

7 Dukes Court
54-62 Newmarket Road
CAMBRIDGE
CB5 8DZ

T: 01223 326812

Your ref: 15/0140/FUL

Our ref: 107257

Mr A Patel
The Planning Department
Cambridge City Council
The Guildhall
Cambridge
CB2 3QJ

Date 8th June 2015

Dear Mr Patel

PROPOSED ERECTION OF STUDENT ACCOMMODATION (30 STUDIOS) AND ASSOCIATED WORKS FOLLOWING DEMOLITION OF EXISTING BUILDING

PRIMROSE STREET, CAMBRIDGE

Following the deferral of the above mentioned application at last week's Planning Committee I write to set out the applicant's response to a number of the points raised and discussed by Members. This letter is structured beneath the key questions raised by the Committee.

Is the type of accommodation proposed (studios) needed?

As you are aware, the proposed development relates to the provision of 30 student studio rooms. During the discussion at Planning Committee reference was made to a suggested lack of demand for student studio rooms. While this question was fielded by officers, we have asked the managing agents of the development (Sab) to comment further on this issue.

I attach a briefing note that has been prepared by Sab which responds to a number of the points raised at Committee (**Enclosure 1**). Within this note it is confirmed that demand for studio accommodation, the type of which is proposed within this application, remains very strong within the City. Sab makes reference to the very high demand for a recently completed scheme off Abbey Street. The type of accommodation provided at Abbey Street is very similar to that proposed here. The advice of Savills was also sought in December 2014. While the letter from Savills has been submitted to you previously, this is reattached for completeness (**Enclosure 2**). This letter also confirms the high demand for the type of studio accommodation proposed within this application.

During the discussion at Planning Committee, it was noted that the title of policy 7/10 refers to "Hostels". It was questioned if this specific title implied that only certain types of student accommodation (hostels) can be provided. The term "Hostels" is not defined within the Local Plan. Policy 7/10 does not however provide any specific guidance on the type or nature of accommodation to be provided. The policy only requires occupancy restrictions to be imposed, appropriate management arrangements to be in place as well as requirements for the development to be accessible to the institutions they will serve and accessible by students who are disabled.

A wide variety of student accommodation schemes have been approved pursuant to Policy 7/10 since the Local Plan was adopted in 2006. These include both studio and cluster developments. Subject to complying with all of the specific requirements of Policy 7/10 (as this scheme does), the principle of developing either form of student accommodation facility is accepted.

This is only a speculative development proposal. Should operators be named?

Concerns were raised by Members as to the fact that this is a speculative student housing scheme only with no apparent identified operator. Productive discussions have been held with regards to the future occupation of the building. As is common, the proposed accommodation will be let directly to and will be occupied by Cambridge University or ARU students. This will be controlled by the terms of the s106 agreement. This application continues to be promoted as a speculative student housing scheme therefore.

As you are aware, Policies 7/7-7/9 of the Local Plan provides the policy framework for assessing development proposals that are seeking to provide accommodation specifically being named for either ARU or the University of Cambridge. Policy 7/10 of the Adopted Local Plan specifically allows for (and supports in principle) the provision of delivering speculative student housing schemes. What is proposed here is fully supported by the Adopted Local Plan.

Is this site well related to ARU and the University of Cambridge?

It was questioned during the Committee's discussion if this site is well situated relatively to the University of Cambridge and/or ARU, the institutions that will serve the resident occupiers. The application site is very well located to the educational institutions it will serve. The colleges of the University of Cambridge are accessible via a short walk or cycle along Victoria Road, down Castle Hill and into the City Centre. ARU is equally accessible and well connected via the established pedestrian and cycle routes to the south. Both institutions are fully accessible by walking, cycling and public transport and their interest in the scheme underlines this.

Given this was however questioned by Members the distance from the site to the City Centre, and to ARU, has been measured as walking/cycling distances (rather than "as the crow flies distances"). The City Centre is located 1.5km from the site and ARU is located 2km from the site. Both of these are comfortable and recognised walking and cycling distances. With access also not relying on busy routes through the City this relationship is considered to be entirely appropriate. Student schemes have already been approved within the local area including sites at either end of Victoria Road (1 Milton Road and the former Texaco Filling Station site). Schemes located further away from the City Centre such as the Lucy Cavendish scheme at 100 Histon Road are also considered to be highly successful student accommodation schemes but which are located a greater distance from the universities they serve. The proposed development therefore complies with criteria (C) of policy 7/10.

Concerned about possible future uses of the building

Concerns were raised by both the public speaker, and Members of the Committee, as to the potential for this building to be used for purposes other than student accommodation. As Officers confirmed, student accommodation is a 'sui generis' use and as such other uses are not permitted without planning permission first having been granted. The applicants are fully committed to delivering a student housing scheme on this site. The applicants are also happy for the occupation of the proposed facility to be limited to students of the University of Cambridge and ARU. In light of the above, the proposed development complies with criteria (A) of policy 7/10.

Management of the Building

Members wanted to be fully briefed on the content of the Management Plan for the building. The planning application was supported by a Draft Management Plan which was subsequently updated following a meeting held with Officers. While this was not reported to Members, I attach a copy of the now updated "Management Agreement" to this letter (**Enclosure 3**). The attached statement from the appointed

managing agents Sab (**Enclosure 1**) also provides additional clarity on matters relating to the management of the building.

I respond to the specific questions raised by Members below:

Occupancy numbers.

It was questioned if the number of students able to occupy the building could be as high as 60 persons. As confirmed within the Statement from Sab, each studio is to be let to a single person only. Dual occupation is prohibited and as a result the number of occupants will be 30 students. The single occupancy of the rooms is specified within the Management Agreement and can therefore be controlled by the Council through the enforcement of Condition 18.

To ensure this is possible, I would request that the wording of this condition be amended to read as follows:

“Prior to the occupation of the building a Management Agreement shall be submitted to and approved in writing by the Local Planning Authority.

Once approved in writing, the Management Agreement shall be treated as the “Approved Management Agreement”.

The development shall be implemented and managed thereafter in accordance with the conditions and stipulations set out within the Approved Management Agreement.

Any amendments to the Approved Management Agreement shall only be implemented on site if first approved in writing by the Local Planning Authority.”

Length of Tenancy

The statement from Sab confirms that all rooms will be let for a period of between 48 and 50 weeks. Subletting of rooms is prohibited and as such, occupation by summer schools and/or conference attendees will not be allowed. If students leave during term breaks their room will be left vacant. This is again specified within the Management Agreement and can therefore be controlled by the Council through the enforcement of Condition 18 (as amended above).

Warden control

The Management Agreement confirms that a Managing Agent will be appointed to oversee the development. An on-site office is provided for the sole use of the managing agent. Since submitting the Draft Management Plan in April, Sab have been appointed as the managing agent. The statement submitted by Sab (**Enclosure 1**) confirms that when the Manager is not on site they will be contactable 24 hours a day by both occupiers of the scheme and neighbours. An on-site manager’s representative will also be appointed to oversee matters on site when the Manager is not present. These measures are specified within the Management Agreement and can therefore be controlled by the Council through the enforcement of Condition 18.

Sab have confirmed that they manage an extensive portfolio of student accommodation facilities in the manner described above. Occupants are made aware of the strict house rules on arrival and the few issues that do arise are able to be resolved swiftly and effectively.

Are adequate parking controls in place?

As was confirmed at the Planning Committee meeting, students will be prevented from bringing a car into Cambridge by virtue of the S106 agreement, the proctorial control of the colleges and by the restrictions within the tenancy agreement of the development.

While the successfulness of any car use restriction was questioned at Committee, these restrictions are tried and tested and have been proven to be successful across the City. As is set out with the statement from Sab, any breach of this restriction is taken seriously with an eviction protocol in place for those who do not abide by the rules. The proposed restrictions are consistent with the requirements of criteria B of policy 7/10 of the Local Plan and are therefore considered to be entirely appropriate.

As we have discussed, the proposed use as student accommodation is one of the few uses where car usage can be prohibited. The previous use of the building as a community centre/care facility generated a greater number of vehicle movements. Other alternative uses, including traditional residential uses will generate a far greater number of vehicle movements also and the occupants will be unable to be prevented from bringing vehicles into the congested streets of Green’s Road and Primrose Street.

Pick up and drop off times.

As I explained during my speech at the Committee Meeting, not all students will travel to the site at the beginning and end of term via car. Those students who are going to arrive by car will be provided with a specific slot over a 2 week period during which they will have exclusive use of the drop off space provided off the highway, at the front of the building. This drop off area will be managed by the managing agent (Sab). The statement from Sab (**Enclosure 1**) confirms this approach.

Amenity Areas

There are no defined standards which set out the amount of amenity/garden land that should be provided as part of a student housing development such as this. During the discussion at Planning Committee it was however questioned if the proposed private garden area, located to the rear of the building, was of sufficient size to cater for the proposed 30 student rooms. In response, we have collectively been reviewing other recent planning approvals for speculative student accommodation developments across the City. These recent approvals have been reviewed to understand how many student rooms have been provided on any given site, how much useable amenity space has been provided (the useable area calculated excludes any planting areas that cannot be accessed/used) and what this provision equates to per head. The study document we have jointly put together is attached (**Enclosure 4**). The summary table is re-produced below.

Site	Number of rooms	Area of approved usable amenity space (sq.m)	Usable amenity per student (sq.m)
91-93 East Road 14/0764/FUL	33	76	2.3
100 Histon Road 12/1576/FUL	71	329	4.6
1 Milton Road 14/1938/S73	211	168	1.86
7-9 Abby Street 11/1430/FUL	24	194	8.08
73 Humberstone Road 13/0415/FUL	15	67	4.46
Texaco Site 11/0876/FUL	98	45	0.46
Thompsons Lane 14/0133/FUL	72	154	2.1
Primrose Street 15/0140/FUL	30	197.6	6.6

The above table confirms that the average amount of amenity space provided per student across the surveyed schemes is 3.8m² per student. In the case of this development, 6.6m² of amenity space is provided per student. Only one of the eight surveyed schemes provided more open space per head than the proposed development and that was Abbey Street where 8.08m² of open space per student is provided. It is also of note that the amount of open space being provided by the proposed development is greater than that provided at 100 Histon Road where 4.6m² of open space is provided per student. This is an existing student accommodation development regarded as being exemplar by the Committee.

Following on from the Committee Meeting we have also looked more closely at how the area of open space could be laid out on site. An updated Landscape Plan (369-01G) is attached (**Enclosure 5**). This demonstrates how an attractive and useable external open space will be able to be provided.

The above assessment has demonstrated that the proposed amenity area is of a very generous area and exceeds the amount of open space provided on most other speculative student housing schemes that have been approved over recent years within the city. The proposed amenity area is an enclosed, private and useable space. The proposed development exceeds the clear precedents that have been set across the City. There are, as a result, no sound reasons upon which an objection could be sustained on the subject of amenity space provision.

As is set out within the statement from Sab (**Enclosure 1**), their general experience suggests that garden areas within student accommodation schemes generally only get used for occasional breakout space. In central locations that are well served by nearby public open spaces students very often choose to utilise larger public parks and meeting places. This site is well related to nearby areas of public open space. The green (Alexandra Gardens) located off Carlyle Road is a 340m walk from the site while Jesus Green is located 580m away from the site. This adds further weight to the case that high quality access to amenity areas will be provided.

What is the difference in footprint between the existing and proposed building?

In response to the Councillor's question I can confirm that the footprint of the existing building is 289.5m². The footprint of the proposed building is 316.89m² which is 27.39m² or 9% larger than the existing.

Conclusion

We have sought to answer the questions raised by the Planning Committee during its deliberations last Wednesday either by referring to information already submitted, or through the submission of additional information. My concluding observations are as follows:

- The proposed development complies with all policies included within the Adopted Local Plan.
- The proposed site is therefore considered to be entirely suitable for the proposed use as student accommodation.
- The provision of a speculative student housing scheme such as this is fully supported by Policy 7/10 of the Adopted Local Plan.
- Policy 7/10 also supports the provision of student studios, as is proposed within this application.
- It has been demonstrated that demand for the studios hereby proposed do exist and similar developments have and continue to prove very successful.

- The site will be fully managed and appropriate safeguarding measures can be put in place to ensure the amenity of adjacent properties will not be adversely affected.
- Each room will be for single occupancy and rooms cannot be sublet. This is controlled by the Management Agreement.
- Use outside of term time other than by the existing tenants will not occur. This is again controlled by the Management Agreement.
- Students will also be prevented from keeping cars in the City. This is also controlled by the Management Agreement.
- The site is located close to existing areas of public open space at Alexandra Gardens, Jesus Green and Midsummer Common.
- The area of the proposed on-site amenity space also exceeds that provided on most speculative student housing schemes across the city.

There are, as a result, no policy conflicts that relate to this proposal and the development accords with the Adopted Development Plan. It is therefore considered that the development should again be recommended for approval. Given the full support offered by the Adopted Local Plan and given we have provided further justification in support of our proposal and have answered the Planning Committee's questions in full, I also trust that the Planning Committee will now be able to approve this application.

Yours sincerely



Paul Belton MRTPI
Associate Partner, Planning and Development

E: Paul.Belton@carterjonas.co.uk
T: 01223 326812
M: 07780 618141

Enclosure 1 – Statement from Sab Managing Agents
Enclosure 2 – Letter from Savills dated 16th December 2014
Enclosure 3 –Management Agreement
Enclosure 4 – Amenity Space Study
Enclosure 5 – Updated Landscaping Plan