

Appendix 5

Student Accommodation

Guildford Borough Council

2023

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1. Background

- 1.1 Guildford borough hosts a variety of further¹ and higher² education establishments including the University of Surrey, the University of Law, Guildford College (which includes Merrist Wood College), the Academy of Contemporary Music and the School of Horticulture at RHS Wisley. Together, these institutions provide a range of higher and further education courses such as foundation, undergraduate and postgraduate degrees, and vocational higher education courses and diplomas.
- 1.2 Students attending these courses are likely to be from a wide range of backgrounds, including students from ages 16 and above. Students typically live in a diverse set of accommodation types such as at home with family, in purpose-built accommodation (either on or off campus), in other establishments (such as the YMCA), or may rent or own houses within the local community. Many students also benefit from distance learning, placement years, or are part-time or postgraduates and may live further away.

2. National planning policy and guidance

- 2.1 The NPPF (paragraph 62) reflects that the need for housing, including for students, should be assessed and reflected in planning policies.
- 2.2 It follows that the supply of student accommodation can count towards the Council's housing land supply. This is confirmed by the Government's national Planning Practice Guidance ('PPG') which states that:

"All student accommodation, whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus, can in principle count towards contributing to an authority's housing land supply based on:

- *the amount of accommodation that new student housing releases in the wider housing market (by allowing existing properties to return to general residential use); and / or*
- *the extent to which it allows general market housing to remain in such use, rather than being converted for use as student accommodation.*

This will need to be applied to both communal establishments and to multi bedroom self-contained student flats. Several units of purpose-built student

¹ Further education typically refers to education for those over 16 years old studying for A levels, higher national diplomas and two-year foundation degrees.

² Higher education typically refers to post-secondary school education for those over 18, usually at university or college and normally for a degree or an equivalent alternative.

accommodation may be needed to replace a house which may have accommodated several students.

Authorities will need to base their calculations on the average number of students living in student only accommodation, using the published [census data](#), and take steps to avoid double-counting. The exception to this approach is studio flats designed for students, graduates or young professionals, which can be counted on a one for one basis. A studio flat is a one-room apartment with kitchen facilities and a separate bathroom that fully functions as an independent dwelling³.”

3. Need for student accommodation

- 3.1 The West Surrey SHMA Guildford addendum 2017 looks at how the student population in Guildford might influence the need for both student accommodation and a wider housing need. It focuses on the growth of the largest student establishment in the borough, the University of Surrey (UniS), which is predicted to increase by 3,800 additional full-time Guildford-based students over the plan period.
- 3.2 The SHMA addendum estimates that assuming 55% of UniS students will live in halls on campus (2,090 students) then there would be an additional maximum need for up to 428 C3 dwellings or 23 dwellings per year for 1,710 students over the plan period to 2034. This separately identified student accommodation need for C3 dwellings is included within the general housing need figures.

4. Supply of student accommodation

- 4.1 As noted above, national guidance supports the principle of counting student accommodation towards contributing to an authority’s housing land supply.

How student accommodation is counted – national guidance

- 4.2 There are different approaches on how student accommodation should be counted as set out under the Government’s Housing Delivery Test.
- 4.3 Firstly, in terms of student communal accommodation, the DELTA: User Guide, Housing Flows Reconciliation (2023)⁴ clarifies that ‘communal accommodation covers school, university and college student accommodation...’. The Housing Delivery Test Measurement

³ NPPG: Housing Supply and Delivery: Paragraph: 034: Reference ID: 68-034-20190722.

⁴ Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1173427/HFR_Guidance_-_2022-2023

Rule Book 5 (MHCLG, 2018) includes this form of accommodation in the housing delivery calculation. The calculation is as follows:

$$\begin{aligned} & \textbf{Net homes delivered in a year} \\ & = \text{Net Additional Dwellings National Statistic} \\ & \quad \textit{PLUS} \\ & \text{Net increase in bedrooms in student communal accommodation in local authority} \\ & \quad \text{-----} \\ & \quad \text{Average number of students in student only households (2.5) in England} \\ & \quad \textit{PLUS} \\ & \text{Net increase in bedrooms in other communal accommodation in local authority} \\ & \quad \text{-----} \\ & \quad \text{Average number of adults (1.8) in households in England} \end{aligned}$$

- 4.4 Adjustments made for student and other communal accommodation within the calculation are made by MHCLG and published in the Housing Delivery Test result. Student communal accommodation delivered within the assessment period counts at the nationally derived ratio of 2.5 bedspaces per household (i.e. 2.5 student bedspaces = 1 equivalent C3 dwelling).
- 4.5 Secondly, purpose built, separate homes for students are dealt with differently. The DELTA: User Guide Housing Flows Reconciliation (2023) indicates that ‘purpose-built, separate homes (e.g. self-contained flats clustered into units with 4 to 6 bedrooms) for students should be included in the main dwelling stock section from sections A to G. Each self-contained unit should be counted as a dwelling’. Thus, a self-contained unit of accommodation for instance a student studio flat including kitchen bathroom and toilet would be counted as one dwelling, whilst a student cluster, including say 6 bedrooms with communal kitchen, would also count as one dwelling.

Application of the national approach in Guildford

- 4.6 In line with the approach above, which reflects university student accommodation as communal accommodation (counted at the applicable 2.5 student bedspaces: 1 dwelling ratio), the Council include the University of Surrey’s halls of residence as student communal accommodation.

⁵ Available at: <https://www.gov.uk/government/publications/housing-delivery-test-measurement-rule-book>.

- 4.7 However, although counting such communal accommodation toward delivery is mandatory as part of the Housing Delivery Test (HDT) assessment, the Council has adopted an alternative approach for the purposes of calculating 5-Year Housing Land Supply (5YHLS). In particular, it has not previously sought to count the supply of on-campus accommodation (some of which is recently delivered) and does not currently seek to count the extant permission for further on-campus accommodation toward its 5YHLS. The rationale for this approach is as follows.
- 4.8 The University of Surrey's on-campus, Purpose-Built Student Accommodation (PBSA), currently being built-out as part of the Manor Park scheme, is expected to meet approximately 55% (2,090 bedspaces) of the overall student need in Guildford derived from the University's expected growth (3,800 bedspaces) as calculated in the Strategic Housing Market Assessment (SHMA) for the Local Plan period.
- 4.9 Given that the recent build-out rate of these units has outpaced the University's rate of growth (over the short term), this source of supply would likely release market housing in the short-term. However, this is not expected to be the case over the plan period. Therefore, the Council did not include these bedspaces in its previous anticipated supply. However, the positive short-term effect of the on-campus student accommodation should be noted, as it will likely benefit the availability of market housing in the early years in the context of the accrued backlog due to past shortfall in supply.
- 4.10 In relation to off-campus purpose built, separate homes for students, the Council counts all of this provision and supply in the manner prescribed above in the DELTA: User Guide Housing Flows Reconciliation (2023) (i.e. each self-contained unit is counted as a dwelling, and a student cluster flat with several bedspaces and a communal kitchen would count as only one dwelling).
- 4.11 This approach is reflected in how outstanding planning permissions are calculated and count toward the Council's 5YHLS as per below.

Outstanding planning permissions

On-campus (University of Surrey)

- 4.12 As some background, the University of Surrey have approximately 6,029 existing student bedspaces on campus in total, taking into account the fairly recent completions of 479 and 674 bedspaces in PBSA at Manor Park in 2018 and 2019 respectively along with planned loss of 224 bedspaces on the Stag Hill campus. Planning permission (reference 21/P/00618) was granted on 16/11/2022 for on-campus student/staff accommodation of 6 x 2 bed apartments, 2 x studio staff/student accommodation and 7 x bedroom (8 beds).
- 4.13 There is outline planning permission at Manor Park for a total of 145,200 square metres of student and staff residential accommodation. The Manor Park Masterplan shows capacity

for approximately 4,171 bedspaces, although the actual number ultimately built may vary within the permitted floorspace of 145,200 sq. m and other parameters.

- 4.14 It is understood that of these approximately 4,171 bedspaces, in the region of 3,022 have been completed and occupied to date (including recent completions as per above). The University has a rolling programme to build the remaining student bedspaces but as noted above the Council do not seek to count this outstanding capacity as part of its supply.

Off-campus

- 4.15 Off-campus Purpose Built Student Accommodation (PBSA) is growing in popularity. The table below sets out future supply through planning permissions not yet built out as at 1 April 2023 for this form of student housing. The Council count 209 equivalent C3 units toward its five-year housing supply from this source.
- 4.16 Although after the base date of the LAA (1 April 2023) there have recently been two planning approvals granted; one at The Bridge, Bridge Street for 18 new student bedspaces (ref: 22/P/02108) and one at Jewsons, Walnut Tree Close for a residential scheme including 84 student studio flats and 38 student cluster units (ref: 21/P/02559).

Date of decision	Planning reference	Site address	Ward	Number of bedrooms (net)	Equivalent no of dwellings ⁶
Approved 21/2/20 ⁷ and 10/6/22	18/P/02391 and 21/P/02296	1 & 2 Ash Grove, Guildford, GU2 8UT	Onslow	99 (59 studio & 20 two bed studios)	79
Allowed at appeal 04/01/2023	21/P/00956	Lantern House, Walnut Tree Close	Friary & St. Nicolas	330 (95 studios + 35 cluster units)	130
Total				429	209

Table 1: Planning permissions for PBSA off-campus 1/4/22 to 31/3/23 (not yet built out).

⁶ Equivalent number of dwellings is calculated as described i.e. each self-contained unit is counted as a dwelling in line with the DELTA: User Guide, Housing Flows Reconciliation (2023).

⁷ 79 studios were approved in 2020, which was increased to 99 studios in 2022.