

Matter: CC4

CCLP ID: 1391

THE BELL EDUCATIONAL TRUST LIMITED

MATTER CC4

Supporting the Cambridge Economy

CC4B Higher Education Policies

CC4B.2 Policy 44 – Specialist Colleges and Language Schools

1.0 INTRODUCTION

1.1 This statement has been prepared by Beacon Planning Ltd on behalf of The Bell Educational Trust Limited in response to the questions raised by the Inspector in the Matters and Issues for Cambridge City Local Plan hearing sessions for the joint examination of the draft Local Plan for Cambridge City Council and South Cambridgeshire County Council.

1.2 This statement is specifically in response to the Inspector's questions on Matter CC4B.2:

Issue 4B.2 i relating to the representations made to policy 44 of the Local Plan Proposed Submission consultation (2013) (ref: 27508);

2.0 BACKGROUND

2.1 The Bell Educational Trust Limited (Trust) owns the site and wholly own Bell Educational Services (Bell) its trading subsidiary. Bell is an English language school for international students and has been established for over 60 years.

2.2 The school was founded by Frank Bell, a University of Cambridge graduate who had a vision to promote intercultural understanding through language education. Following his experience during the second world war, where as a prisoner-of war he established an "undercover University" and organised language courses to promote understanding and harmony through language education, in 1955 he opened his first language school in Cambridge. Since then Bell has grown to become a high-quality education business. The school offers a wide selection of English language courses, as well as university foundation courses for graduate and post graduates, young learners' courses and teacher training.

3.0 KEY ISSUES

3.1 The Trust contend that the Plan at policy 44 is unsound as currently worded. Key issues are:

- it does not comply with the NPPF;
- it is in conflict with other economic policies within the Plan; and
- it does not treat the non-University colleges and school equitably when compared with the Universities.

4.0 ISSUES: 4B.2 POLICY 44

Issue: 4B.2 part i. Would the policy unfairly discriminate against specialist schools as there is no imperative in the Plan for other educational establishments to demonstrate adequate provision of residential accommodation for students as a precursor to development? In this regard, Policy 46 of the Plan Development of student housing appears to be less prescriptive in terms of the provision of student residential accommodation

- 4.1 The original representation draws attention to the conflict between policy 44 and the wording elsewhere in the draft Local Plan, particularly strategic objective 10 which seeks to promote and support the economic growth of the City.
- 4.2 Paragraph 5.2 of Section Five: Supporting the Cambridge Economy: states that the Council aims to strengthen and diversify the economy and provide a range of job opportunities. The Plan acknowledges, at paragraph 5.28 the significant role specialist schools play in contributing to the local economy benefiting retailers, service providers and host families and the tourism sector. Yet the policy restricts the ability of the schools to grow.
- 4.3 As set out in the original representation the policy as currently worded is contrary to one of the core planning principles of the NPPF to proactively drive and support sustainable economic development. Paragraphs 19 to 21 of the Framework expand upon this. Central Government places significant weight on supporting economic growth. The Framework states at paragraph 21 that planning policies should recognise and seek to address potential

barriers to investment. The importance of supporting existing business sectors is also highlighted.

- 4.4 The Council expresses considerable support for the expansion of the sector in principle and cites the NPPF but effectively stifles development by making it conditional on providing substantive additional support facilities.
- 4.5 The Plan states that development of specialist colleges will put pressure on the housing market which is already under strain as a result of additional students. This is no different from expansion of the Universities, where an increase in student numbers attending those institutions also generates the need for additional accommodation.
- 4.6 Policy 44 requires the development of support facilities including residential accommodation to be in step with expansion of student places for specialist schools. No such restriction is imposed on University development. Somewhere to live and access to adequate social and amenity facilities is needed for any non-local student irrespective of where they are studying.
- 4.7 The type of accommodation required by students is of relevance here. There is a difference between the housing needs of students on full time courses of one academic year or more and those on short courses. The range of longer courses is growing in the non-University sector as is the type and age of students as acknowledged by the Council at paragraph 5.30 of the Plan. However, the core of this business remains in short courses.
- 4.8 For students studying English at Bell, a range of accommodation is offered: home stay; letting in purpose built student accommodation in the City; hostel accommodation; and University college and school accommodation out of term time. A small minority of students occupy visitor accommodation e.g. hotels or hostels. Although students are not prevented from renting privately however, those on short courses renting in the private sector housing market is not attractive or necessary. Many students will opt to stay with host families so that they can practice and improve their English in a less formal environment and this brings also benefits to the local economy.
- 4.9 The Inspector's attention is drawn to the Oxford Local Plan Core Strategy 2026 (adopted 14 March 2011). Oxford faces the same pressures on the private housing stock as a result of

the need to house an increasing student population. Oxford City Council took a different policy approach to addressing this to that proposed in Cambridge but the issue of equitable treatment of University and non-University colleges arose and is relevant here.

4.10 In this case the Inspector addressed this specific issue in his report (Report on the Examination into the Oxford Core Strategy Development Plan Document 21st December 2010 – See Appendix 1 for relevant extract). Oxford City Council proposed a policy in their draft Core Strategy DPD which restricted the provision of student accommodation by non-University colleges (such as language schools and specialist colleges). The Inspector at paragraph 4.81 stated that imposing a restriction was ‘effectively placing an embargo on student accommodation to serve the needs of the many non-university colleges in Oxford’. He took the view that the University and non-University colleges should be treated equally. He stated: ‘These colleges [also] make their contribution to the local economy. I find little reason, in terms of housing pressures, to discriminate against non-University colleges. It is not justified in equity terms [and I propose some wording changes to reflect this].’

4.11 The same equitable approach should be taken in the Cambridge Local Plan. Policy 44 should be positively worded to provide support for the development of the non-University colleges and schools. No reference needs to be made to residential accommodation as this can be addressed through policy 46 or a final version of it elsewhere in the Plan.

5.0 CONCLUSION

5.1 The Local Plan in its current form is unsound at policy 44, as it is not consistent with national planning policy. The Plan does not comply with the requirements of the National Planning Policy Framework in fostering economic growth and supporting the expansion of existing business sectors. It is also in conflict with the thrust of economic policy set out elsewhere in the Local Plan which seeks to strengthen and diversify the economy.

5.2 It does not treat the non-university schools and colleges equally compared to the Universities in considering the impact of their expansion on the City.

5.3 It is considered that the policy should be amended such that it is worded positively and makes no reference to residential accommodation which can be addressed through policy 46.

APPENDIX 1



The Planning
Inspectorate

Report to Oxford City Council

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Inspectors appointed by the Secretary of State for Communities and Local Government

21 December 2010

PLANNING AND COMPULSORY PURCHASE ACT 2004

SECTION 20

**REPORT ON THE EXAMINATION INTO THE
OXFORD CORE STRATEGY
DEVELOPMENT PLAN DOCUMENT**

Document submitted for examination on 21 November 2008

Examination hearings held between 14 July – 11 September 2009
and 14-17 September 2010

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ABBREVIATIONS USED IN THIS REPORT

AAP	Area Action Plan
ATO	Access to Oxford
CD	Core Document
CS	Core Strategy
DfT	Department of Transport
DC	District Council
DPD	Development Plan Document
dph	Dwellings per hectare
FPC	Further Proposed Changes
FRMP	Flood Risk Management Plan
GOSE	Government Office for the South-East
HRA	Habitats Regulations Assessment
LDS	Local Development Scheme
LTP	Local Transport Plan
NGC	Northern Gateway Consortium
NOMIS	National Online Manpower Information System (ONS)
NRIA	Natural Resource Impact Analysis
NLP	Nathaniel Lichfield & Partners
OBU	Oxford Brookes University
OCC	Oxfordshire County Council
OELS	Oxford Employment Land Study
ONS	Office for National Statistics
PPG	Planning Policy Guidance
PPS	Planning Policy Statement
RSS	Regional Spatial Strategy for the South East of England (May 2009)
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SCI	Statement of Community Involvement
SCS	Sustainable Community Strategy
SOSDA	South of Oxford Strategic Development Area
SEA	Strategic Environment Assessment
SEEDA	South East England Development Agency
SFRA	Strategic Flood Risk Assessment
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SPD	Supplementary Planning Document
sqm/m ²	Square metres
UoO	University of Oxford

Non-Technical Summary

This report concludes that the Oxford Core Strategy Development Plan Document provides an appropriate basis for the planning of Oxford city over the 20-year period of the plan. The Council has sufficient evidence to support the strategy and can show that it has a reasonable chance of being delivered.

A limited number of changes are needed to meet legal and statutory requirements and ensure that the plan is sound. These can be summarised as follows:

- Incorporate the Council's Proposed Changes (April 2009) (CD1/1) and Further Proposed Changes (April 2010) (CD1/3) into the Core Strategy, except where amended by subsequent changes and the inspectors' recommendations;
- Incorporate the Council's additional Examination Changes resulting from discussions at the September 2010 hearing sessions (CD16/78), except those relating to the revocation of the South-East Plan RSS;
- Remove the general references to small-scale reviews of the Green Belt;
- Provide more updated detail on the homes:jobs balance;
- Revise the policy on student accommodation;
- Strengthen the policy on the built environment;
- Amend Policy CS10 to confirm that all developments should seek to minimise their carbon emissions;
- Amend the text accompanying Policy CS24 relating to density;
- Amend the wording relating to the provision of affordable housing from commercial developments;
- Provide additional details on infrastructure provision, including schools;
- Amend the Policy for the West End, including schools and the need for a flood risk management plan;
- Amend the policy for the Northern Gateway, including securing measures to mitigate impact on the road network and amended text to reflect the views of Natural England, and include an indicative boundary for the subsequent Area Action Plan;
- Amend the policy for Barton, including references to schools and include a defined boundary for the strategic development area shown on the Key Diagram;
- Amend the policy for Summertown, including references to the need to meet the requirements of the Habitat Regulations and Appropriate Assessment, and delete the star marking this strategic area on the Key Diagram;
- Amend Policy CS2 to confirm the position on Safeguarded Land;
- Strengthen the Monitoring section;
- Add page and paragraph numbers.

Most of the changes recommended in this report are based on proposals put forward by the Council in response to points raised and suggestions discussed during the public examination. The changes do not alter the thrust of the Council's overall strategy.

a more detailed analysis of the issues and possible solutions to meet needs whilst sustaining the communities concerned. It is also open for the Council, outside of this Core Strategy, to consider area-based action programmes to reduce the impact of concentrations of students within residential areas.

4.79 Having regard to the sites with planning permission for purpose-built student accommodation, other Local Plan sites (CD16/31) and the Council’s commitment to prepare a Site Allocations DPD, which will include consideration of this need, I am confident that the OBU can meet the Core Strategy target.

4.80 Thus, I come to the view that a ceiling figure of 3,000 is realistic and achievable well within the plan period and could be maintained thereafter. However, a figure materially below the 3,000 level could be difficult to achieve, impacting upon the wider housing market and/or on the continued success of the Universities and their contribution to the local economy. I conclude that the approach of the policy is soundly based and should be effective in reducing and then stabilising the impact on the general housing market and local communities.

4.81 The policy restricts the provision of student accommodation to that related to the Universities, effectively placing an embargo on student accommodation to serve the needs of the many non-university colleges in Oxford. The Council points to the greater emphasis of these other colleges on part-time courses and that a lot of their students take up lodging accommodation, so not adding to the pressures on the city’s housing stock and limited development sites. Nevertheless, some of the students at these other colleges will be full-time and are just as likely to require housing out in the community and put pressure on the housing market. Where full-time students are on courses of upwards of an academic year, it seems to me that they are as likely as University students to be seeking their own housing as opposed to lodgings.

4.82 Whilst removing the policy embargo would increase the competition for any available sites, provided any new accommodation was directed to full-time students, then the impact on the overall housing market would be very limited. These colleges also make their contribution to the local economy. I find little reason, in terms of housing pressures, to discriminate against non-University colleges. It is not justified in equity terms and I propose some wording changes to reflect this. Detailed consideration of the needs of the non-University Colleges can be looked at as part of subsequent DPDs.

4.83 The current wording of the policy is confused and unclear in its meaning. In order to make the plan sound, I recommend some revised wording which seeks to clarify its intent and application, without necessarily conflicting with any specific policies applicable to the West End in the West End AAP.

4.84 In order to make the Core Strategy sound, the following changes should be made:

- i) The deletion of Policy CS26 and its replacement by: “Planning permission will only be granted for additional academic/ administrative accommodation for the University of Oxford and Oxford Brookes University where that University can demonstrate: in the first place that the number of full-time students at that University, who live in Oxford but outside of university-provided accommodation, will, before the particular**

development is completed, be below the 3,000 level and once that figure is reached, thereafter will not exceed that level. All future increases in student numbers at the two Universities as a result of increases in academic/administrative floor-space must be matched by a corresponding increase in purpose built student accommodation.

Student accommodation will be restricted in occupation to students in full-time education on courses of an academic year or more. Appropriate management controls will be secured, including an undertaking that students do not bring cars to Oxford.” and

- ii) **The deletion of the sentences “In addition of Oxford.” and “Student accommodation built Development Management DPD.” from the second paragraph of section 7.4 and their replacement by: “In addition, all new student accommodation (built either speculatively or directly by the Universities or Colleges) will be restricted in occupation to students in full-time education on courses of an academic year or more.”**

Hierarchy of centres and retailing – Policies CS1 and CS32

- 4.85 ***The hierarchy*** Policy CS1 sets out a basic hierarchy of centres where growth will be accommodated: the city centre; Cowley primary district centre; 4 other district centres and, finally, neighbourhood centres. The city centre is unquestionably the appropriate prime location, at the top of the hierarchy. Cowley stands out amongst the district centres as being the most sustainable centre, well served by public transport, central to a large catchment area and with the potential to expand and accommodate a range and mix of uses. It is justifiably raised in status above the other district centres. These other district centres all serve an important local function, with the smaller neighbourhood centres performing a valuable role at a more local level.
- 4.86 The Core Strategy hierarchy represents an evolution of that set out in the Local Plan (CD7/6). The two main changes involve the designation of Cowley as the primary district centre and the addition of Blackbird Leys to the district centres. This reflects the likely level of need, supports the strategy of reducing the need to travel and helps to promote regeneration. The revised broad hierarchy and pattern of centres offers a well-founded, sustainable, geographical spread of locations where development should be focussed.
- 4.87 Policy CS32 sets a more detailed hierarchy than that of the more general one in Policy CS1 for retail development. This involves a distinction between the primary shopping areas in the city and district centres and edge of centre locations. This accords with guidance in PPS6 and I see no difficulty with the distinction drawn here, compared with the hierarchy in Policy CS1.
- 4.88 ***Retail provision*** The table above Policy CS32 sets out retail requirements for the city and district centres. This is broadly based upon the Oxford Retail Needs Study 2004 (CD14/7) and the Update (March 2008) (CD14/8). The Update has confirmed a relatively modest growth in need for additional comparison retailing floor-space and a small amount of convenience retailing floor-space.