.                               | This is not within the remit of the planning system.  | No Change   |
| 1.3.3     | Concerns that the policies will disperse students around the city.   | The SPG will attempt to ensure that students are accommodated in appropriate locations  | No Change   |
| 3.2.4     | Reference should be made to archaeological concerns, given the nature and location of many student developments.             | Wording to this effect as been added to 3.2.4   | SPG Amended |
| 5.1.1     | Feels stronger wording should be used to demonstrate potential negative impact on surrounding streets when design is poor.   | Wording amended to reflect this   | SPG Amended |
| 5.4       | Concern that parking policies will negatively impact on surrounding streets.   | The SPG aligns with the Managing Transport Impacts SPG.   | No Change   |
| 5.4.3     | Feels that more cycle parking should have to be provided.  | The SPG aligns with the Managing Transport Impacts SPG.   | No Change   |
| 5.4.3     | Support provision of cycle parking, but feel it should be more than one space per 2 beds                                     | This is stated in the Managing Transport Impacts SPG  | No Change   |
| 6         | Concerns that room sizes are too small, impacting negatively on students.  | The principle is that student accommodation is only designed as temporary accommodation and so differs from other types. 6.2 outlines standards council would expect to see maintained. | No Change   |
| 6.2       | Feels that the council should insist upon an 'adaptability statement' to ensure buildings are fit for potential future uses. | The council will welcome this statement, but we cannot insist, and each application received has to be judged against what is proposed.   | No Change   |