

# From the St Peter's Residents' Association

## Response to Draft Local Plan 2040

We are commenting on this section only. However it is clear that there does not seem to be much evidence on which to base comments. The last two censuses (2001 and 2011) are available, and there is the Council's register of the larger HMOs. There is very little else. It would be helpful to have had the information which will be provided by the 2021 census, and there may be a case for waiting until that is available. Our comments, below, are in red.

## Needs of Specific Groups

### Students

Canterbury has one of the highest ratios of students to permanent residents in England, at 16.4%, compared to a national average of 6%. The number of students enrolled at the three HE institutions in Canterbury has increased substantially since 2001, with an estimated 30,000 students now enrolled at the three University Campuses in the district.

This percentage seems to have been calculated as a ratio of students to the population of the whole district. A more realistic calculation, if we want to assess the impact of students on the community, would be the proportion of students in the city, since that is where most of the students live.

Some of the 30,000 students quoted will be living at home: in 2011 the number living at home was 2050 out of a total of 18,354 (for students from 18 to 25+): assuming the same proportion (11%) now, the number of students in PBSA or HMOs would be 26,700. The total population of the 5 central city wards is 53,421 (extrapolating from census data from 2001 and 2011 through to June 2019). So a more representative percentage would be 26,700 divided by 53,421, which is 48.1%. It may be even higher than this, since the census figures include some students.

There has also been an increase in the purpose-built student accommodation (PBSA) since 2001, with a current estimate of 8,850 bedspaces. There are now around 1.9 full-time students per PBSA bedspace in Canterbury, a reduction from the 2011 Census figure of 3.6. This increase in PBSA has coincided with a decrease in the number of houses of multiple occupation (HMOs) in Canterbury, although the private rented sector remains an attractive option, particularly for domestic students.

What is the evidence that the number of HMOs has decreased? Does the Council have data on HMOs with fewer than 5 bedspaces? This table, from the 2011 census, shows the number of students living in all-student-only households in Canterbury:

All student-only households where all students are aged 18 or over: total students 2810										
size of HMO	1	2	3	4	5	6	7	8	9	10
number of students	460	444	509	791	430	158	9	6	2	1

The total, in 2011, of the number of HMOs with 5 or more bedspaces was 606: now, according to the Council's Licensing register, that number is 871, so there seems to have been an increase, not a decrease.

In the short-term, it is unlikely that there will be a substantial increase in demand for student accommodation in Canterbury due to an increase in remote teaching resulting from the COVID-19 pandemic. It is considered likely that vacancy rates in the PBSA stock will increase in the short-term, particularly for international students.

We have a real concern that in the last few years PBSA has been built in residential areas where homes could have been built instead: e.g. the large block in Military Road and the smaller block stretching from Havelock Street to Old Ruttington Lane on the site of extension classrooms and a playground for a now defunct school. So placing PBSA close to campuses runs the risk of the same thing happening again. Therefore the aim of providing PBSA close to the universities does not seem feasible unless it is placed in areas in which homes could be built.

The number of young adults considering entry to Canterbury's universities is projected to increase, a result of higher birth rates in the early 2000s. This may help to offset any future challenges associated with the recruitment of international students. However, there remains considerable uncertainty around the longer-term impacts of the COVID-19 pandemic and Brexit on student numbers.

Pending the as yet unknown longer term outcomes of both Covid 19 and Brexit, we support the view that it would be prudent to halt any further new PBSA development plans and activity.

It is recommended that the council continues to keep under review the need for PBSA alongside university growth plans. Regarding HMOs, it is recommended that the Council continues to control the conversion to and proportion of HMOs through its Local Plan policies.

Does the Council know the total number of HMOs? In 2011, in addition to the 606 on the register of larger HMOs there were many more smaller HMOs. Discounting the 1- and 2-bedspace HMOs, that still leaves 1300 3- and 4-bedspace HMOs, i.e. a possible total of 1300 + 606 HMOs, in 2011. We don't know what that total figure is now. We can analyse where the larger HMOs are, however, and it is clear that they are

Part postcode	CT1 1--	CT1 2--	CT1 3--	CT2 7	CT2 8--	CT2 9--
Number of large HMOs	266	14	95	344	119	10

concentrated in areas of Canterbury where there are houses large enough for conversion to HMOs with 5 or more bedspaces. For example, Ulcombe Gardens has 66 houses and 34 of them are large HMOs, Headcorn Drive has 96 houses and 24 larger HMOs. No doubt there will be smaller HMOs in these streets as well so there will be many students and few long-term residents in these areas.

There will be other areas in Canterbury where there will be a preponderance of smaller HMOs, where there is terraced two-up two-down housing. But we don't have data for this: does the Council? The paragraph above recommends that the Council continues to control the conversion to and proportion

of HMOs through its Local Plan policies but is there any control at present? There is mention somewhere that the concentration of houses within a 100 metre radius will be kept at 10% and (presumably) no new HMOs allowed, but, taking four houses at random in Headcorn Drive, adjacent houses (nos 12, 14, 16 and 18) were recently granted HMO licenses on 1 Oct 2018, 20 Nov 2018, 16 Apr 2019 and 5 Dec 2018 respectively so that rule can't have been applied to these.

We have the result that large areas of Canterbury are dominated by student occupation. We feel sure that this was not the intention when the houses were built: they were meant for long-term residents, but now we have a lot of the city's housing stock occupied for two-thirds of the year by students who will probably be there for just one year.

Years ago there should have been pressure on the universities to provide much more PBSA. The recommendation that the Council should keep under review the need for PBSA alongside university growth plans is absolutely essential but has it ever been kept under review in the past? Do the universities consult the Council when they have plans to take more students? It is disappointing that only 3 lines are given to this situation – we would call it a problem. It is a problem which has been developing over the last 50 years so it is going to be very difficult to solve, but we would hope that the Council has some strategy to deal with it.

Another problem which is beginning to emerge is the buying up of houses for use as Airbnb (or similar rental schemes). We think the Council should treat this as a change of use which would require planning permission, with the presumption that permission would not be given. We know of one street in our area where a developer has bought three houses. Now is the time to stop this or else in a few years' time we shall have a further reduction of property available for long-term residents – and residents will wonder why nothing was done about it earlier. We should learn from the situation which has developed with student housing.

*The Guardian* : 24 January 2020

Short-term lettings through Airbnb and other online platforms are "growing out of control" in London, with up to one in 50 of all homes estimated to be available, town hall bosses say.

Councils say the spread of short-term lets is encouraging anti-social behaviour and criminality, and residents are increasingly complaining about the lets being used as party houses and for prostitution and drug dealing. The councils believe the practice is pushing up rents and reducing the availability of homes at a time when the number of people in England who are temporarily homeless is at its highest level since 2010.

Our concern is that areas dominated by students have little community spirit. The SPRA covers an area of Canterbury from Broad Street to St Peter's Place. On the south-west side of the main street we have 3 member households; on the north-east side of the street we have 130. The first side has a lot of HMOs; the other side has few. Residents would like to have neighbours whom they can talk to, help and get help from. The dominance of students makes that impossible.

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