

# Scarborough Borough Council

## STUDENT ACCOMMODATION



### Supplementary Planning Guidance April 2004

*Support for Good Development*

Planning and Building Standards  
April 2004



*A great place to live, work & play*

# Foreword

The attached Supplementary Planning Guidance (SPG) was the subject of public consultation for a six week period between 9<sup>th</sup> January 2004 and 20<sup>th</sup> February 2004. The SPG was also placed upon the Council's Website to allow electronic inspection and feedback. In response to the comments received, the Borough Council agreed minor amendments at its meeting on 20<sup>th</sup> April 2004. The guidance has now been adopted in this revised form by the Council and will be taken into account in the determination of planning applications.

In accordance with PPG12, the SPG is reproduced together with a Schedule of Consultees and the details of the Council's response to comments received. The SPG is to be the subject of regular monitoring and review to ensure that it remains relevant and achieves the desired results.

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## **1.0 Introduction.**

1.1 During 2002/3 there was an increasing number of planning applications received within Scarborough town for the conversion of properties, including hotels, to student accommodation. This trend has largely been a market led response to the accommodation requirements of students enrolled at the University of Hull's Scarborough Campus. This trend, in addition to meeting the needs of students, is assisting the regeneration of Scarborough, bringing under-used, vacant and derelict properties back into use, improving the vitality of certain areas, assisting in the continued success of the town's educational establishments, and working towards the common goal of the renaissance of Scarborough and the North Yorkshire Coast.

1.2 It has, however, also caused concerns in the local community that unchecked growth could result in future problems including :-

- An imbalance in the population in certain areas of the town resulting in a loss of community and perceived anti-social behaviour problems.
- An adverse effect on the character of certain areas.
- The loss of a proportion of the town's stock of hotels.
- An over-supply of student accommodation and the potential for future pressure to create conventional Houses in Multiple Occupation (HiMO) of which there are already considered to be sufficient within the Borough.

1.3 To address these concerns, the Local Planning Authority consider it important to expand on current planning policy by means of this Supplementary Planning Guidance (SPG) to guide developers and prevent any future problems. The guidance contained within this SPG along with that contained within the existing 'Guidance Note on Flat Conversions' clarifies adopted Local Plan policies H.10, H.11, H.12, H.13, L.5 and E.14, which are all included in Appendix 1 of this document. The aims of these policies are to :

- Ensure that there is suitable provision for family housing, by way of retaining and protecting small terraced properties and the family housing stock.
- Ensure that in any conversion to flats, including those to student accommodation, the amenity of existing and future residents is protected.
- Protect Listed Buildings and Conservation Areas from insensitive development.
- Restrict the creation of further HiMOs and encourage the upgrading of existing HiMOs and Hostels.
- Resist the change of use of the existing hotel stock in Prime Holiday Areas defined in the Local Plan and of hotels with over 30 bed spaces.

1.3 This Supplementary Planning Guidance is intended to facilitate good quality conversions to Student Accommodation. It will be important for applicants to demonstrate that the property is suitable for conversion, that the proposed use will not lead to harm and in the case of larger properties, that there is a justified and proven need for such use.

## **2.0 Background Information**

2.1 Following discussions with representatives of the local educational establishments the following information has been established.

## 2.2 University of Hull (Scarborough Campus)

2.2.1 The University has approximately 2000 students at any one time and although numbers have dipped slightly for the year 2003/04 this is seen as a temporary blip. This is considered to be a result of the current political and economic world climate which has led to a reduction in foreign students travelling to the UK. The approximate average intake of first year students is 550, although the current intake is approximately 425 for 2003/04. The University has no plans for major expansion in the short term.

2.2.2 The University has a policy that all first year students requiring accommodation will be offered University approved accommodation. The current breakdown of accommodation for first year students is :

- 223 Students in University owned accommodation (Cayley Hall and Filey Road)
- Approximately 150 to 200 properties managed by the University under the Head Leasing Scheme. This figure depends on the actual intake of the year.

2.2.3 It should be noted that not all first year students take up the offer of University approved accommodation under the Head Leasing Scheme. Also a number of students are from the local area and continue to live at home. This means that the need for accommodation, in terms of bed spaces, falls below the intake number although this is subject to some fluctuation.

2.2.4 The Head Leasing Scheme is an arrangement whereby the owner leases his/her property to the University for a fixed term at a fixed rate. The property is sub-let to a group of students and the University takes over the day-to-day management of the property. The only involvement the owner will have during term time is if repairs, for which they are responsible, are necessary. For further information on the Head Leasing Scheme please contact the University of Hull direct on 01723 357245.

2.2.5 The Head Leasing Scheme relates to a range of properties which are large enough to accommodate 2 – 20+ students.

2.2.6 Currently 75 students are accommodated within units of 20 bed spaces and over, under the Head Leasing Scheme. The University has confirmed that they currently have no requirement for further properties of this scale, as supply now matches demand in respect of these properties. The properties preferred by the University for inclusion in the Head Leasing Scheme tend to accommodate up to 12 students, however, subject to demand the University will accept properties accommodating between 12 and 20.

2.2.7 Depending on intake, between 1000 and 1500 students make their own arrangements for accommodation. The majority of this need is met by the private sector and consists of properties accommodating 4 to 6 students.

## 2.3 Yorkshire Coast College

2.3.1 The College is concerned mainly with the provision of further education as opposed to higher education. As such, the main intake of students is from Scarborough, Whitby and Filey who live locally and attend on a daily basis. Whilst the College does provide some Higher Education courses, these are extremely limited and currently involve only approximately 20 students. There are no plans to significantly increase the number of

Higher Education courses and the number in following years (2004/5 onwards) is not expected to exceed 50 students. The College has therefore confirmed that the demand for accommodation is low. The College collates a list of properties in the area for visiting students but has no involvement in running the accommodation. The College has suggested that the main requirement is for units of 4-6 bed spaces with no demand for larger units owing to the relatively small intake of students from outside of the area.

#### 2.4 The Current Trend of Converting Hotels and Other Properties to Student Accommodation.

2.4.1 Since 1999 the Council has granted planning permission for the change of use of a number of larger buildings within Scarborough to student residences, for example 1-3 Carlton Terrace which accommodates 29 students.

2.4.2 Over 175 student bed spaces have been created by planning permission, accommodated in 12 separate buildings, with a further 20 bed spaces confirmed by the grant of Certificates of Lawfulness.

### **3.0 What does / does not require planning permission?**

3.1 The proposed conversion of all commercial and non-residential buildings to student residences will require planning permission. Also, larger dwellings, where more than six students will be accommodated, will normally require planning permission. The need for planning permission and the acceptability of the use of such buildings will be assessed in accordance with the guidance and criteria in Section 4 and should be discussed with the Council's Development Control Section at an early stage, in order to inform an owner or developer's decision making.

3.2 Under the Town and Country Planning (Use Classes) Order, smaller dwellinghouses can be used by up to six students living together as a single household, without the need for planning permission. This requires the students to share the main facilities of the dwelling, including a kitchen, bathroom and living room with shared utility service accounts rather than forming a bed-sitting type arrangement within the property. However, it may be necessary to upgrade the property, particularly in terms of fire precautions, under the provisions of the Housing Act 1985 (as amended) and you are advised to contact the Council's Environmental Health and Housing Department for further advice in this matter.

### **4.0 The Criteria for the Conversion of Properties to Student Accommodation.**

4.1 This section sets out the criteria for the successful conversion of buildings to student accommodation and will examine the types of properties which are and which are not suitable for conversion.

#### 4.2 Need

4.2.1 In line with advice from the University there is currently no need for accommodation providing for 20+ students. When applications for the conversion of buildings to units of student accommodation for less than 20 students are submitted, they must be accompanied

by supporting evidence to show that there is demonstrable, unmet need for additional student housing of this size in the area.

4.2.2 Should a need be successfully proven the following criteria laid out in this section will need to be fully considered.

#### 4.3 Location

4.3.1 The specific location of student accommodation should be considered at an early stage in terms of its appropriateness and the potential impact on existing development or communities. The following issues should be considered and/or addressed :

- Demonstrate that the conversion of the property to student accommodation will not result in a demographic imbalance in an area or a concentration of students. Such concentrations can disrupt communities and be of detriment to the amenity and character of an area because of the particular life style and needs of students. For example, the viability of a local school or playgroup could be threatened if opportunities for family use of accommodation were to be denied by a concentration of students in the area. Areas should accommodate a wide mix of properties and residents. Whilst there is little evidence to confirm that a concentration of such a group in a single area results in problems including anti-social behaviour it is certainly a perceived threat by existing residents within communities. When considering proposals for student accommodation the impact on neighbouring residents will be a material consideration and it is therefore advised that student accommodation should not be sited near or adjacent to noise sensitive residents (e.g. a care home for the elderly)
- Properties should not be in unsustainable locations, i.e. remote from the university/college and shops, poorly served by public transport.
- Properties near or adjacent to ‘bad neighbours’ such as industrial or noisy late night uses are generally considered to be unsuitable.

#### 4.4 Size and Type of Property

4.4.1 Certain types of property will be more appropriate for conversion to student accommodation and the following is a brief guide to what is generally suitable and unsuitable :

##### Suitable

- Larger residential properties which are no longer suitable for occupation as a single house.
- Other properties (non-residential) where conversion to student accommodation would not be contrary to Local Plan policy. For example, development should not result in the loss of viable industrial or business units which are safeguarded by Policy I.4.
- Vacant flats above shops.
- Existing HiMOs and bedsits which would benefit from upgrading to self contained flats or purpose built student accommodation. (It is always sensible to check the

planning status of a HiMO to check whether permission will be needed for student use).

#### Unsuitable

- All hotels over 30 bed spaces and any hotels or guest houses in Prime Holiday Areas.
- Listed Buildings. Such buildings may generally be unsuitable for conversion owing to the impact of any internal works on the fabric and character of the building. It is suggested that prior to progressing any scheme to convert a listed building to student accommodation that preliminary discussions are arranged with the Council's Conservation Officer.

#### 4.5 Management

4.5.1 The management and wardening of properties is an issue which will require addressing prior to the grant of planning permission. The following will need to be complied with in all cases :

- Provide self-contained accommodation for an on-site, resident warden for properties accommodating 8 or more students.
- Ensure that only bona fida students in full-time education at a local University or College will be housed in the resulting accommodation.
- Provide details as to how the accommodation will be utilised outside of the core term time. Whilst support may be given for short term holiday use, permission is unlikely to be granted for semi-permanent occupation/primary residence use by other, transient groups.

#### 4.6 General Guidance and Room Layout/Sizes

4.6.1 For smaller properties, such as single houses and flats, it may still be necessary to comply with a number of the above criteria and it is suggested that you contact the Council's Development Control Office to discuss any proposal. In cases where planning permission is not required, the Local Planning Authority will have no control over such matters, however, it is suggested that you contact the Environmental Health Section and Building Standards Consultancy to discuss any proposals. For details on the need for planning permission, please refer back to section 3.0.

4.6.2 Specific guidance on room sizes and layouts can be found in the Councils Publication 'Guidance Note on Flat Conversions'. However, as a guide the following is a brief background on guidelines and specifications of rooms and sizes for student accommodation :

- Twin bedrooms will not be permitted. Students should be accommodated one per bedroom.
- Bedrooms are to be a minimum of 7.5 m<sup>2</sup>. This is to allow the room to accommodate a bed, wardrobe and study desk.
- Communal kitchens should be, wherever possible, separate to other rooms. In a small unit, up to 3 students, a kitchenette as part of a dining room may be acceptable. The



minimum requirement for a kitchen will be 7.65m<sup>2</sup>, although a more sizeable kitchen may be required in larger residences.

- A communal lounge will be required of a size sufficient to accommodate the number of students in the unit. Dining space shall be provided for all students either separate to or as part of the living/communal room.
- A toilet (wc), shower and wash basin should be provided on each floor with bedrooms, either in the form of communal a facility or en-suite to/in bedrooms.
- Bedsits style arrangements will not be appropriate; i.e. cooking in rooms.
- Storage space for bicycles etc will also be required.

4.6.3 The accommodation should comply with relevant legislation contained in the Housing Act and The Building Regulations. There are, for example, more stringent requirements for the installation of fire precautions amongst other matters, within student accommodation. Any developer should consult the Council's Environmental Health and Housing Department and Building Standards Consultancy at an early stage, to ascertain these requirements.

4.6.4 As mentioned previously, comprehensive guidelines on all aspects of converting properties to flats (student or otherwise) can be obtained within the 'Guidance Note on Flat Conversions'.

#### 4.7 Maintenance

4.7.1 In addition to the above, it will be a requirement of all permissions to convert properties into student accommodation, that the owner enters into an ongoing programme of maintenance for the exterior fabric of the building. This will be required by condition. An example is indicated in Appendix 2.

#### 4.8 Commuted Payments Towards Open Space

4.8.1 It is appropriate where a non-domestic property is converted to student accommodation for the Local Planning Authority to seek a commuted sum payment towards the off-site provision or improvement of public open space. In the case of student residences accommodating 8 or more students the rate for payment will be £104 per student based on the information provided within the Council's Draft SPG on Standards for the Provision of Open Space and Recreation in New Housing Development.

#### 4.9 Security

4.9.1 Whilst security of converted properties is an issue outside of the control of the Planning Service, it should be noted by developers that North Yorkshire Police have raised it as a main issue when considering student accommodation. Student properties are often the target for crime, owing to the equipment often contained within (e.g. PC's, Printers and other electrical equipment). Whilst the Local Planning Authority cannot enforce security measures by condition, it is agreed that all developers of student accommodation should be encouraged to contact the Police Architectural Liaison Officer (PALO) to discuss this matter. The PALO can be contacted on 01723 509725.

4.9.2 An informative note will be added to relevant decision notices to further draw the applicants attention to the need to provide an adequate level of security.

## 4.9 Further Issues

- 4.9.1 Further issues including refuse storage, disabled access, energy efficiency, parking and cycling facilities and design are covered in the document 'Guidance Note on Flat Conversions'.

## 5.0 Relevant Contacts

- 5.1 The following is a list of contacts at the Local Authority when submitting planning applications, listed building applications or building regulation applications for the conversion of buildings to student accommodation:

Development Control      Tel: 01723 232477  
Email: marcus.whitmore@scarborough.gov.uk

Conservation Officer      Tel: 01723 232481  
Email: chris.hall@scarborough.gov.uk

Building Standards Consultancy      Tel: 01723 232440  
Email: building.standards@scarborough.gov.uk

Environmental Health and Housing Tel: 01723 232530  
Email: tony.fenter@scarborough.gov.uk

Written correspondence should be addressed to any of the above at the following address:

Scarborough Borough Council  
Town Hall  
St Nicholas Street  
Scarborough YO11 2HG

Main Switchboard: 01723 232323  
Internet: [www.scarborough.gov.uk](http://www.scarborough.gov.uk)

The Police Architectural Liaison Officer can be contacted at :

Pickering Police Office  
Malton Road  
Pickering, YO17 7EY

## Appendix 1

### **Relevant Policies from the Scarborough Local Plan**

#### H10: Protection of Residential Amenity

Planning permission will not be granted for development that would have a serious effect on residential amenity. In considering proposals account will be taken of:

- (A) The extent of overlooking and loss of privacy;
- (B) The proximity and relationship of new and existing buildings and whether there is an overbearing effect on existing property;
- (C) Disturbance or danger resulting from the level of traffic likely to be generated by the development;
- (D) Levels of noise, smell and other emissions and pollutants;
- (E) The impact of the development on the appearance of the area; and
- (F) The loss of significant open space or landscaped areas.

#### H11: Protection of Small Terraced Houses

Proposals involving the conversion of small terraced houses to flats will not be permitted.

#### H12: The Conversion and Sub-Division of Buildings for Residential Use

With the exception of buildings to which Policy H11 applies (Small Terraced Houses), the conversion of buildings or the sub-division of existing dwellings to form smaller units of accommodation will only be permitted within the defined development limits of towns and settlements where self contained accommodation can be provided without:

- (A) Affecting adversely the amenities of potential occupants or nearby residents; or
- (B) External alterations likely to detract from the street scene; or
- (C) Leading to a concentration of such uses, or otherwise likely to harm the character of the surrounding area.

Proposals for non self-contained accommodation will only be permitted where they satisfy the above criteria and are justified either by a proven housing need or a need to retain the special character and features of particular buildings, e.g. room sizes in listed buildings.

#### H13: Residential Use of Upper Floors

The use of upper floors for commercial premises for residential purposes will be permitted unless it would give rise to conflict with existing uses in the area.

#### E14: Extensions and alterations to existing buildings

Extensions and alterations to existing buildings will be permitted provided that:

In the case of alterations:

1. The alteration will not detract from the character, appearance or historic significance of the building; and
2. The alterations will not harm the uniformity of a terraced frontage or otherwise harm the appearance of a streetscene.

L5: Changes of use of hotels and guest houses

The change of use of hotels with over 30 bed spaces will not be permitted. The change of use of other hotels and guest houses within the prime holiday areas defined on the proposals map will only be permitted where:

1. It can be demonstrated that overall demand for this type of accommodation during peak periods in the particular town is being met; or
2. The proposal will result in a significant environmental improvement or other benefit to the character of the prime holiday area.

## Appendix 2

The following is a list of standard conditions which may be appropriate for inclusion on Decision Notices relating to student accommodation. Please note that this list is not exhaustive.

1. Maintenance of Exterior of Property

*The external appearance of the converted property shall be maintained in a good state of repair in accordance with an agreed and ongoing scheme of external maintenance which has been submitted to and approved in writing by the Local Planning Authority.*

**Reason:** *As the property will be occupied by groups of students on a short term basis the maintenance of the exterior of the building is unlikely to be carried out by the occupants of the property. It is therefore the responsibility of the owner of the property to ensure that the exterior of the property is maintained to an appropriate standard in order to safeguard the appearance and visual amenities of the area in which it is situated.*

2. Occupation of Property

*The occupation of the property shall be limited to bona fide students whose main residence is elsewhere and who are enrolled on recognised full-time courses at one of the higher educational establishments in the town of Scarborough only, and it shall not be occupied by any other persons.*

**Reason:** *To ensure that the accommodation is available to bona fide students at all times and to safeguard against the use of the property as a house in multiple occupation. The Local Planning Authority consider that accommodation of this type is suitable only to meet the demands of higher educational establishments and that sufficient shared accommodation for other persons already exists in the locality. The Local Planning Authority aims to ensure that a concentration of shared use accommodation which would lead to an imbalance in housing provision and social profile does not occur.*

3. Communal Living Accommodation

*The rooms entitled kitchen, dining room/lounge on the plans forming part of the application shall be retained as communal living accommodation for use by all the student residents of the property.*

**Reason :** *To ensure that the occupiers of the property have an appropriate standard of residential amenity.*

4. Students per Bedroom

*The student residents of the building shall be accommodated one per bedroom and the maximum total number of students accommodated in the building shall be no more than (insert number) without the express written approval of the Local Planning Authority.*

**Reason :** *To ensure that the occupiers of the property have an appropriate standard of residential amenity.*

5. Restricted Letting

*The building shall not be used for any other type of lettings without the express written approval of the Local Planning Authority.*

**Reason :** *To ensure that the accommodation is available to bona fide students at all times and to safeguard against the use of the property as a house in multiple occupation.*

6. Adverts if Converted from Guesthouse/Hotel

*Prior to the first occupation of the building as a student residence all external signage and paraphernalia associated with the guest house use shall be removed from the property and the site.*

**Reason :** *In the interests of the appearance of the property and the character of that part of the Conservation Area in which it is set.*

7. Example of External Improvements Condition

*Within one month of the date of the planning permission hereby permitted, a detailed schedule of external improvements and repairs shall be submitted to and be approved by the Local Planning Authority. The schedule shall include for, inter alia, the retention, repair and overhaul of all the original sliding sash windows on the front elevation, or their like for like replacement, the removal of the stone cladding around the front door and the rendering of that area, the repainting of the front elevation of the property and the reinstatement on the front elevation of a painted timber panelled door. The schedule of works so approved shall be implemented in full within six months of the date of the planning permission hereby permitted or within such other time period as may be approved in writing by the Local Planning Authority.*

**Reason:** *The use hereby permitted is only acceptable on the basis of this condition, in the interest of the character of the building and the visual amenity of that part of the Conservation Area in which the property is situated.*

8. Confirmation of no Permitted Development Rights

*Other than the alterations required under Condition X above, there shall be no external alterations to the property without the prior written approval of the Local Planning Authority.*

**Reason:** *To safeguard the rights of control of the Local Planning Authority over alterations, in the interests of the character and appearance of the Conservation Area in which it is set.*

### **Appendix 3**

#### Statement of Consultation and Involvement.

The draft SPG was subject to public consultation for a period of 6 weeks. To ensure that the guidance was commented upon by a varied and large group the following were consulted :

- The Local Educational Establishments (University of Hull – Scarborough Campus and Yorkshire Coast College)
- Scarborough Hospital
- Recent Applicants for Student Accommodation
- All members of the Architects and Agents Liaison Group
- Scarborough Borough Councils Environmental Health Section and Legal Services Section.
- All Members of the Planning Sub-Committee (Urban)
- Scarborough Landlords Association.
- North Yorkshire Police.
- Universities of Hull, Teesside and York
- Other Local Authorities.

In addition to the above the draft SPG was available to view within Borough Council Offices and on the Councils Web Site ([www.scarborough.gov.uk](http://www.scarborough.gov.uk)). It was also possible to leave feedback online.

## Appendix 4

### STUDENT ACCOMMODATION SPG

#### SCHEDULE OF THE RESPONSE TO PUBLIC CONSULTATION

Ref. No.	Consultee	Comments Made	Suggested Response
1.	Scarborough and North East Yorkshire Healthcare (NHS)	Threshold of 8 students for the need to provide a warden is too low.	The need for wardened accommodation will be decided on an individual basis and it is unlikely to apply to any future on-site hospital accommodation for medical students. However, in general it is considered that a threshold of 8 students is appropriate as this level of accommodation has the potential to have nuisance and amenity issues.
2.	As above	The 'concentration' of students in a particular area works well on some occasions. Preference would be to locate students as close as possible to place of education, though this is at odds with this SPG.	Allocation within Borough Local Plan for student accommodation near to University site demonstrates that policy welcomes such accommodation near to place of education. Comments from North Yorkshire Police (Ref. No. 7) explain clearly reasons why some dispersal is important.
3.	University of Hull	Flexibility and implementation of changes should be allowed if and when necessary with SPG.	Noted.
4.	As above	The natural North / South Bay divide is bound to create areas of increased student population.	Noted.
5.	North Yorkshire Police	Supports consistency of approach and the fact it will ensure long term use of premises as student accommodation rather than being a stepping stone to HiMO.	Support noted.
6.	As above	Support need to justify requirement for additional student accommodation.	Support noted.
7.	As above	Support dispersal suggestion as it will assist in integration of students into wider community. Will also	Support noted.



		avoid pockets of residence which become targets for crime and burglary especially when unoccupied out of term time.	
8.	As above	As part of planning requirement would it be possible to require achievement of a set level of security, possibly leading to a security accreditation of the premises ? This would give students the assurance of a minimum level of security.	Unable to add conditions to decisions notices to ensure this, however, comments are noted and suggested that a note be added to decision notices referring applicant to Police Architectural Liaison Officer.
9.	Ms Sandra Rogers Brighton and Hove City Council	Do you envisage 'tying' the accommodation to a particular educational establishment i.e. for the college to manage the lettings ?	No, although many units are already controlled by the University under the Head Leasing Scheme.
10.	Bell-Snoxell Associates Ltd	It is very important not to over-control the provision of accommodation.	Noted.
11.	As above	Agree with demonstrating need. Should be overall restriction on 20+ units, a demonstration of need for between, say, 12 to 20 and a straightforward application for 6 to 12.	This would over-complicate the issue. The current proposal suggests that 20+ units be restricted and need be demonstrated on proposals for less than 20 units. This simple breakdown will not prevent smaller units being developed as the use of properties for student accommodation for up to 6 students will not require consent.
12.	As above	Suggests that market forces should prevail with reference to the protection of hotels, guest houses etc as artificial constraints lead to major problems for property owners.	This stance of protecting hotels, guest houses etc is considered vital to the tourist economy of the town and in line with adopted Borough Local Plan policy. It is clear that should the policy be relaxed, especially in the current housing boom, extensive areas of hotels, guest houses etc would be lost.
13.	As above	Suggests that the dispersal of student accommodation will have problems when providing criteria. Suggests this will lead to personal rather than policy decision making taking place.	Each application is examined on its own merits and decisions will continue to be made on that basis.
14.	John Warburton	Welcomes the SPG. It is important to raise standards wherever we can.	Support noted
15.	Richard Green	Asks the question of where are the problem areas with reference to the concentration of student accommodation.	Some areas of South Cliff.

16.	As above	Do not agree with the extra cost on developers for commuted sums for off-site POS provision.	Any new residential development (including Student Accommodation) puts increased demand on Public Open Space and recreation and the payment of a commuted sum will assist toward increasing or improving POS.
17.	As above.	Should be active encouragement to see conversion of vacant flats above shops.	Agreed.
18.	Reeds Rains	Agrees with the SPG	Support noted.
19.	E. G. Shepherd	Agrees with the SPG	Support noted.
20.	East Riding Council	No objections	Noted.