

PLANNING COMMITTEE**Date: 4th March 2015**

Application Number	14/1496/FUL	Agenda Item	
Date Received	13th October 2014	Officer	Mr Toby Williams
Target Date	12th January 2015		
Ward	Romsey		
Site	Land At 315 - 349 Mill Road Cambridge Cambridgeshire		
Proposal	Student housing development consisting of 270 rooms, communal areas, bicycle parking, refuse store, plant room, office, new substation, infrastructure and access.		
Applicant	Mr c/o Agent United Kingdom		

SUMMARY	<p>The development is contrary to the adopted and emerging Development Plans for the following reasons:</p> <ul style="list-style-type: none">-It would fail to provide any housing to meet identified housing need and is contrary to policies 5/1, 7/9 and site allocation 7.12 in the Proposals Schedule of the Cambridge Local Plan 2006.-The emerging Local Plan is at an advanced stage of preparation and the proposal would be contrary to it and premature, prejudicing and cumulatively reducing the Council's ability to meet housing need over the lifetime of the Cambridge Local Plan 2014: Proposed Submission.-Not enough open space is provided on site, there is a shortfall in public informal open space provision locally and student use of such spaces would unreasonably intensify their use. The proposal is contrary to Cambridge Local Plan (2006) policy 3/8 and the, 'Open Space and Recreation Strategy'
----------------	--

	<p>(2011).</p> <p>-The proposal does not include a public art delivery plan and the proposal is contrary to Cambridge City Council Public Art SPD (2010) and policies 3/4 and 3/7(L) of the Cambridge Local Plan (2006).</p> <p>-The proposal would fail to secure a S106 planning obligation to secure mitigation in terms of indoor and outdoor formal open space, transport measures, occupancy restrictions and monitoring.</p>
RECOMMENDATION	REFUSAL

1.0 SITE DESCRIPTION/AREA CONTEXT

- 1.1 The site is located within Romsey Town on the northern side of Mill Road. It is rectangular in shape, measuring 60m on its frontage to Mill Road and is 100m deep, occupying an area of 0.60ha. It is close to local shops and services within the local centre and is near to a number of bus stops.
- 1.2 The site is currently vacant having been cleared of all buildings in 2009. Painted hoarding panels have been erected around its frontage onto Mill Road. Most recently the site was used as a car dealership/workshop by the Priory Motors Group but is now mainly hard-standing.
- 1.3 To the north and east is Brookfields Hospital. Immediately to the north is a line of mainly poplar trees of 20m height and vegetation adjacent to the Arthur Rank Hospice and late 20th century one and two storey healthcare buildings. To the east are a series of Victorian hospital buildings dating from the 1880's of 1-3 storeys in height. A strong line of 8 Lime trees and a Corsican Pine of 22-25m in height extend close to the eastern boundary and are highly visible from Mill Road. The two single storey pitched roof buildings setback from the road on the Brookfields site and the principle 2.5-3 storey gault brick building facing Mill Road (Brookfield House) are Buildings of Local Interest (BLIs).

- 1.4 To the south and opposite the front of the site is two-storey residential terraced housing typical of this part of Mill Road.
- 1.5 To the west is the site of the proposed mosque which has the benefit of planning permission under reference 11/1348/FUL issued in May 2013 but is as yet unimplemented expiring in May 2016. The mosque site is also currently vacant having being cleared of buildings.
- 1.6 The site lies just outside the extended Mill Road Conservation Area, which wraps around its southern and eastern boundaries. Nos. 299-307 Mill Road to the east, the terrace houses opposite and the historic buildings on the Brookfields Hospital site all lie within the Conservation Area boundary. Brookfield House is identified as a 'Focal Building' in the Mill Road Conservation Area Appraisal.
- 1.7 The site falls outside the controlled parking zone.
- 1.8 The site is listed as 7.12 the 'Former Magnet Warehouse, Mill Road' site in the Proposals Schedule of the Cambridge Local Plan (2006) with a total area of 1.10ha. It is allocated together with the mosque site for 'mixed use housing development and community facilities'. A rider to the allocation suggests that development could include a student hostel for Anglia Ruskin University on part of the site in lieu of affordable housing.
- 1.9 Relevant guidance and appraisal documents include the Mill Road Area Conservation Area Appraisal 2011 and the Mill Road Development Brief (Robert Sayle Warehouse and Co-Op site) 2007 (The Brief). The Brief was subject to extensive public consultation and provides an interpretation of the design policies contained within the Local Plan (2006) to help guide an appropriate form of development on the site.
- 1.10 The site forms part of proposal site R21 (Appendix B, of the Proposals Schedule) for dwellings and employment floorspace and is proposed to be included within the Mill Road Opportunity Area under policy 23, as part of the Draft Cambridge Local Plan 2014. Site R21 includes 315-349 Mill Road and the wider Brookfields Hospital site but not the Mosque site. The proposals schedule indicates the wider site at 2.78ha could accommodate 128 dwellings at 46dph and up to 1ha of employment floorspace.

2.0 THE PROPOSAL

2.1 The application seeks full planning permission for a student housing development. The plans have been revised and the number of student rooms proposed has reduced from 301 to 270. The proposal includes communal areas, bicycle parking, refuse stores, plant room, office, a new substation, infrastructure and access. The scheme would be built for students of Anglia Ruskin University (ARU) and the application is accompanied by a letter from ARU which provides their support for the proposal. The scheme would comprise four student Blocks providing three different types of student accommodation as set out in the table below:

Block	Studio Units (Bedroom, en-suite / kitchen)	Townhouse (Individual bedrooms & shared kitchen, bathroom and lounges)	En-suite Cluster (Rooms with en- suites & shared kitchen, dining, & conservatory spaces)
A	30		
B		71	
C		77	
D	18		74
Total (270)	48 (17.8%)	148 (54.8%)	74 (27.4%)

2.2 The application is accompanied by the following supporting information:

- Design and Access Statement
- Planning Statement
- Statement of Community Engagement
- Air Quality Assessment
- Noise Impact Assessment
- Drainage Assessment
- Transport Assessment and Travel Plan
- Energy and Sustainability Report
- Landscape Design
- Arboricultural Implications Assessment
- Ecological Assessment
- Archaeology Report

- Sunlight and Daylight Assessment
- Operational Statement
- Fire Strategy
- Heads of Terms: Planning Obligations
- Ground Investigation Report

2.3 As indicated above, the application has been amended since the original submission. The amendments, which have been re-consulted upon, include:

- Revised plans for the design, scale and siting of the student Blocks (all the originally submitted plans have been superseded)
- New marketing information for the site
- Updated Transport Assessment and Travel Plan
- Revised landscaping plans
- Revised Daylight and Sunlight Report
- Updated Energy Report
- Revised application form to account for the change in student room numbers

2.4 The development would comprise four separate Blocks of student accommodation; a southern Block facing onto Mill Road (Block A), two parallel Blocks running down the western (Block B) and eastern (Block C) sides of the site and a northern Block to the rear of the site (Block D).

2.5 To the east of Block A would be the vehicular access point from Mill Road, which turns into the site and would run along the rear side of the Block. The access arrangement is gated. To the west of Block A would be a small landscaped square, vehicular egress onto Mill Road and two disabled car parking spaces. All Blocks would face onto a central landscaped space accessible only to students and visitors. The proposal does not include any car parking for students apart from the disabled car parking spaces indicated above.

2.6 Block A (Studio Wing) incorporates the main pedestrian entrance for students from Mill Road into a lobby and ground floor student lounge area which in turn has access into the central landscaped space through the back of the building. Block A would also contain the laundry, an integral refuse area and substation. On its eastern side would be a ramped entrance point to an underground cycle store for 192 cycles on two tiered racks. The basement would also

be accessible via a 2m deep lift suitable for cycles which would serve every floor of the development. The basement would also contain space for plant and additional refuse space accessible via a platform lift. The 1st and 2nd floors would contain 30 studio rooms. Block A would be a mixture of 2 and 3 storeys high (pitched roofed) and occupy a broadly rectangular footprint.

- 2.7 Blocks B and C (Townhouses) would be accessed from the central landscaped space. Both Blocks are subdivided vertically into a series of 7 townhouse style student residences that would have shared bathroom and communal lounge and kitchen facilities. To the rear of both Blocks would be a series of small rear garden spaces extending to the edges of the site. Each townhouse would contain a cluster of between 8-12 student rooms. Blocks B and C together deliver 148 student rooms. The Blocks are mostly 4 storeys high (flat roofed) and occupy long rectangular footprints. The uppermost floors have been set back from the edges, particularly the roof accommodation of Block B facing the proposed Mosque. The townhouses closest to Block A on both Blocks B and C do not have a 3rd floor.
- 2.8 Block D (En-suite/Studio Wing) has two separate entrance points from the corners of the central landscaped space into two vertical circulation cores. Accommodation within the Block is divided horizontally into 74 single aspect en-suite student rooms on the ground, 1st and 2nd floors in typical clusters of between 5 and 7 rooms, each with their own communal lounge and kitchen areas. The 3rd floor provides 18 studio apartments. The Blocks have lift cores from the ground to the upper floors. Block D thus provides a total of 92 student rooms, would be 4 storeys high, flat roofed with the uppermost storey set back at its eastern and western ends. Its footprint is double canted, following a set back from the tree canopy line adjacent to the northern boundary.
- 2.9 All Blocks would be mainly clad in a buff brick. There would be limited timber panelling for Blocks B and C, and the use of timber rainscreen panelling and zinc rainscreen cladding for the upper floors of Blocks B, C and D. The sloped roofs of Block A would be slate. Windows would be aluminium double glazed units of various sizes set within reconstituted stone reveals with stone banding across the facades.

3.0 SITE HISTORY

3.1 The site has a long and varied history. I have listed the four of the most relevant applications to the site, the first of which highlights its former usage as a car dealership. The last two applications highlight that there has been interest in developing the site for residential purposes within the lifetime of the Cambridge Local Plan 2006.

Reference	Description	Outcome
11/1100/FUL	Change of use of established car showroom/sales (Use Class sui generis) to car valeting (Use Class B1) and hand car wash (sui generis) mixed use and siting of portacabin for staff facilities/shelter, together with removal of internal fence and tidying up of site	A/C 14/11/2011
11/0410/FUL	Change of use of established car showroom/sales (Use Class sui generis) to car valeting (Use Class B1) and hand car wash (sui generis) mixed use and siting of portacabin for staff facilities/shelter, together with removal of internal fence and tidying up of site.	Ref 12/04/2011
08/0663/FUL	Redevelopment of site for residential use comprising fifteen one-bedroom flats, ten two-bedroom flats, four three-bedroom town houses and six four-bedroom town houses and 51-bed student accommodation with associated car and cycle parking	W/D 24/11/2008
07/0990/FUL	Redevelopment for residential use and student housing (12 x 3 bedroom town houses, 19 x 1 bedroom flats, 24 x 2 bedroom flats and 72 bedroom student accommodation)	W/D 1/11/2007

11/1348/FUL	Adjacent Mosque Site: Demolition of disused storage building, relocation of electricity sub-station and erection of building for place of worship (mosque) and community facilities (all D1 Use Class), cafe (A3 Use Class), 2 social rented dwellings and associated development.	A/C 3/05/2013
-------------	---	------------------

4.0 PUBLICITY

4.1	Advertisement:	Yes
	Adjoining Owners:	Yes
	Site Notice Displayed:	Yes
	Developer Led Public Consultation Events At Mill Road Baptist Church.	27.02.14 & 01.03.14

5.0 POLICY

5.1 See Appendix 1 for full details of Central Government Guidance, Cambridge Local Plan 2006 policies, Supplementary Planning Documents and Material Considerations.

5.2 Relevant Development Plan policies

PLAN		POLICY NUMBER
Cambridge Plan 2006	Local	3/1, 3/4, 3/6, 3/7, 3/8, 3/11, 3/12, 3/13 4/3, 4/4, 4/11, 4/12, 4/13, 4/14, 4/15 5/1, 5/5 7/9, 7/10 8/2, 8/3, 8/4, 8/5, 8/6, 8/9, 8/10, 8/16, 10/1.

5.3 Relevant Central Government Guidance, Supplementary Planning Documents and Material Considerations

<p>Central Government Guidance</p>	<p>National Planning Policy Framework March 2012</p> <p>National Planning Policy Framework – Planning Practice Guidance March 2014</p> <p>Circular 11/95</p>
<p>Supplementary Planning Guidance</p>	<p>Sustainable Design and Construction (May 2007)</p> <p>Planning Obligation Strategy (March 2010)</p> <p>Public Art (January 2010)</p>
	<p><u>City Wide Guidance</u></p> <p>Cambridge City Council (2011) - Open Space and Recreation Strategy</p> <p>Cambridge City Council - Guidance for the application of Policy 3/13 (Tall Buildings and the Skyline) of the Cambridge Local Plan (2006) (2012)</p> <p>Cycle Parking Guide for New Residential Developments (2010)</p> <p>Buildings of Local Interest (2005)</p>
	<p><u>Area Guidelines</u></p> <p>Cambridge City Council (2002)–Eastern Corridor Area Transport Plan:</p> <p>Mill Road Area Conservation Area Appraisal (2011)</p> <p>Mill Road Development Brief (Robert Sayle Warehouse and Co-Op site) (2007)</p>

--	--

5.4 Status of Proposed Submission – Cambridge Local Plan

Planning applications should be determined in accordance with policies in the adopted Development Plan and advice set out in the NPPF. However, after consideration of adopted plans and the NPPF, policies in emerging plans can also be given some weight when determining applications. For Cambridge, therefore, the emerging revised Local Plan as published for consultation on 19 July 2013 can be taken into account, especially those policies where there are no or limited objections to it. However it is likely, in the vast majority of instances, that the adopted development plan and the NPPF will have considerably more weight than emerging policies in the revised Local Plan.

For the application considered in this report, the following policies in the emerging Local Plan are of relevance: 1, 3, 23 and 46.

6.0 CONSULTATIONS

Cambridgeshire County Council (Highways Development Management)

6.1 *Application as Submitted*

Holding Objection

Existing Conditions

The historic aerial photography contained on Google Earth confirms that the former facility was used with in excess of 100 vehicles on-site.

On-street parking

The County Council are concerned how Proctorial Control will operate for a Block of flats if occupied by students from several different education establishments, although this is an issue for the City Council as the planning authority to address.

Details should be provided as to the number of staff expected on site on a daily basis in order to assess the potential additional parking off site.

Non-car Travel

Non-car travel on street isochrones have been provided with the application show reasonable walking distances to key facilities. The isochrones are not clearly defined and therefore the County Council recommend these be updated. Signal crossing facility locations have been provided on figure 4, although the plan provided is not very clear and therefore should be updated.

The County Council require that the applicant provides a zebra crossing outside the development to aid pedestrians and cyclist on foot to cross Mill Road.

In addition it has not been recognised that students may also travel to Sainsbury's located on Barnwell Drive/ Coldham's Lane roundabout and therefore the County Council require a contribution towards the improvement of the cut through from Seymour Street into Wycliffe Road to facilitate these journeys.

An audit of pedestrian and cycle facilities to the Anglia Ruskin University, Cambridge University and other key facilities should be provided.

The Scoping Note identifies that the majority of stops comprise shelters although no suggestion of improvements have been provided, and therefore further information is required identifying where improvements and upgrades could be made to local stops.

Accident Data

Paragraph 2.4.4 identifies that there is a strong trend in the number of cyclist-related accidents on the roads in the vicinity of the site, although it should be noted that this trend continues along Mill Road towards the city centre on routes towards Anglia Ruskin and Cambridge University which is of particular concern to the County Council.

Any potential improvements that could be made to Mill road should be suggested by the applicant.

Person Trip Generation

Former use

The filtering applied to the TRICs sites appears reasonable and acceptable for the purpose of this assessment.

Proposed use

The daily person trips for the development are acceptable to the County Council as it comparable to the 4 trips per student room contained in the ECATP. However, the mode split applied to the person trips is not acceptable. Further consideration should be given whether the pedestrian and cycle facilities to the City Centre and Universities are sufficient to accommodate the additional trips.

Net Change

The County Council require AM, PM and 24 hour person trips by mode to be provided.

Highway Impact

Site Access Arrangements

Paragraph 5.1.2 mistakenly identifies the Brookfields Hospital access as the conflicting junction of concern to the County Council as part of the scoping discussions, instead of the junctions opposite the site. The concern is with the location of the access in relation to Montreal Road. This is marked as an egress on the proposals, however this will intensify conflict upon the public highway at this location.

Given the flexibility of movement of cyclists, it is likely to be used as an entry for cyclists and pedestrians.

Parking

The Highway Authority are concerned that this appears to be speculative development, as the "car-free" nature would normally

rely upon Proctorial Control. This is an issue for the City Council to consider as the Planning Authority and potential impact this may have on surrounding roads.

Disabled Car Parking

If the development is to be marketed for disabled persons, one parking space is insufficient disabled parking provision. As a group these occupants are more reliant upon the private car than many other students and this is reflected within the arrangements for administering proctorial control, furthermore disabled visitors would be expected to visit the site

Cycle Parking

The cycle parking provision on-site should be informed by the Cambridge Residential Cycle Parking Guide (CRCPG) and comply with standards which it currently does not.

The ramp needs to be of a shallow gradient with appropriately dimensioned channels on both sides if it is to be usable and convenient

In addition the doors on the side access to the bike store should be widened and the design informed by the swept paths shown in the CRCPG, the design should also allow ease of access for more varied pedal vehicles. Internal dimensions for the lift should be provided.

The visitor cycle parking numbers should be revisited by the applicant, the spaces provided should be a mix of covered and uncovered spaces.

Off Site Impact

The County Council are concerned about the cycling and walking connectivity of the site with the major destinations that this site will connect with.

Most trips to Colleges or ARU will use Mill road for at least part of their journey.

The length of Mill Road is constituted of two identified accident cluster sites, interfacing at the railway bridge.

No mitigation for the increased pedestrian and cycling usage, and therefore increase in risk, has been proposed. The County Council require that the Travel Plan be updated to provide measures to minimise the potential safety issues associated with students travelling to and from the site, as detailed in other sections of this report.

The Transport Statement should provide measures to alleviate any impacts associated with the development on the network, including the addition of a zebra crossing outside the development on Mill Road and a contribution towards a cut through between Seymour Street and Watkins Street.

Eastern Corridor Area Transport Plan

The site falls within the area for which a financial contribution of £216,405 towards the Eastern Corridor Area Transport Plan are sought.

Highway Safety

This section will need to be revisited by the applicant once a suitable mode split has been applied to the development trips.

Given the safety concerns associated with Mill Road the County Council require that the Travel Plan include a commitment to encourage students to cycle and provide training courses to provide an induction of how to cycle safely and legally in Cambridge. In addition students should be provided with specific cycle routes to colleges to ensure that students are fully aware of the safe routes.

Travel Plan

The County Council require that the Travel Plan include a commitment to encourage students to cycle and provide training courses to provide an induction of how to cycle safely in Cambridge. In addition students should be provided with specific

cycle routes to colleges to ensure that students are fully aware of the safe routes.

Conclusion

Having reviewed the Transport Assessment submitted in support of the application the County Council require further information to be provided by the applicant in order to comment fully on the application. Therefore a holding objection is recommended at this stage.

6.2 *Application as amended*

No Objection

A technical note has been submitted in response to our comments dated 5th November 2015.

Revised mode split and person trip generation

The applicant applies the Anglia Ruskin mode split which has been adjusted to reflect the travel options available at Mill Road.

The County Council had asked for mode split evidence of other student residences to provide origin data. The mode split data presented for Anglia Ruskin is destination data, although this provides a potentially helpful indication of student movements. Whilst we do not necessarily accept this, we do not consider on this occasion that this will have a significant impact on the required mitigation measures.

The analysis suggests a level of car trip generation although it is anticipated that a car free would not be expected to generate this level of movement. However, it is considered that it would not significantly change the conclusions and would be expected to have little impact.

Access by non-car modes and potential off-site improvements

The pedestrian and cycle isochrones have been updated to make them clear which is not acceptable to the County Council.

The ECATP contribution has been recalculated based on 270 rooms, rather than the 301 rooms in the previous TA. The required contribution would now be:

270 rooms x 4 trips per room = 1080 trips
1080 – 259 existing trips = 821
821 x £229 = £188,009

Paragraph 2.2.3 refers to S106 contributions being secured, however we would prefer to secure S106 contributions or direct implementation of improvements. In addition, we disagree with the statement that the ECATP would be spent on unrelated improvements, but instead would be spent on improvements within the wider corridor.

The County Council require the following improvements from Table TN2 to be secured through S106 agreement and/ or direct implementation:

- A contribution should be provided for the installation and maintenance of real-time bus information at the southbound bus stop located on Mill Road, near to the site.
- Advised cycle stop lines should be provided at the Coleridge Road/ Mill Road signalised junction.
- Improved footpath between site and Sainsbury's supermarket (via Seymour Street), including improved lighting and resurfacing.
- Zebra crossing on Mill Road outside the site frontage.

Cycle parking

The City Council standards require 234 cycle parking spaces to be provided, comprising 180 students and 54 visitors. The development proposals include for 192 spaces in the basement, 16 spaces in front of block A, and suggest conditioning 26 additional spaces the location of which are indicated on Appendix TE.

The County Council require that the minimum cycle parking standards be provided from the outset. In addition the cycle parking layout and ramp should be considered and agreed at the detailed design stage.

2.4 & 2.5 Site access arrangements and Car Parking

The meeting with the developer's consultant and the documents submitted following that meeting have addressed the concerns raised.

Travel Plan

The County Council require that the Travel Plan include a commitment to encourage students to cycle and provide training courses to provide an induction of how to cycle safely in Cambridge. In addition students should be provided with specific cycle routes to colleges to ensure that students are fully aware of the safe routes. Additional measures should be identified by the applicant where possible to minimise the risk to cyclist, such as free or discounted safety equipment etc.

We require that the actual travel plan should give more information on the monitoring process and how the travel plan would be governed in regards to changes should targets not be met. A Steering Group will now be set up and responsible for contingency planning should targets from an annual survey not be met.

This Travel Plan can only be considered as an outline document and the County recommends that a condition requiring the submission and approval of a full Travel Plan prior to occupation of the development is required should planning permission be granted

As this is an outline travel plan with no fixed measures we would recommend that it is a condition to be fulfilled prior to occupation that a full travel plan with SMART targets and specific actions is written and implemented.

The County recommends the inclusion of a site map with where facilities will be set placed in the final Travel Plan.

Conclusion

Having reviewed the Transport Assessment and supplementary information submitted in support of the application the County Council raise no objection to the application subject to the following being secured through planning condition or section 106 agreement:

- 1) ECATP contribution of £188,009
- 2) A contribution should be provided for the installation and maintenance of real-time bus information at the southbound bus stop located on Mill Road, near to the site.
- 3) Advised cycle stop lines should be provided at the Coleridge Road/ Mill Road signalised junction.
- 4) Improved footpath between site and Sainsbury's supermarket (via Seymour Street), including improved lighting and resurfacing.
- 5) Zebra crossing on Mill Road outside the site frontage.
- 6) A revised Travel Plan should be provided for agreement prior to occupation of the development that addresses the above issues raised.

NB: The County Council would be willing to deduct the cost of items 3-5 from the ECATP contribution (item 1) given the wider benefits.

Planning Policy (on matters of Principle)

6.3 Application as submitted and amended

Scope

'These comments address a range of issues, including the current allocation of the site and relevant policies in the Cambridge Local Plan 2006; the Mill Road Development Brief; the emerging allocation of the site and relevant policies in the Cambridge Local Plan 2014: Proposed Submission and discussion of the need for student accommodation in Cambridge; and provision of student accommodation.

Cambridge Local Plan 2006:

This plan was assessed for its compliance with the requirements of the National Planning Policy Framework. This assessment was agreed at Environment Scrutiny Committee for decision-making purposes on 26 June 2012. In terms of the policies and allocations mentioned in the paragraphs below, the plan is considered compliant with the National Planning Policy Framework.

Policy 7/9 Student Hostels for Anglia Ruskin University (Cambridge Local Plan 2006) and its supporting text adds further

detail as to how the student hostels can be provided in lieu of affordable housing on specific sites. The sites where the Cambridge Local Plan 2006 allows this approach in relation to Policy 7/9 are as follows:

- Site 7.11 Brunswick Site (1.57ha) Mixed use housing development and community facilities. Could include a student hostel for ARU on part of the site in lieu of affordable housing.
- Site 7.12 Former Magnet Warehouse, Mill Road (1.10ha) Mixed use housing development and community facilities. Could include a student hostel for ARU on part of the site in lieu of affordable housing.

Since the adoption of the Cambridge Local Plan 2006, Site 7.11 Brunswick Site has been subject to a planning application (08/0871/FUL), which substituted student accommodation for the affordable housing element of the scheme. In order to implement this, the applicants drew up a notional housing scheme with 40% affordable housing. The area used to provide affordable housing in this notional scheme was then used to provide student accommodation in the final scheme. The purpose of the notional scheme is to establish the land take of the affordable housing component in line with the policy. This scheme has now been developed and has provided 251 student units. This student accommodation was subject to a cascade mechanism within the Section 106 agreement for the development to restrict use of the student units to Anglia Ruskin University and the University of Cambridge.

Site 7.12 Former Magnet Warehouse, Mill Road has been subject to a planning application for the erection of a building for a place of worship (Mosque) and community facilities (all D1 Use Class), two social rented dwellings and associated development (11/1348/FUL). This planning application covers only the western half of the allocated site 7.12. Accordingly, it is considered that the remainder of the allocated site should be developed for residential development in line with the allocation for site 7.12 in the Cambridge Local Plan 2006 i.e. "Mixed use housing development

and community facilities. Could include a student hostel on part of the site in lieu of affordable housing.” The text of the allocation is clear that while it is allocated for mixed use development, housing is expected to form part of that development. Furthermore, the student hostel in lieu of affordable housing is very much optional and would only comprise equivalent to the portion of the site which would have been used to accommodate affordable housing. The proposal in planning application 14/1496/FUL is for a solely student accommodation scheme (270 units). Failure to provide any housing on the site is considered contrary to the allocation in the adopted Local Plan 2006 which allocates the site for “Mixed use housing development and community facilities”.

Furthermore, Policy 5/1 Housing Provision in the Local Plan 2006 is clear that sites allocated for residential development are safeguarded from development for other uses except in specific circumstances:

“These sites and provision are safeguarded and development for alternative uses will not be permitted except: a. as provided for in Policies 9/4 to 9/9 or the Proposals Schedule; or b. for additional floorspace for established firms for their own occupation and use on their existing site”.

Given that the proposed scheme does not include any housing, the proposal is considered contrary to policies 5/1, 7/9 and site allocation 7.12 in the Proposals Schedule of the Cambridge Local Plan 2006.

Mill Road Development Brief:

This document was adopted by the council on 10 July 2007. It is not a supplementary planning document and has only limited weight as a material consideration in decision-making.

The Cambridge Local Plan 2014: Proposed Submission:

The Cambridge Local Plan 2014: Proposed Submission was consulted upon from 19 July to 30 September 2013 and submitted to the Secretary of State on 28 March 2014. The Government’s

National Planning Policy Framework (Paragraph 216) sets out the weight which can be given by decision-takers to relevant policies in emerging plans. Whilst the emerging local plan has weight in decision-making as it has been submitted for examination, there remain unresolved objections to the relevant policies and allocations in the plan. Policy 46: Development of student housing and the allocation of Site R21: 315 - 349 Mill Road and Brookfields were both subject to a number of objections during the Cambridge Local Plan 2014: Proposed Submission consultation in July – September 2013. All representations made during this consultation have been submitted to the Inspector examining the plan on behalf of the Secretary of State.

Paragraph: 014 Reference ID: 21b-014-20140306 of the National Planning Practice Guidance refers to the circumstances under which it might be justifiable to refuse planning permission on the grounds of prematurity. It provides two circumstances, which it is likely (but not exclusively) that prematurity should be restricted to:

- a) the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging Local Plan or Neighbourhood Planning; and
- b) the emerging plan is at an advanced stage but is not yet formally part of the development plan for the area.

If approved, this proposal would see the loss of part of existing and proposed housing allocations within the current Cambridge Local Plan 2006 and the emerging Local Plan respectively. This proposal risks this allocation with the loss of a number of housing units on Mill Road, but also has a potential cumulative effect. As such, the adverse impacts of granting planning permission on this site would significantly and demonstrably outweigh the benefits, by preventing the council from being able to deliver appropriate numbers of housing units to meet the city's objectively assessed need. Additionally, in reference to criterion b above, the emerging Local Plan is indeed at an advanced stage of preparation, given

that it has been submitted to the Secretary of State for examination.

It is considered that this application should be refused on the basis of prematurity, given the substantial and cumulative risk to the council's delivery of its objectively assessed need for housing.

For this application, there are two key differences between the adopted plan and the emerging plan. Firstly, this site now forms part of a larger allocation (Site R21). This allocation is a different site from Site 7.12 in the Cambridge Local Plan 2006, as it excludes the land with planning permission for the mosque and includes the adjacent Brookfields hospital site which wraps around to the north and east of the remaining portion of Site 7.12. Site R21 is proposed for allocation for residential, employment and healthcare development with an indicative number of 128 dwellings and 1 hectare of employment and healthcare floorspace.

The council has undertaken a Strategic Housing Land Availability Assessment (SHLAA) (first produced in 2012 and updated in 2013)¹ which is an important part of the evidence base to the local plan and has been endorsed by councillors as a material consideration in planning decisions. Furthermore, detailed site assessments of sites were undertaken as part of developing the emerging Local Plan. The site was first assessed as the remainder of site 7.12 for the purposes of including the site in the Issues and Options 2: Part 2 consultation. After representations were made by landowners for Brookfields Hospital at Issues and Options 2: Part 2 consultation, the site was expanded to include the hospital in the overall site area. The larger site R21 was assessed in the council's Technical Background Document - Part 2 Supplement to Part 2 Site Options within and on the Edge of Cambridge (January 2013). Together with the council's latest Annual Monitoring Report 2013-2014², the SHLAA and the Technical Background Document provide an up-to-date picture of the council's housing supply position and assessment of this site.

¹ Presented at Development Plan Scrutiny Sub-Committee on 29 May 2012 and 29 May 2013 at 2pm.

² Presented at Development Plan Scrutiny Sub-Committee on 9 December 2014.

Information in the Strategic Housing Market Assessment (SHMA) 2013 for the Cambridge housing sub-region and the Cambridgeshire County Council Population, Housing and Employment Forecasts Technical Report 2013 provide the most up-to-date assessment of housing need for Cambridge. Based on the data contained within the SHMA and the Technical Report, the emerging Local Plan identifies an objectively assessed need figure of 14,000 units to 2031. As identified within the council's housing trajectory, which forms part of the Annual Monitoring Report 2013 – 2014 discussed above, the actual and projected cumulative completions to 2031 comprise 14,102 units (compared with 14,191 units at Proposed Submission consultation stage).

In terms of provision of student accommodation, the council no longer considers it appropriate to provide student accommodation for Anglia Ruskin University in lieu of affordable housing on any allocated sites within the city. Despite a continuing reliance on open market housing in the city, Anglia Ruskin University has made considerable progress in acquiring new purpose built student accommodation since the allocation of a number of sites for student accommodation in the Cambridge Local Plan 2006. Significant levels of development around Cambridge railway station (CB1) allowed for the inclusion of student accommodation in the City Centre. 251 units were delivered at the Brunswick site adjacent to Midsummer Common during 2012 and are predominantly occupied by Anglia Ruskin University students. Over 1,000 student units have now been delivered at CB1. In addition, other new accommodation has come forward on a range of sites around the city, including at Addenbrooke's, Perne Road and Malta Road, and has increased the overall stock of purpose-built student accommodation serving Anglia Ruskin University.

Whilst the council recognises the potential impact on Anglia Ruskin University's provision of student accommodation, this matter needs to be balanced with the city's need for housing and the need to take a co-ordinated approach to delivering the whole site allocation of R21.

Need for student accommodation

In terms of overall need for student accommodation, work underpinning the emerging Local Plan forecasts that the population of students living in communal establishments will increase by 3,500, from 17,500 in 2011, to 21,000 in 2031³. The need for student hostels generated by this need is not taken account of in the draft 14,000 dwelling target for Cambridge. It is worthwhile triangulating these forecasts with information the council has received from the two universities in Cambridge.

The University of Cambridge are expecting 0.5% undergraduate and 2% postgraduate growth per annum, equating to approximately 4,060 additional students. The University of Cambridge seeks to house 100% of undergraduates in student accommodation and 90% of postgraduates, which equates to a need for just under 3,780 further student units by 2031.

Anglia Ruskin University also expects 0.5% undergraduate and 2% postgraduate growth per annum, equating to 1,421 additional students. They have not supplied data on their expectations of housing them in student accommodation, however Anglia Ruskin University generally houses a lower percentage of students in purpose built accommodation. It is noted that Anglia Ruskin University has provided a letter in support of the proposed development and has highlighted the need to accommodate first year undergraduates. However, Anglia Ruskin University has provided no information on their overall need for student accommodation and how this relates to their aspirations for growth.

The applicants also point out that the National Planning Policy Guidance paragraph 038 Reference ID: 3-038-20140306 states:

All student accommodation, whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus, can be included towards the housing requirement, based on the amount of accommodation it releases in the housing

³ Population, Housing and Employment Forecasts Technical Report, 2013

market. Notwithstanding, local authorities should take steps to avoid double-counting.

Whilst the National Planning Policy Guidance notes that student accommodation 'can be included towards the housing requirement, based on the amount of accommodation it releases in the housing market', it is not straightforward to undertake this task. Although it may be possible to average the number of students occupying housing to 4 students per house (for example) and accordingly work out that a scheme for 100 student units might free up 25 houses, this assumes that the houses are freed up and that they will be occupied by non-students in the future. Given lack of control by developers over the existing housing units used by students as housing in multiple occupation, the council has little or no certainty that this housing will be occupied in the future by non-students. The letter from Anglia Ruskin University provides no information on where the first year students in question were eventually accommodated, or indeed what percentages of its students live in purpose-built student accommodation and in general needs housing. Without further evidence, the council is not able to count the delivery of student units against the housing requirement.

Student completions and commitments

In terms of completions and commitments of student units since 2011: between 1 April 2011 and 31 March 2014, 1,056 student units (net) were completed. There were commitments at 1 April 2014 of a further 1,698 student units (net) with planning permission but not yet built. Since 1 April 2014 to September 2014, a further 379 student units (net) have obtained planning permission. There are therefore 3,133 student units which have been built out or have obtained planning permission since the start of the plan period for the emerging Local Plan. Many of these are restricted through a cascade mechanism within the Section 106 agreement to the University of Cambridge or Anglia Ruskin University. It is not considered that there is sufficient evidence of the urgent need for

student units to approve development contrary to policies 5/1, 7/9 and the proposals schedule in the adopted Local Plan 2006.

Conclusion

In conclusion, the proposal in planning application 14/1496/FUL fails to provide any housing on the site contrary to the allocation in the adopted Local Plan 2006 which allocates the site for mixed use housing development and community facilities. The proposal is considered contrary to policies 5/1, 7/9 and site allocation 7.12 in the Proposals Schedule of the Cambridge Local Plan 2006.

Furthermore, in the context of the emerging Cambridge Local Plan 2014, this proposal risks not only this allocation and the loss of a number of housing units on Mill Road, but would increase the risk of other allocated sites not being delivered for housing. As such, the adverse impacts of granting planning permission on this site would significantly and demonstrably outweigh the benefits, by prejudicing the outcome of the plan process and preventing the council from being able to deliver appropriate numbers of housing units to meet the city's objectively assessed need.'

Planning Policy (on matters of Open Space)

6.4 'Policy 3/8 of the Cambridge Local Plan states:

All residential development will provide public open space and sports facilities in accordance with the Open Space and Recreation Standards. Provision should be on-site as appropriate to the nature and location of development or where the scale of development indicates otherwise through commuted payments to the City Council.

Open space requirements are calculated on the basis of the number of people to be accommodated in a development, each unit in this case being assumed to accommodate one person per bedroom. The total assumed population of the development is therefore 270 people.

The total informal open space required by the development (based on provision of 18 square metres per person) is 4,860 square

metres. Given the size of the application site and the number of students the scheme proposes to house, it does not appear possible to accommodate both the proposed development and the amount of informal open space required on site.

Provision of informal open space in Romsey Ward

The application site lies within Cambridge's Romsey Ward. The Council's Open Space and Recreation Strategy 2011 describes Romsey Ward (page 61) as a *densely built-up, predominantly residential environment to the south-east of the City Centre. Much of the housing provision consists of terraced housing, although there are pockets of semi-detached housing in the northern part of the ward. Most gardens are relatively small and narrow and there is little in the way of street trees given the densely urban nature of the area.*

The Council's Open Space and Recreation Strategy 2011 describes both the strengths and weaknesses of each ward. For Romsey Ward, the weaknesses (page 61) are set out below:

Apart from the relatively informal pitch provision on Romsey Recreation Ground, there is no formal sports provision in Romsey. However, Coleridge Community College and Coleridge Road Recreation Ground are relatively close to the ward. The amount of informal open space in the ward is low given the local population density and the amount of natural and semi-natural green space is very low and is restricted to tree belts within Romsey Recreation Ground and Brooks Road Play Area.

The Strategy gives the population of Romsey Ward at 8,950⁴ (page 26). The amount of protected open space (this is all types of open space) equates to 10.56 hectares or 1.18 hectares per 1000 population. Of the total amount of protected open space within Romsey, 6.75 hectares classified as private protected open space, mainly comprising allotments. These spaces would be unlikely to be accessed by students of the scheme, as most of the city's allotments have waiting lists of a number of years. The remaining 3.81 hectares could be classified as forming part of the informal

⁴ Based on the known population at the time of drafting the Open Space and Recreation Strategy in 2011. The city's population is understood to have risen since 2011 to 9,450 (according to Cambridgeshire County Council's population data).

open space network, equating to 0.43h hectares per 1000 population (based on 2011 population).

The adopted standard for the provision of publicly accessible informal open space provision is 1.8 hectares per 1000 population. The Open Space and Recreation Strategy 2011 suggests this should move to a higher ratio of 2.2 hectares per 1000 population and is put forward for adoption as part of the Cambridge Local Plan 2014; Proposed Submission. This plan is currently at examination. As the relevant policy (Policy 68: open space and recreation provision through new development) is subject to a number of objections, the weight which can be afforded to it is limited.

The extent of under-provision of informal open space in Romsey Ward is considered significant. Furthermore, the Open Space and Recreation Strategy 2011 (page 55) recognises that Petersfield Ward suffers from a similar lack of publicly accessible informal open space. Petersfield directly abuts Romsey and is on a clear route from the site to the Anglia Ruskin University's East Road campus. Public open space in neighbouring Coleridge and Abbey wards is not conveniently located for ease of use by any students living within this development. As a result, Romsey Recreation Ground would be likely to be subject to even heavier use than it currently experiences, impacting on the quality and availability of provision.

It should also be noted that the Council's Open Space and Recreation Strategy sets out an opportunity on page 61:

Site 7.12 Former Magnet Warehouse on Mill Road is allocated for housing, community facilities and student housing in lieu of affordable housing in the Cambridge Local Plan 2006. If this site comes forward for its allocated use, the quality and quantity of open space made available on site should be high in line with the Council's standards in order to avoid further negative impact on deficiencies in publicly accessible open space in Romsey ward.

Additionally, the Council's Open Space and Recreation Strategy states as a threat:

Inadequate open space delivered as a result of new residential development coming forward and deterioration in the quality of existing open spaces.

Whilst this site has not come forward for its allocated use, student development still generates a need for informal open space provision. The development of the site should seek to provide a quantum of informal open space provision closer to the need arising from its future occupants. Any under-provision of space needs to be robustly justified.

The Mill Road Development Brief 2007 sets out an aspiration for the provision of a large area of open space extending back from Mill Road (not dissimilar to Ditchburn Place) which would create a well-defined space to serve the residential development of the site. The Brief was subject to extensive public consultation in March-April 2007 and again in June 2007 prior to consideration by the City Council's Environment Scrutiny Committee and approval by the Executive Councillor (Environment).

The applicants' attention should be drawn to paragraphs 1.9 and 4.18 of the Council's Open Space and Recreation Strategy with regard to the impact of the development on open space provision and the opportunities for provision and enhancement of open space. In conclusion, due to the size of the proposed development and the number of students likely to be living on site, the subsequent need arising for informal open space provision and the lack of such space provided as part of the development, and due to the location of the site within and adjacent to wards where there is a shortfall in public informal open space provision and where student use of such spaces would unreasonably intensify the use of such spaces and because substantial mitigation through developer contributions would not be possible but a greater percentage of informal open space provision would be possible from the site, the proposal is considered contrary to Cambridge Local Plan 2006 Policy 3/8 and the Cambridge City Council's Open Space and Recreation Strategy 2011.'

Head of Refuse and Environment

6.5 Application as submitted

No Objection: Recommends the following conditions: construction and delivery hours; construction noise, demolition and piling; dust; noise insulation from traffic; plant noise; noise assessment and mitigation from hospital plant; waste and recycling; waste lorry movements; and contaminated land. Various informatives are suggested.

Urban Design and Conservation Team

6.6 Application as submitted

Scale and Massing

Block A

Block A is approximately 35.5m long and whilst forward of the building line of the adjacent Mosque, forms a similar arrangement and relationship to Mill Road as the terrace houses opposite. The proposed block is broken into two elements ranging from 2.5 storeys (west) to 3.5 storeys (east) with the top floor accommodation located within the pitched roof spaces. The ridge line is in the same east-west orientation as the terrace houses opposite.

The submitted Mill Road Elevation (drawing D0201 Rev P1) shows that the eaves of the 2.5 storey element aligns with the parapet line of the lower portico element of the Mosque and that the ridge aligns with the taller parapet line of the prayer hall. The 2.5 storey element is approximately 6.6m high to the eaves and 10.5m to the ridge and is 2m taller than the ridge of the adjacent terrace houses. The proposed taller 3.5 storey element is significantly taller than these and is a similar height to the 3 storey Brookfields House (BLI) to the east but is approximately 4.8m above the ridge height of the terrace houses opposite.

The proposed arrangement of accommodation within Block A (with double banked corridors at upper floor levels and single aspect rooms) results in a deep plan block with shallow sloping pitched roofs. The initial pre-application proposals (page 26 of the

submitted D&A Statement) proposed double gable ends with linking elements spanning the valleys at roof level. Whilst a storey too tall, this approach was supported as it helped to break up the depth of the block and provided steeper roof pitches replicating the roof angle of the terrace houses opposite. The proposed scheme includes curved stair/circulation cores on the rear northwest and northeast corners of the block to visually break up the width of these gables. Despite this we are concerned that the 13m wide gable on the east face of the block and 12.6m wide gable on the west face forms a poor relationship with the existing visible gables of houses on Mill Road (e.g. No. 307 Mill Road and the terrace houses opposite are approximately 7.3m wide). The building will be particularly prominent from views looking east and west along Mill Road (as shown in the submitted 3D perspective views on page 47 of the D&A Statement). The overall scale fails to meet the brief and is too great when compared to the finer grain development of the surrounding conservation area.

Block B

Block B is located adjacent the western site boundary with the southern gable end fronting onto the proposed public space (located between Block A and the Mosque site). The gable is broken into two elements; the lower 3 storey element is approximately 9m wide, whilst the taller 3.5 storey element is approximately 12.3m wide and setback 1.2m. We are concerned that the 3.5 storey element is too tall at 14.6m and is visually prominent from views looking east along Mill Road as the block rises above the lower 'portico' element of the adjacent Mosque. The block needs to be reduced to 2.5 storeys.

Block C

Block C is located adjacent to the eastern site boundary and reflects the scale and massing of Block B opposite. We are concerned that the 3.5 storey scale of Block C and narrow garden depth (between 6.5-8m) results in an overbearing impact on the BLIs on the Brookfields Hospital site. Whilst the existing mature trees partially screen the proposal it is likely that this block will be highly visible from both Mill Road and within the Brookfields Hospital site.

Block D

Block D is 4 storeys high with a flat roof. The 3rd floor level is setback approximately 5.8m from the east and west elevations but only 0.6m from the north and south elevations.

Overall, with regards to scale and massing, we are concerned that the scale of development proposed on the site fails to respond to the domestic scale of the terrace houses opposite. The 3.5 storey elements of Block A, B and C form a poor scale relationship and are visually dominate in views along Mill Road and the adjacent Brookfields Hospital site. As noted in the Mill Road Development Brief (page 21) '*The ultimate height of buildings on the Mill Road frontage and to the boundaries of the site should not exceed the established ridge height established by properties opposite the site*'. The impact on the conservation area is also unacceptable and fails to respond to the domestic scale of houses in the surrounding context. The 3.5 storey elements of Block A, B and C need to be reduced by at least 1 storey.

Residential amenity

We are concerned that the proposed 3.5 storeys element on the Mill Road frontage will result in an overbearing impact on the terrace houses opposite.

The scale and close proximity of Block C to the western site boundary raises potential overlooking concerns between first floor windows on the west elevation of Block C and the windows to the social rented unit on the east elevation of the Mosque. As proposed the windows to bedrooms T01 and T02 of the 5th and 6th 'townhouses' are approximately 9m and 10m from the windows of the social rented unit located on the east elevation of the Mosque.

Elevations and Materials

The pre-application proposals for Block A (as shown on page 42 of the submitted D&A Statement) had the appearance of 6 'terraces' on the Mill Road elevation due to the vertical emphasis of the windows, downpipes and extended 'party' walls. This approach was supported (albeit a storey too tall) as the Mill Road elevation replicated the rhythm and fine grain of the terrace houses opposite. The extended 'party' walls were felt to replicate (to some extent) the appearance of chimneys and helped break up and articulate the roof line.

We are concerned that this approach has not been translated into the final design of Block A which now proposes full height curtain wall glazing at ground floor level and stone banding giving a horizontal appearance to the Mill Road elevations. The Mill Road Development Brief (page 21) states that *'the rhythm of the terraces opposite the site, in terms of the continuity of the frontage and, at a more detailed level, the ratio of solid (wall) to void (windows and doors) and the way in which they are organised on the elevations, should be used to inform the way in which elevations are handled'*. The detailed design of the Mill Road elevations need to be revisited with chimneys, extended 'party' walls, downpipes, windows etc. used to provide a vertical emphasis and reflect the rhythm and grain of the terraces opposite.

The elevation treatment of Blocks B, C and D is more successful. The 'townhouses' are broken up by the projecting bays, recessed brick panels and extended 'party' walls providing a vertical emphasis to the elevations. The north and south elevations of Block D are broken up by the arrangement of the stair/circulation cores.

The proposal takes a contemporary approach to the proposed material treatment and includes slate roofs, reconstituted stone cills, aluminium windows, timber rain screen cladding and buff facing brickwork with panels of light and dark mortar. The proposed material palette is acceptable in design terms.

Daylight and sunlight

Impact on surrounding properties

The results from the Vertical Sky Component (VSC) and the Annual Probable Sunlight Hours (APSH) tests show that the existing terrace houses opposite the site are not impacted upon by the proposed scheme when assessed against the BRE guidelines and maintain high levels of daylight. The hospital buildings considered to have a requirement for natural light retain good levels of daylight with 15 of the 18 rooms assessed enjoying a good level of daylight distribution in excess of the BRE guidelines.

However, the VSC results for the Mosque show that of the 9 windows assessed, none will adhere to the BRE guideline criteria. The daylight distribution test shows that out of the 5 windows assessed, all fall below recommended guidelines. The results for

the APSH tests are better with 3 of the 7 windows assessed falling just marginally below the 25% APSH threshold.

The windows impacted by the proposed development relate to habitable rooms within the social rented unit proposed on the east face of the Mosque (windows impacted are to the kitchen, living and dining rooms at ground floor level and bedrooms at first floor level of this unit). The impact to the windows assessed within the Mosque is a result of the height and close proximity of Block B to the western site boundary. Whilst the Mosque is yet to be constructed we are concerned the proposed student development will result in a poor living environment for the future occupants of the social rented unit. However, the consented Mosque application proposed a 1.8-2.1m high rendered block wall setback 1.8m from east elevation; the ground floor habitable rooms may therefore already receive limited daylighting.

Daylight within the proposed development

A total of 74 rooms have been tested of which 30 are combined studios and 44 are bedrooms. The submitted report assumes an Average Daylight Factor (ADF) criteria of 1.5% (for Blocks A & D) and 1% (for Blocks B & C). An ADF criteria of 2% should be used for rooms within Block A as these form studios and therefore have a combined bedroom, living room and kitchen function.

Of the 3 rooms assessed on the Mill Road frontage of Block A, 2 would achieve ADF levels of below 2%. The 7 rooms assessed on the rear elevation represent the worst case condition as the rooms directly face Block C. The ADF results for these rooms range between 0.64% and 0.82 which are well below the 2% recommended criteria. We are concerned that these rooms will form a poor living environment for the occupants.

The ADF results for Blocks B and C show that all of the bedrooms assessed exceed the 1% ADF target, whilst all but one of the living/kitchen rooms exceed the 1.5% ADF level.

For Block D the rooms assessed on the north elevation exceed the 1.5% ADF level. Out of the 21 rooms on the south elevation facing Blocks B and C, 8 fall below the BRE guidelines. We are concerned that these rooms will form a poor living environment for the occupants.

The APSH test for the proposed Blocks A-D indicates all the windows assessed would meet the BRE guidelines for access to annual and winter sunlight.

Shadow impacts to the proposed amenity spaces

The proposed central courtyard is shown to receive full sunlight at 12:00 on the 21st March; it is therefore likely that the central courtyard will meet the recommended BRE criteria for daylight and sunlight.

The rear private gardens associated with Block B are shown to be partially in shadow at 09:00, 12:00 and 15:00 on the 21st March. We are concerned that these rear gardens will fail to meet the recommended BRE criteria.

Cycle Parking

The submitted scheme proposes to incorporate all of the required cycle parking provision (200 spaces) within the basement level of Block A. A further 9 Sheffield stands are proposed on the Mill Road frontage for visitors. Access to the basement level cycle store is via a separate staircase with 400mm wide ramps either side. We are concerned that the proposed basement level cycle parking provision is poorly related to the majority of units within the scheme and may lead to bicycles being left within the central courtyard or within corridors.

Cycle parking should be located so as to relate to the individual entrance/core areas of each of the 4 blocks. The 14 'townhouse' units within Blocks B and C should incorporate their own cycle parking provision at the front of the 'house' units.

Landscape and Open Space

The landscaped thresholds proposed in front of the townhouse units (Blocks B and C) are acceptable in design terms. The thresholds include raised planting beds and bench seating which improves the privacy of the ground floor bedrooms (T06) and further defines and breaks up the length of the blocks.

The submitted site plan shows a large undefined space in front of the southwest corner of Block D which is accessed through the

proposed refuse store. The function of this space needs to be clarified.

The southernmost 'townhouse' in Block C has no access private amenity space due to the arrangement and location of the disabled car parking space and the substation.

Details of the proposed boundary treatments need to be provided.

Conclusion:

The creation of the pocket park at the front of the site and the proposed 'townhouse' typology used for Blocks B and C are supported in design terms. However we are concerned about the overall scale of development proposed on the site, the 3.5 storey elements of Block A, B and C forms a poor scale relationship and results in dominating the existing terrace houses and the lower scale buildings on the Brookfields Hospital site. This in turn has an adverse impact on the adjacent conservation area and BLIs on the Brookfields Hospital site. The 3.5 storey elements of Block A, B and C should be reduced by at least 1 storey to comply with the scale and massing guidance contained within the Mill Road Development Brief.

The treatment of the Mill Road elevation of Block A has a horizontal appearance and fails to reflect the rhythm and grain of the terraces opposite which have a more vertical emphasis.

The scale and close proximity of Block B to the western site boundary raises potential overlooking and overshadowing concerns to the social rented unit on the east face of the Mosque.

As proposed the submitted application is unacceptable in design and conservation terms and fails to meet the requirements of Cambridge Local Plan (2006) Policy 3/4 *Responding to Context*, 3/7 *Creating Successful Places*, 3/12 *The Design of New Buildings* and 4/11 *Conservation Areas*.

6.7 *Application as amended*

Scale and massing

In response to previous concerns regarding scale and massing the applicant has amended the scheme to reduce the overall height of Blocks A, B and C. These changes are discussed in more detail below.

Block A

The original submitted scheme proposed a total of 42 studio bedrooms located at first, second and third floor levels in Block A. The amended scheme reduces the number of studios in Block A to 30, and those located within the 3rd floor have been removed entirely.

The length of Block A has increased from approximately 35.2m to 37.3m, we assume as a result of incorporating the electrical substation within the footprint of the block.

The submitted application drawings for Block A broke up the Mill Road elevation into two elements (2.5 storey west element, rising up to 3.5 storeys on the east). The 2.5 storey element measured approximately 10.5m to the ridgeline and 6.5m to the eaves. The taller 3.5 storey element measured approximately 13.3m to ridgeline and 9.3m to the eaves (as measured from the ground floor finished floor level). Previously, the City Council's Design and Conservation Panel were *'more comfortable with this almost equal split between the 2+1+roof and the 3+1+roof elements as this variation helps to resolve Block A's previous solid mass appearance'* (D&C Panel Minutes dated 9th July 2014).

The amended Block A elevations break the Mill Road street frontage down further into four elements ranging from 2 storeys plus roof to 2.5 storeys and 3 storeys plus roof. The east and west gable ends of the block are bookended by 2 storey pitched roof sections. The ridge level of the lower 2 storey elements are approximately 7.9m high whilst the taller central 3 storey element is approximately 11.6m. The proposed amendments result in reducing the overall height of Block A between 1.7 and 2.5m when compared to the original submitted scheme.

The proposed reduction in height of the Mill Road frontage is supported in design and conservation terms. The ridge and eaves height of the lower 2 storey pitched roof elements bookending the block sit approximately 1m below the ridge and eaves levels of the terrace houses opposite. The variation in roofline between elements is supported and relates the scheme to the more varied roofline of existing terrace houses further west along Mill Road. Whilst the 3 storey pitched roof element remains taller than the terrace houses opposite, the approach to incorporate a greater proportion of the 2nd floor accommodation within the pitched roof space (within the cross eave dormers) visually reduces the scale of Block A. The ridge height of the 3 storey element no longer competes with the adjacent Brookfields House BLI on the adjacent Brookfield's Hospital site.

We previously raised concerns that the depth of Block A (13m wide eastern gable and 12.6m wide western gable) formed a poor relationship with the width of visible gables of existing houses along Mill Road. The amended floor plans show that the western gable end has been broken up and the rear element setback approximately 6.2m. The eastern gable has been equally broken up but the setback (of the rear element) is significantly less at 0.7m. As a result of the setbacks, the depth of the gable ends has been reduced to approximately 8.8m (eastern gable) and 8.5m (western gable). The revised approach is supported in design terms as the depth of the lower sections are more consistent with the depth of existing residential terraces on Mill Road. The lower sections also help to screen the full depth of the balance of the Block A building.

Blocks B and C

The amended drawings remove the pitched roofs proposed on Blocks B and C and replace them with flat roofs. As a result, the height of both blocks have reduced from approximately 14.4m to 12.1m. The 3rd floor accommodation has been setback approximately 3.2m from the west elevation of Block B (adjacent to the proposed Mosque) and both blocks have been setback approximately 7m from the south elevation.

Whilst not removing a storey, the revised roof form does result in a reduction in the overall scale and massing of these blocks. The deeper setbacks at 3rd floor level are more sympathetic to the scale of the terrace houses opposite. The 2nd floor parapet also forms

an improved scale relationship with the flat roof of the prayer hall on the adjacent approved Mosque site.

The reduction in height has resolved concerns about views of the scheme from the Conservation Area. Views of the 3rd floor from Mill Road will be largely concealed by Block A. Glimpsed views of Block B looking east along Mill Road will be possible but a larger proportion of the 3rd floor will be concealed by the prayer hall element of the Mosque. Existing trees on the boundary with the Brookfield Hospital site will result in filtering views of Block C when looking west along Mill Road.

Block D

The proposed amendments move the footprint of Block D between 0.51m (central element) and 1m (northwest element) away from the northern site boundary so as to reduce the impact on the root protection zone of the retained trees. This amendment is acceptable in design terms.

Elevations and materials

We previously raised concerns that the full height curtain wall glazing at ground floor level and reconstituted stone banding (between ground and first floor) on Block A gave a horizontal and somewhat commercial appearance to the Mill Road street frontage. The amended elevations for Block A remove the stone banding and have proposed smaller windows at ground floor level. We support this approach which improves the domestic appearance of the building.

Whilst the overall approach to the proposed elevations and material treatment is acceptable in design and conservation terms, the following amendments to Block A are required to improve the relationship and appearance of the block with the existing terrace houses opposite. These amendments could be covered through condition should the application be approved.

- The 2.5 storey element of Block A now includes a central extended 'party' wall which is acceptable in design terms. 'Party' walls should also be reintroduced to each end of the 3 storey element (as proposed as part of the original submitted application) so as to provide a vertical emphasis to the Mill Road elevation and further reinforce the breaks between elements.

- The material proposed for the ‘party’ walls should be pre-cast stone copings (as opposed to PPC aluminium cappings) to match the reconstituted stone window cills.
- Transoms should be introduced for the 1st and 2nd floor windows fronting Mill Road to improve the proportions and relate to the terrace houses opposite.
- The east and west gable elevations of Block A indicate a central recess between the roof pitches which is represented with a change in material. A deeper setback should be introduced to further break up the depth of the block when looking east and west along Mill Road.
- The reveal depth of windows needs to be clarified.

Daylight and sunlight

The increased setback to the west and south elevations of Block B at 3rd floor level has slightly increased the level of daylight within the habitable rooms, with 1 of the rooms now meeting the recommended daylight distribution test guidelines (previously all windows fell below recommended guidelines). The submitted amendments also result in increasing the Average Probable Sunlight Hours (APSH) results with 5 of the 7 windows assessment adhering to the BRE guideline criteria (previously 3 of the 7 windows adhered to the BRE guidance for APSH). However despite the proposed amendments, of the 9 windows assessed as part of the Vertical Sky Component (VSC) test, none would adhere to the BRE guidelines.

The VSC and APSH tables (Appendix B and D of the submitted Daylight and Sunlight Report dated 28th January 2015) shows existing and proposed figures for windows within the Mosque. The figures have been compiled using 3D computer modelling and specialist computer simulation software. The submitted 3D model views (Appendix A) do not show the 1.8-2.1m high boundary wall on the eastern boundary of the Mosque site which was proposed as part of the consented application. The applicant needs to confirm whether or not the boundary wall (which is located approximately 1.8m from the east elevation of the Mosque) was factored into the VSC and APSH tests.

Given that all of the buildings on the proposed site have been demolished the windows within the Mosque would inevitably receive a higher degree of daylight than it would have done prior to

demolition. In our view, the arrangement of habitable rooms and close proximity of windows to the eastern site boundary would impact existing daylight to these rooms.

Conclusion

The lower roof line of Block A and deeper setbacks proposed to the south elevation of Blocks B and C at 3rd floor level are supported in design and conservation terms. The scale and massing of these three blocks is now more sympathetic with the scale of the terrace houses opposite.

Whilst acceptable in design and conservation terms a number of amendments are required to the elevation treatment of Blocks A, B and C, as outlined herein, which should be conditioned should the application be approved.

Senior Sustainability Officer (Design and Construction)

6.8 Application as submitted

No Objection. Conclusion: The applicants approach to meeting the requirements of Policy 8/16 and many of the approaches related to sustainable design and construction are supported. I would encourage the applicant to go further in relation to the reduction of potable water consumption given the water stress faced by Cambridge.

Access Officer

6.9 Application as submitted

Objection: 1 more room for disabled students should be provided and 16 Blue Badge parking spaces. The entrance double doors need be power assisted or asymmetrical with one leaf being a minimum of 900mm. Reception needs hearing loop and seating of mixed height, with and without arms. It would be better if some accessible bedrooms were nearer the front of the complex. As wheelchair users will sleep upstairs secondary power supply to the lifts are needed.

Head of Streets and Open Spaces (Tree Team)

6.10 Application as submitted

Objection: Blocks A and C –Concerns regarding the nature of the outside space between the protected trees to the east and the four storey Block given how the space will be shaded by both trees and building. Notwithstanding the proposed tree protection, There are concerns regarding the impact of construction on the protected trees to the east. Given the height of the Blocks to be constructed, the location of the protection fencing is inadequate. The use of Trak panels in this area and the width of the ground protected by the panels would suggest vehicular access in this area for construction purposes. The access, which would include high sided vehicles, piling rigs and cranes would require significant pruning of overhanging branches. If this is not the case and vehicular access is not required the fencing should be pulled out to help protect canopies. This is potentially a significant issue, as if access is required for major construction activity there is insufficient space between the canopy edge and the building line, therefore addressing this impact cannot be conditioned. In addition to the above ground issue, to the south of this boundary a new access is proposed well within the RPA of the 1st three trees. Again the comments presented in the AIA regarding existing hard standing are acknowledged but it is not clear how far the existing hard standing extends into the RPA. If the new access requires extending the hard standing towards the trees in to soft ground, this will not be acceptable without a no dig construction.

Block D –is also close to the Category B trees to the north. Even with the extensive pruning proposed, the lower levels will suffer from lack of light due to the northern orientation and the proximity to the large tree belt. Again given the scale of the building and likely space required for construction, conflict between construction activity and tree canopies is expected. There is no indication of ground protection this area.

Proposed tree losses are acceptable but the scheme needs to allow for appropriate replacement and new planting especially along the frontage.

Head of Streets and Open Spaces (Landscape Team)

6.11 Application as submitted

Objection: Conclusion: Due to the fundamental concern over the height and massing of the proposals the application is not supported. The buildings create an overly dominant frontage onto the green spaces, both public and private as well as onto Mill Road and the residential terraces adjacent and opposite.

6.12 Application as amended

No Objection:

Central Open Space

- The improvements made result in a wider, more open central space. The building heights have included setbacks at upper levels which reduce the 'canyon'-like feel of the previous iteration.
- The "townhouse" units have reduced the total number of occupants and the amenity 'rear' spaces have been left undivided which provides a larger, more social space.
- The smaller planted areas at the frontage of the townhouses continue to create a defensible boundary image despite being reduced and this is an improvement

Impact on existing landscape

- The removal of both the substation and the parking bays from the rootzone areas of the trees on the eastern boundary is an improvement.
- Note: The access road to the east of Block A encroaches on the RPA of trees along the eastern boundary. This is a pre-existing hard paved area, construction under existing trees must be taken into account.

Amenity spaces

- The spaces surrounding Block D are not being utilised in the best way. There are opportunities for additional access to

the green areas around the building. This section of the building could be straightened. The slight relocation of Block D to give additional space to the trees at the rear of it is acceptable

Street scene

- Improvements have been made to the street scene aspects at Block A, including the articulation of the roof lines, the frontages and side aspects, there are still concerns about the overall width of the Block and the visual impact to the character of the area.

Conclusion

More comfortable about the proposals in this iteration than previous submissions however; more thought needs to be applied to the spaces around Block D, particularly the pinch points between Block D and Block C. More needs to be done to alleviate the width to Block A.

Head of Streets and Open Spaces (Walking and Cycling Officer)

6.13 Application as amended

No objection: There should be more cycle parking at grade near Block A or more cycle parking for Block D should be provided in a covered area near to Block D. The gradient of the ramp should be clarified as this will potentially affect the layout of the whole building - the gradient should be about 1 in 4. Whilst the lift is useable to take a bike down to the basement this will entail taking them through the lobby area and is not really a feasible option at busy times. The door to the basement parking should automatic.

Head of Streets and Open Spaces (Sustainable Drainage Officer)

6.14 Application as submitted

No Objection: The proposals to limit the flow from the site to 5 l/s would be an improvement in terms of water management from the

site and therefore this is supported, however, there are no details of how this will be achieved. A surface water condition is recommended.

Head of Streets and Open Spaces (Public Art Officer)

6.15 Application as submitted

Objection: The planning application submission does not contain a Public Art Delivery Plan to support the application and to comply with the Council's policy. However, the Design and Access Statement contains the following: 'The council has a Public Art Supplementary Planning Document (2010) which guides provision of public art in Cambridge by setting out clear objectives on public art. The choice of public art should be informed by the development of design. A potential location for public art has been identified and public art consultant will be appointed to help develop the opportunities within the Site.' The text is also accompanied by a plan marking where the art will be located.

The planning submission simply does not have enough information within it, which sets out the provision of public art and also because it has not been considered as an important element of the scheme, time has passed, the development has been designed and opportunities have been lost. It is not satisfactory to have the plan marked where public art will be located and indeed, this is exactly what the policy set out to stop happening. As a matter of urgency the developer needs to seek advice from a professional art consultant and take the project forward. We will need a Public Art Delivery Plan submitted, which sets out the project and approach to it and this will need to be approved prior to the commencement of development (this could also be presented to the Council's Public Art Panel). At no time in the process has the developer made contact to seek advice and it would be helpful to have an indication of what the budget is.

Currently the planning submission does not comply with the Council's policy.

Anglian Water

6.16 Application as submitted

No Objection: Recommends a surface water condition.

Cambridgeshire Constabulary (Architectural Liaison Officer)

6.17 Application as submitted

No Objection: The location of the proposal sits within the busy city ward of Romsey, in terms of crime the ward has seen 558 x crimes recorded in the past 12 months. Only been 7 x crimes have been recorded in the immediate vicinity of the site

Cycle security is outlined within the Operational Statement (OS) as providing secure access and CCTV. Cycle crime is a significant problem in Cambridge therefore the security arrangements for cycles are of the utmost importance. The OS outlines that there will be a 24/7/365 day support via a national call centre and that a Major Incident Plan will be in place.

The cycle security arrangements outlined are adequate in terms of security e.g. lighting & CCTV. The Secured by Design requirements are supported. There is mention of an around the clock reception desk which would deal with parcels/letters and visitors.

There is no mention of visitor access within the document. Student accommodation within CB1 adopted the principle that all students' process mobile phones and that a visitor can contact a resident to be allowed access. This would be acceptable.

Satisfied with the considered level of security for the student accommodation.

Design and Conservation Panel (D&C Panel)

The scheme has been presented to D&C panel on two occasions prior to the formal application being made. The planning application is similar to the proposal put forward to the July 2014 meeting.

6.18 'D&C Panel Meeting of 9th July 2014

The revised pre-application proposal for student accommodation presented on behalf of the McLaren Construction Group. Today's presentation is in response to concerns raised at the June Panel meeting (verdict RED - 1, AMBER -6).

Presentation by Bill Soper and Nenad Manasijevic of TP Bennett Architects.

Revisions include a reduction in unit numbers from 329 to c. 300 and Blocks B, C and D having been pulled away from the site boundary. The east and west elements of Block D have been re-orientated to respond to the grain of buildings on adjacent sites, and Block A on Mill Road has been redesigned to correspond to the two and three storey plus roof context of the local area.

The Panel's comments are as follows:

Response to context

The Panel acknowledge the attempts made to adjust the scheme to make it more responsive to its context. However, the Panel felt that the presentation material lacked sufficient information to properly assess the impact of Blocks B and D and the intervening spaces in the site's north west corner on the rear elevations of the proposed mosque. Detailed studies of this important interface between the two developments would help to clarify potential issues of overlooking, privacy and appropriate boundary treatments such as fencing and landscaping.

Landscaping

- Central courtyard. The Panel welcome the removal of the secondary refuse collection point which allows this area to be given over entirely to landscaping.
- Mill Road frontage. In the Panel's view, there is a need to strike a balance between the hard landscaping elements and softer, garden elements, particularly where the site boundary meets that of the mosque. A continuation or integration with the mosque planting beginning with the alignment of the proposed trees is to be encouraged, so as the two areas could be read as a single amenity

space, (notwithstanding the interruption resulting from the mosque's ramped vehicular access.) Detailed consideration is needed to demonstrate how the vehicular ramp is to be integrated successfully into the site layout and surrounding landscaping.

Comments on the proposed residential Blocks

Block A

- Elevations. In general terms, the Panel were more comfortable with this almost equal split between 2+1+roof and 3+1+roof as this variation helps to resolve Block A's previously solid mass appearance. With its position between the proposed highly decorative mosque and the Edwardian BLIs of the Brookfields site, it was suggested that this Block could benefit from a more enriched elevational treatment. All agreed detailed design would be key.
- Dormer windows. The Panel would have welcomed a greater degree of subtlety here as the mosque in contrast offers singularity. The Panel would support a recessive dormer solution (although not on the eaves). That may indeed be the intention within the design. However there is a need for greater care and consistency in the drafting of the illustrations, as the shading used to illustrate these windows was misleading.
- Recessed glazed bays (southern elevation, eastern end). Further inconsistency is revealed between the elevations and the plan, with the last two bays appearing to be glazed on the elevations but not on the plans. Panel members also felt that the brick pier at the eastern end of the south elevation was visually too thin and weak.

Blocks B and C

- Boundary treatment. Treatment of both the east and west boundaries needs to be clarified, but more specifically Panel questioned the design and configuration of the fence and gates proposed between Block B and the eastern boundary of the mosque, which needs to be resolved. The architects are advised against the inclusion of close-bordered timber fencing between the rear of Block B and the boundary with the mosque. A more elegant solution is needed, given the importance of the landscaped space it will define and contain.

- Defensible space (southern end of Block B). As the southern end of Block B includes a kitchen and lounge area, there is a need for the external defensible space to be inward-looking out of respect to those using the mosque. The need for further development of the landscape treatment of this space has already been referred to under 'Landscaping' above.
- Elevations. The Panel questioned the juxtaposition of the blank gabled elevation at the southern end of Block B facing the square, in relation to the flat roof element that steps forward from the gable. Once again there are inconsistencies between different drawings for this element, so final intentions are not clear.
- Conservatories. Significantly more detail is needed here; not only in terms of how these ground floor 'cubes' would be experienced, but how they relate to the boundary with the mosque.

Block D

- Layout. The Panel note that Block D has been pushed back from the northern boundary by 1metre. Although the ground floor student rooms have reasonably sized windows, the Panel would encourage analysis of daylight levels. The boundary trees may be deciduous (Poplars), but there was a concern these rooms would be cold, gloomy spaces for a significant portion of the year.
- Point of arrival. Following the comments made last time, the Panel welcome the improvements made to entrance spaces by the provision of wider apertures.
- Elevations. Block D has an expressive form but calm detailing. The Panel would recommend greater architectural expression within its central area facing into the courtyard garden area, so as to enhance the quality of the courtyard, and achieve a better relationship to the architectural treatment of the Blocks B and C.
- West elevation to mosque - Daylight studies should also be undertaken to help evaluate the quality of this space within such close proximity to the mosque and whether in fact the central corridor would achieve the levels of natural light as described in the presentation.

Signage

- A development of this kind would require a signage strategy. Details of this would be welcomed.

Conclusion

The Panel experienced some difficulty in appreciating aspects of the scheme due to inconsistencies in various details shown in the presentational material. Greater attention to the accuracy of details would have enhanced the Panel's appreciation and assessment of the proposals (and may well have been reflected in additional green votes). The Panel re-iterate the benefits of consulting with the architects for the proposed mosque in resolving elevational, landscaping and boundary treatments of the schemes so as to achieve a compatibility in use for both student residents and worshippers, and to realise an integrated streetscape along the Mill Road frontage.

VERDICT – GREEN (2), AMBER (7)'

.....

6.19 'D&C Panel Meeting of 11th June 2014

The proposal for student accommodation (329 units) by the McLaren Construction Group is at the pre-application stage. The accommodation types proposed include 47 studios, 10 studios for the disabled, 104 cluster en suite rooms and 168 townhouse rooms. The scheme presented by Nenad Manasijevic of architects TP Bennett accompanied by Laura Bradley of Bradley Murphy Design consists of four Blocks of accommodation arranged around a courtyard/ garden.

The site is located between the proposed Mill Road Mosque (which received Planning consent in 2012) and the Brookfields Hospital site which contains Buildings of Local Interest.

The Panel's comments are as follows:

Response to context

The Panel were far from comfortable with the assertion that the proposals were responsive to the surrounding context including the

approved scheme for a Mosque. Analysis of the relationship between the existing built form and publicly accessible space in the area was lacking and should, through the development of alternative arrangements and building types informed the scale, mass and form of the various residential elements. It was not evident as to whether the City Council's Mill Road Development Brief (2007) had been taken into account. Also, it was felt that insufficient consideration had been given to the way in which the proposed Mosque is to be arranged and function. For example, the location of Blocks B&D to be located very close to the site boundary and over-looking the adjacent east-facing prayer hall (particularly Block D) appeared to lack sensitivity despite the potentially more comfortable relationship illustrated in the small concept sketch included in the presentation material. Notably lacking were drawings including the detail of the Mosque. A context section including the Mosque would help and should be done to examine the situation.

It was suggested that the architects contact the architects of the Mosque – Marks Barfield.

Movement and access

- Student drop-off arrangements. The Panel were informed that access would be via the service route and staggered over several days. Some concern was expressed whether this would work effectively for 329 students and the potential for disruption and nuisance.
- Cycle parking. As the majority of spaces are to be located in the basement, the Panel would welcome some cycle provision in carefully chosen areas at street level for the benefit of visitors. Cycle parking incorporated into the public plaza may need to be avoided out of respect to those using the Mosque. It was also generally felt that cycle provision set back from the road would more likely be used by those visiting the site.
- Refuse collection. The Panel were unconvinced by the proposed arrangements, particularly for the secondary facilities serving Block D and to be sited on the edge of the courtyard gardens.

Layout

- Rooms (Blocks D). With only minimal amenity space between the Blocks and the site boundary, the Panel questioned whether sufficient breathing space would be provided between the single aspect, north facing rooms and the canopy edge. An improved response to the constraints is needed. Again, a contextual site section was noted as being useful both to examine and to review.
- Block D (stair). The point of arrival was regarded as mean and should be re-considered.

Scale and massing

Relationship between Block A and the buildings opposite. This Block is proposed to be 3.5 storeys which is considerably higher than the existing properties on the south side of Mill Road and does not acknowledge the character of its immediate surroundings. The Panel recommend that the Block should be 2 storeys plus roof. The additions of defensible space at ground level, which is a feature of the locality, should be considered.

Landscaping/open spaces

The Panel were generally supportive of the contemporary landscape concept. Given that the area is under-provided in green spaces the Panel would encourage exploration of the creation of multi-functional spaces and shared spaces appropriate to the setting of both the Mosque, the student accommodation and wider community.

Conclusion

Overall, the proposed built form of the scheme is not sufficiently responsive to the site's constraints and the wider context and is need of significant improvements to make it acceptable.

VERDICT – RED (1), AMBER (6)

.....

6.20 Disability Consultative Panel (Meeting of 25 November 2014)

Student drop-off arrangements. Given the location of this site and the likely traffic congestion at peak times, the Panel would hope that a management plan will be in place to minimise congestion during student drop-off/collection periods.

Scooter charging points would be recommended.

Accessible lifts. These ideally should be fire fighting/evacuation lifts in order to provide a safe means of escape for disabled students or visitors.

Block D. This Block is furthest from the road which may cause additional difficulties for disabled students and visitors.

1 accessible parking bay on site is insufficient.

Induction loops. These need to be fitted in all publically accessible areas.

Wayfinding. Consideration needs to be shown towards the visually impaired when designing signage and creating spaces to be easily navigable.

Amenity space. The absence of a WC within a short walking distance would be a cause for concern for some ambulant disabled students and visitors.

Accessible WC for visitors. Some facilities for the benefit of older visitors arriving at the beginning or end of term would be welcomed.

Conclusion

This application reflects only minimal consideration for the disabled and the Panel expressed doubt as to the scheme's compliance with BSA 300, the Local Plan or Part M Building Regs. The distance between this site and the ARU campus as well as the increased cycling traffic on Mill Road generated by this development were also of concern to the Panel.

The above responses are a summary of the comments that have been received. Full details of the consultation responses can be inspected on the application file.

7.0 REPRESENTATIONS

7.1 The owners/occupiers of the following addresses have made representations:

24 Abbey Road	23 Hope Street	30 Suez Road
30 Belgrave Road	16 Jane's Court, Seymour Street	34 Suez Road
18 Belgrave Road	18 Jane's Court, Seymour Street	18 Tamarin Gardens
19A Belgrave Road	24 Jane's Court, Seymour Street	8 Tom Amey Court, St Philips Road
22 Belgrave Road	16 Madras Road	45 Vinery Road
26 Belgrave Road	17 Madras Road	55 Vinery Road
67 Burnside	5 Malta Road	57 Vinery Road
75 Burnside	273 Mill Road	King's Parade, CB2 1ST
	301-305 Mill Road (SPAR) (obj.)	32 London Road, Harston, Cambridge
95 Burnside	316 Mill Road	
3 Catharine Street	320 Mill Road	
96 Cavendish Road	322 Mill Road	
44 Cowper Road	372 Mill Road	
54 Cromwell Road	373 Mill Road	
210 Cromwell Road	380 Mill Road	
45 Eltisley Avenue	7 Montreal Road	
1 Fletchers Terrace	18 Montreal Square	
12 Hemingford Road	3 Natal Road	
14 Hemingford Road	58 Natal Road	
77 Hemingford Road	17 Romsey Road	
102 Hemingford Road	32 Romsey Road (EMRAG)	
129 Hemingford Road	13 Sedgwick Street	
1 Hobart Road	20 Seymour Street (obj.)	
6 Hobart Road	37 Seymour Street	
9 Hobart Road	42 Seymour Street	
30 Hobart Road	85 Seymour Street	3 x representations with no address given which will not be taken into consideration

7.2 The representations in objection to the application can be summarised as follows:

Principle

- The proposed use is contrary to the adopted local plan, emerging local plan and 2007 design brief for the site.
- The site should be developed for housing (family, key worker and affordable).
- The site should be developed for housing/mixed uses/community development.
- Lack of affordable units (either for students or local people) the development would not meet this need.
- Granting a 100% student scheme on this site would set a precedent and compromise the Council's ability to meet its housing targets.
- The proposal will not free up housing stock for general needs housing by students relocating to the site. The demand for student housing is 'infinite'.
- No evidence ARU will use the development.
- The accommodation would be occupied by students not from ARU or the University of Cambridge.
- The consent for the mosque has not invalidated the 2007 Brief.
- Students are already well catered for, such as at CB1.
- The Royal Standard site is providing student accommodation.
- The need for family and affordable housing outweighs the need for student housing.
- The trend is for family housing in the area to be converted for student use and not the reverse.

Layout

- The layout should include more green open space on its frontage as there is a shortage in the area.
- The small square of open space is poorly designed and too small.
- The development would put too much pressure on existing open spaces locally, such as Romsey Rec, especially with the population of Romsey having grown by 10% over the last decade.
- Buildings should be set back more significantly from Mill Road in accordance with the design brief.
- Density of 300 students too high.
- Lack of active frontage onto Mill Road failing to contribute to its vitality.

- Removal of Norway Maple tree on Mill Road unacceptable.
- New tree planting should be of a bigger stock (20-25cm girth).

Design

- The mosque would appear compressed and 'hemmed-in' by the development, losing its spaciousness.
- The design would not recognise the massing, proportions, materials or design culture of the mosque.
- The design is disconnected from local reference and is banal.
- The proposal is an unsuccessful contrast in style.
- Incongruous and conspicuous form.
- Low quality, cheap design.
- Too high.
- Should be two storeys to reflect local context.
- Overbearing impact on Mill Road and the Conservation Area.
- Not in keeping with the Conservation Area.
- Student units are too small.
- Detract from BLI's on Brookfield's Hospital site.
- The scale and positioning of the buildings would create a claustrophobic development.

Privacy

- Overlooking into adjacent mosque residential unit.
- Overlooking into housing opposite.

Light/Overshadowing

- Loss of light into adjacent mosque residential unit.

Noise

- Students will generate late night noise to the detriment of surrounding occupants.

Enclosure

- Block A would dominate housing opposite.

Car Parking

- No provision for parking.

- Students would generate unreasonable levels of car parking and traffic irrespective of proctorial control (which is not policed).
- Existing surrounding streets are already at capacity, the proposal would make the situation worse.
- The mosque would not be agreeable to making the underground car park available for student parking or set-down or drop-off.
- Visitor car parking bays should be provided, as family friends will visit and will cause disruption.

Cycle Parking

- The location of cycle parking within the basement will lead to cycles cluttering up the surrounding external spaces.

Co-ordinated development

- Demonstrates a lack of co-ordinated development with the mosque site adjacent.
- This is a piecemeal development.
- Will inhibit the development of the wider site R21.
- Should avoid piecemeal development like Cromwell Road.

Highway Safety and Transport Impacts

- Additional students cycling down Mill Road would generate a highway safety issue.
- Move-in and move-out days would cause congestion, parking problems locally and highway safety issues, particularly on Mill Road.
- Surrounding streets are already too congested and could not cope with an additional 1,300 pedestrian movements a day.
- Significant cycling improvements to Mill Road need to be made.
- Site is on a bottleneck and would exacerbate problems.
- Transport assessment is flawed.

Community

- Gated development.
- Not socially inclusive.
- Not a balanced, mixed use of the site.
- Students tenure is short-term and the student use would create a highly transient population.
- Increase in drug problems within the area would arise.

- Would create a ghetto.
- Nowhere on site for groups of students to meet.
- No evidence that the development would be warden controlled.
- Housing on the site would be better for community stability.
- Reduce the quality of life on Mill Road.

Other

- Profit driven, speculative proposal.
- No amenities for local residents are provided.
- Inadequate input or consultation with residents.
- Developer's summary of local interest is disingenuous.
- Would alter stock types within local shops in favour of student goods rather than family orientated goods.
- ARU should not continue to expand.
- Too much strain on local healthcare facilities
- Public Art should form part of the proposal.
- Increase in rubbish.
- Detrimental to the economic well-being of the City.

On the Amendments

- The issues have not been addressed
- A reduction in 10% of students is not sufficient, the reduction is minimal
- Does not address drop-off times and late night taxis
- Viability is not an issue
- Profit driven

7.3 A representation has been received from East Mill Road Action Group (EMRAG), of 32 Romsey Road. The representation is in objection to the proposal and can be summarised as follows:

- Local residents do not want student housing on the site. Most would prefer housing or mixed housing and flats with an affordable element (evidenced by EMRAG survey).
- The site should contain more green open space onto Mill Road with buildings set back.
- The existing 2007 development brief should be adhered to and should carry significant weight.
- There is no evidence that the scheme would free up existing housing stock in student use. The development would not meet the Council's Housing needs.

- This would be a gated community, of mono-tenure, not sustainable or mixed use.
- Parking should be provided on-site, the proposal is contrary to adopted car parking standards.
- 6,836 student bedrooms have been built in Cambridge or have planning permission since 2006. (4,501 built, 2,335 having p.p). Only 2,480 family homes have been built in the same period.
- The need for family and affordable housing would not be met.
- The need for student housing is limitless, many student dwellings are not occupied by ARU or University Students.

Results of 2007 survey by EMRAG

-154 responses. 68% oppose student housing, 15% support it. 78% support affordable housing, 11% oppose it. 88% favour green open space on site, 2% oppose it. Of 212 preferences, 7% supported student housing, 61% supported family housing, 49% supported a mix of flats and houses.

7.4 Two letters of support have been received from the following addresses:

- 20 Seymour Street
- 301-305 Mill Road (SPAR)

- One letter does not give any reason why the proposal is supported.
- The other letter of support indicates that a student use would be better suited next to the proposed mosque rather than affordable housing which would bring several issues associated with it.
- The proposal is a long-term and managed solution to the domination of student buy-to-let schemes.

7.5 The above representations are a summary of the comments that have been received. Full details of the representations can be inspected on the application file.

8.0 ASSESSMENT

8.1 From the consultation responses and representations received and from my inspection of the site and the surroundings, I consider that the main issues are:

1. Principle of development
2. Context of site, design and external spaces
3. Open space
4. Public Art
5. Renewable energy and sustainability
6. Disabled access
7. Residential amenity
8. Secured-by-design
9. Refuse arrangements
10. Highway safety
11. Car and cycle parking
12. Trees
13. Environmental Impact
14. Third party representations
15. Planning Obligation Strategy

Principle of Development

Cambridge Local Plan 2006

- 8.2 The Council's Policy Team has confirmed that policies 5/1 and 7/9 and the allocation within the adopted local plan are compliant with the requirements of the NPPF (2012). Policies 5/1 and 7/9 confirm the safeguarding of site 7.12 for mixed use housing development and community facilities, which could include a student hostel for ARU on part of the site in lieu of affordable housing.
- 8.3 I note that the Brunswick site, similarly allocated (site 7.11), has been built under permissions 09/0179/FUL and 09/0181/FUL for, amongst other uses, 205 market units and 251 student units for Anglia Ruskin University in lieu of the affordable housing element.
- 8.4 For the allocated site 7.12, of which the application site forms part, the mosque would constitute the community facility element of the allocation (planning permission 11/1348/FUL). Correspondence from the Muslim Academic Trust confirms there is a definite commitment to fund the mosque and that they anticipate the commencement of major works in summer 2015, irrespective of the outcome of this application. For the remainder of the allocated site – the application site - that leaves 0.6 hectares for the mixed use housing element to be delivered, which could include a student hostel on part of the site in lieu of affordable housing.

- 8.5 As the proposal is solely for student accommodation, it is contrary to policies 5/1, 7/9 and allocation 7.12 in the Proposals Schedule of the Cambridge Local Plan (2006) because it would fail to provide any housing.

The Cambridge Local Plan 2014: Proposed Submission

- 8.6 The site forms part of proposal site R21 (Appendix B, of the Proposals Schedule) for dwellings and employment floorspace, as part of the Cambridge Local Plan 2014 proposed submission. Site R21 includes 315-349 Mill Road and the wider Brookfields Hospital site but not the Mosque site. The proposals schedule indicates the wider site at 2.78ha could accommodate 128 dwellings at 46dph and up to 1ha of employment floorspace.
- 8.7 Because the emerging plan has been submitted for examination it has weight in the decision making process albeit that both policy 46 and proposed site R21 have been subject to objections during the emerging plan consultation process. This reduces the weight that can be attached to these emerging policies.
- 8.8 The Planning Policy Team state:
- 8.9 *'If approved, this proposal would see the loss of part of existing and proposed housing allocations within the current Cambridge Local Plan 2006 and the emerging Local Plan respectively. This proposal risks this allocation with the loss of a number of housing units on Mill Road, but also has a potential cumulative effect. As such, the adverse impacts of granting planning permission on this site would significantly and demonstrably outweigh the benefits, by preventing the council from being able to deliver appropriate numbers of housing units to meet the city's objectively assessed need...'*

and that the:

- 8.10 *'application should be refused on the basis of prematurity, given the substantial and cumulative risk to the council's delivery of its objectively assessed need for housing'*.
- 8.11 I accept this advice, the application is contrary to the emerging Local Plan and would be premature and conflicts with paragraph 14 of the National Planning Practice Guidance.

Student Need versus Housing Need

8.12 ARU has made progress in acquiring purpose built student accommodation since the adoption of the Cambridge Local Plan. The Policy response indicates that for ARU and subject to cascade mechanisms:

-251 units have been delivered at the Brunswick site

-Over 1,000 units have been delivered at CB1

-Sites have come forward at Addenbrooke's and Perne Road and Malta Road serving ARU.

8.13 In my view, taken together with the above sites, existing planning applications under consideration, future windfall sites and evidence of student completions and commitments (3,133 units) since the start of the plan period for the emerging Local Plan, the development of the allocated site for both market housing and student accommodation would be unlikely to prejudice ARU's student housing need.

8.14 The application includes a letter from ARU setting out that it has a demand for student en-suite cluster and townhouse style properties in the location of the site and that they currently are unable to house all first year students in University sponsored accommodation. However, it is not clear from the letter whether ARU is specifically commenting on the proposed plans. I note that ARU make reference to not wanting 'large numbers of expensive studios'. The application contains 48 studio units, mostly within Block A. There is no evidence that these units would be affordable to ARU.

8.15 Notwithstanding the letter from ARU, the Policy team state that:

8.16 *'Anglia Ruskin University has provided no information on their overall need for student accommodation and how this relates to their aspirations for growth'.*

8.17 It is therefore difficult to compare the needs for general market housing with student housing on a strategic basis. I note that the Council no longer considers it appropriate to provide student accommodation for Anglia Ruskin University in lieu of affordable housing on any of the proposed allocated sites. By contrast, the

Council's objectively assessed housing need figure of 14,000 units (which does not include student hostels) to 2031 and latest actual and projected cumulative completions to 2031 would comprise 14,102 units. This emphasises the need to safeguard existing and proposed allocated sites.

Freeing up Housing Stock

- 8.18 The National Planning Policy Guidance paragraph 038 states:
- 8.19 *'All student accommodation, whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus, can be included towards the housing requirement, based on the amount of accommodation it releases in the housing market. Notwithstanding, local authorities should take steps to avoid double-counting.'*
- 8.20 The Policy team accept that it may be possible to average the number of students occupying housing to 4 students per house (for example) and accordingly work out that a scheme for 100 student units *might* free up to 25 houses. The issues with this approach are that:
1. The developers do not have any control over existing housing units used by students.
 2. There is no certainty that student occupied houses would be freed up.
- 8.21 In my view, even if ARU were the applicant or minded to be party to a S106, it would be difficult to ensure that an element of their existing student housing stock should revert back to and remain in C3 use. What makes this difficult is that in the first place ARU would have to be agreeable to such a scenario and in the second, planning permission would be likely to be required, implemented and the continuing use secured. For students who rent in the private sector in properties that are set up for such use, I cannot necessarily see that general demand for continuing student occupation of such properties would not continue, either from ARU students or from other students of educational institutions within Cambridge.

8.22 The Policy comments conclude that without further evidence, the Council is not able to count the delivery of student units against the housing requirement. I agree with this approach, students who may otherwise have occupied HMO's in Romsey could equally be replaced by ARU students or other students and housing stock would not necessarily be released.

Site Marketing

8.23 The amended application includes a marketing report from Barford + Co which states that until February 2013 there had been little active marketing of the site. Before that time, between 2005-2012, the only form of marketing had been an 'All Enquiries' and 'For Sale' board on the site. In 2008, the Co-Op as applicant (08/0663/FUL) sought permission for a mixed housing and student scheme on the allocated site with the subsequent intention of a sale if permission were forthcoming. The application was withdrawn. The marketing report summarises the following:

8.24 -2009-2012 Limited marketing: via 'All Enquiries' and 'For Sale' board only. Occasional enquiries received, typically from housebuilders, retailers (food and non-food), restaurant operators, community groups and the NHS.

8.25 -2013 Full marketing of the site in late January - 28 February: via papers including the Estates Gazette, Cambridge Evening News, the internet including Rightmove, EG Propertylink and Barford + Co and mailshot to 300 housebuilders and developers. Best and final offers were invited by 28 February 2013.

8.26 The marketing in 2013 (Barford + Co states 11 offers were made but lists 12) resulted in the following offers:

- 5 bids from student housing operators
- 3 bids from food stores
- 2 bids from 'traditional' housebuilders
- 1 bid from a housing association
- 1 bid from a care home operator

8.27 The marketing report provides a general analysis of why, in the run up to the final offers date, a lot of the initial interest from housebuilders and Cambridge developers did not transpire into formal bids. The reasons given can be summarised as follows: site

too small (below 2 acres) for national housebuilders; presence of the mosque; road noise and congestion; uncertainty of the Brookfield's Hospital site.

- 8.28 No direct evidence from interested parties concerning their decision not to pursue a formal bid is given in the marketing report. Some of the statements appear to be conjecture.
- 8.29 No evidence is given relating to the offers made from the 'traditional' housebuilders or housing association. The marketing report refers to the only offers at a 'sensible' level as being those from student housing operators. The actual offers and their details are not set out.
- 8.30 My view is that the marketing report provides little information upon which to draw any real conclusions. The very limited full marketing exposure of the site (1 month) has resulted in bids from 'traditional' housebuilders. It is conceivable that a longer marketing exercise would have produced more interest and equally that if the site was put on the market again, that further offers from housebuilders would be forthcoming given that the NHS's intentions for the Brookfields site have become clearer and the larger proposed allocated site is 2.78ha. Neither is it beyond the capability of a house-builder to mitigate against issues of noise, disturbance or traffic congestion. The development of the mosque site is now more certain and, in my view, a choice to not pursue a bid on the basis of its potential proximity is short-sighted; housing and places of worship are common neighbours all along Mill Road. Given the strategic need for the site, either singularly or as part of a wider proposed allocation to provide housing, I do not consider its possible sale for mixed or general needs housing to be an outright obstacle to its development.

Conclusion on Issues of Principle

- 8.31 The applicants assert that the new homes bonus will apply to the new development, that Council tax receipts will increase (when student houses are freed up) and that the scheme would develop a brownfield site and ease pressure on the Green Belt. All these factors would be true of a planning application which included general needs housing on the site and I am, in any event, unconvinced that student houses would be freed up. In my view, the current allocation could still be realised and the approval of the

mosque application does not prejudice this. Notwithstanding the size of the mosque site, the application site is capable of delivering housing which would meet objectively assessed housing need. I give little weight to the marketing report albeit that I recognise that there has been interest in developing the site from 'traditional' housebuilders. I have no doubt that the location of the site for ARU students is appropriate and the development would be likely to fulfil some of ARU's student housing needs but to my mind, these factors do not outweigh the substantive need for general needs housing that the Council is looking for from this site, either through the current Local Plan 2006 or emerging plan and granting permission would undermine the Council's ability to provide for this.

Context of site, design and external spaces

Design

- 8.32 I have no particular issue with the design of Blocks B, C or D. They would be appreciated mainly by students and visitors to the site. Block D would be mostly enclosed from views by the preceding blocks. Its staggered footprint would provide some relief to its façade. Blocks B and C, the townhouses, are in my view well-proportioned and the combination of brick, timber infill panels, and detailing such as the stone cills and zinc rainscreen cladding would combine to provide a relatively plain but appropriate appearance. Urban Design and Conservation officers agree with this appraisal. If I were minded to recommend approval, samples of materials, reveal depths, rainwater goods and extract flues etc. would be sought via condition.
- 8.33 Turning to Block A, I note from the Design and Access Statement that this block has been redesigned on several occasions; earlier at the pre-application stage at the two presentations to Design and Conservation Panel and most recently through the latest amendments to the application. It strikes me that the architects have had some difficulty in achieving an appropriate design for the amount of accommodation proposed within it. Previous designs for this block have been both flat roofed and twin pitched at 4 storeys. As submitted, Block A was designed as a pitched roof combination of 3 and 4 storeys with the uppermost level of accommodation within the roof slope. As amended, the height of Block A has been broken down further into four different elements, two lower 2 storey

elements on either end, and two middle sections of 3 storeys each, the westernmost with recessive dormers and a slightly lower ridge height than the easternmost element with dormers that cross the eaves line.

- 8.34 As Block A faces onto Mill Road and would be highly visible and prominent from within the Conservation Area and in views of Brookfield House BLI (a focal building), its design quality and detailing has to be of a higher standard than Blocks B, C and D. In my opinion, Block A has a series of wide gabled elements and bulkiness of built form when seen in oblique views up and down Mill Road (views A, B, C, E and F). Views eastwards along Mill Road show the wide gabled elements of Block A set against the more slender and steeply pitched roof of Brookfield House. The location of the studio units, as a double bank of rooms around a central corridor, has led to this block being wider than the other blocks at 16.2m. In my view, the visual relationship between Block A's depth and its roof length and roof pitch together with the size of the dormers compared to Brookfield House BLI could be considered discordant.
- 8.35 However, I recognise the advice from the Urban Design and Conservation Team that the proposed amendments have resulted in reducing the overall height of Block A by between 1.7 and 2.5m and that this height is supported. The depth is mitigated by the lower 2 storey pitched roof elements bookending the block and the variation in roofline. The depth of the lower sections are also more consistent with the depth of existing residential terraces on Mill Road. The lower sections help to screen the full depth of Block A.
- 8.36 The Design and Conservation Panel, whilst commenting on a different design for Block A, suggested that it could benefit from a more enriched elevation treatment and that the detailed design would be key. It does not appear to me that these elements have evolved but that is not to say that with further refinement Block A could not be improved further. The Urban Design and Conservation Team agree with this approach.
- 8.37 The front elevation remains relatively plain with stone cill detailing to the windows. The centres of the wide gables are broken up with rectangular aluminium spandrel panels. The recess to these panels could be conditioned and the finer details of the glazing and window recesses could be sought. Other detailed design elements

such as flue extracts, brick samples, brick detailing, roofing materials and 'party' walls could be conditioned. On balance and in view of the advice I have received from the Councils Urban Design and Conservation Team, I am not minded to recommend refusal of permission for Block A.

Height

- 8.38 The mosque would be between 6 metres for the frontage block to 8m for the prayer hall located further back into the site. The dome would extend to 15m. The terraced housing opposite the site is typically 8.6m to the ridge. Most housing within the area is 2-2.5 storeys high. Brookfields Hospital buildings range from 1-3 storeys. Brookfields House, the BLI, is 2.5 storeys high extending to 12m to the ridge.
- 8.39 In terms of height, the Mill Road Brief (2007) indicates that 'the frontage should be of a similar scale to that on the west side of Mill Road opposite the site. A maximum of 2 residential storeys should limit the height of development along the frontage, although there may be some scope for some accommodation within the roof-space.'
- 8.40 The Brief goes on to state
- 8.41 *'The ultimate height of buildings on the Mill Road frontage and to the boundaries of the site should not exceed the established ridge height established by properties opposite the site. Recessed upper floors may reduce the bulk of buildings when viewed from Mill Road. Public consultation raised concerns over the ultimate height of buildings on the site and as a result this guidance recommends that 3 residential storeys should be the maximum height allowed. The acceptability of the final height of buildings will be dependent on the treatment of roofs and the scale and massing of development proposals'*.
- 8.42 Block A would be a mixture of 2 and 3 storeys. The uppermost storey would be set within the roof space. The ridge line of Block A would be 11.8m high and varied, dropping down towards its ends. Existing houses opposite are typically 8.6m high. Having examined the street section (A-A) along Mill Road and cross-sections (B-B & D-D) across Mill Road, I do not consider that of itself the height of

this Block would be harmful to the character and appearance of the area.

- 8.43 Blocks B and C would be 4 storeys. The uppermost storey would be flat roofed. Blocks B and C would be 12m high. The southernmost townhouses of these blocks do not include a fourth storey and are set back from the edge by approximately 7.2m. In addition, the fourth floor of Block B adjacent to the proposed mosque is set back 3.5m from the parapet. In my view, the recessive nature of the fourth floors would mean that in cross-section (see B-B & D-D) and in oblique views (see views B and C) that the height of these Blocks would not be overly dominant when seen from Mill Road.
- 8.44 Block D would be 4 storeys. The uppermost storey would be fractionally set back from the main northern and southern sides of the building, but set in from its eastern and western sides by 4.8m and 3.8m respectively. Block D would be 12m high. I have no concerns with the height of this building given its position at the rear of the site.
- 8.45 Whilst I recognise the Brief's guidance and the concerns raised by local residents, I do not consider the building heights proposed, because of either the recessive nature of the upper floors or the incorporation of accommodation with the roof space, to be harmful to the surrounding area. I note that height is not an issue raised by the Design and Conservation Panel or the Urban Design and Conservation Team.

Design of External Spaces

- 8.46 I have no issue with the design of the external spaces, these appear to be well laid out and design concepts for them sufficiently detailed. The Landscape officer is also of this view following amendments to the scheme. If I was minded to recommend approval I would recommend a number of conditions in relation to landscaping, both hard and soft, to ensure the quality of the spaces are delivered. However, I have more significant concern with regard to the quantity of open space provision provided given the number of students that would be living on this site. I set these concerns out in the paragraphs below.

Open Space

- 8.47 Policy 3/8 of the Cambridge Local Plan states:
- 8.48 *'All residential development will provide public open space and sports facilities in accordance with the Open Space and Recreation Standards. Provision should be on-site as appropriate to the nature and location of development or where the scale of development indicates otherwise through commuted payments to the City Council'.*
- 8.49 Open space requirements are calculated on the basis of the number of people to be accommodated in a development, each unit in this case being assumed to accommodate one person per bedroom. The total assumed population of the development is 270 people.
- 8.50 The total informal open space required by the development (at a rate of 18sqm per person) is 4,860sqm (almost half a hectare). The size of the site is 0.6ha and is taken up by the substantial footprints of the blocks. Given the number of students proposed, it does not appear possible to accommodate both the building footprints and the amount of informal open space required on site.
- 8.51 To the front of the site adjacent to Block A, a rectangular space of 288sqm (24m x 12m) identified in red on the applicant's open space strategy plan is proposed and would be publicly accessible. This could count towards the provision of informal open space on-site. Within the site, a rectangular space of 1,044sqm (58m x 18m) is proposed. This would not be open to members of the public. This is a central private amenity space for the proposed students. To the rear of Blocks B and C would be a series of semi-private garden type spaces associated with the townhouses typically of between 8-10m in depth. To the rear of Block D would be a shallow strip of land between 6-8m in depth running along the northern boundary and covered mostly by tree canopies.
- 8.52 Taking only the frontage space, the proposed development would provide for 5.9% of the adopted standard as publicly accessible informal open space. If the private rectangular space were to be included within this calculation (1,332 sqm), 27.4% of the adopted standard as publicly/privately accessible informal open space would be provided. I have not included the space to rear of Blocks

B, C or D as these are not laid out for more general informal open space use for students. The space behind Block D in particular is very unlikely to be used given its northerly orientation behind the block and its proximity to the canopies of the trees.

- 8.53 The site is within the Romsey Ward. The Cambridge City Council, 'Open Space and Recreation Strategy 2011 (OS Strategy)', describes Romsey Ward (page 61) as a:
- 8.54 *'Densely built-up, predominantly residential environment to the south-east of the City Centre. Much of the housing provision consists of terraced housing, although there are pockets of semi-detached housing in the northern part of the ward. Most gardens are relatively small and narrow and there is little in the way of street trees given the densely urban nature of the area.'*
- 8.55 The surrounding residential environment to the site displays these characteristics. Within the OS Strategy, the strength of Romsey Ward is identified as its allotment provision.
- 8.56 The OS Strategy goes on to state as its weakness:
- 8.57 *'Apart from the relatively informal pitch provision on Romsey Recreation Ground, there is no formal sports provision in Romsey. However, Coleridge Community College and Coleridge Road Recreation Ground are relatively close to the ward. The amount of informal open space in the ward is low given the local population density and the amount of natural and semi-natural green space is very low and is restricted to tree belts within Romsey Recreation Ground and Brooks Road Play Area.'*
- 8.58 The Strategy gives the population of Romsey Ward at 8,950. The amount of protected open space (this is all types of open space) equates to 10.56ha or 1.18ha per 1000 population.
- 8.59 Of the total amount of protected open space within Romsey, 6.75ha is classified as private protected open space, mainly comprising allotments. These spaces would be unlikely to be accessed by students of the scheme. The remaining 3.81ha could be classified as forming part of the informal open space network, equating to 0.43ha per 1000 population.

- 8.60 The adopted standard for the provision of publicly accessible informal open space provision is 1.8ha per 1000 population. The OS Strategy suggests this should move to a higher ratio of 2.2ha per 1000 population and is put forward for adoption as part of the emerging local plan 2014.
- 8.61 For a population of 8,950, the adopted standard for informal open space of 18sqm per person would require 161,100sqm of informal open space or 16.11 ha of informal open space provision within Romsey. I note the Policy team indicate that the known population at the time of drafting the Open Space and Recreation Strategy in 2011 was 8,950 but that the city's population is understood to have risen since 2011 to 9,450. However, for the purposes of my calculations I have used the lower figure.
- 8.62 The actual provision of 3.81ha of public informal open space therefore amounts to only a 24% provision of the standard. In other words, the Romsey ward is underprovided in informal open space by approximately 76% of the standard. The extent of under-provision of informal open space is therefore significant.
- 8.63 Within Petersfield, the amount of public protected open space amounts to 7.76ha, within Coleridge it is 18.17ha and Market it is 40.46ha. The OS Strategy (page 55) recognises that Petersfield Ward suffers from a similar lack of publicly accessible informal open space. Petersfield directly abuts Romsey and is on a clear route from the site to the ARU East Road campus. In my opinion, if there was sufficient provision of informal open space within Petersfield, students would be more likely to access it than any other adjacent ward, but this is not the case.
- 8.64 The OS Strategy states as an opportunity:
- 8.65 *'Site 7.12 Former Magnet Warehouse on Mill Road is allocated for housing, community facilities and student housing in lieu of affordable housing in the Cambridge Local Plan 2006. If this site comes forward for its allocated use, the quality and quantity of open space made available on site should be high in line with the Council's standards in order to avoid further negative impact on deficiencies in publicly accessible open space in Romsey ward. A pedestrian friendly access to the green space adjoining Cherry Hinton Brook and Coldhams Common should be considered.'*

8.66 I would describe the quantity of publicly accessible informal open space, at 5.9% of the adopted standard, as low.

8.67 The OS Strategy states as a threat:

8.68 *'Inadequate open space delivered as a result of new residential development coming forward and deterioration in the quality of existing open spaces.'*

8.69 Whilst this site has not come forward for its allocated use, student development still generates a need for informal open space provision. In my opinion, the development of the site should seek to provide a quantum of informal open space provision closer to the need arising from its future occupants. Any under-provision of space needs to be robustly justified.

8.70 The closest areas of informal open space provision are:

- Romsey Recreation Ground (within Romsey Ward) of 2.81 Ha (Parks and Garden site 18).
- Coleridge Recreation Ground (within Coleridge Ward) of 5.08 Ha (Parks and Gardens site 07).
- Parker's Piece, (within Market Ward) of 9.63 Ha (Parks and Gardens site 16).

8.71 Both Romsey Rec. and Coleridge Rec are within 10 mins walk of the site, but neither are on direct routes to the ARU East Road Campus from the application site. In my view, these spaces are likely only to be partly accessed by future student occupants Mon-Fri, perhaps more likely at weekends. Parker's Piece, a well-used strategic informal open space is the more likely of the spaces to be utilised by students for informal recreation which lies within the Market Ward. The OS Strategy identifies this space as at threat from deterioration in its quality due to high levels of use. Parker's Piece is of City wide importance and has considerable pressure from use throughout the year, not only for informal recreation but large scale events. Coldham's Common to the north is a City-wide strategic area of public open space which comprises a mixture of informal and formal recreation spaces, including numerous sports pitches. In my view, if students were to utilise Coldham's Common, it is more likely to be for formal sports activities rather than informal recreation, as it is further away to its access points (more than a

10min walk) than both Romsey Rec. and Coleridge Rec which are relatively nearby.

8.72 The Mill Road Development Brief 2007 sets out an aspiration for the provision of a large area of open space extending back from Mill Road (not dissimilar to Ditchburn Place) which would create a well-defined space to serve the residential development of the site. The Brief was subject to extensive public consultation in March-April 2007 and again in June 2007 prior to consideration by the City Council's Environment Scrutiny Committee and approval by the Executive Councillor (Environment).

8.73 Paragraph 1.9 of the OS Strategy states:

8.74 *'Within the existing built up area of Cambridge, there need to be improvements in the range of open space, sport and recreation opportunities that are available and accessible through:*

- *The protection and/or enhancement of existing open spaces; and*
- *The creation of new open space, mostly within new developments.*

In areas of deficit, creative solutions should be explored and implemented to make the most innovative use of sites. Planning officers should identify if a development site lies within an area deficient in open space and consider opportunities for delivery of additional open space within the proposed development. This is in order to ensure that the additional residents generated do not contribute to unmanageable pressures on existing open space.' (My highlights).

8.75 The site is within a ward where there is a deficit of public informal open space. It is also adjacent to a ward which also has such a deficit and is on a direct route to the ARU campus. My view is that is Parker's Piece is likely to take the strain of additional pressures arising from student occupiers given its proximity to the ARU campus on East Road. As this is a strategic space, it would not be unreasonable to expect such use from students irrespective of on-site provision, but likewise, I am of the opinion, due to the pressure of use and its distance from the application site, that it would be unreasonable for the development to rely mostly on this space as

catering for the needs of its students. I am of the same opinion with regard to Coleridge Rec. and Vinery Rec. There is a clear opportunity to provide more public informal open space on site as part of its development and such provision would undoubtedly be of significant benefit to future students in an area of clear deficit.

8.76 Paragraph 4.18 of the OS Strategy states:

8.77 *'Where opportunities are expressed in the ward profiles, they are intended to be illustrative rather than exhaustive. If **allocated or windfall sites come forward for residential development in wards where there are clear deficiencies in publicly accessible open space, the development should be required to provide high quality provision on site, unless it can be clearly demonstrated that this is not possible.** If provision cannot be secured on site, financial contributions should be paid in order to enhance open space in the locality to allow it to support a greater number of users. Site allocations will be reviewed as a part of the review of the Local Plan.'* (My highlights).

8.78 I am of the opinion that it would be possible to provide a greater extent of informal open space on site. This could be achieved by either setting the building footprint of Block A back, cutting out a block(s) from the proposal or lessening the height of the units to reduce student numbers and the pressure on the central open space. The applicants have indicated that they would be willing to provide financial contributions to enhance open space in the locality of the site. I am not convinced that contributions alone could address the fundamental issue of a lack of informal open space within the locality of the site. I am not aware of any schemes locally which would result in works to support a greater number of users; most of these spaces are already intensively used.

8.79 In conclusion, the proposal fails to provide sufficient informal open space for future students on site and is contrary to Cambridge Local Plan (2006) policy 3/8 and the Cambridge City Council, 'Open Space and Recreation Strategy 2011. The location of the site within and close to wards where there is a shortfall in public informal open space provision, means student use of such spaces would unreasonably intensify their use. Appropriate mitigation through developer contributions to increase the capacity for use of such spaces is not realistic. Given more informal open space

provision could be provided on site, the harm arising could be mitigated by the applicant.

Public Art

- 8.80 The application does not include a Public Art Delivery Plan as required by the Public Art SPD 2010. The Design and Access Statement indicates that the small square to the west of Block A could be utilised for the inclusion of some form of public art.
- 8.81 The Council's Public Art Officer has indicated that the planning submission does not have enough information within it, including the absence of a projected budget and that at no time in the process has the developer sought her advice. This has been relayed to the applicants and I was expecting this element of the submission to be addressed as part of the amendments, but it has not.
- 8.82 The applicant's approach to the inclusion of public art within the scheme is disappointing. I do not consider that a suitably worded condition could adequately address this issue because I have little certainty of what the public art would entail and where and how it would be delivered. The proposal is contrary to the Public Art SPD 2010 and policies 3/4 and 3/7(L) of the Cambridge Local Plan (2006).

Renewable energy and sustainability

- 8.83 The application includes an Energy and Sustainability report. This sets out that the applicants intend to:
- enhance the building fabric
 - provide natural ventilation to student rooms
 - provide solar glazing to East, West and Southern facades to prevent overheating
 - to provide water efficient fixtures and fittings
 - to use A rated building materials
 - to use permeable paving
 - to provide gas fired Combined Heat and Power (CHP) meeting 50% of the space heating and domestic hot water demand. This measure is predicted to achieve a carbon reduction of 15.7% in regulated emissions.

A BREEAM pre-assessment has also been carried out which demonstrates that a 'Very Good' rating is achievable'

- 8.84 The Council's Sustainability Officer has stated that the applicants approach to meeting the requirements of Policy 8/16 and many of the approaches related to sustainable design and construction are supported. I accept this advice.
- 8.85 In my opinion the applicants have suitably addressed the issue of sustainability and renewable energy and the proposal is in accordance with Cambridge Local Plan (2006) policy 8/16 and the Sustainable Design and Construction SPD 2007.

Disabled access

- 8.86 All of the Blocks would have level access at their entrance points. The central landscaped space would be designed to be level and obstruction free. Blocks A and D would have three lifts and be fully wheelchair accessible. Blocks A and D would provide a total of 15 wheelchair studios/en-suite rooms (see table below). Two disabled car parking bays would be provided to the west of Block A. The applicants have indicated that, as necessary, the central space behind Block A could accommodate a further 3 disabled parking bays if required and that the need for this would be assessed on a yearly basis.

Block	Studio	Townhouse	En-suite Cluster
A	3		
B		0	
C		0	
D	3		9
Total (15 or 5.6%)	6		9

- 8.87 I note the Access Officer's and Disability Panel's recommendations for scooter charging points, accessible fire-fighting/evacuation lifts, induction loops, an accessible WC for visitors, way-finding, power assisted entrance doors, and that it would be better if some accessible bedrooms were nearer the front of the complex. These are all building control Part M issues but they have been relayed to the applicants and they have indicated that most of these

recommendations can be accommodated. If I was recommending approval, an informative advising of these recommendations could be appended to the decision notice.

- 8.88 The Disability Panel and the Access Officer also raise concern regarding Block D being the furthest from the road which may cause additional difficulties for disabled students and that only 1 accessible parking bay on-site is insufficient. As noted above, the number of disabled parking spaces that could be accommodated has been increased to 5 to address these concerns.
- 8.89 For Block D, I recognise that its position is furthest from the road but there is little practical means by which to make a route to this block any more straightforward.
- 8.90 Regarding disabled car parking provision, policies 7/10 and 8/10 and appendix C of the Local Plan set out the policy position. Appendix C states that where rooms are specifically designed for disabled people that disabled parking of at least 1 space for each room so designed should be provided. By providing space for 5 cars for 15 rooms, the development is therefore contrary to these adopted policies. However, I am mindful that this issue was tested on appeal at the former Texaco site on Huntingdon/Histon Road under planning reference 10/0887/FUL, where no disabled parking was provided for a student scheme of 94 rooms. In that appeal decision, the Inspector noted that:
- 8.91 *'There is, therefore, an inherent conflict in the Council's policy objectives. The choice lies between making no provision at all for people with disabilities on the one hand and providing four bedrooms without the required parking spaces on the other. The site is well served by public transport and is within walking distance of the city centre and many of the University colleges. There is a limited amount of on-street parking available nearby, on both Huntingdon Road and Histon Road, and a lay-by within the highway would be provided as part of the development. Moreover, by no means all people with disabilities have cars and, indeed, many are unable to drive at all. Taking all of those circumstances into account, the compromise solution proposed by the Appellants seems eminently sensible.'*
- 8.92 *My conclusion on this issue is that, in the particular circumstances of the site and in the light of other policy*

requirements, no demonstrable harm would be caused by the failure to provide disabled parking spaces in accordance with local Plan Policy 8/10.'

- 8.93 Whilst the application site is not as constrained as the former Texaco site, it is nonetheless located along a main transport corridor into town, is accessible via public transport and within reasonable distance of shops and services within the local Romsey Area. To my mind, the provision of 15 disabled car parking spaces would significantly erode the already constrained open space located within the site. For these reasons, and because the applicants have sought to accommodate as many spaces as they can in the revised plans, I do not consider this particular conflict with the Local Plan to be a reason for refusal that is sustainable on appeal, despite the original concerns of the Access Officer and County Transport colleagues.

Residential Amenity

Impact on amenity of neighbouring occupiers

Noise and Disturbance

- 8.94 The application includes a Management Plan. This sets out that the scheme would benefit from a full time accommodation manager, a full time assistant, a full time maintenance operative and three part time community ambassadors. The management team would be available on-site Monday-Friday 9am-6pm. The community ambassadors would be available 24 hours, 7 days a week, and would be likely to be third year students living on site, being on-call, out of core hours. They would be formally employed for the period of their tenancies and trained. Communal areas of the site would be covered via CCTV. Block A would include a reception desk and a common room area for students to meet. The management company appointed would be responsible for producing a student travel pack which would seek to influence travel behavior and highlight that, with the exception of allocated disabled spaces, that students owning or keeping a car in Cambridge is a breach of their contract which could lead to a termination of a tenancy. This could be written into a S106 agreement as necessary.
- 8.95 With regard to the check-in process, the Management Plan states:

- 8.96 *'Unlike university owned accommodation, there is no strict start date where all students must be matriculated. This is in part due to the anticipated mix of students at Mill Road, such as post-graduates and international students, who will continue to arrive well into October'.*
- 8.97 The management plan, which has been prepared by a student management company, also includes details relating to: Student welcome packs and travel advice; check-in time slots in order to stage the impact of the check-in process; the organization of the move-in day ensuring people are on hand to help move and store personal items; site security; the management of deliveries; meet and greet induction evenings emphasizing the responsibilities expected of students both inside and outside the site; the management of move out times; 24hr maintenance cover; tenancy checks on students; waste management; rules on tenant behavior; and the external display of contact information for on-site management and emergencies.
- 8.98 In my view the draft management plan is comprehensive and could be secured through a condition if I was minded to recommend approval. With particular reference to parking, I note that the site does have space for cars to pull in behind Block A to enable unloading. In my view, the effective management of a staggered check-in process is essential because this part of Mill Road is often congested and surrounding streets are often at parking capacity. This is not beyond the capability of a management company to successfully undertake.
- 8.99 The communal areas are central to the site and its layout is such that most impacts from student occupancy are likely to be internal. I therefore consider student behavior within the site is likely to be well managed.
- 8.100 I recognise, however, that it is more difficult to manage the off-site behavior of students who are by their nature a transient population. It is inevitable that from time-to-time, students living on this site are going to cause noise and disturbance to their neighbours and sometimes this is going to be late at night. However, this is a mixed use area that already contains a high proportion of students and which is well served by local restaurants, cafes and public houses, providing a late night economy. The site is also favourably

located directly off Mill Road as opposed to a side street where a large student presence would be more greatly felt. A number of nearby uses on the north side of this part of Mill Road are also non-residential; Brookfields Hospital is to the east and a series of local shops including a SPAR are to the west. The residential units contained within the Mosque itself would not front Mill Road. The range of student unit types also means that students will not solely be first year undergraduates. In my opinion, given this context, it would be difficult to argue that the impact of the use would be significantly harmful to the quality of life of local residents or that this harm could not be adequately managed by the on-site management team or other statutory bodies.

8.101 In my opinion, the development accords with policies 3/4, 3/7 and 7/10 of the Cambridge Local Plan 2006.

Privacy and Enclosure

8.102 Apart from the proposed Mosque, I do not consider that the scheme would unduly impact on any of its other residential or healthcare neighbours in terms of visual dominance, loss of light or privacy.

8.103 The scheme is sufficiently far enough away in terms of the siting of the blocks so as to adequately respect the amenity of Vinery Road and Mill Road occupants. Whilst I accept that the northerly outlook from living room and bedroom windows of occupiers of Mill Road properties directly opposite the site would change, this is an inevitable consequence of the development of the site. Set across the road, and at the proposed 3 storey height, I do not consider that Block A would be unduly harmful to the amenity of occupants opposite.

Impact on the Proposed Mosque

Sunlight and Daylight

8.104 The applicants have produced a sunlight and shadow assessment in accordance with BRE guidelines. In terms of external impact, the main issue highlighted is the impact on a residential unit granted as part of the mosque proposal which would be on its eastern side facing the middle of block B.

- 8.105 The Daylight and Sunlight Report concludes, that of 9 windows assessed in the mosque residential unit (4 ground floor windows, 5 first floor windows), none of them would adhere to the BRE guideline criteria (20%) on vertical sky component, with ratio reductions of between 0.52 to 0.76 the former value. A daylight distribution test for 5 rooms (2 on the ground and 3 on the first floor) within the residential unit, show that 4 would fall below recommended guidelines with ratio reductions of between 0.13 and 0.72.
- 8.106 From studying the plans of the proposed 3-bed residential unit for the mosque, the key issue would appear to be the impact on ground floor east facing living room windows which is brought about by the proximity and height of Block B. A cross-section (D-D) through the mosque, shows Block B to be 9.9m from the mosque residential unit.
- 8.107 If the mosque was built and the unit occupied, the theoretical impact would be a real one. However, that is not the case and I am mindful that approved plans for the mosque's residential unit provide very little external amenity space to the boundary (1.9m). I have asked the mosque to clarify the intended occupation of the unit and they have stated that it is designated for the imam and his family and they would be likely to be long-term occupants. The mosque has indicated that definite commitments have been secured to fund the project and that commencement of development is planned for late summer 2015.
- 8.108 In my view, this is an on-balance issue. On the one hand there is reasonable prospect of the development of the mosque and the permanent residential occupation of the unit and it is clear that subsequent occupation may well be affected by low light levels from the proposed student scheme. On the other hand, the approved plans for the mosque rely too heavily on an easterly outlook and give little space to future occupants to the boundary. In conclusion and despite my concerns, I am not minded to support a refusal of planning permission.

Privacy and Enclosure

- 8.109 Each of the first and second floors of Block B facing the proposed residential unit within the mosque would have a series of student bedrooms approximately 9.9m away (building-building). Block B

would therefore enclose and be visually dominant when seen from the proposed mosque side and there would inevitably be some inter-looking at relatively close range. To an extent, privacy issues could be resolved through the obscure glazing of the lower two thirds of the student window panes, or the insertion of privacy hoods or louvers to direct views from the student residencies away from the proposed mosque unit. However, the issue of enclosure and dominance of built form is less capable of mitigation. For the reasons given above, on balance, I am not minded to recommend refusal of the student scheme based upon a theoretical impact and especially where the approved mosque layout provides a relatively small amount of amenity space for the occupant(s) of the intended unit. If the proposed mosque were equidistant to the boundary as Block B (i.e. 8m), I doubt that I would have the same degree of concern in terms of either loss of light, overshadowing or enclosure.

Wider Community Impact

8.110 Lots of representations have criticised the fact that the development would be gated. I recognise that the provision of gates is not socially inclusive but in my opinion, it is necessary to ensure the adequate safety and security of students. Fears of increases in drug problems within the area and of the creation of a ghetto are in my opinion unfounded.

8.111 In my view, the proposal adequately respects the residential amenity of its neighbours and the constraints of the site and I consider that it is compliant with Cambridge Local Plan (2006) policies 3/4, 3/7 and 3/12.

Amenity for future occupiers of the site

8.112 The scheme provides a variety of different types of student accommodation and is generally set far enough from its boundaries so as to provide an adequate outlook for future occupants from bedroom and habitable room spaces. I have had some concern with regard to the occupants of Block D having a solely northern outlook into the tree canopies adjacent. I acknowledge that this block has moved marginally away from the canopy line and whilst this accommodation is not ideal it is satisfactory for an undergraduate student on limited tenancy. The site would be secure and I note the general support for the

proposal from the Police Architectural Liaison Officer. I note that the townhouse Blocks B and C would each have rear access into shared 'private' garden type spaces and that the Council's Landscaping Officer is generally satisfied with the landscape design of the scheme as amended.

- 8.113 In my opinion, notwithstanding my concerns with regard to the quantum of informal open space on site, the proposal would otherwise provide a satisfactory living environment in terms of the design and arrangement of the student blocks and the outlook from them and is compliant with Cambridge Local Plan (2006) policies 3/7 and 3/12.

Secured-by-Design

- 8.114 The main entrance would be from Mill Road into Block A which would incorporate security barriers opposite a 24 hour reception. All internal doors would be operated via a key card system. The cycle security arrangements would be via a key card and covered CCTV. Low level lighting would cover the internal landscaped spaces within the site.
- 8.115 The Architectural Liaison Officer is satisfied with the level of security for the student accommodation as set out in the Design and Access Statement. I accept his advice. In my view, the development is in accordance with policy 3/7 of the Cambridge Local Plan 2006.

Refuse Arrangements

- 8.116 Provision for waste is made via 4 refuse storage areas across the site. Two would be within the ground and basement areas of Block A and two would be at the northern ends of Blocks B and C. Refuse would be collected via the access to the rear of Block A. The refuse arrangement would be managed by the appointed management company.
- 8.117 In my opinion the proposal is compliant with Cambridge Local Plan (2006) policy 3/12.

Highway Safety

- 8.118 The County Council's original consultation response raised

numerous issues with the proposal as submitted. A significant amount of further survey work, audit and technical supporting/modal split information was requested.

8.119 In terms of specific mitigation for the development, the County Council has stated that they require:

- A contribution for the installation and maintenance of real-time bus information at the southbound bus stop located on Mill Road, near to the site.
- The provision of advised cycle stop lines at the Coleridge Road/ Mill Road signalised junction.
- The provision of an improved footpath between the site and Sainsbury's supermarket (via Seymour Street), including improved lighting and resurfacing.
- The provision of a zebra crossing on Mill Road outside the site frontage.

Site Access Arrangements

8.120 The Highway Safety Engineer originally raised a concern regarding the access point in relation to Montreal Road. The County Council now advise that they have met with the developers and that the documents submitted following that meeting have addressed the concerns raised. I have asked for further clarification on this point and will report any additional comments received on the amendment sheet or orally at the meeting.

Conclusion

8.121 Further information has been provided by the applicant in order to address the concerns raised. The County Council has advised, subject to mitigation, that the further information satisfies their concerns. I am minded to accept the advice from the County Council Transport Team. In my view, the proposal is compliant with Cambridge Local Plan (2006) policy 8/2.

Car and Cycle Parking

Car Parking

8.122 Apart from 2 designated disabled parking bays on-site, the scheme does not propose any car parking for students. A significant number of third party objections have raised concern with regard to parking, in particular that:

- students would generate unreasonable levels of car parking and traffic irrespective of proctorial control (which is not policed).
- that existing surrounding streets are already at capacity and the proposal would make the situation worse.
- visitor car parking bays should be provided, as family friends will visit and will cause disruption.

8.123 The applicants have indicated that as part of tenancy agreements that students will not be allowed to own or keep a car within Cambridge and that this can be secured via a S106 agreement. Students who do not abide by this agreement would be subject to warnings and the termination of their tenancy. This provision would accord with policy 7/10b of the Local Plan and in my view, the proximity of the ARU East Road campus means that most students will either walk, cycle or bus from the site. I do not consider that a significant increase in visitor parking provision on site would be justified. The scheme has a pick-up/drop-off area to the rear of Block A and I consider this to be sufficient if needed. The scheme is likely to only generate 2-3 full time staff on site at any one time. Staff would be encouraged through the travel plan to arrive by sustainable modes and I note that cleaning staff would be provided with cleaning equipment on site.

8.124 I recognise that these provisions do not guarantee that there would not be a demand for car parking in local streets arising from the development. I acknowledge that existing streets, which are outside the CPZ, are at capacity but, my view is that this will dissuade car ownership and visitor parking from occurring. This is an existing problem for local residents that the developers cannot address themselves and which, in my view, can only be partially tackled through the extension of the CPZ into this part of Mill Road.

Cycle Parking

8.125 On the eastern side of Block A would be a ramped entrance point to an underground cycle store for 192 cycles laid out on two tiered

'Josta' racks. The cycle store would be accessed via a secure card system and covered by CCTV. 16 spaces would be provided on Sheffield stands in front of the main entrance to Block A for visitors. Access to the basement cycle park has been tracked via a swept path analysis and the applicants have indicated that the lift to the basement is to be 2m deep to accommodate bikes if necessary.

8.126 The adopted standards require provision to be made for two thirds of the student bed spaces (180) and one visitor space for every five bed spaces (54). As such, 16 visitor spaces is below the standard, but I see no reason why this could not be increased through a suitably worded condition if considered necessary. The applicants have already indicated that further provision could be made within the public square to the west of Block A.

8.127 If I were minded to recommend approval, I would seek to ensure that the ramp gradient with appropriately dimensioned 400mm wide wheel channels on both sides; automatic door design on the side cycle access of no less than 1m in width; CCTV; and internal dimensions for the lift; are provided as part of detailed plans and secured by a suitably worded planning condition. I also welcome the applicant's intention to explore the provision of a 'Nextbike' rental station at the site as part of their Travel Plan commitments.

8.128 In my opinion, subject to conditions, the proposal is compliant with Cambridge Local Plan (2006) policies 8/6 and 8/10.

Trees

8.129 The Councils Arboricultural Officer raised an initial objection with regard to the potential impact of the construction of Blocks A and C, the access, car parking and a proposed sub-station, on TPO'd Lime trees adjacent to the eastern boundary. The protected Limes are a significant landscape feature of Mill Road, are widely seen and contribute positively to the setting of the Conservation Area.

8.130 The amended plans have sought to address these concerns by removing the sub-station (and associated trenching) and the parking space from the plans. The applicants have also clarified that the new access adjacent to the Block A and which runs underneath a tree canopy would be constructed no lower than the existing foundations to the hard-standing which are on site at

present.

- 8.131 The Arboricultural Officer also raised a concern with regard to Block D which is close to a number of category B trees to the north requiring extensive pruning. The applicants have amended the plans to set Block D further away from the tree canopies.
- 8.132 I will report any further comments from the Arboricultural Officer on the amendment sheet or orally at the meeting, however, in my view the development appears to have addressed the initial concerns and is likely to comply with Cambridge Local Plan (2006) policy 4/4. If I were minded to recommend approval of the scheme, I would ensure that tree protection conditions were imposed on the scheme, including a construction methodology for the access underneath the tree canopies.

Environmental Impact

Need for an Environmental Impact Assessment

- 8.133 On 21 January 2014 the Council offered a screening opinion confirming that the scheme did not require an Environmental Statement under the terms of the Environmental Impact Regulations. I am still of this view.

Construction and Operational Impacts

- 8.134 The Council's Environmental Health Officer has not raised an objection to the scheme. He has recommended conditions relating to construction and delivery hours; construction noise, demolition and piling; dust; noise insulation from traffic; plant noise; noise assessment and mitigation from hospital plant; waste and recycling; waste lorry movements; and contaminated land. Various informatives are suggested. If I were minded to recommend approval of planning permission, these conditions would be recommended.

Drainage

- 8.135 The Council's Sustainable Drainage Officer has raised no objection to the proposal. The proposal seeks to limit the flow of water from the site to 5 litres a second. This would be an improvement in terms of water management. If I were minded to

recommend approval of planning permission, a surface water drainage condition would be recommended.

Ecology

8.136 The application is accompanied by an Ecological and BREEAM assessment report. As the site is mainly hard standing, on-site ecology is considered mainly of negligible/low value. However, a number of semi-mature/mature trees (T1-T5) line the site, some of which have the potential for roosting bats. The report recommends works to these particular trees are only carried out subject to further surveys and only at particular times of the year as appropriate and that any site lighting is minimal and kept away from the trees. Similar provisions for the protection of birds, particularly during the nesting season, are recommended.

8.137 In order to promote bio-diversity within the site Bat boxes, Hedgehog nesting domes within garden areas, Sparrow, Starling and standard bird boxes on new buildings and on trees and species rich grassland and deadwood log piles to promote invertebrates such as Bumblebees and butterflies are proposed.

8.138 If I were minded to recommend approval, conditions requiring: adherence to the measures set out to protect bats and birds; the provision of an external lighting scheme; and provisions for the enhancement of bat, bird and invertebrate species for the site, would be recommended.

8.139 In my opinion, the ecological impact of the scheme would be acceptable and the proposal accords with Cambridge Local Plan policies 3/1, 4/3, 4/7, 4/13, 4/15 and NPPF advice

Third Party Representations

8.140 I summarise the third party representations and my responses to them in the table below.

<u>Principle</u>	
-The proposed use is contrary to the adopted local plan, emerging local plan and 2007 design brief for the site, compromising the Council's	See paragraphs 8.2 – 8.11

ability to meet its housing targets.	
-The site should be developed for housing (family, key worker and affordable).	As above
-The site should be developed for housing/mixed uses/community development.	As above
-Lack of affordable units (either for students or local people) the development would not meet this need.	There are no policies in the adopted local plan which required affordable student housing
-Granting a 100% student scheme on this site would set a precedent	Agree, this could set a precedent for other sites the Council has allocated where student uses are being proposed or could be proposed. However, each site should be treated on its own merits.
-The proposal will not free up housing stock for general needs housing by students relocating to the site. The demand for student housing is 'infinite'.	See paragraphs 8.18 – 8.22. It is agreed that housing stock would be necessarily be freed up from student use.
-No evidence ARU will use the development.	See paragraph 8.14 which notes ARU's interest in the site.
-The accommodation would be occupied by students not from ARU or the University of Cambridge.	See paragraph 8.152, a S106 occupation clause would cover this.
-The consent for the mosque has not invalidated the 2007 Brief.	Agree, the mosque forms part of the community facility element of the 2007 Brief and site allocation.
-Students are already well catered for, such as at CB1.	Agree, but this does not necessarily mean that there is not a further need for student accommodation.
-The Royal Standard is providing student accommodation.	As above
-The need for family and affordable housing outweighs the need for	See paragraphs 8.12 – 8.17.

student housing.	
-The trend is for family housing in the area to be converted for student use and not the reverse.	There is no evidence to support this.
<u>Layout</u>	
-The layout should include more green open space on its frontage as there is a shortage in the area.	See paragraphs 8.47 – 8.79. I agree regarding the need for more open space, but see no reason why this should necessarily be on the frontage.
-The small square of open space is poorly designed and too small.	See paragraph 8.46
-The development would put too much pressure on existing open spaces locally, such as Romsey Rec, especially with the population of Romsey having grown by 10% over the last decade.	See paragraphs 8.47 – 8.79.
-Buildings should be set back more significantly from Mill Road in accordance with the design brief.	I disagree, Block A building needs to front Mill Road and enclose it.
-Density of 300 students too high.	I agree, even as amended to 270 students. See paragraphs 8.47 – 8.79. This is most easily explained by the lack of open space provided for students.
-Lack of active frontage onto Mill Road failing to contribute to its vitality.	Block A would have an active frontage.
-Removal of Norway Maple tree on Mill Road unacceptable.	This is not a significant tree in terms of the wider street scene. Replacement planting could mitigate for this and be secured through condition
-New tree planting should be of a bigger stock (20-25cm girth).	This could be secured through condition

<u>Design</u>	
-The mosque would appear compressed and 'hemmed-in', and the design would not recognise the massing, proportions, materials or design culture of the mosque.	See paragraphs 8.32 – 8.37. I partially agree, but the harm here is really concerning the residential amenity of the proposed mosque residential unit. Detailed design elements can be secured through condition
-The design is disconnected from local reference, is banal and an unsuccessful contrast of low quality	As above
-Too high, claustrophobic positioning.	See paragraphs 8.38 – 8.45
-Overbearing impact on Mill Road, the Conservation Area and extract from the adjacent BLI's on Brookfield's Hospital.	As above
-Student units are too small.	The size of the units themselves are within established guidelines for student accommodation and would be acceptable to ARU and would meet Environmental Health regulations.
<u>Privacy</u>	
-Overlooking into adjacent mosque residential unit.	See paragraph 8.109.
-Overlooking into housing opposite.	This is across Mill Road from Block A. As such windows are already onto Mill Road, this is not considered a significant privacy issue worthy of refusal of planning permission.

<u>Light/Overshadowing</u>	
-Loss of light into adjacent mosque residential unit.	See paragraphs 8.104 – 8.108.
<u>Noise</u>	
-Students will generate late night noise to the detriment of surrounding occupants.	See paragraphs 8.94 – 8.101.
<u>Enclosure</u>	
-Block A would dominate housing opposite.	This is across Mill Road from Block A. The roof form and scale of Block A is sufficiently fragmented so as not to cause an issue of enclosure.
<u>Car Parking</u>	
-No provision for parking.	See paragraphs 8.122 – 8.124.
-Students would generate unreasonable levels of car parking and traffic irrespective of proctorial control (which is not policed).	As above
-Existing surrounding streets are already at capacity, the proposal would make the situation worse.	As above
-The mosque would not be agreeable to making the underground car park available for student parking or set-down or drop-off.	The mosque has explicitly stated this in their consultation response to the application.
-Visitor car parking bays should be provided, as family friends will visit and will cause disruption.	See paragraph 8.123
<u>Cycle Parking</u>	
-The location of cycle parking within	I disagree, both the cycle

the basement will lead to cycles cluttering up the surrounding external spaces.	parking basement area and the external spaces are likely to be well managed. The external space is unlikely to be cluttered by cycles. The basement area would also have secure access which means students are incentivised to use it.
<u>Co-ordinated development</u>	
-Demonstrates a lack of co-ordinated development with the mosque site adjacent and is a piecemeal development	The proposed mosque has permission and the applicants can do nothing about that. The relationships between the proposed developments has been examined.
-Will inhibit the development of the wider site R21.	See paragraphs 8.6 – 8.11
<u>Highway Safety and Transport Impacts</u>	
-Additional students cycling down Mill Road would generate a highway safety issue.	See paragraphs 8.118 – 8.121
-Move-in and move-out days would cause congestion, parking problems locally and highway safety issues, particularly on Mill Road.	See paragraph 8.97
-Surrounding streets are already too congested and could not cope with an additional 1,300 pedestrian movements a day.	See paragraphs 8.118 – 8.121, see proposed mitigation
-Significant cycling improvements to Mill Road need to be made.	As above
-Site is on a bottleneck and would exacerbate problems.	As above
-Transport assessment is flawed.	The applicants have

	addressed the concerns raised by the County Transport Team.
<u>Community</u>	
-Gated development, not socially inclusive. Students tenure is short-term and the student use would create a highly transient population	See paragraphs 8.110 – 8.111
-Not a balanced, mixed use of the site.	See paragraph 8.141
-Increase in drug problems, creation of a ghetto	See paragraph 8.110
-Nowhere on site for groups of students to meet.	Block A has a ground floor lounge facility
-Warden controlled.	There would be 24hr management cover
-Housing on the site would be better for community stability.	I do not disagree but this is not a reason for refusal in my view.
-Reduce the quality of life on Mill Road.	There is no evidence this would be the case.
<u>Other</u>	
-Profit driven, speculative proposal.	This is not a material planning consideration
-No amenities for local residents are provided.	This is not a requirement of policy. It would be unreasonable for the development to mitigate existing deficits in local amenities.
-Inadequate input or consultation with residents.	This is not a material planning consideration.
-Developer's summary of local interest is disingenuous.	This is a matter of opinion and is not a material planning consideration. The applicants have set out a statement of Community Engagement in accordance

	with the requirements of the NNPF and the Localism Act.
-Would alter stock types within local shops in favour of student goods rather than family orientated goods.	There is no evidence this would be the case. This is not a material planning consideration.
-ARU should not continue to expand.	ARU is not planning a significant increase in student numbers. The developers are arguing that the development would take students out of and free up existing housing stock.
-Too much strain on local healthcare facilities	There is no evidence this would be the case, see above.
-Public Art should form part of the proposal.	See paragraphs 8.80 – 8.82.
-Increase in rubbish.	This is not a material planning consideration.
-Detrimental to the economic well-being of the City.	There is no evidence this would be the case. Students would contribute towards the local economy.

8.141 A lot of third party representations criticise the use of the site solely for students as creating a tenure mono-culture and not providing a balanced, mixed use of the site. The lack of housing would mean that the wider community is potentially deprived of longer term occupancies which brings with them greater integration with the existing sedentary community and its associated infrastructure. However, in my opinion, the population of this part of Mill Road is defined by its mix of permanent and transient residents (which also includes young professionals living in HMO's on short-term tenancies). In my opinion, an additional 270 students is not going significantly unbalance the pre-existing housing mix.

Planning Obligation Strategy

Planning Obligations

8.142 The Community Infrastructure Levy Regulations 2010 have introduced the requirement for all local authorities to make an assessment of any planning obligation in relation to three tests. If the planning obligation does not pass the tests then it is unlawful. The tests are that the planning obligation must be:

- (a) necessary to make the development acceptable in planning terms;
- (b) directly related to the development; and
- (c) fairly and reasonably related in scale and kind to the development.

8.143 In bringing forward my recommendations in relation to the Planning Obligation for this development I have considered these requirements. The Planning Obligation Strategy (2010) provides a framework for expenditure of financial contributions collected through planning obligations. The proposed development triggers the requirement for the following community infrastructure:

Open Space

8.144 The Planning Obligations Strategy Supplementary Planning Document (2010) recognises that if all the open space required in a new development under the Open Space and Recreation Standards cannot be accommodated on site, financial contributions towards the provision or improvement of open space elsewhere can be accepted. The Planning Obligation Strategy SPD provides a framework for the negotiation and expenditure of monies secured under Section 106 agreements.

8.145 For student developments, the Planning Obligation Strategy states that full provision for informal open space for non-family student accommodation will not be sought if the development is on a college campus and it can be shown that adequate appropriate open space is provided such that students are unlikely to make significant use of other informal open space. In this case, the development is not on the main East Road ARU campus nor is close to it. Furthermore, the East Road campus is a compact

educational environment and provides very little informal open space provision for students. In my view, the existing ARU campus would not cater for the need arising from the site.

8.146 If an off-site contribution was to be required towards informal open space, it would amount to £61,485 (£65,340 minus 5.9% or £3,855) worth of provision. In my view, however, it would not be reasonable to accept a contribution because:

- it would be unlikely to result in any identified tangible improvement to existing open space(s) to mitigate the need from students.
- any possible improvements to informal open space, such as at Coleridge Rec. or Romsey Rec, would not necessarily be of direct benefit to student occupiers of this site because of their location away from the student 'corridor' into town and the main ARU campus.
- even if nearby recreational spaces were used by students, this would cumulatively exacerbate the use of such spaces, such as at Coleridge Rec. or Romsey Rec, which is within a ward already under-provided for in terms of informal open space provision.
- more informal public open space could be provided on site. It would in the interests of good planning to make such provision given the site's location, the quantum of development and the need arising.

The requirement for this site also covers outdoor sports facilities and indoor sports facilities. The contributions can be calculated as follows:

Outdoor sports facilities					
Type of unit	Persons per unit	£ per person	£per unit	Number of such units	Total £
studio	1	238	238	270	£64,260
1 bed	1.5	238	357		
2-bed	2	238	476		
3-bed	3	238	714		
4-bed	4	238	952		
Total					£64,260

Indoor sports facilities					
Type of unit	Persons per unit	£ per person	£per unit	Number of such units	Total £
studio	1	269	269	270	£72,630
1 bed	1.5	269	403.50		
2-bed	2	269	538		
3-bed	3	269	807		
4-bed	4	269	1076		
Total					£72,630

Informal open space					
Type of unit	Persons per unit	£ per person	£per unit	Number of such units	Total £
studio	1	242	242	270	£65,340*
1bed	1.5	242	363		
2-bed	2	242	484		
3-bed	3	242	726		
4-bed	4	242	968		
*Total (£65,340 minus 5.9% (£3,855) on site public upon space)					£61,485

8.147 In the absence of a S106 planning obligation to secure the requirements of the Planning Obligation Strategy (2010) and in accordance with the Cambridge City Council Open Space Standards Guidance for Interpretation and Implementation (2010), the proposal is in conflict with Cambridge Local Plan (2006) policies 3/8 and 10/1 and the Planning Obligation Strategy 2010 and the Cambridge City Council Open Space Standards Guidance for Interpretation and Implementation (2010).

Transport Contributions and Specific Improvements

8.148 Contributions towards catering for additional trips generated by proposed development are sought where 50 or more (all mode) trips on a daily basis are likely to be generated. The site lies within the East Corridor Area Transport Plan where the contribution sought per trip is £229.

8.149 The applicants have made an assessment of the proposal, on which the following assessment of expected additional trips and contributions is based.

Existing use trips = 259

270 student rooms x 4 = 1080

1080 – 259 = 821 net additional trips

821 x £229 = £188,009 ECATP contribution

The County Council has accepted the trip data and theoretical ECATP contribution but has indicated that it would prefer to secure site specific infrastructure through the S106. The possible improvements are listed below, the cost of the last three of which, if chosen to be implemented, would be taken off the ECATP contribution.

- A contribution towards the installation and maintenance of real-time bus information at the southbound bus stop located on Mill Road, near to the site.
- The provision of advised cycle stop lines at the Coleridge Road/ Mill Road signalised junction.
- An improved footpath between the site and Sainsbury's supermarket (via Seymour Street), including improved lighting and resurfacing.
- The provision of a zebra crossing on Mill Road outside the site frontage

8.150 In the absence of a S106 planning obligation to secure this infrastructure provision, the proposal is contrary to Cambridge Local Plan (2006) policies 8/3 and 10/1 and the Planning Obligation Strategy 2010.

Travel Plan

8.151 A draft Travel Plan accompanies the planning application. The County Council require that a Travel Plan is secured for the site to

include a commitment to encourage students to cycle and provide training on how to cycle safely in Cambridge. In addition, students should be provided with specific cycle routes to colleges to ensure that they are fully aware of the safe routes. The County Council also ask that additional measures are identified by the applicant where possible to minimise the risk to cyclists, such as free or discounted safety equipment and that the final Travel Plan has more specific commitments regarding monitoring and governance. In my view, all of these measures are justified and could be secured either as part of a S106 agreement or by planning condition.

Occupancy

8.152 The applicants state that the accommodation would be for Anglia Ruskin University (ARU) students. ARU has stated that the development would meet the accommodation needs of some of its students but ARU is not the applicant. In my view, this development is speculative and policy 7/10 is applicable. A S106 planning obligation is therefore required to ensure that:

- Occupancy restrictions are in place to ensure the accommodation is only available to full time ARU or University of Cambridge students, and
- Management arrangements are in place to ensure students do not keep cars in Cambridge.

8.153 In my view, any S106 should also stipulate provisions relating to out-of-term use. In my view, given the very limited car parking on-site, I would be concerned regarding any use of the premises in the summer months that could significantly exacerbate on-street car parking demand (such as from delegates on courses) because the site is outside the CPZ. Occupancy restrictions and car ownership should also both be monitored by the applicants with such information being provided upon request to the Council.

Monitoring

8.154 The Planning Obligation Strategy (2010) requires that all new developments contribute to the costs of monitoring the implementation of planning obligations. It was agreed at Development Plans Scrutiny Sub- Committee on 25 March 2014

that from 1 April 2014 monitoring fees for all financial and non-financial planning obligations will be 5% of the total value of those financial contributions (up to a maximum of £50,000) with the exception of large scale developments when monitoring costs will be agreed by negotiation. The County Council also requires a monitoring charge to be paid for County obligations in accordance with current County policy

- 8.155 For this application a monitoring fee of £6,845 (5% of £136,890) is required to cover monitoring of Council obligations plus the County Council monitoring fee.

Planning Obligations Conclusion

- 8.156 It is my view that the planning obligations are necessary, would be directly related to the development and be fairly and reasonably related in scale and kind to the development. A S106 on this basis would pass the tests set by the Community Infrastructure Levy Regulations 2010.

9.0 CONCLUSION

- 9.1 The application has raised a significant number of issues including those of principle, design and scale, open space and impact on residential amenity for existing residents and likely future occupiers of the mosque. In my opinion, there is a strong case to pursue a refusal of planning permission on the grounds of principle and failing to meet housing need under the current Local Plan. There are also issues of prematurity given the advanced stage of preparation of the Cambridge Local Plan 2014: Proposed Submission and the knock-on effect of allowing this site to proceed in view of its proposed allocation and likely housing delivery from allocated sites to 2031 to meet housing need.
- 9.2 The application site cannot resolve the existing shortfall in informal open space provision but it would exacerbate it and in my view not enough space has been provided on site. Highway safety and transport issues have been resolved with the County Council Highway Safety Engineer and Transport Team. I recognise that residents have concerns regarding the impact of 270 students on the amenity of the area but I am satisfied that issues of noise and disturbance and car parking can be mitigated through the appropriate management of the accommodation. The impact on

future occupiers of the mosque is an on-balance recommendation given that it is likely to proceed, but I am not minded to support a reason for refusal at this stage given that the mosque development has not begun and the approval partly contributes to an uncomfortable relationship of built form.

10.0 RECOMMENDATION

REFUSE for the following reasons:

1. The development would fail to provide any housing on the site contrary to the allocation in the adopted Local Plan 2006 which allocates the site for mixed use housing development and community facilities. The development would therefore fail to meet objectively identified housing need and is contrary to policies 5/1, 7/9 and site allocation 7.12 in the Proposals Schedule of the Cambridge Local Plan 2006.
2. The emerging Local Plan is at an advanced stage of preparation and the proposal would be contrary to it and premature, prejudicing and cumulatively reducing the Council's ability to meet housing need over the lifetime of the Cambridge Local Plan 2014: Proposed Submission. As such, the adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits and the proposal is contrary to paragraph 14 of the National Planning Practice Guidance.
3. The proposal fails to provide sufficient informal open space for future students on site and is contrary to Cambridge Local Plan (2006) policy 3/8 and the Cambridge City Council, 'Open Space and Recreation Strategy 2011. The location of the site within and close to wards where there is a shortfall in public informal open space provision, means student use of such spaces would unreasonably intensify their use. Appropriate mitigation through developer contributions to increase the capacity for use of such spaces is not realistic. Given that a greater amount of informal open space provision could be provided on site, the harm arising could be mitigated by the applicant.
4. The proposal does not include a public art delivery plan and it is unclear whether the provision of public art on the site can be adequately provided. As such, the proposal is contrary to

Cambridge City Council Public Art SPD (2010) and policies 3/4 and 3/7(L) of the Cambridge Local Plan (2006).

5. The proposed development does not make appropriate provision for: indoor sports or formal outdoor open space provision to mitigate the need arising from the site; transport mitigation (ECATP); and monitoring contributions in accordance with Cambridge Local Plan 2006 policies 3/8, 8/3 and 10/1, the Planning Obligation Strategy (2010), the Open Space Standards Guidance for Interpretation and Implementation 2010 and the Eastern Corridor Area Transport Plan 2002.
 6. The proposed development does not make appropriate provision for occupation restrictions to full time Anglia Ruskin University Students or University of Cambridge students, including restrictions on the keeping of a car within Cambridge in accordance with Cambridge Local Plan 2006 policy 7/10.
 7. The proposed development does not make appropriate provision for identified highways improvements and travel plan measures in accordance with Cambridge Local Plan 2006 policies 8/3 and 10/1 and the Planning Obligation Strategy (2010).
-
8. In the event that the application is refused, and an Appeal is lodged against the decision to refuse this application, delegated authority is sought to allow officers to negotiate and complete the Planning Obligation required in connection with this development