
**Cambridge City and South Cambridgeshire Local Plan
Examinations**

**Matter CC6A – Specialist Colleges and Language Schools, Student
Housing, Housing in Multiple Occupation**

Hearing Statement

**On behalf of the Cambridge Colleges' Bursars' Environment and
Planning Sub-Committee (Representor ID 688 / Representation ID
28018)**

Contents

1. **Statement of Purpose**
2. **Issue 6A.2 (i): Does the policy accord with paragraph 159 of the National Planning Policy Framework (the Framework) as the policy is based on the necessity for the applicant to demonstrate the need for any development which would provide student accommodation rather than to meet the objectively assessed need established through the Local Plan process?**
3. **Issue 6A.2 (ii): Is criterion (a) [and criterion (c) by implication] of the policy too restrictive as the criteria tie any proposed student accommodation to the educational institution which is seeking to provide it whereas paragraph 14 of the Framework requires that the Plan should meet objectively assessed needs with sufficient flexibility to adapt to rapid change?**
4. **Issue 6A.2 (iii): Is criterion (a) too inflexible to enable alternative models of student accommodation to be provided as some students may not wish to live in cluster style accommodation?**
5. **Issue 6A.2 (iv): Would compliance with criterion (f) be determined on a case by case basis?**

1. Statement of Purpose

- 1.1. This Hearing Statement addresses Matter CC6A as raised by the Inspector in respect of Specialist Colleges and Language Schools, Student Housing and Housing in Multiple Occupation. It specifically responds only to Issue 6A.2 concerning Policy 46: Development of Student Housing and questions (i) to (iv) posed by the Inspector in relation this issue. These questions are addressed in numerical order and reference is provided as to how the proposed policy would fail the tests of soundness as per the National Planning Policy Framework, and moreover, how the Plan could be made sound.
- 1.2. This Hearing Statement relates to Policy 46 as it was agreed to be modified by Cambridge City Council at the Full meeting of the City Council on 23 February 2017. Policy 46 as modified by the Council is contained within the Examination document entitled 'Further Proposed Modifications to the emerging Cambridge Local Plan: Student Accommodation, Gypsies and Travellers, and Accessible Homes' (January 2017) (Document reference number: RD/CFM/010).
- 1.3. The Programme Officer emailed participants on 6 March 2017 to advise that the Matters and Issues to inform statements submitted for the Matter CC6 hearings have been revised by the Inspector. Of the questions posed by the Inspector in relation to Issue 6A.2, only question (v) has been revised, although this same question is the only question under Issue 6A.2 that this Statement does not respond to.
- 1.4. This Hearing Statement has been prepared on behalf of the Cambridge Colleges' Bursars' Environment & Planning Sub-Committee (the BEPSC) (Representor ID 688). The University of Cambridge is a 'collegiate' university, with its constituent, 31 autonomously governed Colleges providing teaching and learning support and the vast majority of accommodation for its students and scholars. Intercollegiate matters at Cambridge are conducted via a number of Committees, including the Bursars' Committee and its various Sub-Committees. The BEPSC is established to deal with various environmental matters, such as a Town & Country Planning and transport issues, of collective interest to Colleges.

- 2. Issue 6A.2 (i): Does the policy accord with paragraph 159 of the National Planning Policy Framework (the Framework) as the policy is based on the necessity for the applicant to demonstrate the need for any development which would provide student accommodation rather than to meet the objectively assessed need established through the Local Plan process?**
- 2.1 On behalf of the City Council, the Cambridge Centre for Housing and Planning Research has recently undertaken an assessment of student housing and the report upon this is contained within Examination document entitled 'Assessment of Student Housing Demand and Supply for Cambridge City Council' (January 2017) (Document reference number: RD/CFM/020).
- 2.2 This assessment work has not only considered the University of Cambridge (and its constituent Colleges) and Anglia Ruskin University, but also colleges of further education, specialist colleges and language schools, and affiliated organisations. Also, we understand that the survey work which has underpinned the assessment to have benefited from a high rate of response from those Institutions approached. We therefore consider the assessment work to provide a robust and reliable evidence base for the policy.
- 2.3 Our representations to the Submission version of the Local Plan in 2013 had considered Policy 46 to be unsound on the basis that it requires applicants to demonstrate the 'need' for student housing proposals, when this need is already recognised by the Local Plan. Our concern therefore was that the policy was too onerous in requiring applicants to demonstrate a need for student housing proposals, when the Council had already acknowledged a need for this within the same Local Plan. However, now that a recent and robust assessment of student housing supply and demand has been undertaken across institutions in the city, we consider that reliable and comprehensive evidence is now provided as a backdrop against which proposals for student housing proposals can be assessed on their merits.
- 2.4 In light of the above, we are now of the view that a need test is not too onerous. In adopting that position, it remains that applicants will be required to demonstrate a need for student housing, when that need is already accepted in the Local Plan. However, the application of the 'need' test against the backdrop of the recent evidence is considered to provide an appropriate policy check in view of constraints that affect the city and the need to manage and provide for competing types of housing, and indeed other uses, across the city. We adopt this position on the basis of the policy being a permissive one and we note that the policy states that proposals 'will be permitted', subject of course to the criteria set out within the policy.
- 2.5 In view of the above, we therefore consider that the policy is compliant with Paragraph 159 of the Framework.

3. Issue 6A.2 (ii): Is criterion (a) [and criterion (c) by implication] of the policy too restrictive as the criteria tie any proposed student accommodation to the educational institution which is seeking to provide it whereas paragraph 14 of the Framework requires that the Plan should meet objectively assessed needs with sufficient flexibility to adapt to rapid change?

3.1 As for the same reasons in response to question (i), we are of the view that a need test is not too restrictive. It is considered that the need test provides an appropriate policy check to manage proposals in a city with the special circumstances and character of Cambridge. This is however on the basis that a comprehensive analysis of student housing need has now been undertaken through engagement with institutions across the city, providing the backdrop against which need can be assessed. We do however consider that criterion (a) of the Policy should be amended in order for this to be made sound (effective) with regard to Paragraph 14 of the Framework. Specifically, it is considered that additional wording (*shown in italics*) should be added to criterion a) such that this reads:

with reference to evidence contained within the City Council's 'Assessment of Student Housing Demand and Supply' (or as updated) there being a proved need for student accommodation to serve the institution;

3.2 The City Council's Assessment of Student Housing Demand and Supply should not be seen as a definitive basis against which applications should be assessed in terms of whether a proven need is demonstrated, or not. Indeed, needs can change and to accord with Paragraph 14 of the NPPF, the Policy should be sufficiently flexible to adapt to rapid change. However, we consider that the City Council's recent and comprehensive evidence provides a robust basis for use in assessing the need for student housing proposals. We therefore consider it appropriate for the policy to specifically refer to this evidence and for applicants to demonstrate a proven need with reference to it. In doing so, it is considered that the above amendment to the policy will ensure that it can adapt to rapid change, whether this be by way of being able to account for new evidence prepared by the City Council, or by way of evidence provided by the applicant, allowing the Council to assess proposals on their merits.

3.3 In terms of criterion (c), we do not consider this to be too restrictive in being able to effectively manage the location of new student housing proposals. The location of accommodation for the Cambridge Colleges is particularly important within the context of the collegiate University of Cambridge. Central to the collegiate structure is the principle of creating a strong sense of community. This allows for a supportive environment for the welfare of students, their learning and for ideas to be freely exchanged. As such, and in supporting the collegiate system in Cambridge, it is necessary to manage development carefully, but positively within the context of the highly sensitive heritage context of Cambridge. This is especially the case in light of the permissive approach adopted by the Local Plan and we have highlighted this through our representations to Policy 56 concerning the creation of successful places. However, it is essential that policy is applied in a positive and innovative way, otherwise the benefits arising from this policy will be directly contradicted by an overly restrictive approach to College-owned PBSA, resulting in frustration for all parties.

3.4 In summary, the physical location of accommodation is therefore crucial to the creation of a scholarly learning environment provided for by the collegiate system. Therefore, and within the 'Cambridge context', criterion (c) is not considered too restrictive.

- 4. Issue 6A.2 (iii): Is criterion (a) too inflexible to enable alternative models of student accommodation to be provided as some students may not wish to live in cluster style accommodation?**
- 4.1 It is not considered that criterion (a) is too restrictive within the context of the policy as modified by the Council. The policy as modified now requires applicants to enter into formal agreement with institutions to confirm that the proposed accommodation is suitable in type, layout, affordability and maintenance regime for the relevant institution. It is anticipated that in most cases for the Cambridge Colleges, it will be appropriate for accommodation to be provided as 'cluster', rather than self contained accommodation. However, in some circumstances, it may be appropriate for other formats or types of accommodation to be provided, such as studio units. This may be the case for post-graduate accommodation, or indeed post doctoral researchers. In such instances, the policy now allows for institutions to agree to this in order for this to be allowed. As such, we consider there to be full flexibility in relation to the type of accommodation provided and we do not therefore consider criterion (a) to be too inflexible.
- 4.2 In referring to post doctoral researchers, we raise a separate but related point that these should be treated as students for the purposes of Policy 46. We therefore propose that the wording '(including post doctoral researchers)' is added to the first sentence of Policy 46, after the word 'students'. This will ensure that the policy is made sound with regard to the test of effectiveness.

5. Issue 6A.2 (iv): Would compliance with criterion (f) be determined on a case by case basis?

- 5.1. We consider that criterion (f) should be determined on a case by case basis, in that the size of accommodation will depend upon the specific circumstances of the proposal.

Will Lusty
Associate Director

+44 (0) 1223 347246
+44 (0) 7968 550427
wlusty@savills.com

Unex House
132-134 Hills Road
Cambridge CB2 8PA