

Matter: CC6

CCLP ID: 1391

THE BELL EDUCATIONAL TRUST LIMITED

MATTER CC6

Maintaining a Balanced Supply of Housing

MATTER CC6A.1 Policy 44 – Specialist Colleges and Language Schools

MATTER CC6A.2 Policy 46 – Student Housing

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 in response to the Inspector's questions on policies 44 and 46 in Matter CC6A:

Issue 6A.1 relating to the representations made to policy 44 of the Local Plan Proposed Submission consultation (2013) (ref: 27508);

Issue 6A.2 relating to the representations made to policy 46 of the Local Plan Proposed Submission consultation (2013) (ref: 27499);

- 1.3 With regard to Issue 6A.1 Policy 44 was originally scheduled to be heard at the Hearing for Matter CC4B Higher Education Policies which took place on Wednesday 7th September. Statements for that Hearing were required to be submitted by 16th May 2016. This was in the response to the question posed by the Inspector at that time. A copy of that Statement was submitted on behalf of the Trust and is attached at Appendix 1. However, following submission of the Statements the programme was amended and Policy 44 is now to be heard under Matter CC6A.

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 ISSUES 6A.1 POLICY 44: SPECIALIST COLLEGES AND LANGUAGE SCHOOLS

Is the requirement that residential accommodation for all non-local students should be provided concurrently with the education facilities justifiable given that there is no such requirement for the Cambridge University colleges or the Anglia Ruskin University?

- 3.1 The question posed by the Inspector when this policy was to be considered under Matter CC4B (Appendix 1) was worded slightly differently than that which is now posed. However, it is considered that the issue is the same in that specialist and language schools are being treated differently to the Universities.
- 3.2 The Statement submitted under Matter CC4B covers this point of discrimination and draws attention to the conflict with other policies within the draft Plan and compliance with the NPPF. This is therefore not repeated here and I draw the Inspector's attention to that Statement attached at Appendix 1.
- 3.3 However, since then the City Council has commissioned an Assessment of Student Housing Demand and Supply for Cambridge City Council (ASHDS) which was published in January 2017 and the findings of the Report were endorsed by the City Council Development Plan Scrutiny Sub-Committee on 29th January (Ref: RD/CFM/030). The City Council has also proposed further modifications to the draft Plan which were agreed by the Committee at the same meeting to be submitted for further consideration by Full Council and for submission to Inspectors as part of the Local Plan process (ref: RD/CFM/010). Both the ASHDS report and the modifications are relevant to consideration of Policy 44.
- 3.4 The AHDS is welcomed as it provides a comprehensive assessment of student supply and demand in Cambridge and valuable background evidence to inform the draft Plan. Bell Educational Services participated in the survey undertaken as part of the ASHDS. The school falls within the category of non-University institutions as defined in the ASHDS.

- 3.5 The ADHDS identifies the diverse accommodation arrangements and needs of non-education institutions and confirms that a large proportion of their students make no impact on the housing stock in the City. (Appendix 2 Paragraphs 1.16 part g and 1.34 of ADHDS).
- 3.6 As set out in paragraph 1.16 of the ADHDS of the 15,000 non-institutional students in Cambridge, 5,000 (33%) live locally in the parental home. Nearly 30% of students are housed in home stay. This being a fundamental part of their learning experience whilst attending the school. Just under 30% of students are housed in PBSA (private halls or their own accommodation) with extensive use made of this accommodation out of term time making a very efficient use of existing available accommodation.
- 3.7 Only 2% of the non-educational institution students (according to the ADHDS) are accommodated in shared housing.
- 3.8 Paragraph 5.32 of the draft Plan states ‘Language schools can place additional burdens on the housing market.’ As evidenced by the ADHDS this is clearly not the case. Indeed, non-University institutions are contributing to the economy in their extensive use of homestay arrangements. Further the use of University halls outside term-time ensures a highly efficient use of this accommodation. The wording of the paragraph does not reflect the most up to date background evidence on student housing.
- 3.9 The findings of the ADHDS have not been recognised in the modifications to policy. The Report shows that this sector makes the least impact on the private housing stock by some considerable way. The policy should not therefore make expansion dependent upon provision of additional facilities which are not needed either by the institution or to offset any impact on housing provision.
- 3.10 The final line of the Policy as proposed in the Modifications is unnecessary as this would apply to any form of residential use which could lead to the loss of family dwellinghouses.

4.0 CONCLUSION TO ISSUES 6A.1

- 4.1 The Local Plan in its current form (with modifications) 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.

4.2 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.

4.3 It is considered that the policy should be amended such that it is worded positively to recognise and support the contribution these schools and colleges make to the economy and as acknowledged elsewhere in the draft Plan. There is no reason to make reference to a requirement for residential accommodation which can be addressed through policy 46.

‘The development of existing and new specialist colleges and/or language schools will be permitted subject to meeting other planning policies. The provision of residential, social and amenity facilities in step with expansion of student places will be encouraged.’

5.0 ISSUES: 6A.2 POLICY 46: STUDENT HOUSING

5.1 There are five questions posed by the Inspector in relation to Policy 46. This Statement responds to the following:

v. Are the requirements of the final paragraph of the main policy text too onerous in respect of those educational institutions such as specialist schools where students do not necessarily attend full time courses for one academic year?

5.2 As a result of the Modifications this is now the second to last paragraph.

5.3 The City Council has commissioned an Assessment of Student Housing Demand and Supply for Cambridge City Council (ASHDS) which was published in January 2017 and the findings of the Report were endorsed by the City Council Development Plan Scrutiny Sub-Committee on 29th January (Ref: RD/CFM/030). The City Council has also proposed further modifications to the draft Plan which were agreed by the Committee at the same meeting to be submitted for further consideration by Full Council and for submission to Inspectors as part of the Local

Plan process (ref: RD/CFM/010). Both the ASHDS report and the modifications are relevant to consideration of Policy 46.

- 5.4 The ASHDS is welcomed as it provides a comprehensive assessment of student supply and demand in Cambridge and valuable background evidence to inform the draft Plan. Bell Educational Services participated in the survey undertaken as part of the ASHDS. The school falls within the category of non-university institutions as defined in the ASHDS.
- 5.5 The ASHDS identifies that all educational institutions in Cambridge have part time students. Both Universities have a proportion of part time students but the majority of part time students (75% of the total population) attend non-university institutions. The non-university educational institutions, such as Bell, offer a range of accommodation for their students who have different accommodation needs. For example, those students under 16 need a place with suitable element of care and supervision such as homestay. They also make highly effective use of existing accommodation within the City as evidenced in the ASHDS report.
- 5.6 It is assumed although not specified that the second to last paragraph in the policy only relates to the part time students at an institution rather than the institution as a whole – especially given that the Universities have part-time students and conversely an increasing number of non-university institutions have full-time courses. The ASHDS estimates 6,000 (nearly 40%) of students at non-university institutions are on academic courses of one year or more, i.e. considered to be full-time students. For example, Bell offers University foundation courses, a Masters preparation programme and A-levels all for one academic year or more. The intention is to double the number of places on the foundation courses.
- 5.7 The question arises as to what is the material difference between accommodating part-time as opposed to full time students in PBSA. There is a higher turnover of students on short courses but the criteria set out in the policy would ensure that the accommodation is acceptable in planning terms and managed appropriately.
- 5.8 Non-university institutions by the nature of their courses and age range and type of student have a diverse range of accommodation needs for their non-local students. For example, homestay which is and will remain a fundamental part of the English language learning experience for students. Purpose built student accommodation (PSBA) is one relatively

small element of range of accommodation used but it is of a type which non-university institutions will continue to use.

5.9 The policy should not treat non-university institutions any differently. Part a of the policy requires the need for the accommodation to be proven. The submission of evidence to prove need as part of a planning application would enable the non-University educational institutions to demonstrate this in the same way as the universities and allow the local planning authority to interrogate the information. A distinction between the Universities and non-university institutions is not necessary and the paragraph should be omitted.

6.0 CONCLUSION TO ISSUES 6A.2

6.1 The change in policy to include non-University institutions within the category of educational institutions is welcomed. However, there is no justification for differentiating between institutions when the material impact is no different.

6.2 The Local Plan in its current form (with modifications) is unsound at policy 46, 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.

6.3 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.

6.4 It is considered that the policy 46 should be amended to omit the second to last paragraph.

APPENDIX I

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

by **David Fenton** BA(Hons) MSc DipTP MRTPI
and **Stephen J Pratt** BA (Hons) MRTPI

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

File Ref: PINS/G3110/429/5

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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.

APPENDIX 2

Cambridge Centre
for Housing &
Planning Research

Assessment of Student Housing Demand and Supply for Cambridge City Council

Report to Cambridge City Council

January 2017

Dr Gemma Burgess

Michael Jones

Dr Charlotte Hamilton

1.15 The table below (Table 3) shows a summary of the overall student numbers by the four broad categories of accommodation type.

Baseline: 2015/16 student accommodation: numbers of students by broad category of accommodation					
	Purpose Built Student Accommodation	Shared existing housing	Existing family housing	No information	Total
University undergraduate	12125	5014	2113	716	19968
Postgraduate (1 year)	2505	946	199	372	4022
Postgraduate (2+ years)	3194	2842	123	372	6531
Total university	17824	8802	2435	1651	30712
Non-university institutions	4586	355	9694	785	15420
Total all institutions	22410	9157	12129	2436	46132

Table 3: Number of students by accommodation type in Cambridge 2015/16

1.16 Key points:

- a. **There are an estimated 46,132 students in Cambridge with a need for some form of accommodation.** Of these, 22,410 are housed in PBSA, an estimated 9,157 are in shared housing, 12,129 are in existing family housing (either in the parental home or 'homestays'), and there is no information for 2,436 students.
- b. 91% of undergraduates and 55% of postgraduates at the University of Cambridge are in University or College maintained accommodation, compared to 11% of undergraduates and 15% of postgraduates at Anglia Ruskin University.
- c. **Anglia Ruskin University is therefore currently dependent upon housing 4,285 undergraduates and 785 postgraduates in shared housing,** a total of 5,070 students, occupying at least 1,000 shared houses, assuming an average of 5 students to each shared house.
- d. The position is reversed for **the University of Cambridge, where only 729 undergraduates are housed in shared existing housing, but 3,003 postgraduates are accommodated in shared existing housing,** occupying at least 600 shared houses, again assuming an average of 5 students to each shared house.
- e. The non-university institutions have very little directly owned accommodation (750 bed spaces among 15,420 students), but make extensive use of private halls (3,836 bed spaces, or 82% of all student accommodation in private halls).
- f. **The non-university institutions also house 4,390 students in 'homestay' accommodation,** and a further 5,304 are living in the parental home (mainly Cambridge Regional College students).
- g. **The non-university institutions also make relatively little use of shared housing,** with only 355 students accommodated in shared housing, or only 2% of the total number of non-university institution students.

population in Cambridge, some of whom will desire a more 'home-like' form of accommodation.

- 1.34 There is also a diverse student population using the non-university education institutions in the city. Many of these are accommodated in homestays, in existing accommodation facilities such as the University of Cambridge Colleges over the summer, and in some PBSA. It is clear that many of these students are only resident in the city outside of university term time (e.g. students at summer schools).

Student housing that meets the needs of the different institutions

- 1.35 Policy 46 of the emerging Local Plan includes the requirement for student accommodation to meet the identified needs of an existing educational institution providing housing for students on full-time courses of an academic year or more. It expands the existing policy position, which restricts accommodation to the University of Cambridge and Anglia Ruskin University, to include other institutions. However, the current policy situation has led to problems, primarily in tying the accommodation to particular institutions. This has occurred where new student accommodation is proposed and is in theory for students at Anglia Ruskin University, for example, but is not developed in discussion with Anglia Ruskin University, does not meet the affordability needs of these students, and is subsequently occupied by single people who may not be students or may be students of other institutions.
- 1.36 The research suggests that the policy position should be **to require the proposed accommodation to be tied to a specific educational institution, or a group of institutions, through either a long-term lease or long-term nomination agreement**. The system seems to work well where the details of the development are specified in partnership with an education institution, and is further strengthened where applications are made jointly.

The location of new PBSA

- 1.37 **The report estimates that some 6,000 rooms would have to be delivered in new PBSA if existing housing stock shared by students was to be returned to the open housing market.** There is an issue about the location of any new PBSA. There is a strong case for defining the areas in which new PBSA will be acceptable, rather than allowing speculative developments to become 'pepper potted' across the city. Having defined areas for housing students, within walking or cycling distance of teaching facilities, enables efficiencies in transport and service provision. This would enable greater control over issues such as car parking.

The role of HMO in the wider housing market in the city

- 1.38 This would not necessarily mean that permission for new HMO should then be refused, because so many other groups are reliant on HMO for affordable housing in the city. It should also be borne in mind that some students will always prefer to live in shared housing rather than PBSA. Any development of PBSA is also not guaranteed to release into the open market accommodation currently occupied by students,