

**MATTER CC7B SITE R17  
MOUNT PLEASANT**

**REPRESENTOR ID 4257**

**REPRESENTATION 27796**

**HEARING STATEMENT  
ON BEHALF OF ST EDMUND'S  
COLLEGE, CAMBRIDGE**

**CAMBRIDGE CITY LOCAL PLAN  
SPECIFIC HEARINGS**

**MAY 2016**

**ShrimplinBrown**  
Planning & Development

Lion House, Oriental Road  
Woking, Surrey, GU22 8AR  
t: 01483 745 414/5  
e: [info@shrimplinbrown.com](mailto:info@shrimplinbrown.com)  
w: [www.shrimplinbrown.com](http://www.shrimplinbrown.com)

**Title:** Hearing Statement  
**Project:** Mount Pleasant House, Cambridge  
**Client:** St Edmund's College, Cambridge  
**Issue:** Final  
**Project No:** 13143

Prepared by:  Robert Shrimplin MRTPI MPhil TP

Checked by:  James Brown MRTPI DiP TP

1.1 This Hearing Statement is made on behalf of St Edmund's College, Cambridge (representor ID 4257) in relation to the Cambridge City Local Plan specific hearings regarding Matter CC7 – Policy 26 'site specific development opportunities and appendices B (proposals schedule), C (designations schedule), CC7B Site R17, Mount Pleasant (representation 27796).

### **Background**

1.2 Site R17 is identified as a potential residential site with capacity for 50 dwellings (reference R17). It is intended to contribute towards the target of 14,000 dwellings 2011-2031 set by emerging Local Plan Policy 3: 'Spatial strategy for the location of residential development'<sup>1</sup>.

1.3 The site is to the north-west of, and close to, the city centre. In the vicinity of the site to the south of Huntingdon Road are a number of other colleges. To the north and east of the site are residential areas, with a number of commercial properties concentrated around the junction of Mount Pleasant/Huntingdon Road/Castle Street.

1.4 The proposed allocation of the application site was made as a result of the previous owners of the site, the Universities Superannuation Scheme Ltd (representor ID 230), seeking to expand the potential uses for the site by submitting it to the SHLAA call for sites (November 2011). In doing so they also highlighted that the site had potential for student accommodation, demonstrating that they did not consider residential to be the only potential use of the site.

1.5 The site has since been purchased by Howard Osborne in late 2013 (after the close of the consultation on the Submission Local Plan, thus denying them the opportunity to make representations). Howard Osborne is a joint venture between Howard Group,

---

<sup>1</sup> Following further work to address the issues raised by the Local Plan Inspectors the Council have undertaken a further consultation on the Local Plan as it relates to those specific issues. That consultation has confirmed that the housing target for Cambridge City Council should remain at 14,000. It has suggested a slight increase in the target for South Cambridgeshire District Council from 19,000 to 19,500 (rounded up from 19,337).

a Cambridge based developer, and Geoffrey Osborne, a construction, civil engineering and property services business, experienced in working with many of the UK's top universities.

- 1.6 Howard Osborne are working with St Edmund's College and Darwin College to promote a student accommodation scheme on the site. The proposed development will be built by the developer, Howard Osborne, and leased to the Colleges over a period of c40 years, at the end of which the freehold of the buildings will transfer to the Colleges.<sup>2</sup>
- 1.7 The proposed student accommodation development has benefitted from extensive pre-application discussions with officers and the Design and Conservation Panel over two years including a number of meetings and submissions of information. The applicant has also held a widely publicised public exhibition to seek the views of local residents and stakeholders.

**Would the development of the site for 50 dwellings at a density of 88 dph represent the most effective use of the land?**

- 1.8 The Foreword to the emerging Local Plan explains that "the plan will deliver new homes and jobs in a sustainable way, providing affordable housing and an accessible,

---

<sup>2</sup> This particular financial arrangement is possible because of the strength of the College's covenants and the scale of the investment achieved by the development together with the historically low interest rates prevalent at this moment in time. This arrangement, which we understand is unique in Cambridge, is extremely attractive to the Colleges since they do not have to raise the money up front for construction; the lease terms are fixed; and at the end of the process they own the land and buildings. This arrangement is particularly beneficial to St Edmund's and Darwin as they are "new" colleges, founded in 1896 and 1964 respectively, and, as a result, they are much less financially strong than other colleges. St Edmund's has the smallest endowment in collegiate Cambridge. The Colleges could therefore not deliver a scheme of this scale on their own.

compact city form where people can have sustainable choices about how they access work, study, leisure and other services” (p1, emphasis added).

- 1.9 The emerging Local Plan’s “Vision” for Cambridge is “of a compact, dynamic city, located within the high quality landscape setting of the Cambridge Green Belt” (paragraph 2.3, emphasis added).
- 1.10 The supporting text to Policy 1 ‘The presumption in favour of sustainable development’ explains that “For Cambridge, sustainable means supporting and enhancing an efficient, compact city form that is attractive, highly accessible and meets its needs now and in future: a city where the quality of life and place has underpinned economic success” (paragraph 2.14, emphasis added).
- 1.11 The Local Plan explains that the “compact city strategy” will be achieved “...through focusing new development in accessible locations, reusing previously developed land and completing the delivery of planned new urban neighbourhoods, and small Green Belt releases where exceptional circumstances can be argued” (paragraph 2.5, emphasis added).
- 1.12 The importance of reusing previously developed land is consistent with the NPPF. The NPPF’s 12 “core land-use planning principles should underpin both plan-making and decision-taking” include to “encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value” (paragraph 17).
- 1.13 Elsewhere the NPPF re-emphasises that, in the context of “Conserving and enhancing the natural environment”, “Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value” (paragraph 111).
- 1.14 Creating a compact, efficient and sustainable city is therefore of central importance to the success of the emerging Local Plan and a key element of this, which is consistent with the NPPF’s core land use planning principles, is making the best use of scarce brownfield land.

**Given the proximity of the site to a number of Cambridge Colleges should the residential nature of the allocation be changed from dwellings to student accommodation? Would this approach represent more effective use of the land?**

**Housing**

1.15 The first requirement of the NPPF's chapter on "delivering a wide choice of high quality homes" is that local planning authorities should (paragraph 47):

- Meet "...the full, objectively assessed needs for market and affordable housing in the housing market area...";
- identify a supply of specific "deliverable" sites sufficient to provide five years' worth of housing; and
- identify a supply of specific, "developable" sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15.

1.16 The Council's Housing Land Supply Update (November 2015) and accompanying Housing Trajectory (Appendix 4), repeated in the Annual Monitoring Report 2014/15 (December 2015), provides the most up to date information on housing. The application site is identified as coming forward in 2021/22. It therefore does not form part as part of the Council's five year supply of "deliverable" sites but is instead part of the supply of "developable" sites.

**Application site's contribution to meeting the full, objectively assessed needs for housing**

1.17 Cambridge City Council's objectively assessed needs for housing are 14,000 units to 2031. The loss of 50 potential residential units is equivalent to 0.36%. The loss of 50 units will therefore not have a material impact on the achievement of this target.

1.18 The objectively assessed needs for housing for Cambridge and South Cambridgeshire are 33,500 dwellings. The loss of 50 units would have even less impact on the achievement of this target.

1.19 The Inspector considering the Mill Lane appeal (which was allocated for housing in the adopted Local Plan, unlike the subject site which is simply a proposed allocation) similarly concluded that the loss of 30 potential residential units on that site would not have a material impact on the achievement of the Council’s housing target:

“There is currently an expectation that the site would provide 30 houses in 2022-2023, which would be lost if it was wholly developed for student accommodation. It is argued by the appellants that this is not a significant contribution. Whilst the scale of delivery is not the sole determining factor in assessing the importance of the contribution, there being a need for a variety of type and location of sites, it is accepted in this decision that the anticipated yield would remain a small proportion of the requirement for 14,000 dwellings by 2031, without strategic implications for the overall level of delivery and within the forecast surplus.” (paragraph 10).

1.20 It is important to remember that in evidence submitted in advance of the Local Plan EiP, in Hearing Sessions during the Examination, in the most up to date Housing Land Supply Update (November 2015) and in the Annual Monitoring Report 2014/15 (December 2015) the Council have consistently made clear that they can meet, and even exceed, their housing target.

1.21 Cambridge City Council’s ‘Topic Paper – Housing Land Supply’ (March 2014) (Local Plan Inquiry ref RD/Top/070), published before the commencement of the EiP, stated the Council’s confidence about the future rate of house building in Cambridge:

“There remain a number of reasons why the rate of housing completions may remain high during the next plan period:

- The housing market in Cambridge remains strong, with a continued demand and high prices achieved;
- High densities have continually been achieved in Cambridge;

- Intensification of existing residential plots and redevelopment of existing residential sites has been relatively consistent” (paragraph 3.11).

1.22 The Topic Paper also argued that further housing could come forward from windfall sites via the changes to permitted development rights (paragraph 3.13).

1.23 The Councils’ Joint Matter Statement regarding Matter 8 Housing Land Supply and Delivery (January 2015), based on the Annual Monitoring Report 2013/14 (December 2014), concluded that in relation to Cambridge:

“The Council therefore considers that they have a robust, realistic and, in some instances, cautious expectation of delivery for existing outstanding planning permissions and allocations and also for the new proposed allocations” (paragraph 18).

1.24 The more recent Housing Land Supply Update (November 2015) provides an even more positive picture. It explains that proposals for Cambridge East, at Land North of Cherry Hinton, have advanced since the Council’s previous Housing Trajectory in their Annual Monitoring Report (December 2014) and now an additional 1,200 dwellings can be delivered, 780 in Cambridge City and 420 in South Cambridgeshire (Modifications PM/SC/3/A to Policy SS/3 Cambridge East). This development “significantly improves housing land supply in Cambridge to 14,682 dwellings” (Executive Summary) and is “5% (682 dwellings) more than the housing requirement of 14,000 dwellings and allows flexibility to respond to changing conditions as required in the NPPF” (paragraph 3.9). The Joint Housing Trajectory shows that 35,773 dwellings can be delivered, which is 7% (2,273 dwellings) more than the revised requirement of 33,500.

Application site’s contribution to meeting the five year supply of deliverable sites

1.25 As explained above, the subject site does not form part as part of the Council’s five year supply of “deliverable” sites.



- 1.26 The Housing Land Supply Update confirms that in terms of Cambridge City Council's five year housing supply the Council can achieve 8.4/8.5 years with a 5% buffer and 7.4/7.5 years with a 20% buffer, depending on whether the Liverpool or more onerous Sedgefield method is used for calculation (paragraph 4.9)<sup>3</sup>.
- 1.27 In terms of the joint housing supply the two Councils can achieve 5.9/6.4 years with a 5% buffer and 5.2/5.6 years with a 20% buffer (paragraph 4.9). In the Housing Land Supply Update South Cambridgeshire District Council argue that many sites could come forward sooner than expected, thus further improving the five year housing land supply (paragraphs 3.12-3.16).
- 1.28 Our own analysis of the Housing Land Supply Update's Housing Trajectory (see Appendix A) demonstrates Cambridge City Council substantially exceed their five year housing land supply target of deliverable sites (by 78% or 2,719 dwellings), even allowing for a 5% buffer (69%, 2,544 dwellings) or a 20% buffer (48%, 2,019 dwellings). When Cambridge City Council and South Cambridgeshire District Council are taken together they also exceed the target in all scenarios.

Application site's contribution to meeting the 6-10 year supply of developable sites

- 1.29 The NPPF explains that to be considered developable "sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged" (paragraph 47, footnote 12).
- 1.30 The owners of the site have made clear that the site is not available for development as residential. The new owners of the site have made this clear in discussions with the Council and in their formal response to the Councils Annual Monitoring Reports over the 2.5 year period since they purchased the site. It is demonstrated by the

---

<sup>3</sup> The Council's view that the most appropriate method for calculation is the Liverpool method, which delivers a greater housing land supply, because it has been used by Cambridge for its Development Plan Documents since the requirement to demonstrate a 5 year supply was first introduced (see Housing Topic Paper paragraph 3.16). They also consider that the 5% buffer is appropriate (see Housing Topic Paper paragraph 3.19).

time and effort they have put in to assembling a planning application for a non residential use.

- 1.31 Our analysis shows (see Appendix A) that beyond the five year period, at the point at which the application site is expected to come forward in 2021/22, Cambridge City Council continue to substantially exceed their target (by 63% or 3,086 dwellings), even allowing for a 5% buffer (55%, 2,841 dwellings) or a 20% buffer (36%, 2,106 dwellings). When Cambridge City Council and South Cambridgeshire District Council are taken together at this point in time they also exceed the target in all scenarios.
- 1.32 Cambridge City Council also substantially exceed their 6-10 year target for a supply of developable sites (by 43% or 2,690 dwellings at year 10), even allowing for a 5% buffer (36%, 2,610 dwellings) or a 20% buffer (19%, 1,560 dwellings). When Cambridge City Council and South Cambridgeshire District Council are taken together they also exceed the target in all scenarios.

### Conclusion

- 1.33 The subject site's contribution to meeting Cambridge City Council's full, objectively assessed needs for housing is 0.36%. Its loss will not have a material impact on the achievement of this target. It is also important to note that the Council have consistently made clear that they can meet, and even exceed, their housing target.
- 1.34 The subject site does not form part as part of the Council's five year supply of "deliverable" sites. The Council can meet, and exceed, this target.
- 1.35 The owners of the site have consistently made clear that the site is not available for development as residential. The site therefore does not meet the requirements of the NPPF that to be considered developable "sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged" (footnote 12).
- 1.36 In accordance with NPPF paragraph 182, the proposed allocation for housing fails the test of soundness as it is not "justified" since the evidence demonstrates that the site

will not come forward for housing; is not “effective” since the Plan’s proposed allocation of this site for housing is not deliverable; is not “consistent with national policy” as it does not meet the definition of being “developable”. It is therefore necessary to delete this proposed allocation in order to make the Local Plan sound.

**Student accommodation**

1.37 In the vicinity of the site to the south of Huntingdon Road are a number of other colleges. St Edmund’s College immediately abuts the site to the south, Murray Edwards College immediately abuts the site to the west, nearby are Fitzwilliam College, Churchill, Lucy Cavendish and Magdalene Colleges.

1.38 There are a number of advantages of locating students on site. Having students on site enables students to become part of the college community, as well as allowing them to access communal facilities such as the dining hall, common room, laundry, the library, outside space etc. Importantly, it also enables the colleges to provide students with more effective tutorial support.

1.39 The Cambridge Colleges' Bursars' Building and Planning Sub Committee (BBPSC) also firmly supports housing students close to their college.

“...where possible it is desirable to house undergraduate students, in particular, close to pastoral and communal facilities in their Colleges” (February 2012).<sup>4</sup>

1.40 As well as delivering the benefits described above, the proposal would avoid the harm caused by students having to find private rental accommodation. Private rental accommodation is generally more expensive than college accommodation and is often not of the same standard as that provided by the colleges. Students can have difficulty in identifying affordable, conveniently located properties and the contract management and maintenance support from some landlords can be problematic, with colleges often having to become involved to assist. The lack of

---

<sup>4</sup> This note forms part of the evidence base for the Local Plan (document ref RD/H/400) and so has the support of the Council.

affordable, good quality accommodation means that some students are forced to rent premises as far away as Ely or Newmarket, thus creating unsustainable travel patterns that put pressure on infrastructure and a significant financial and time burden on students.

- 1.41 The Council, NPPG and the Mill Road Appeal decision all accept that the provision of new student accommodation relieves pressure on private sector housing, thus in effect releasing more housing.
- 1.42 Table 2.1 of the emerging Local Plan provides a summary of needs that the Local Plan must meet, in addition to homes and jobs, during the plan period to 2031 and this includes 3,016 (net) rooms to accommodate the growth in undergraduates and postgraduates<sup>5</sup>. This target is informed by an assessment of student housing needs undertaken by BBPSC but is also subject to objections from the BBPSC (representation ID: 28046)<sup>6</sup>.
- 1.43 The Council are struggling to meet this target. The Local Plan only identifies a supply of 1,670 rooms<sup>7</sup>. Of these, 320 (19%) have been identified for other uses as well as student accommodation<sup>8</sup>. The emerging Local Plan does suggest that two areas of

---

<sup>5</sup> The NPPG makes clear that “Local planning authorities should plan for sufficient student accommodation whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus. Student housing provided by private landlords is often a lower-cost form of housing. Encouraging more dedicated student accommodation may provide low cost housing that takes pressure off the private rented sector and increases the overall housing stock. Plan makers are encouraged to consider options which would support both the needs of the student population as well as local residents before imposing caps or restrictions on students living outside of university-provided accommodation. Plan makers should engage with universities and other higher educational establishments to better understand their student accommodation requirements”.

<sup>6</sup> The BBPSC’s objections to the Submission Local Plan make explicitly clear that the figure of 3,016 net additional rooms is in addition to an assumed rate of windfall development and the 2,000 rooms being provided at North West Cambridge.

<sup>7</sup> 1,250 rooms within Station Area West (Policy 20), 200 within Old Press/Mill Lane Opportunity Area (Policy 25), 120 at Grange Farm off Wilberforce Road (site U3), 100 at Bell School within the Southern Fringe Area of Major Change (site R42d within Policy 17).

<sup>8</sup> 200 within the Old Press/Mill Lane Opportunity Area (Policy 25) which the Local Plan says may come forward for residential instead. It is, in any event, a long term proposal (the site was identified in the adopted Local Plan (2006) and a SPD was adopted (January 2010), but a detailed masterplan still needs to be produced and consulted upon) which is reliant upon the relocation of a number of University premises. The fact that the site “lies in the historic core of the city” and “contains some

Major Change have potential for student accommodation, but it makes clear that their potential will be limited<sup>9</sup>. The Council's ability to meet the 3,016 target is therefore very much in doubt.

- 1.44 It is also relevant to note that the delivery of the NW Cambridge site is still some way off<sup>10</sup>.
- 1.45 It is important to note that the target of 3,016 rooms is net, i.e. relocating existing students who currently have to find accommodation off site in the private sector would not eat into the 3,016 target.

### Conclusion

- 1.46 The site is well located for student accommodation. There are a number of advantages of locating students on site and a number of disadvantages of locating students off site. New student accommodation also relieves pressure on private sector housing, thus in effect releasing more housing. It is also relevant that the Council are struggling to meet their target for student accommodation. Notwithstanding this, allocating the site for student housing is not necessary to make the Plan sound.

---

of the few remaining vestiges of the city's commercial past" (emerging Local Plan, paragraph 3.101) further complicates the site's delivery.

120 at Grange Farm rolls forward the allocation from the adopted Local Plan (site 7.09) which in fact identified the site for student accommodation or affordable/key worker housing for the University. Given the length of time that the site has been identified but has not forward there is no guarantee that it will come forward any time soon.

<sup>9</sup> The Fitzroy/Burleigh Street/Graton Area of Major Change (Policy 11) "is the primary focus for providing additional comparison retail in the City Centre", with residential and student accommodation on the upper floors. The delivery of the site will take time given the number of ownerships involved and the necessity to produce a masterplan to guide development.

The West Cambridge Area of Major Change (Policy 18) is focused on educational and research uses, in line with existing consents, although the Local Plan indicates that it could include some student accommodation.

<sup>10</sup> Following adoption of the NW Cambridge AAP in October 2009 and granting of the outline planning permission February 2013 (11/1114/OUT), amended in November 2013 (13/1402/S73), a number of reserved matters applications have now been submitted. Many of these are for infrastructure, but they include permission granted on 18 December 2013 for 325 student rooms (ref 13/1400/REM).

---



## Appendix A

## Housing trajectory summary

	Provision		Target		Performance	
	Camb	Camb + S Camb	Camb	Camb + S Camb	Camb	Camb + S Camb
5 year * <sup>v</sup> 2015/16 2019/20	6,219	10,688	3,500	8,375	+78% (+2,719)	+28% (+2,313)
MPH at year 7 * <sup>v</sup> * <sup>x</sup> 2022/21	7,986	15,027	4,900	11,725	+63% (+3,086)	+28% (+3,302)
10 year * <sup>v</sup> * <sup>x</sup> 2020/21 2024/25	9,960	21,101	7,000	16,750	+43% (+2,690)	+26% (+4,351)

## Housing trajectory summary + 5% buffer

	Provision		Target		Performance	
	Camb	Camb + S Camb	Camb	Camb + S Camb	Camb	Camb + S Camb
5 year * <sup>v</sup> 2015/16 2019/20	6,219	10,688	3,675	8,794	+69% (+2,544)	+22% (+1,894)
MPH at year 7 * <sup>v</sup> * <sup>x</sup> 2022/21	7,986	15,027	5,145	12,311	+55% (+2,841)	+22% (+2,716)
10 year * <sup>v</sup> * <sup>x</sup> 2020/21 2024/25	9,960	21,101	7,350	17,588	+36% (+2,610)	+20% (+3,513)

## Housing trajectory summary + 20% buffer

	Provision		Target		Performance	
	Camb	Camb + S Camb	Camb	Camb + S Camb	Camb	Camb + S Camb
5 year * <sup>v</sup> 2015/16 2019/20	6,219	10,688	4,200	10,050	+48% (+2,019)	+6% (+638)
MPH at year 7 * <sup>v</sup> * <sup>x</sup> 2022/21	7,986	15,027	5,880	14,070	+36% (+2,106)	+7% (+957)
10 year * <sup>v</sup> * <sup>x</sup> 2020/21 2024/25	9,960	21,101	8,400	20,100	+19% (+1,560)	+5% (+1,001)

Camb: target of 700 dwellings/annum (total target of 14,000)

S Camb: target of 975 dwellings/annum (total target of 19,500)

\* includes Camb surplus of 60 units from 2011/12 to 2014/15.



~ includes S Camb undersupply of 1,165 from 2011/12 to 2014/15.

\* excludes 50 units for MPH.