



## **Further Proposed Modifications to the emerging Cambridge Local Plan**

### **Student Accommodation, Gypsies and Travellers, and Accessible Homes**

**January 2017**



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### **1. Introduction**

- 1.1 This report provides an overview and analysis of the issues relating to student accommodation, Gypsies and Travellers' accommodation needs, and accessible homes.
- 1.2 The report outlines proposed modifications in respect of these issues in the emerging Local Plan and provides an explanation as to why modifications are necessary.
- 1.3 Sections 2 to 9 of the report address student accommodation, while Section 10 covers Gypsies and Travellers' accommodation needs. Section 11 discusses accessible housing need.

### **2. Student Accommodation**

- 2.1 Cambridge City Council and Oxford City Council recently commissioned the Cambridge Centre for Housing and Planning Research to investigate issues relating to the provision of student accommodation in both cities. Although the assessment of institutions was undertaken using the same methodology, two separate reports have been produced for the Councils. The assessment work was identified as necessary by Cambridge City Council for the following reasons:
  - 1. Since the emerging Local Plan was submitted for examination in March 2014, a new element of the National Planning Practice Guidance was introduced in 2015 in respect of student accommodation;
  - 2. The Council has dealt with a significant appeal for student accommodation on an existing housing allocation (App/Q0505/W/15/303586) at 315 – 349 Mill Road; and
  - 3. An increasing number of applications have come forward for student accommodation, with a particular emphasis on the provision of studio units as part of sui generis student accommodation.

The data collection in Cambridge was undertaken between September and December 2016. The Cambridge Centre for Housing and Planning Research's Assessment of Student Housing Demand and Supply for Cambridge City Council is referred to in this report as the student accommodation study.

- 2.2 The student accommodation study includes a baseline analysis of the current structure of the student population, the current accommodation used by students, and the future plans of the different educational institutions. It analyses what the level of purpose built student accommodation (PBSA) could be if all current and potential future students were to be accommodated in PBSA, rather than, for example, in shared housing in the private rented market. The report also reviews

relevant planning policies adopted or proposed by other local authorities experiencing particular pressure from student numbers.

- 2.3 This report sets out the national context, the adopted and emerging Local Plan policy approach in respect of student accommodation, provides a summary of the issues identified in the student accommodation study regarding student numbers and the current and future potential levels of purpose built student accommodation in the city.
- 2.4 In addressing the issues raised in the student accommodation study, this report proposes modifications to policies and site allocations in the emerging Local Plan, including an analysis of the issues raised by the student accommodation study and the suggested approach to addressing these issues. The report also suggests some proactive changes in the current approach to development management matters, and puts forward some issues which may need to be addressed by the next Local Plan, which will include a review of the Council's Strategic Housing Market Assessment.

### **3. National Planning Policy Background**

- 3.1 The National Planning Policy Framework (NPPF) sets out the Government's planning policy approach to achieving sustainable development. Whilst no specific reference is made to student accommodation within the NPPF, key policy principles set out in the document are relevant to informing any Local Plan policy approach. Paragraph 17 of the NPPF makes reference to every effort being made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. In particular, local planning authorities should 'plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community' (paragraph 50).
- 3.2 The NPPF confirms that local authorities should plan positively for the knowledge industries and the development of a strong and competitive economy. Supporting higher and further education organisations is compatible with national policy aims and the proposed economic vision for the city as a centre of excellence and world leader in higher education. In supporting to ongoing success of higher and further education in Cambridge, consideration needs to be given to the provision of sufficient student accommodation to meet the ongoing needs of a range of institutions, whilst addressing the potential for distortions in the local housing market as a result of the attractiveness to developers of providing student housing.
- 3.3 In terms of the Government's National Planning Policy Guidance (NPPG), which was published in March 2014 immediately prior to the Council submitting its Local Plan to the Secretary of State for examination on 28 March 2014, there are two references to the provision of student accommodation.
- 3.4 Paragraph 3-038-20140306 of the NPPG allows for student accommodation to be counted towards the housing requirement for a district, based upon the amount of accommodation it releases from the housing market:

*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.*

- 3.5 Notwithstanding this advice within the NPPG, Cambridge City Council does not currently count new student accommodation towards the Council's housing requirement as there has been little evidential basis for a robust assumption that new purpose built student accommodation (PBSA) will result in existing shared accommodation being released into the housing market, given the large number of higher and further education institutions in Cambridge and the overall demand for student accommodation. The student accommodation study has provided more information on how to count student accommodation towards the housing requirement, but has not concluded whether counting student accommodation towards the housing requirement is an appropriate approach for Cambridge. This matter is discussed further in Section 7 of this report.
- 3.6 Additionally, the final bullet point of paragraph 2a-021-20160401 of the NPPG states that:

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

The student accommodation study provides information on the student accommodation requirements of a range of educational institutions in Cambridge and assists the Council in addressing this element of the NPPG.

#### **4. Cambridge Planning Policy Background**

- 4.1 The current Development Plan for Cambridge includes the following:

- Cambridge Local Plan (2006) and Proposals Map (2009);
- Cambridge East Area Action Plan (2008);
- North West Cambridge Area Action Plan (2009);
- Cambridgeshire and Peterborough Minerals and Waste Core Strategy, Minerals and Waste Site Specific Proposals Plan and Proposals Maps (2011/2012).

- 4.2 The Cambridge Local Plan 2006 contains a number of policies addressing the need to deliver student accommodation. Policy 7/7 deals with staff and student housing for the University of Cambridge and sets out criteria for assessing proposals.
- 4.3 Policy 7/9 of the adopted Local Plan 2006 addresses the student accommodation needs for Anglia Ruskin University, through sites allocated for this purpose in the proposals schedule. Policy 7/9 in the Local Plan 2006 is very supportive of the development of student hostels for Anglia Ruskin University. This includes a provision that if residential developments on a number of specific allocations provide a significant proportion of student hostel accommodation for Anglia Ruskin University, they would not have to provide affordable housing as set out in Policy 5/5. This was successful in encouraging the provision of 251 student bed spaces at the former Cambridge Regional College Brunswick site (Site 7.11), in addition to specific allocations for student accommodation at Sedley School (Site 7.13).
- 4.4 Policy 7/10 of the adopted Local Plan 2006 supports the provision of speculative student hostels on sites that have not been allocated in the Local Plan, but have become available during the plan period. Policy 7/10 restricts such speculative development by way of a Section 106 agreement to housing full-time students attending Anglia Ruskin University or the University of Cambridge. Concerns have been raised that this is unfair to other established education providers in Cambridge such as specialist schools. Local residents are also often concerned about a clearly identified institution being linked to any application as it allows issues like proctorial control of car parking to be addressed more effectively.
- 4.5 The Cambridge Local Plan 2006 also has a policy, which only deals with language schools. Existing Policy 7/11 does not allow for new permanent language schools to be set up in the city and regulates existing schools by virtue of a 10% tolerance control on new teaching floorspace provided. This policy has been in place for a considerable number of years and stems from concerns about possible impacts on the local housing market and previous Cambridgeshire and Peterborough Structure Plan policy towards selective management. However, language schools are only one type of specialist school, so future policies would need to extend to include all of the other types of independent specialist schools and possibly independent academies. The numbers of these have increased. Examples include CATS in Round Church Street, Abbey College in Station Road, and Glisson Road, and Bellerby's College in Bateman Street and Manor Community College. Others such as Cambridge Centre for Sixth Form Studies are educational charities and non-profit organisations more akin to a state registered schools catering for local students and boarders.
- 4.6 The Cambridge East Area Action Plan is supportive of student accommodation, but does not make any specific allocations for student accommodation. No applications for student accommodation have come forward within the Cambridge East area.
- 4.7 The North West Cambridge Area Action Plan has enabled the University of Cambridge to promote the development of its North West Cambridge site through an agreed policy framework, including Policy NW5: Housing Supply. This site is subject to outline planning permission (11/1114/OUT) granted in February 2013 which

includes 2,000 new student units for the University of Cambridge, 325 of which have reserved matters approval (13/1400/REM). Construction commenced in early 2015.

## **5. The emerging Cambridge Local Plan**

- 5.1 Cambridge City Council commenced the process of reviewing the Local Plan in 2011. After two issues and options stages of consultation in 2012 and 2013, 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 Cambridge Local Plan 2014: Proposed Submission was submitted for examination on 28 March 2014 at the same time as South Cambridgeshire District Council submitted their Local Plan. Having held joint hearing sessions on issues relating to overall housing need, the development strategy, Green Belt, transport and housing delivery, the Inspectors wrote to advise the Councils of issues to be addressed (Inspectors' letter of 20 May 2015). The Councils produced a number of further evidence base documents and consulted on Proposed Modifications to both Local Plans. The hearing sessions recommenced in June 2016. The policy relating to the provision of student accommodation (Policy 46) has not yet been the subject of examination hearings. As yet, we have not had confirmation of hearing dates for this matter. Remaining matters for Cambridge only hearing sessions include student accommodation, affordable housing, accessible homes and residential space standards, and Cambridge only omission sites such as Emmanuel and Gonville and Caius playing fields off Wilberforce Road.
- 5.2 The NPPF (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.
- 5.3 Higher education and the provision of student accommodation have been considered as a key issue from the outset of the plan making process and are key themes running throughout the emerging Local Plan. The vision takes account of the aspirations identified in the Cambridge Local Plan 2006 and through an iterative process has reviewed them against the experience of delivering that vision, and the issues relevant to Cambridge today. It recognises that Cambridge is a world-class city in terms of its academic reputation and the knowledge-focused economy that has sprung from this.
- 5.4 The strategic objectives include reference to the need to promote and support economic growth in environmentally sustainable and accessible locations, facilitating innovation and supporting Cambridge's role as a world leader in higher education, research, and knowledge-based industries, while maintaining the quality of life and place that contribute to economic success.
- 5.5 Within Section 2 of the emerging Local Plan, paragraph 2.18 identifies that there are other needs (in addition to housing and employment need) that should be considered in the period to 2031. This is in keeping with paragraph 17 (bullet point 3) of the NPPF. The land requirements set out in Table 2.1 of the emerging Local Plan do not

necessarily mean specific land will need to be allocated for them. Additional floorspace/facilities will be provided primarily by intensification or extension of existing facilities/sites. In terms of the universities' student accommodation needs, Table 2.1 currently identifies that the University of Cambridge's growth requirements lead to further provision of 3,016 (net) bed spaces for undergraduates and postgraduates to 2031.

- 5.6 Provision of student accommodation is outlined through various policies and allocations. Policy 11: Fitzroy/Burleigh Street/Grafton Area of Major Change is supportive of student accommodation provision within the area of major change given the proximity of the area to both universities and the city centre. However, any student accommodation proposals would also need to meet the criteria of Policy 46. Policy 20: Station Areas West and Clifton Road Areas of Major Change also makes reference to student accommodation (1,250 units), which has now been delivered on this site. Policy 25: Old Press/Mill Lane Opportunity Area also currently makes reference in the supporting text at paragraph 3.102 to the scope for provision of up to 200 student accommodation units on the site. Allocations are made for student accommodation at Site U3 Grange Farm (120 units) and at North West Cambridge (2,000 units) within the North West Cambridge Area Action Plan.
- 5.7 In addition, provision of some student accommodation is also expected to come through windfall sites. This is on the basis that a number of schemes for student accommodation have come forward on windfall sites through the adopted Local Plan 2006 and there is nothing to suggest that this would not continue alongside allocated sites. 1,516 bed spaces have come forward on windfall sites since 2011. Current planning applications and pre-application discussions indicate that windfall sites remain a strong source of student accommodation.
- 5.8 Policy 44: Specialist colleges and language schools within the emerging Local Plan requires any expansion of educational provision or new educational provision to be commensurate with student accommodation provision and social amenities. This policy is intended to address those institutions providing courses of less than one academic year.
- 5.9 The emerging Local Plan's Policy 46 specifically addresses provision of student accommodation for students on courses of one academic year or more. Policy 46: Development of student housing requires student accommodation to meet the identified needs of an existing educational institution providing housing for students on full-time courses of an academic year or more. This represents a step change from the existing policy position in the Cambridge Local Plan 2006 which restricts accommodation to the University of Cambridge and Anglia Ruskin University and allows student accommodation for Anglia Ruskin University to be delivered in lieu of affordable housing on specific allocated sites.
- 5.10 In relation the exemption in the Cambridge Local Plan 2006 (Policy 7/9) to deliver student accommodation for Anglia Ruskin University instead of affordable housing on specific allocations, this led to options 147 and 148 in the Issues and Options report (2012). These options set out the opportunity to retain (Option 147) or remove the exemption from affordable housing provision (Option 148). Whilst Anglia Ruskin

University does not have access to considerable levels of purpose-built student residential accommodation and remains highly dependent on houses acquired on short leases and on students living in HMO, its circumstances have improved with the delivery of purpose built student accommodation, including Sedley Court, Brunswick and Station Area student accommodation and a range of windfall sites which have delivered student accommodation for both universities. Given the limited land availability in Cambridge and the need to provide more affordable housing to meet a range of needs, it is important that the council takes all reasonable opportunities to provide new market housing and affordable housing. The Council is committed to supporting the University of Cambridge, the colleges, Anglia Ruskin University and other institutions, which contribute to the knowledge economy, and acknowledges the important role that they play locally, nationally and internationally. However, the importance of and need for student accommodation must be balanced with the need to deliver market and affordable housing. As such, it was proposed that the exemption is removed and that option 148 is pursued through the new Local Plan. Despite a continuing reliance on open market housing in the city, considerable progress has been made in delivering new purpose built student accommodation since 2006.

- 5.11 The change in approach in Policy 46 on the restriction to the University of Cambridge and Anglia Ruskin University resulted from two key issues. Firstly, restricting access to student accommodation only to the two universities in the emerging Local Plan was considered to have the potential to conflict with the NPPF's approach which requires local authorities to support the knowledge industries and the development of a strong and competitive economy. Secondly, when considering comparator policies, officers identified a similar approach in Oxford's Core Strategy (Policy CS25), which was overruled by the Inspector at the Examination in Public into the Council's Core Strategy on 21 December 2010. In the case of Oxford, the Inspector removed the embargo restricting occupation of student accommodation to students attending the two universities in Oxford on the basis that it was inequitable and was discriminating against non-university colleges.

## **6. Local Issues**

- 6.1 A number of issues have been raised locally in respect of planning applications coming forward for student accommodation development in Cambridge. These issues include:
- The number of (largely speculative) planning applications coming forward for student accommodation;
  - Affordability and appropriateness of studio units as part of student accommodation;
  - Delivery of affordable housing through student accommodation schemes;
  - Compliance with the occupancy restrictions on student accommodation;
  - Student car use and parking issues.

- 6.2 Taking the issue of the number of speculative planning applications which have come forward in recent years for student accommodation first, concerns have been raised through committees, petitions, response to planning applications and the local press about the amount of student accommodation coming forward in Cambridge for different institutions, including student accommodation applications on sites allocated for mainstream residential use.
- 6.3 In relation to the provision of student accommodation, Cambridge has seen significant provision of new student accommodation since 1 April 2011. In terms of completions and commitments of student bed spaces since 2011: between 1 April 2011 and 31 March 2016, 2,511 student bed spaces (net) were completed. At 31 March 2016, there were a further 1,281 student bed spaces (net) with planning permission, but not yet completed. Of these 1,281 rooms, some 950 rooms were under construction. There are therefore 3,792 student bed spaces which have been built out or have obtained planning permission since the start of the plan period for the emerging Local Plan through to 31 March 2016. Of the 3,792 student bed spaces with permission or built out since the start of the plan period, 2,144 bed spaces are on allocated sites and 132 are on an emerging allocation. This figure includes 325 bed spaces which have reserved matters permission at North West Cambridge and form part of the allocation provided by the North West Cambridge Area Action Plan. The remaining 1,516 bed spaces have come forward on windfall sites.
- 6.4 The policy approach in the emerging Local Plan, which allows a wider range of institutions to use student accommodation than the existing Local Plan approach, is proving to be a particular point of concern. Particular reference should be made to a recent appeal decision for 315 - 349 Mill Road, where an appeal was allowed for student accommodation on a housing allocation (App/Q0505/W/15/3035861). Paragraphs 14 and 15 of this appeal decision address the issue of how Anglia Ruskin University's (ARU) students are accommodated:
- Whilst it may well be possible to meet the intention of supplying dedicated rooms to all ARU first year students who require them, this appears to be a minimum objective: the Local Plan notes that the University wishes to house as many students as possible in purpose built accommodation, and more recent correspondence from ARU indicates that it is generally not possible to accommodate later years in University sponsored rooms. Similarly, data provided by the appellants indicates that ARU lies above national averages in both the proportion of students in private rented accommodation, and those travelling from remote locations.*
- It is recognised that this is a fluid situation, and that there is likely to be a continuing strong supply of new student housing in the City, prompted by the financial attractiveness of this form of development. However, in part this attractiveness arises out of the level of unsatisfied demand for such accommodation. At this stage, the evidence falls short of proving that there does not remain a need for purpose built student housing, especially to improve the choice and opportunities for ARU students.*
- 6.5 Notwithstanding the fact that Cambridge City Council has seen significant levels of student accommodation applications in recent years on both allocated sites and

through windfall development, the Council considered it appropriate to undertake a specific student accommodation study in order to understand whether there needs to be any changes to the emerging Local Plan at this point in time. This student accommodation study provides a greater level of detail on student numbers and type than has been available previously.

- 6.6 There is also a concern that, as a result of the growing market of wealthy overseas language students, the costs of purpose built accommodation is beyond the reach of 'ordinary' students. This is a particular issue in relation to the type of accommodation provided. Recent planning applications have included a high number of studio units, rather than cluster flats (where students have individual bedrooms and bathrooms, but share kitchen and living room space). Anglia Ruskin University, in particular, has stated that studio units are not as suitable for its students as cluster flats, given the higher prices charged for such accommodation and the layout of units not allowing for social interaction. Anglia Ruskin University has confirmed that there have been a number of instances where developers state that the accommodation is for Anglia Ruskin University students, but there is no formal link between the scheme and Anglia Ruskin University given the nature of the units proposed and the lack of affordability. This may mean that individual Anglia Ruskin University students occupy a small number of the units, but the other units are either void or let to other institutions. The current Cambridge Local Plan 2006 does not effectively cover the issue of studio units as the use of studio accommodation was not a common approach to the provision of student accommodation when the Local Plan was drafted. The issue cannot be addressed effectively by policies within the Cambridge Local Plan 2006 and the NPPF and NPPG do not assist significantly in this respect. Modifications are proposed to the emerging Local Plan to address this issue.
- 6.7 Councillors and local residents have also previously suggested that student accommodation schemes should only be allowed if they deliver affordable housing provision within the site. The Council consulted on an option (Option 95) at the Issues and Options stage of plan-making on requiring affordable housing from student development. On the basis of the results generated from analysis, the Council's viability consultants advised the Council in 2013 that the average surplus is too low to recommend confidently that the Council include a policy for the collection of financial contributions towards affordable housing from student accommodation at this stage. A notional very low charge could potentially be levied but this could mean that any financial contribution towards affordable housing could potentially reduce or even remove any buffering inherent within the Community Infrastructure Levy rate suggested for student accommodation. If the Council were to alter its approach towards affordable housing through student accommodation schemes, the Council would potentially need to reconsider its stance on the Community Infrastructure Levy, where the Council is currently looking to charge £125 per square metre in relation to student accommodation schemes and we would also need to update our viability work. In the event of a change of approach, this would require amendments to policies in the emerging Local Plan.
- 6.8 The student accommodation study also reviewed how other local planning authorities have addressed any policy provision for delivery of affordable housing through student accommodation developments. This is not an approach taken by other local

authorities and would have negative implications for the collection of Community Infrastructure Levy monies from student accommodation development. This could be revisited when developing the next Local Plan.

- 6.9 There is local concern regarding compliance with occupancy restrictions on existing purpose built student accommodation. This is of particular note in respect of speculative schemes, where the Council understands that developers may have had initial discussions with Anglia Ruskin University about the suitability of accommodation in terms of layout, type and affordability. Once the scheme has been submitted as a planning application, it is understood that the scheme often bears little resemblance to the initial scheme and does represent something that many Anglia Ruskin University students would sign up to. Affordability of accommodation and developers' commitment to maintenance and repairs are key issues for Anglia Ruskin University.
- 6.10 The issue of student car use and associated parking has also been raised by local residents. Existing and proposed planning policy discourages students from bringing cars to Cambridge, as do the universities. However, there are concerns that students are still using cars in Cambridge, with implications for the availability of on-street parking for residents.

## **7. Key Findings from the Assessment of Student Housing Demand and Supply for Cambridge**

- 7.1 The student accommodation study has identified current student numbers and projections of future student numbers (full-time) for the universities, and a large number of specialist colleges and language schools in Cambridge, and the types of courses that they are attending. This has included data collection from:
- University of Cambridge, including all 31 colleges;
  - Anglia Ruskin University;
  - Colleges of further education, specialist colleges and language schools, and affiliated organisations such as the colleges which form the Cambridge Theological Federation.
- 7.2 The data used in the analysis comes from two main sources:
- The first source is data extracted from the Higher Education Statistics Agency (HESA) returns made by the University of Cambridge and Anglia Ruskin University;
  - The second source of data is an online survey that was used to collect data from individual institutions about their student profile, current accommodation provision, and future planned provision. The University of Cambridge Colleges and wider University of Cambridge were included in the study, as was Anglia Ruskin University. The non-university institutions excluded the standard school sector but included the Further Education (FE) colleges e.g. Cambridge Regional College, language schools e.g. Bell Educational Services Ltd, performing arts colleges e.g. Cambridge School of

Visual and Performing Arts, theological colleges e.g. Wesley House, independent sixth forms e.g. Mander Portman Woodward and summer schools e.g. Reach Cambridge.

- 7.3 An important issue to highlight that came through the research is that student numbers can appear to vary, quite legitimately, depending on what source or definition is used. Counting students, even at individual institutions, is therefore quite difficult. There are discrepancies between the data provided through the online survey and extracted from the HESA returns. This relates in part to which students are included in the data. It also reflects the self-reported nature of the HESA data. A key issue identified is that the analysis suggests that some students who select 'Own permanent residence owned or rented by you' are in fact occupying shared houses.
- 7.4 For the purposes of study, part time students were excluded from the analysis of the HESA data based on the assumption that they are already housed for the duration of their part time studies.
- 7.5 The data analysis makes assumptions about the average number of students in a shared property. According to Cambridgeshire County Council's research team, one dwelling provides accommodation for 3.5 students, on average. However, the data collected from the University of Cambridge Colleges showed that shared houses that are rented for use by students in the open market accommodate an average of 5 students per property. The data analysis therefore estimates the number of shared houses based on the average of both 3.5 and 5 students per property and provides a range.
- 7.6 The analysis of the future potential for PBSA has a projection for 10 years to 2026. Although the Local Plan period runs to 2031, there is a considerable lack of certainty about potential future growth of the universities which means that 10 years is the maximum projection that can be made using realistic data.

### **Student Numbers**

- 7.7 The Council established the growth aspirations of the University of Cambridge and Anglia Ruskin University as part of preparing the emerging Local Plan. However, since the start of the plan period in 2011, there has been significant change in terms of the volume of applications coming forward for student accommodation, the type of student accommodation (e.g. studio flats rather than cluster flats), and the increased number of applications being made for accommodation for other institutions (not the University of Cambridge or Anglia Ruskin University).
- 7.8 Many university students live in halls of residence, either purpose built or university-owned accommodation, but there are not enough places in halls of residence to accommodate all students. Most students not living in halls of residence or purpose built student accommodation will be living in private rented accommodation. Anglia Ruskin University has a much smaller stock of its own purpose built student accommodation than the University of Cambridge and relies more heavily on head lease properties, student accommodation built by third parties, and housing its students in open market housing including Houses in Multiple Occupation (HMO). Locally, demand for student accommodation is considered to have placed pressure

on the local housing stock often resulting in perceived or actual harmful impacts on communities accommodating students, especially in areas close to Anglia Ruskin University.

- 7.9 The Census 2011 provides data on student numbers for all local authority areas across the country. The data for Cambridge showed that in 2011, the total number of full time students aged 18 and over was 24,506. This would not have included students at Cambridge-based educational institutions who live outside Cambridge.
- 7.10 The student accommodation study shows that the number of students at educational institutions in Cambridge with a need for some form of accommodation is estimated at 46,132 in 2015/16. Within the 46,132 students total, the student numbers per institution in 2015/16 are set out in Table 1 below.

**Table 1: Number of Students 2015/16 with a need for accommodation**

<b>Institution</b>	<b>Student Numbers</b>
University of Cambridge	21,227
Anglia Ruskin University	9,485
Other institutions	15,420
<b>Total</b>	<b>46,132</b>

- 7.11 There are an estimated 46,132 students in Cambridge with a need for some form of accommodation<sup>1</sup>. Within the 46,132 students total, the student numbers per type of accommodation in 2015/16 are set out in Table 2 below.

**Table 2: Type of Accommodation 2015/16**

<b>Type of Accommodation</b>	<b>Student Numbers</b>
Purpose built student accommodation	22,410
Shared housing	9,157
Existing family housing (parental home or homestay)	12,129
No information available	2,436
<b>Total</b>	<b>46,132</b>

- 7.12 Some 91% of undergraduates, and 55% of postgraduates at the University of Cambridge are in University or College maintained accommodation, compared to 11% of undergraduates and 15% of postgraduates at Anglia Ruskin University.
- 7.13 Anglia Ruskin University is therefore currently dependent upon housing 4,285 undergraduates and 785 postgraduates in shared housing, a total of 5,070 students, occupying at least 1,000 shared houses, assuming an average of 5 students to each shared house. The position is reversed for the University of Cambridge, where only 729 undergraduates are housed in shared existing housing, but 3,003 postgraduates are accommodated in shared existing housing, occupying at least 600 shared houses, again assuming an average of 5 students to each shared house.

<sup>1</sup> This could include students who commute into the city from other authorities.

- 7.14 The non-university institutions have very little directly owned accommodation (750 bed spaces among 15,420 students), but make extensive use of private halls (3,836 bed spaces, or 82% of all student accommodation in private halls). The non-university institutions house 4,390 students in 'homestay' accommodation, and a further 5,304 are living in the parental home (mainly Cambridge Regional College students). The non-university institutions make relatively little use of shared housing, with only 355 students accommodated in shared housing, or only 2% of the total number of non-university institution students. Many non-university institutions rely on use of PBSA during the vacation periods, especially to accommodate summer language course students. This includes PBSA provided by the Colleges of the University of Cambridge and speculative student accommodation where there are clauses in the legal agreements to allow use by non-university students outside term-time.
- 7.15 Excluding mature students who are less likely to be living in shared accommodation, there is an estimated current potential for 6,085 bed spaces in PBSA. The research then analysed the impact of the growth plans of the universities and asked about the potential impact of Brexit on those plans. Anglia Ruskin University is planning to remain at the same student numbers in Cambridge over the next five to ten years. The University of Cambridge's current planning framework envisages an expansion in undergraduate numbers of 0.5% each year for the next ten years, and in postgraduate numbers of 2% per annum, with some individual Colleges having higher expansion rates than others. This leads to an estimated future potential 2,874 additional student bed spaces to 2026. The other institutions have an anticipated growth rate of 230 students in total to 2026. This suggests that a total of 9,189 student rooms could be built in PBSA by 2026 to address both the current and the potential future levels of student numbers. As at 31 March 2016, there were 1,281 student bed spaces in the planning pipeline. Once completed, and provided they are occupied by students, this will reduce the current level of students outside PBSA from 6,085 to 4,804, and reduces the future potential level of students outside PBSA from 9,189 student bed spaces to 7,908.

**Table 3: Current and Future Potential Levels of PBSA**

Institution	Current potential level of PBSA	Future potential level	Total current and future potential level
Anglia Ruskin University	2,803	-	2,803
University of Cambridge	3,282	2,874	6,156
Other institutions	-	230	230
<b>Sub-Total</b>	<b>6,085</b>	<b>3,104</b>	<b>9,189</b>
<b>Total Minus Pipeline<sup>2</sup> of 1,281 bed spaces to 31 March 2016</b>	<b>4,804</b>	<b>-</b>	<b>7,908</b>

<sup>2</sup> Pipeline figures consist of student bed spaces which have planning permission, but are not yet built or are under construction and not yet occupied.

**Addressing the NPPG**

- 7.16 The NPPG confirms that encouraging more dedicated student accommodation may provide low cost housing that takes pressure off the private rented sector and increases the overall housing stock. Plan makers are encouraged to consider options which would support both the needs of the student population as well as local residents before imposing caps or restrictions on students living outside of university-provided accommodation.
- 7.17 In the appeal decision on 315 – 349 Mill Road, the Inspector confirmed that:
- “It follows that increasing the availability of purpose built student housing in a location suitable for those students would either facilitate the return of private space to the general housing market, or help to meet an unsatisfied student demand, and thereby reduce the overall pressure.”*
- 7.18 In addition to establishing student numbers and the current and future needs for accommodation, the study was also commissioned to assess to what extent the Council can rely on the delivery of purpose-built student accommodation to release existing housing units back to the general market. The study investigated how other relevant local planning authorities have dealt with the accommodation needs of students and different institutions, including data on any policy restrictions on particular institutions and accommodation types. It also reviewed how other authorities are dealing with the allowance in the NPPG at Paragraph 3-038-20140306 which permits Councils to count student accommodation towards the housing requirement for a district, based upon the amount of accommodation it releases from the housing market.
- 7.19 It is possible that an increase in provision of PBSA could increase the number of houses available to non-student households. However, it is difficult to establish how many houses could be freed up by the development of PBSA. The student accommodation study made assumptions about the average number of students in a shared property. According to Cambridgeshire County Council’s research team, one dwelling provides accommodation for 3.5 students, on average. As such, every 3.5 additional student units provided in Cambridge could reduce the demand for use of market dwellings by students by one dwelling. The common assumption is that on average there are 3.5 students in a shared house. However, the data collected from the University of Cambridge’s Colleges showed that shared houses that are rented for use by students in the open market house an average of 5 students per property. The data analysis therefore estimates the number of shared houses based on the average of both 3.5 and 5 students per property and provides a range.
- 7.20 It should be noted that other local authorities are taking a range of figures to allow them to count dwellings as released back into the market by the provision of new student accommodation. This is dependent on the nature of the authority – there is no standard unit size. The average number used in Strategic Housing Market Assessments (SHMA) and Strategic Housing Land Availability Assessments (SHLAA) has varied due to the nature of properties available for letting in a given location. For example, the West Surrey SHMA allows for 4 students per household

based on discussions with Higher Education institutions. The Oxford SHLAA meanwhile has used an average of 5 students as many houses in Oxford are inter-war semi-detached properties or Victorian terraces with 3 bedrooms plus a living room/dining room often used as a fourth bedroom (thus accommodating 4 students). There are also many larger properties, in North Oxford in particular, which may house an average of 6 students each. The Oxford SHLAA therefore takes the midpoint of five, making the assumption that developing five student rooms would release the equivalent of one dwelling in the housing market.

- 7.21 The student accommodation study confirms that any development of PBSA is not guaranteed to release into the open market accommodation currently occupied by students, because there is no guarantee that the properties would not be purchased by private landlords and continue to operate as HMO for students. Few mechanisms exist to prevent released property from being bought by an investor and let as an HMO to single professionals (or any other group of single people). As one example of a possible mechanism, the Council may wish to consider whether there is a housing role in acquiring property, possibly in a joint venture vehicle, would then be let at market rents to single sharers such as contract research staff or other single professionals, thereby offering direct control over standards and allocation.
- 7.22 Furthermore, different authorities are taking different approaches towards discounting the number of units freed up. To provide a hypothetical example, it may be possible to average the number of students occupying housing to 4 students per house and accordingly work out that a scheme for 100 student units might free up 25 houses. However, this assumes that the houses are all freed up and that non-students will occupy them in the future. Some authorities have been cautious about this and have discounted the indicative figure of 25 housing units to indicate that a lesser number of housing units would actually be freed up and returned to the market/mainstream rental. Discounting does not necessarily appear to be based on any specific evidence though. The circumstances are further complicated by the recent Local Plans Expert Group Report (LPEG)<sup>3</sup>, which suggested that there should be specific exclusion of specialist types of accommodation as components of housing supply. A number of the recommendations from the LPEG Report have already been taken forward, but these recommendations have not included consideration of specialist housing. Further LPEG recommendations may be included in the Government's expected Housing White Paper.
- 7.23 The student accommodation study established that there is no consistent approach made to dealing with the counting of student accommodation towards the housing requirement. In light of this and given the Local Plan Expert Group's concerns about this approach and the expected Housing White Paper, it is advised that the Council does not count student accommodation towards the housing requirement for the time-being. Moving forward, a new SHMA could assist in any future counting of student accommodation provision as a component of housing supply as the overall

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<sup>3</sup> The Local Plans Expert Group was established by the Communities Secretary, Greg Clark and the Minister of Housing and Planning, Brandon Lewis MP, in September 2015, with a remit to consider how local plan making could be made more efficient and effective. Their [report](#) was issued in March 2016.

role of student accommodation within the wider housing market would be better understood and comparison of data would be more straightforward, reducing any risk of double-counting or not comparing like with like.

## **8. The Council's Approach – the emerging Local Plan and the next Local Plan**

### **The emerging Local Plan**

- 8.1 The study reports that if all current and potential future students were to be accommodated in purpose built student accommodation, there would need to be provision of 7,908 bed spaces, having taken into account student accommodation units already in the pipeline. Whilst the NPPF confirms at paragraph 17 that local authorities should consider development needs other than simply housing and employment, it should be noted that there is no part of national planning policy that says that all students are required to be provided for in purpose built student accommodation. The student accommodation study recognises that students have different needs and make different choices and that purpose built student accommodation will not be suitable for all students. The student accommodation study also notes that it has not been possible to set growth rates of the institutions beyond 2026. There is therefore no coverage of the last five years of the plan period. This is considered reasonable, given the uncertainties over forecasting beyond 2026 and ongoing concerns over the impacts of Brexit on the higher education sector.
- 8.2 In the absence of a national policy requirement to provide purpose built student accommodation, the ongoing uncertainty about needs beyond the next ten years, and the provision of student accommodation which continues to be made through both allocations and windfall sites, it is considered there is no justification to conclude that the Council's current approach in the emerging Local Plan is not reasonable.
- 8.3 The emerging Local Plan acknowledges the competing development pressures in Cambridge, including student accommodation, and it has always considered it important that a balanced approach is taken within the remit of sustainable development in order to support the economic and social needs as well as quality of life and place in the city.
- 8.4 Given this, the Council is not suggesting a major change of direction in the strategy for student accommodation in the emerging Local Plan and considers that student accommodation can continue to be provided in a variety of ways, through allocations for student accommodation and through the delivery of windfall sites.
- 8.5 The policy as anticipated is capable of delivering accommodation that would lead to an increase in provision to address the identified future growth aspirations of the institutions and to provide additional flexibility. The Council is not seeking through the Local Plan to provide PBSA for all of the existing resident student population. To do so will require a substantial modification to the development strategy for the current submitted Local Plan which it is not appropriate to introduce at this stage, nor is there any policy requirement to do so. The student accommodation study identifies that the University of Cambridge is looking to grow by a further 2,874 students to 2026. While Anglia Ruskin University has confirmed that it has no growth aspirations to 2026, a number of the other institutions in Cambridge have stated aspirations to

grow. These institutions have a total growth figure to 2026 of 230 students in total.<sup>4</sup> This gives rise to a total growth figure for the universities and the other institutions of 3,104. Taking into account student accommodation pipeline figures of 1,281 student units under construction or with planning permission, allocations in the emerging Local Plan (as modified) providing 740 student units and the remaining allocation at North West Cambridge for 1,675 student units, these sources of supply would address and go beyond the growth figure of 3,104. The additional 592 units provide an appropriate and prudent degree of flexibility in terms of delivery. Any provision over and above these sources of supply would need to be considered on its merits against the criteria in Policy 46 and having regard to the absence of any policy requirement at either national or local level for all students to be provided with purpose built student accommodation.

### **Proposed Modifications to the emerging Local Plan:**

Although the current approach is still considered largely appropriate, a number of modifications are suggested to the emerging Local Plan to reinforce the Council's approach and ensure that needs for market and affordable housing and student accommodation can be addressed. The proposed modifications are outlined in Appendix 1 of this report. The proposed modification include an explanation of the need for the modification in respect of soundness. A summary of the proposed modifications is included overleaf:

#### **1. Policy 3: Spatial strategy for the location of residential development**

This policy will be strengthened alongside Policy 46: Development of student housing to ensure that existing housing and housing allocations are not lost to student accommodation. This main modification is proposed to safeguard residential allocations which have been proposed in the emerging Local Plan in order to meet objectively assessed housing need. It is considered that the plan is positively prepared and justified in respect of meeting objectively assessed need for housing and that this modification confirms that these allocations should not be lost to other forms of development, including student accommodation. Without this modification, residential allocations continue to be at risk. The Council considers that this is particularly important in light of the recent Mill Road appeal decision on an existing housing allocation in the Cambridge Local Plan 2006.

#### **2. Policy 46: Development of student housing**

This policy will be strengthened to ensure that housing allocations are maintained alongside modifications to Policy 3: Spatial strategy for the location of residential development. It will also be amended to confirm that schemes are tied to particular institutions, which have specific need for accommodation. The type of accommodation will need to be suitable for the institution in terms of type and layout, affordability and maintenance regime.

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<sup>4</sup> Wesley House (96 students), Woolf Institute (13 students), Cambridge School of Visual and Performing Arts (18 students), Reach (18 students), Bell (80 students), St Andrew's (5 students).

This main modification is proposed to safeguard residential allocations which have been proposed in the emerging Local Plan in order to meet objectively assessed housing need. It is considered that the plan is positively prepared and justified in respect of meeting objectively assessed need for housing and that this modification confirms that these allocations should not be lost to other forms of development, including student accommodation. Without this modification, residential allocations continue to be at risk. The Council considers that this is particularly important in light of the recent Mill Road appeal decision on an existing housing allocation in the Cambridge Local Plan 2006.

The main modification requiring an institution to be committed to the proposed scheme, through a formal agreement, will support the effectiveness of the plan in ensuring that the accommodation proposed reflects the student accommodation requirements of specific institutions such as Anglia Ruskin University and the University of Cambridge. This formal agreement with the institution will confirm that the accommodation will be occupied by students of the institution undertaking full-time courses of one academic year or more. When planning permission is granted for new student accommodation, a planning agreement will be used to robustly secure that use. This policy only applies in instances where planning permission is required for schemes housing more than six students (*sui generis*). By requiring a specific institution to be tied to a planning permission, the institution will need to have confirmed to the Council that the type, layout, affordability and maintenance regime of the accommodation is suitable for their students. Without this modification, there is a significant risk that the development proposals coming forward for student accommodation will not meet the needs of the institutions identified in the student accommodation study.

There are a number of additional modifications throughout the Plan which reflect the proposed modifications on student accommodation and the findings of the student accommodation study.

### **3. Conversion of two existing residential allocations (Sites R17: Mount Pleasant House and U1: Old Press/Mill Lane) to allocations for student accommodation**

These main modifications are proposed as a result of discussions with the landowners to bring forward development on the Mount Pleasant House site (Site R17) and Old Press/Mill Lane site (Site U1). Both landowners have confirmed that mainstream residential accommodation will not be deliverable on these sites and that student accommodation is being pursued.

These main modifications are in keeping with the requirements for plan-making in that they are positively prepared, justified and effective. These allocations are deliverable for student accommodation. On the information which has now been provided, the allocations are not deliverable as mainstream housing. As such, the modifications seek to provide allocations which, on all of the information presently available, are deliverable on the sites.

Residential allocations within Cambridge remain vitally important in meeting the city's objectively assessed need for homes. However, the two sites proposed for a change in allocation from residential to student accommodation have very specific circumstances. Both sites are very well located to meet the known student accommodation needs of at least seven Colleges of the University of Cambridge. They lie in close proximity to existing main College sites which provide a range of services to their students. By balancing the retention of the significant majority of residential allocations in the Local Plan, while allowing two allocations to change to student accommodation, this addresses both objectively assessed need for homes and the known needs for student accommodation.

### **The next Local Plan**

- 8.6 The study also includes recommendations for the next Local Plan, which is proposed to be a Local Plan covering the Greater Cambridge area. This would involve further consideration of student accommodation in the next Strategic Housing Market Assessment and the Council's Housing Strategy, which follows therefrom, and the potential to release market housing stock by further provision of student accommodation.
- 8.7 Additionally, as part of drawing up the next Local Plan, consideration needs to be given to the scope for the introduction of an Article 4 direction to restrict the change of use from dwellinghouse (C3) to small House in Multiple Occupation (HMO) (C4). A small HMO (C4) is described as accommodating between 3 and 6 unrelated people, while a large HMO (Sui Generis) is occupied by more than 6 unrelated people. Large HMO always require planning permission as they are not with a defined planning use class and there are no permitted development rights associated with them. An Article 4 Direction would need to be introduced in tandem with a more restrictive policy approach to the provision of new HMO in the next Local Plan.
- 8.9 Article 4 Directions are a means by which a local planning authority can bring within planning control certain types of development, or changes of use, which would normally be permitted development (i.e. not require an application for planning permission). The purpose of the introduction of an Article 4 Direction would be to allow the Council to have greater control over shared houses in the city. An Article 4 Direction could be introduced on a city-wide basis or could be applied to specific wards where there is a large concentration of HMO. Introducing a direction on a ward-specific basis could however have the unintended consequence of displacing the issue into other wards where HMO have not traditionally been concentrated.
- 8.10 The introduction of a direction would also require analysis of up to date data on the distribution of HMO across the city in order to confirm where the highest concentrations of current HMO are, and to assist in formulating a new planning policy, which may involve a limit on HMO numbers in a given area.

## 9. Addressing Current Issues

- 9.1 Prior to the emerging Local Plan being adopted and the development of new evidence base documents to support the next Local Plan, the Council will continue to receive applications for student accommodation development. There are a number of measures which can be undertaken to address current local concerns regarding student accommodation. These concerns include parking, enforcement of occupancy restrictions, monitoring of student accommodation, assessing the design, layout and affordability of student accommodation.
- 9.2 As an interim measure, in order to address the local concerns raised with regard to both parking and enforcement of occupancy restrictions, the Council will investigate opportunities within the current development management processes to address both parking issues and compliance with occupancy restrictions in the case of existing student accommodation developments.
- 9.3 **Parking** - Discussions should take place between the City and County Councils to understand the programme for introduction of residents' parking schemes across the city as this could assist in restricting parking spaces available for student use. Discussions with the universities about proctorial control and parking enforcement should also be undertaken.
- 9.4 **Enforcement of occupancy restrictions** - This will involve assessment of existing legal agreements and planning conditions to see whether there is any scope for strengthening the wording of legal agreements/conditions for future development proposals. Additionally, where occupancy restrictions are not being complied with by developers/landowners, those will be the subject of investigation.
- 9.5 **Monitoring student accommodation and assessing design, layout and affordability** - While the adopted Cambridge Local Plan 2006 and national planning policy documents do not assist the Council specifically in dealing with the issues of studio units, the emerging Cambridge Local Plan will address this issue. By requiring a specific institution to be tied to a planning permission, the institution will need to have confirmed to the Council that the type and layout of accommodation is suitable for their students.

In the meantime, the Council proposes that a working group is set up to assist in proactive monitoring and coordination of student accommodation issues. It is proposed that Council officers (Housing and Planning) hold a regular working group with representatives of the University of Cambridge and its Colleges, and Anglia Ruskin University. This would allow an opportunity to work collaboratively to address known needs. In addressing the design, layout, affordability and maintenance of student accommodation developments, this working group could produce a design guide and checklist for speculative developers of student accommodation in order to ensure that student accommodation units meet the requirements of the two institutions with the greatest identified need for student accommodation. This working group could also produce up to date work on affordability of student accommodation across the city and address other issues with student accommodation as and when issues occur. The Council's Annual Monitoring Report

will provide an opportunity to feedback issues which the working group has dealt with over the monitoring year and will allow the Council to update the known needs of the institutions.

## **10. Gypsy and Traveller Accommodation Needs**

- 10.1 The emerging Local Plan includes Policy 49 regarding provision for Gypsies and Travellers. This policy has not been the subject of a hearing session as yet. It is anticipated that a joint hearing session with South Cambridgeshire District Council will be held to discuss policies on Gypsies and Travellers during 2017.
- 10.2 In August 2015, a new Planning Policy for Traveller Sites (PPTS) was published by the Government which sets out a new definition for Gypsies and Travellers and Travelling Showpeople. The key change that was made to both definitions was the removal of the term '*persons ... who have ceased to travel permanently*', meaning that those Gypsies and Travellers and Travelling Showpeople who have ceased to travel permanently will not now fall under the definition of a "Gypsy and Traveller" for the purposes of national planning policy.
- 10.3 Reflecting the national policy changes, and also the need to update the previous 2011 study in light of national policy changes and appeal decisions across Cambridgeshire, a new Gypsy and Traveller Accommodation Assessment for Cambridgeshire, King's Lynn and West Norfolk, Peterborough and West Suffolk (GTAA) was commissioned in 2015 and completed in 2016 to provide up to date and robust evidence of need. The new GTAA has been produced by Opinion Research Services (ORS), a professional consultancy which undertakes this type of work for local authorities across England and Wales. The study was commissioned by a consortium of eight neighbouring local authorities, covering the administrative areas of Cambridge, South Cambridgeshire, East Cambridgeshire, Huntingdonshire, Peterborough, Kings Lynn and West Norfolk, Forest Heath and St Edmundsbury. It provides an up to date evidence base for the Local Plan.
- 10.4 The GTAA sought to establish the accommodation needs of the Gypsy, Traveller and Travelling Showpeople population in the study area through a combination of desk-based research, stakeholder interviews and engagement with members of the travelling community living on all known sites. ORS used the results from the survey of travelling communities to identify current need by identifying households on unauthorised developments, those in concealed or overcrowded households, those wishing to move sites, or households on waiting lists for public sites.
- 10.5 In response to the change in definition in national planning policy, the GTAA sets out three sub-groups of Gypsies and Travellers derived from the survey work and identifies their accommodation needs:

- Households who meet the “Traveller” definition for the purposes of planning;
- Unknown Households;
- Households which do not meet the definition.

10.6 In Cambridge, there are currently no authorised Gypsy or Traveller sites and no authorised Travelling Showpeople yards. For Cambridge, there were only two Gypsy or Traveller households identified, both living on a mobile home park not conditioned for occupancy by Gypsies and Travellers. Neither household have any identified current or future accommodation needs. There were no Travelling Showpeople households identified in Cambridge. As a result of this information, the GTAA did not identify any need for accommodation for Gypsies and Travellers and Travelling Showpeople in Cambridge.

10.7 The Council will need to propose modifications to the Inspectors examining the Local Plan to reflect the changes to Government guidance and the findings of the new GTAA. As a result of these findings, a main modification is proposed to the emerging Policy 49 to update the policy in the light of the new GTAA. A number of additional modifications are proposed to the supporting text to the policy to reflect the new GTAA and PPTS. Proposed Modifications have been identified in Appendix 1 and are summarised below:

#### **Proposed Modifications**

Policy 49 is modified to indicate that there is no identified need for accommodation for Gypsies and Travellers in Cambridge and that no specific provision for Gypsies and Travellers is made. This proposed modification is considered to be positively prepared, effective, justified and consistent with national policy. The Council has worked with other neighbouring authorities to undertake a new local assessment of need for Gypsy and Traveller pitches (Cambridgeshire, King’s Lynn and West Norfolk, Peterborough and West Suffolk Gypsy and Traveller Accommodation Assessment (October 2016)) and to address any need for pitches which may arise. This work has been undertaken in compliance with the PPTS and also represents consistent and robust engagement with other authorities under the Duty to Cooperate. Without this modification, the policy would not reflect up to date evidence.

Policy 49 is also modified to clarify how applications for sites for Gypsies and Travellers within the Green Belt should be treated consistent with the PPTS.

The supporting text for Policy 49 is subject to a number of additional modifications to update the supporting text in line with the proposed main modification to the policy.

10.8 In terms of transit needs across the study area, the GTAA concluded that there is no identified need to allocate Gypsy and Traveller transit sites at this time. The consultants suggest that a review of the evidence base relating to unauthorised encampments should be undertaken once there is a new three year evidence base following the changes to the PPTS in August 2015 including attempts to try and identify whether households on encampments meet the new definition. This will

establish whether there is a need for investment in more formal transit sites or emergency stopping places.

- 10.9 The PPTS requires the Council to maintain a five year land supply of deliverable sites to meet the needs of those meeting the planning definition of Gypsies and Travellers and Travelling Showpeople, and identify sites for years 6 to 10, and where possible for years 11 to 15. The lack of identified need for Gypsies and Traveller and Travelling Showpeople sites in Cambridge means that identifying a supply of Gypsy and Traveller and Travelling Showpeople sites is not required, and does not warrant specific land allocations in the Local Plan.
- 10.10 It is considered that the criteria based policy approach set out in Policy 49 is a reasonable and proportionate response to the current situation for the Local Plan, as it can provide an appropriate response to any proposals received during the plan period.
- 10.11 The assessment acknowledges that it was not possible to determine the travelling status of a number of households of both Gypsies and Travellers and Travelling Showpeople who did not or refused to participate in the survey process, and a proportion of these may meet the definitions provided in the PPTS. The Local Plan's Policy 49 will guide consideration of any planning application proposals for Gypsy and Traveller sites to meet 'unidentified' potential need which may arise during the plan period. With regard to those who do not meet the PPTS definition, proposals for development would be considered against the wider policies of the development plan similar to other forms of residential development.

## **11. Accessible Homes**

- 11.1 In March 2015, the Government published a written ministerial statement<sup>5</sup> which stated that requirements for accessible dwellings should only be set in relation to the new national optional standards which have been introduced as Part M4(2) and Part M4(3) of the Building Regulations.
- 11.2 A dwelling built to Part M4(2) is one which makes 'reasonable provision for most people to access the dwelling and incorporates features that make it potentially suitable for a wide range of occupants including older people, those with reduced mobility and some wheelchair users'. This is similar to the standard for Lifetime Homes.
- 11.3 A dwelling built to Part M4(3) is one which makes 'reasonable provision, either at completion or at a point following completion, for a wheelchair user to live in the dwelling and use any associated private outdoor space, parking and communal facilities that may be provided for the use of the occupants'. This is similar to the Wheelchair Housing Design Standards.

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<sup>5</sup> • Written Ministerial Statement: Planning Update, 25 March 2015:  
<https://www.gov.uk/government/speeches/planning-update-march-2015>

- 11.4 The National Planning Policy Framework (NPPF) states that planning authorities should ‘plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own home’ (paragraph 50). The NPPF also states that ‘The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities’ (paragraph 69).
- 11.5 In order to use the optional standards, it is necessary for a local planning authority to gather evidence to determine whether there is a need for additional standards in their area, and justify setting appropriate policies in their Local Plan. The Council has completed a report ‘Accessible Housing in Cambridge’ to determine need for additional standards. The National Planning Practice Guidance states that the following should be taken into account when identifying the need for accessible dwellings:
- The likely need for future housing for older and disabled people (including wheelchair user dwellings);
  - Size, location, type and quality of dwellings needed (for example retirement homes, sheltered homes or care homes);
  - The accessibility and adaptability of the existing housing stock;
  - How needs vary across different housing tenures;
  - The overall impact on viability
- 11.6 An appropriate requirement for Cambridge for accessible homes has been identified through consideration of a range of data.
- 11.7 The Council has reviewed Policy 51 and believes it prudent to apply optional requirement M4(2) to all new build homes and optional requirement M4(3) to 5% of all affordable housing developments of 20 units or more.
- 11.8 The recommendation to require 100% of all new homes to be built to optional regulation M4(2): *Accessible and adaptable dwellings* is based on the following evidence provided within the Accessible Housing in Cambridge evidence document:
- It is estimated that only 7% of homes (3,270 households) currently meet the equivalent of M4(2). 5,170 households in Cambridge would require minor work to meet this standard and 19,593 would require moderate work. The remaining 18,681 homes would require major work or are unable to be adapted.
  - There is a potential unmet need for 6,539 accessible and adaptable homes. This implies that before even taking into account future need for accessible and adaptable homes, 48% of new planned homes between 2011/12 and 2031/31 would be required to be fully accessible and adaptable to meet existing need. As 3,744 homes have already been built within the plan period

(2011/12 to 2015/16), this unmet need could rise to up to 67% of all remaining homes to be built to 2031.

- The lack of accessible and adaptable homes is spread across all tenures.
- Cambridge's population is expected to rise to 154,200 by 2031. The proportion of people over 65 years is also expected to rise from 11.8% in 2011 to 15.4% by 2031. This illustrates an aging population, as the older population increases, so does the need for accessible and adaptable housing.
- It is estimated that 4,985 people aged 65 and over will be in need of specialist care or in-house adaptations to improve their mobility and quality of life within their home. Likewise 8,755 people over 65 years are estimated to be unable to manage a self-care activity on their own. Predicted falls in the Cambridge residents over 65 years are estimated to reach 6,755 by 2031. Hospital admissions and further care as a result of trips and falls in the home also put a further strain on the NHS.
- Article 19 of The Care Act 2014 directs local authorities towards the implementation of preventative action through housing i.e. the provision of accessible and adaptable homes.
- The number of people with long-term health issues or disability is not restricted to a particular tenure.
- An estimated 7,073 people aged 18 to 64 years in Cambridge will be living with a moderate disability in 2031 and 1,959 with a serious disability.
- As the 18 to 64 years population ages, it is possible that some of their in-home needs may increase over time and homes may be required to be sufficiently adaptable to provide additional aids to meet these needs.

11.9 The recommendation to require that optional requirement M4(3): Wheelchair user dwellings be applied to 5% of all affordable housing developments of 20 units or more and to encourage the application of wheelchair accessible dwellings in Market Housing is based on evidence provided within the Accessible Housing in Cambridge evidence document. It is estimated that unmet and future wheelchair user household need to 2031 will be 354.89 households. This is equivalent to 10.74% of all affordable housing completions to 2031. Long-term health issues or disability is more prevalent in Housing Association or Council housing. It is therefore considered conservative to require 5% wheelchair accessible housing through the application of optional building regulation M4(3): Wheelchair user dwellings to affordable housing.

11.10 The National Planning Practice Guidance states that Local Plan policies for M4(3) wheelchair accessible homes should only be applied to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling. In the interests of creating mixed and balanced communities, the Council wishes to encourage developers of market housing to deliver wheelchair accessible market homes. Text to this effect has been included in the additional modifications to the supporting text of Policy 51. The proposed modifications to address the need for accessible homes are summarised below and are set out in Appendix 1.

### **Proposed Modifications**

It is proposed that Policy 51 is modified to reflect that the Lifetime Homes and Wheelchair Housing Design Standards have been replaced by optional standards M4(2) and M4(3). These optional standards can only be required through planning policy at a local level and then implemented via Building Regulations. In order to include the standards in Policy 51, assessment of need and viability has been undertaken. The main modification proposed to Policy 51 and the additional modifications proposed to the supporting text to the policy are necessary in order to be consistent with national planning policy and to be effective and justified in meeting the identified need for accessible homes to meet the changing needs of Cambridge's population.

### Appendix 1: Further Proposed Modifications

The modifications set out below relate to a number of policies and their supporting text, and site allocations in the Cambridge Local Plan 2014: Proposed Submission. The changes are expressed either in the conventional form of strikethrough for deletions and underlining for additions of text, or by specifying the modification in words in *italics*.

The page numbers and paragraph numbering below refer to the Cambridge Local Plan, and do not take account of the deletion or addition of text.

Page	Policy/Paragraph	Modification	Reason for proposed modification
6	Paragraph 1.8	Although Cambridge is a small city in size, its international stature and the extent of the facilities it offers are much greater than one would expect. The population of Cambridge was 123,900 in 2011. It is predicted that by 2031 the population will reach 150,000. Cambridge also has to consider the needs of its academic population. The city hosts a large student population from the University of Cambridge and Anglia Ruskin University. In 2012, the student population <u>of the University of Cambridge and Anglia Ruskin University</u> was estimated at 29,087.	This additional modification is proposed as this clarifies the origin of the student numbers estimated in 2012.
18 – 19	Table 2.1: Summary of other needs during the plan period, first row	Both universities require land for student <del>hostels</del> <u>accommodation</u> . <del>The University of Cambridge has identified a need to find space for 3,016 (net) rooms for undergraduates and postgraduates to 2031.</del>	This additional modification is proposed for clarity in order to use the same description of student accommodation consistently throughout the Local Plan. The term 'student hostel' was used in the adopted Cambridge Local Plan

Page	Policy/Paragraph	Modification	Reason for proposed modification
			<p>2006, but is no longer considered to appropriately represent the nature of modern student accommodation.</p> <p>The figure of 3,016 (net) rooms has been removed as the <i>Assessment of Student Housing Demand and Supply for Cambridge City Council</i> has provided up to date information on this matter. The <i>Assessment of Student Housing Demand and Supply for Cambridge City Council</i> has been referred to in one place in the plan: Policy 46 and its supporting text.</p>
24 -25	Policy 3: Spatial strategy for the location of residential development	<p>The overall development strategy is to focus the majority of new development in and around the urban area of Cambridge, creating strong, sustainable, cohesive and inclusive mixed-use communities, making the most effective use of previously developed land, and enabling the maximum number of people to access services and facilities locally</p> <p>Provision will be made for the development of not less than 14,000 additional dwellings within Cambridge City Council's administrative boundary over the period from April 2011 to March 2031 to meet the objectively assessed need for homes in Cambridge. This will enable</p>	<p>This main modification is proposed to safeguard residential allocations which have been proposed in the emerging Local Plan in order to meet objectively assessed housing need. It is consider that the plan is positively prepared and justified in respect of meeting objectively assessed need for housing and that this modification confirms that these allocations should not be lost</p>

Page	Policy/Paragraph	Modification	Reason for proposed modification
		<p>continuous delivery of housing for at least 15 years from the anticipated date of adoption of this local plan. This provision includes two small sites to be released from the Cambridge Green Belt at Worts' Causeway, which will deliver up to 430 dwellings.</p> <p>In order to maintain housing provision, planning permission to change housing or land in housing use to other uses will only be supported in exceptional circumstances. <u>Other uses include the provision of student accommodation, where planning permission would usually be required for change of use.</u></p> <p>A full schedule of sites allocated for development in order to meet the headline housing targets is set out in Appendix B and illustrated on the policies map. <u>Permanent purpose built student accommodation will not be supported on sites allocated for housing or with either an extant planning permission for residential development or sites identified as potential housing sites within the Council's Strategic Housing Land Availability Assessment.</u></p>	to other forms of development, including student accommodation.
45	Paragraph 3.8	The table within the policy identifies those uses that the Council thinks are appropriate at ground floor level in the PSA. The NPPF identifies office and residential uses as town centre uses. While the value of these uses in centres is recognised, these are only appropriate in upper floors in the primary and secondary frontages in Cambridge. These uses would not provide active frontages. The Cambridge Retail and Leisure Study Update 2013 identifies a significant capacity for additional comparison shopping, and the best location for this is within the City Centre at the top of the retail hierarchy. Therefore, ground floor units should not be lost to offices or residential use, including	This additional modification is proposed for clarity in order to use the same description of student accommodation consistently throughout the Local Plan. The term 'student hostel' was used in the adopted Cambridge Local Plan 2006, but is no longer considered to appropriately represent the nature of modern student

Page	Policy/Paragraph	Modification	Reason for proposed modification						
		student <del>hostels</del> <u>accommodation</u> , and any applications for such a change of use would have to provide evidence of marketing and show there were exceptional circumstances why a unit could not be used for a centre use.	accommodation.						
92	Paragraph 3.102	<p>In 2008, the council and the University of Cambridge undertook a viability assessment for development of the site in producing the Old Press/Mill Lane SPD (January 2010), which led to this indicative capacity being reached<sup>6</sup>. <u>Since this work was undertaken, further work has been undertaken by the University of Cambridge and it is now clear that the site is likely to deliver student accommodation rather than housing:</u></p> <table border="1" data-bbox="757 821 1556 1295"> <thead> <tr> <th>Land use</th> <th>Indicative floorspace/units</th> </tr> </thead> <tbody> <tr> <td><u>Residential Student Accommodation</u></td> <td> <p>Student accommodation: Indicative capacity of 350 student rooms*</p> <p>Up to 150 units</p> <p><del>Note: If student residential is provided, there is the potential for up to 200 student residential units or the equivalent square metreage in student accommodation</del></p> </td> </tr> <tr> <td>Commercial (excluding retail)</td> <td>Up to 6,000 sq m</td> </tr> </tbody> </table>	Land use	Indicative floorspace/units	<u>Residential Student Accommodation</u>	<p>Student accommodation: Indicative capacity of 350 student rooms*</p> <p>Up to 150 units</p> <p><del>Note: If student residential is provided, there is the potential for up to 200 student residential units or the equivalent square metreage in student accommodation</del></p>	Commercial (excluding retail)	Up to 6,000 sq m	<p>This main modification is proposed as a result of discussions with the University of Cambridge to bring forward development on the Old Press/Mill Lane site. The University of Cambridge has confirmed that mainstream residential accommodation will not be deliverable on this site and that student accommodation is being pursued for the site. This is not incompatible with the aspirations of the adopted Old Press/Mill Lane SPD which allows for up to 200 student units.</p> <p>This main modification is in keeping with the requirements for plan-making in that it is positively prepared, justified and effective. This allocation is deliverable for</p>
Land use	Indicative floorspace/units								
<u>Residential Student Accommodation</u>	<p>Student accommodation: Indicative capacity of 350 student rooms*</p> <p>Up to 150 units</p> <p><del>Note: If student residential is provided, there is the potential for up to 200 student residential units or the equivalent square metreage in student accommodation</del></p>								
Commercial (excluding retail)	Up to 6,000 sq m								

<sup>6</sup> Old Press/Mill Lane SPD Option Appraisal: Summary Report (February 2009) and Old Press/ Mill Lane SPD (January 2010).

Page	Policy/Paragraph	Modification	Reason for proposed modification				
		<table border="1" data-bbox="757 272 1559 432"> <tr> <td data-bbox="757 272 994 312">Hotel</td> <td data-bbox="994 272 1559 312">Up to 75 bedrooms</td> </tr> <tr> <td data-bbox="757 312 994 432">Other (excluding retail)</td> <td data-bbox="994 312 1559 432">Up to 1,000 sq m</td> </tr> </table> <p data-bbox="645 501 1559 600">* <u>The indicative capacity of this site is subject to detailed testing, including consideration of the site's constraints, particularly the historic environment.</u></p> <p data-bbox="645 636 1559 1098"><b>Note for the Inspectors: The Council has been working with the University of Cambridge to progress pre-application discussions on this site. Since the Old Press/Mill Lane Supplementary Planning Document was adopted in January 2010, the circumstances of a number of the existing buildings on the site have changed, and there is now additional potential for student accommodation. This has resulted from changes in the usage of buildings owned by the University of Cambridge. This indicative figure of 350 student rooms could increase as pre-application discussions progress. As such, the Council and the University of Cambridge would provide an update to the examination at the appropriate time.</b></p>	Hotel	Up to 75 bedrooms	Other (excluding retail)	Up to 1,000 sq m	<p data-bbox="1585 272 2051 616">student accommodation. On the information which has now been provided, the allocation is not deliverable as mainstream housing. As such, the modification seeks to provide an allocation which, on all of the information presently available is deliverable on the site.</p>
Hotel	Up to 75 bedrooms						
Other (excluding retail)	Up to 1,000 sq m						
143	Policy 44: Specialist colleges and language schools	The development of existing and new specialist <u>colleges and/or language</u> schools will not be permitted unless they provide residential accommodation, social and amenity facilities for all non-local students (students arriving to study from outside Cambridge and the Cambridge sub-region), with controls in place to ensure that the provision of accommodation is in step with the expansion of student places. <u>The</u>	<p data-bbox="1585 1134 2051 1281">This additional modification to the terminology for specialist colleges and language schools is proposed for clarity and consistency.</p> <p data-bbox="1585 1318 2051 1386">This additional modification was proposed in Matter CC4 to</p>				

Page	Policy/Paragraph	Modification	Reason for proposed modification
		<p><u>use of family dwellinghouses to accommodate students of specialist colleges and/or language schools only is not appropriate.</u></p>	<p>strengthen the wording already included in the supporting text, that it will not be appropriate to use family dwellinghouses to accommodate specialist college and/or language school students only.</p>
143	Paragraphs 5.28 – 5.31	<p>There are a growing number of specialist <del>schools</del> <u>colleges</u> in Cambridge, including secretarial and tutorial colleges, pre-university foundation courses and crammer schools. These <del>schools</del> <u>colleges</u> concentrate on GCSE and A level qualifications and pre-university foundation courses. They attract a large number of students and contribute significantly to the local economy.</p> <p>Cambridge is also an important centre for the study of English as a foreign language. For more than 50 years, overseas students have been coming to Cambridge to study English in language schools (<del>another form of specialist college</del>). The city has <del>22</del> <u>a large number of permanent and temporary foreign language schools</u> <del>and a fluctuating number of around 30 temporary schools,</del> which set up in temporary premises over the summer months. <del>Currently, the annual student load at these centres is thought to be around 31,000, although the average stay is only five weeks.</del></p> <p>The industry has matured in recent years and more and more courses are being run throughout the year and are being focused at a much broader range of students, including people working in business as</p>	<p>This additional modification to the terminology for specialist colleges and language schools is proposed for clarity and consistency.</p>

Page	Policy/Paragraph	Modification	Reason for proposed modification
		<p>well as the more traditional younger students.</p> <p>The Cambridge Cluster Study recognised the increasing contribution these establishments make to the local economy and has suggested a review in the policy approach, as <del>the schools between them</del> <u>they</u> contribute £78m per annum to the local economy. The National Planning Policy Framework (NPPF) supports a policy approach that seeks to take advantage of this benefit. <del>Therefore the</del> <u>The</u> Council considers it appropriate <del>to support the growth of that</del> such colleges and schools where they <del>also seek to</del> manage the impacts of their growth.</p>	
144	Paragraphs 5.32 – 5.33	<p><u>Specialist colleges and</u> <del>L</del>Language schools can place additional burdens on the housing market. This policy seeks to ensure that when specialist <u>colleges and language</u> schools seek to grow, those burdens are mitigated. The applicant will need to demonstrate how many additional students will be generated by the proposal. This will allow the Council to judge the residential, social and amenity impact generated. The Council will <del>be flexible in considering any</del> <u>require a</u> robust method of calculating the additional number of students arising from any proposal, and will consider a range of mechanisms to agree an upper limit to the number of additional students. The range of mechanisms considered may include, but not be limited to, controlling the hours of operation, the number of desk spaces and the number of students. This will ensure that a proposal will generate a specific level of growth that can be measured and mitigated. Student accommodation is dealt with under Policy 46 in Section Six.</p> <p>The housing market in Cambridge is already under significant</p>	<p>This additional modification to the terminology for specialist colleges and language schools is proposed for clarity and consistency.</p> <p>This additional modification on methodology was proposed in Matter CC4 and in the Schedule of Proposed Changes following Proposed Submission Consultation (March 2014) as PM/5/008 for clarity.</p>

Page	Policy/Paragraph	Modification	Reason for proposed modification
		<p>pressure. The growth of specialist colleges and language schools should not worsen this situation. Appropriate residential accommodation can take the form of home-stay (with resident families in the area) or the use of existing accommodation outside term time, and the use of purpose-built student accommodation within the curtilage of the <u>college/school</u>. Use of family dwelling houses to accommodate students only is not appropriate, as this will put additional pressure on the housing market. Promoters of language school and specialist college development will be expected to submit evidence to demonstrate how this issue is being addressed as a part of their planning application.</p>	
151	<p>Policy 46: Development of student housing, criterion e</p>	<p>Proposals for new student accommodation will be permitted if they meet identified needs of an existing educational institution within the city of Cambridge in providing housing for students attending full-time courses of one academic year or more. <u>Schemes should demonstrate that they have entered into a formal agreement with the University of Cambridge or Anglia Ruskin University or other existing educational establishments within Cambridge providing full-time courses of one academic year or more. This formal agreement will confirm that the proposed accommodation is suitable in type, layout, affordability and maintenance regime for the relevant institution. The council will seek appropriate controls to ensure that approved schemes are occupied solely as student accommodation for an identified institution and managed effectively.</u> Applications will be permitted subject to:</p> <p>a. there being a proven need for student accommodation to serve the</p>	<p>This main modification is proposed to safeguard residential allocations which have been proposed in the emerging Local Plan in order to meet objectively assessed housing need. It is considered that the plan is positively prepared and justified in respect of meeting objectively assessed need for housing and that this modification confirms that these allocations should not be lost to other forms of development, including student accommodation.</p> <p>The requirement for an institution to be committed to the proposed</p>

Page	Policy/Paragraph	Modification	Reason for proposed modification
		<p>institution;</p> <p>b. the development not resulting in the loss of existing market housing and affordable housing;</p> <p>c. it being in an appropriate location for the institution served;</p> <p>d. the location being well served by sustainable transport modes;</p> <p>e. having appropriate management arrangements in place to <del>ensure students do not keep cars in Cambridge</del> <u>discourage students from keeping cars in Cambridge</u>;</p> <p>f. rooms and facilities being of an appropriate size for living and studying; and</p> <p>g. <u>minimising</u> <del>if appropriate, being warden-controlled to minimise</del> any potential for antisocial behaviour <u>and, if appropriate, being warden-controlled</u>.</p> <p>The loss of existing student accommodation will be resisted unless adequate replacement accommodation is provided or it is demonstrated that the facility no longer caters for current or future needs.</p> <p>In the instance of institutions where students do not attend full-time courses of one academic year or more these institutions will be expected to provide residential accommodation for their students within their own sites; make effective use of existing student accommodation</p>	<p>scheme, through a formal agreement, will support the effectiveness of the plan in ensuring that the accommodation proposed reflects the student accommodation requirements of specific institutions such as Anglia Ruskin University and the University of Cambridge.</p> <p>The additional modification to criterion e was proposed as Modification PM/6/004 in the Addendum to Cambridge Local Plan 2014: Proposed Submission document - Schedule of Proposed Changes following Proposed Submission Consultation, March 2014 (RD/Sub/C/050) to respond to representation 28138 and as it is not enforceable in planning terms.</p>

Page	Policy/Paragraph	Modification	Reason for proposed modification
		<p>within the city outside term time; or use home-stay accommodation.</p> <p><u>Permanent purpose built student accommodation will not be supported on sites allocated for housing or with either an extant planning permission for residential development or sites identified as potential housing sites within the Council's Strategic Housing Land Availability Assessment.</u></p>	
152	Paragraph 6.11	<p>The presence of two large universities <u>and a number of other educational institutions</u> has a significant impact on Cambridge's demography and on its housing market, <del>with one in four of its residents studying at one of the universities.</del> The student communities, including undergraduates and postgraduates, contribute significantly to the local economy, and to the vibrancy and diversity of the city. Out of term time and throughout the year, the city is also a temporary home to conference delegates and other students attending pre-university courses <u>and short courses</u> at specialist <del>schools and</del> colleges, or studying English as a foreign language at one the city's language schools.</p>	This additional modification to the terminology is proposed for clarity and consistency.
152	Paragraph 6.14	<p><i>Amend to read:</i></p> <p><u>The Council commissioned a study<sup>7</sup> to identify the demand for and supply of student accommodation within the city. This study provides information on the potential level of purpose built student accommodation to address current and future student numbers (to</u></p>	This main modification is proposed to make reference to the Council's recent study on the demand for and supply of student accommodation in Cambridge. This ensures that the plan is

<sup>7</sup> Assessment of Student Housing Demand and Supply for Cambridge City Council, Cambridge Centre for Housing and Planning Research, January 2017.

Page	Policy/Paragraph	Modification	Reason for proposed modification
		<p><u>2026) if all students were to be accommodated in purpose built student accommodation. Having considered the findings of the study, the Council recognises that student accommodation can be provided in a variety of ways, including through allocations for student accommodation and through windfall sites. The Plan, including policy 46, is intended to deliver accommodation to address the identified future growth aspirations of the institutions and to provide additional flexibility. The City Council is not seeking through the Local Plan to provide purpose built student accommodation for all of the existing resident student population. The student accommodation study identifies that the University of Cambridge is looking to grow by a further 2,874 students to 2026. While Anglia Ruskin University has confirmed that it has no growth aspirations to 2026, a number of the other institutions in Cambridge have stated aspirations to grow. These institutions have a total growth figure to 2026 of 230 students. This gives rise to a total growth figure for the universities and the other institutions of 3,104 to 2026. Taking into account student accommodation units under construction or with planning permission, allocations in the Local Plan and the remaining allocation at North West Cambridge, these sources of supply would address and go beyond the growth figure of 3,104 and would provide flexibility. Any provision over and above these sources of supply would need to be considered on its merits against the criteria in Policy 46 and having regard to the absence of any policy requirement at either national or local level for all students to be provided with purpose built student accommodation.</u></p> <p><u>In order to show that the known needs of specific institutions are being met, Evidence must be provided as a part of the application to show</u></p>	<p>justified and positively prepared.</p> <p>This paragraph includes a main modification PM/CC/6/B in Cambridge Local Plan Proposed Modifications (March 2016) (RD/MC/140). Justification for this modification can be found in RD/MC/140.</p> <p>Part of this modification was suggested in response to a representation and to ensure clarity and was proposed as modification PM/6/005 as part of the Addendum to the Cambridge Local Plan 2014: Proposed Submission document – Schedule of Proposed Changes following Proposed Submission Consultation (RD/Sub/C/050).</p>

Page	Policy/Paragraph	Modification	Reason for proposed modification
		<p>a linkage with at least one higher or further education institution. <u>This will need to comprise a formal agreement with the institution which confirms that the accommodation will be occupied by students of the institution undertaking full-time courses of one academic year or more. When planning permission is granted for new student accommodation, a planning agreement will be used to robustly secure that use and the link to the particular institution for whom the accommodation is to be provided. This policy only applies in instances where planning permission is required for development housing more than six students (sui generis). It is accepted that, due to the relatively short lifespan of tenancies and the lifestyle of student occupants, different amenity standards should apply from those for permanent accommodation. However, student accommodation should still be well designed, providing appropriate space standards and facilities. Student accommodation should be well designed, providing appropriate internal and/or amenity space standards and facilities. The provision of amenity space will need to reflect the location and scale of the proposal. Provision should be made for disabled students. The ability to accommodate disabled students should be fully integrated into any student housing development, in keeping with the requirements of Policy 51.</u></p>	
155 - 156	Policy 49: Provision for Gypsies and Travellers	<p>The Council, working with neighbouring authorities, will maintain a local assessment of need for pitches for Gypsies and Travellers and plots for Travelling Showpeople. The outcome of <del>these</del> <u>this</u> assessments will assist the Council in determining planning applications. The latest published evidence (<del>December 2014</del><u>2016</u>) indicates there is a <u>no identified need for just one pitches or plots in Cambridge</u> between <u>2014</u><u>2016</u> and 2031. This local plan therefore</p>	<p>This main modification was made to reflect the updated evidence base on Gypsies and Travellers in the form of the Cambridgeshire, King's Lynn and West Norfolk, Peterborough and West Suffolk Gypsy and Traveller</p>

Page	Policy/Paragraph	Modification	Reason for proposed modification
		<p>makes no <u>specific</u> provision for new sites in Cambridge. Proposals for permanent, transit and emergency stopping provision for Gypsies and Travellers will only be permitted where:</p> <ol style="list-style-type: none"> <li>a. the applicant or updated council evidence has adequately demonstrated a clear need for the site in the city, and the number, type and tenure of pitches/plots proposed, which cannot be met by a lawful existing or available allocated site;</li> <li>b. the site is accessible to local shops, services and community facilities by public transport, on foot or by cycle;</li> <li>c. the site has safe and convenient vehicular, pedestrian and cycle access for the type of vehicles that could reasonably be expected to use or access the site;</li> <li>d. the site is capable of being provided with essential utilities, including mains water, electricity, sewerage, drainage and waste disposal;</li> <li>e. the site will provide an acceptable living environment and the health and safety of the site's residents should not be put at risk. Factors to be taken into account include flood risk, site contamination, air quality and noise;</li> <li>f. the site will not have an unacceptable adverse impact on the amenity of nearby residents or the appearance or character of the surrounding area. The site should respect the scale of the surrounding area and appropriate boundary treatment and landscaping should be capable of being provided;</li> <li>g. the site will allow the needs of the residents of the site to be met without putting undue pressure on local services; and</li> <li>h. the site provides adequate space for vehicle parking, turning and</li> </ol>	<p>Accommodation Assessment (October 2016).</p> <p>The Council considers that this modification is positively prepared, effective and justified. The Council has worked with other neighbouring authorities to undertake a local assessment of need for Gypsy and Traveller pitches and to address any need for pitches which may arise. This work has been undertaken in compliance with the national <i>Planning policy on travellers sites</i> (August 2015) and also represents consistent and robust engagement with other authorities under the Duty to Cooperate.</p> <p>The modification is consistent with national policy. National <i>Planning policy on traveller sites</i> was produced in August 2015 and provides a new definition for Gypsies and Travellers. Policy 49 has been updated to reflect findings of the Cambridgeshire,</p>

Page	Policy/Paragraph	Modification	Reason for proposed modification
		<p>servicing of large vehicles, storage, play and residential amenity.</p> <p>Should up to date needs assessment indicate there is a need, then opportunities to deliver sites for Gypsies and Travellers will be sought as part of significant major development sites. The location of site provision will be identified through the masterplanning and design process. <del>Sites in the Green Belt would not be appropriate, unless exceptional circumstances can be demonstrated at the masterplanning and planning application stage.</del> <u>Gypsy and Traveller sites are inappropriate development in the Green Belt. Any proposals in the Green Belt would also have to demonstrate compliance with national and local policy regarding development in the Green Belt.</u> Sites will not be located in identified areas of green separation. Sites provided will meet the following criterion in addition to the above criteria (a– h):</p> <p>i. sites will be well-related to the major development, enabling good access to the services and facilities, and providing safe access on foot, cycle and public transport. Access should not rely on minor residential roads.</p>	<p>King's Lynn and West Norfolk, Peterborough and West Suffolk Gypsy and Traveller Accommodation Assessment (October 2016) which was produced to address the change in national policy.</p>
157	Paragraph 6.23	<p><i>Replace paragraph 6.23 with the following text:</i></p> <p><u>The Government's Planning Policy for Traveller Sites requires that local planning authorities set targets for the provision of Gypsy and Traveller pitches and Travelling Showpeople plots which address the likely site accommodation needs of Travellers in their area, working collaboratively with neighbouring local planning authorities. The</u></p>	<p>This additional modification was made to reflect the national <i>Planning policy on traveller sites</i>, which was produced in August 2015.</p>

Page	Policy/Paragraph	Modification	Reason for proposed modification
		<p><u>Government's policy approach requires Councils to maintain a five year land supply of Traveller sites, in a similar way to housing, and identify deliverable sites to meet the needs identified for the first five years. This planning guidance was revised in 2015, in particular revising the definition of Gypsies and Travellers for the purposes of planning. Applicants will need to demonstrate that they meet the definitions provided by the Government's Planning Policy for Traveller Sites.</u></p> <p><del>The Government's Planning Policy for Traveller Sites requires local planning authorities to:</del></p> <ul style="list-style-type: none"> <li><del>• set out targets for the provision of pitches for Gypsies and Travellers and plots for Travelling Showpeople;</del></li> <li><del>• to maintain a five-year land supply of sites;</del></li> <li><del>• to identify and update annually deliverable sites to meet the accommodation needs of Travellers within their area within the first five years;</del></li> <li><del>• identify a supply of sites or broad locations for growth in later years of the plan period;</del></li> <li><del>• work collaboratively with neighbouring authorities to provide flexibility in identifying sites.</del></li> </ul>	
157	Paragraph 6.24	<p><i>Split paragraph 6.24 into two paragraphs and amend to read:</i></p> <p>These requirements necessitate collaborative working with neighbouring authorities on both assessment of need and ongoing</p>	<p>This additional modification was made to reflect the national <i>Planning policy on traveller sites</i>, which was produced in August 2015, and which led to the</p>

Page	Policy/Paragraph	Modification	Reason for proposed modification
		<p>provision. In informing debate on need, a number of Cambridgeshire, Norfolk and Suffolk authorities commissioned the Gypsy and Traveller Accommodation <del>Needs Assessment 2014-2016</del> (GTANA) to cover the period <del>2014-2031</del> <u>2016-2036</u>. This assessment concluded that <u>there was no identified Cambridge's need in Cambridge was for one for permanent pitches for Gypsies and Travellers or plots for Travelling Showpeople between <del>2024</del>2016 and <del>2026</del>2031. The Local Plan does not propose any allocations. There was no identified need for plots<sup>8</sup> for Travelling Showpeople within Cambridge's administrative area. The assessment acknowledges that it was not possible to determine the travelling status of existing households who did not participate in surveys carried out for the purpose of the assessment. These households may or may not include individuals who meet the definition provided in the Planning Policy for Traveller Sites and therefore give rise to some need for pitch provision. However, the extent of such need (if any) cannot be identified. Any proposals for sites will be considered according to Policy 49: Provision for Gypsies and Travellers.</u></p> <p>The GTANA refers to need for transit/emergency stopping place provision, but it was not possible to determine precise demand for such temporary accommodation in any one local authority area, particularly in light of changes to the Planning Policy for Traveller Sites potentially leading to more households travelling. <del>The GTANA notes that beyond the immediate need, assessments of growth are based on modelling, and the best information available. There will be a need to monitor and review the plan, as necessary, to take account of up to</del></p>	<p>Councils producing updated evidence base in the form of the Cambridgeshire, King's Lynn and West Norfolk, Peterborough and West Suffolk Gypsy and Traveller Accommodation Assessment (October 2016).</p>

<sup>8</sup> Where there is sufficient space for living accommodation and the storage of equipment.

Page	Policy/Paragraph	Modification	Reason for proposed modification
		date evidence.	
157	Paragraph 6.25	<p><i>Amend paragraph 6.25 to read:</i></p> <p>The Government's Planning Policy for Traveller Sites requires plans to identify specific sites or broad locations, where need will be met within the plan period. The Council considers that significant major developments provide an opportunity to deliver provision to meet any longer-term needs. This would allow the delivery of pitches as an integral part of the development, in sustainable locations close to services and facilities. <u>Given the significant education, health and disability-related inequalities experienced by many Gypsies and Travellers, the provision of pitches within sustainable, major developments could help to address these issues. Additionally, as</u> stated in The Road Ahead: Final Report of the Independent Task Group on Site Provision and Enforcement for Gypsies and Travellers, published by the Department for Communities and Local Government in December 2007, the approach of integrating the provision of accommodation for Gypsies and Travellers as part of new development helps to erode misconceptions and distrust.</p>	This additional modification was made to reflect the concerns of the Council's Gypsy and Traveller Working Group in respect of the inequalities faced by the Gypsy and Traveller community.
158	Insert new paragraph after paragraph 6.26	<p><i>Insert new paragraph after paragraph 6.26 to read:</i></p> <p><u>When applications for planning permission or reserved matters approval come forward for large scale new communities or significant major development sites, consideration will be given to whether there is a current need for Gypsy and Traveller site provision, and the opportunity to deliver appropriately a site or sites within that phase of the development will be reviewed.</u></p>	This additional modification was made to reflect the text of the South Cambridgeshire Local Plan in respect of the needs of Gypsies and Travellers to ensure that cross-boundary sites are dealt with consistently and effectively.

Page	Policy/Paragraph	Modification	Reason for proposed modification
161	Policy 51: Lifetime Homes and Lifetime Neighbourhoods	<p>Policy 51: <del>Lifetime Homes and Lifetime Neighbourhoods</del> <u>Accessible Homes</u></p> <p>In order to create <del>Lifetime Homes and Neighbourhoods</del> <u>accessible homes</u>:</p> <ol style="list-style-type: none"> <li>a. all housing development should be of a size, configuration and internal layout to enable <del>the Lifetime Homes Standard</del> <u>Building Regulations requirement M4 (2) 'accessible and adaptable dwellings'</u> to be met; and</li> <li>b. 5 per cent<sup>9</sup> of <u>the affordable housing component of every housing schemes development</u> providing or capable of acceptably providing 20 or more self-contained <u>affordable homes</u><sup>10</sup>, <del>including conversions and student housing,</del> <u>should meet Building Regulations requirement M4 (3) 'wheelchair user dwellings' to be wheelchair accessible either meet Wheelchair Housing Design Standards, or be easily adapted to meet them for residents who are wheelchair users.</u></li> </ol> <p>Compliance with the criteria should be demonstrated in the design and access statement submitted with the planning application.</p>	<p>This main modification is made to reflect a change in national policy.</p> <p>On 25 March 2015, the Government introduced a Written Ministerial Statement in respect of accessibility. This statement introduced optional standards which would be brought forward via Part M of Building Regulations and would replace Lifetime Homes Standard with the M4 (2) optional standard for accessible and adaptable homes, and replace the Wheelchair Housing Design Standard with the M4 (3) option standard for wheelchair user housing. This change to Building Regulations came into force in October 2015.</p> <p>This modification supersedes Modification PM/6/007 in the Addendum to Cambridge Local</p>

<sup>9</sup> Rounded up to the nearest whole unit.

<sup>10</sup> Part M of the Building Regulations generally does not apply to dwellings resulting from a conversion or a change of use. Additional guidance on the applicable requirements of the Building Regulations (amended 2015) can be found in: Approved Document M Access to and use of buildings Volume 1: Dwellings.

Page	Policy/Paragraph	Modification	Reason for proposed modification
			Plan 2014: Proposed Submission document - Schedule of Proposed Changes following Proposed Submission.
161	Paragraph 6.32	This plan throughout adopts the principle of inclusive design: "The design of mainstream products and/or services that are accessible to, and usable by, as many people as reasonably possible ... without the need for special adaptation or specialised design" (BSI 2005). This principle applied to housing has resulted in the concept of Lifetime Homes and indeed goes wider to the concept of Lifetime Neighbourhoods, which enable an increasingly aging society to get out and about in the areas in which they live – both physically and virtually – and connect with other people and services in the immediate neighbourhood and beyond. <u>The Lifetime Homes and Wheelchair Housing Design Standards have now been superseded by optional housing standards on accessibility introduced by the Government through Part M of Building Regulations in 2015.</u>	This additional modification is made to support the change to Policy 51 (see above) to reflect the change in national policy in respect of optional accessibility standards which replaced Lifetime Homes and the Wheelchair Housing Design Standard.
161	Paragraph 6.33	<del>An accessible home</del> <del>Lifetime Home</del> (see <del>Figure 6.1</del> ) supports changing needs of residents from raising children through to mobility issues faced in old age or through disability. This essentially allows people to live in their home for as much of their life as possible. Such homes have design features that have been tailored to foster accessible living, helping to accommodate old age, injury, disability, pregnancy and pushchairs or enable future adaptation to accommodate this diversity of use.	This additional modification is made to support the change to Policy 51 (see above) to reflect the change in national policy in respect of optional accessibility standards which replaced Lifetime Homes and the Wheelchair Housing Design Standard.
161	Paragraph 6.34	The standards for <u>housing to meet Building Regulations requirements M4 (2) and M4 (3)</u> <del>Lifetime Homes and wheelchair accessibility</del> relate	This additional modification is made to support the change to

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		<p>primarily to the layout of self-contained homes for permanent occupancy. <u>Meeting Building Regulations requirements M4 (2) and M4 (3) will normally be controlled through the use of a planning condition to ensure that the relevant homes are delivered to meet the standards. The National Planning Practice Guidance states that Local Plan policies for wheelchair accessible homes (M4 (3)) should only be applied to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling. In the interest of mixed and balanced communities, the Council would also encourage developers to build wheelchair accessible market homes.</u></p> <p><del>As occupants of student housing will only stay for a limited period, student housing is not expected to meet Lifetime Homes standards. However, 5 per cent of student flats or study bedrooms (together with supporting communal spaces) should be built to meet the needs of disabled people. Within the required percentage, half of the units should be designed and built out for wheelchair users and at least one unit should be delivered in accordance with the guidance in BS 8300 (2009) concerning access for carers (i.e. adjoining room with a through door). Of the other half, these should show specific adaptation to meet the needs of other disabled people, either with sensory impairments, whether sight, hearing or both, autism, being of certain statures etc.</del></p>	<p>Policy 51 (see above) to reflect the change in national policy in respect of optional accessibility standards which replaced Lifetime Homes and the Wheelchair Housing Design Standard. As it is for Building Regulations to assess the compliance of the developer with the requirements of the optional standards M4 (2) and M4 (3), it is necessary to inform the relevant Building Control provider that the standards are in place within the local authority area. To this end, a planning condition will be added to the decision notice to confirm the requirement.</p> <p>While the Council can no longer require market housing to meet the requirements of M4 (3) due to the limitation set out in the National Planning Practice Guidance at Paragraph 56-009-20150327, the Council would still wish to encourage developers of market housing to deliver wheelchair housing as this is beneficial in creating mixed and balanced</p>

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			<p>communities.</p> <p>In relation to student accommodation, this form of accommodation is considered under Volume 2 of Part M: Access to and use of buildings other than dwellings. Student accommodation is viewed as hotel/motel accommodation in Building Regulations and as such the new technical standard for accessibility contained within Volume 1 of Part M cannot be applied to this type of unit. The additional modification proposed to the end of paragraph 6.34 reflects this change in Building Regulations.</p>
162	Paragraphs 6.35 and 6.36	<i>Delete paragraphs 6.35 and 6.36.</i>	<p>This additional modification is made to support the change to Policy 51 (see above) to reflect the change in national policy in respect of optional accessibility standards which replaced Lifetime Homes and the Wheelchair Housing Design Standard. The optional standards do not allow for flexibility</p>

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			in application to conversions of existing buildings.
162	Figure 6.1	<i>Delete Figure 6.1: Indicative diagram of a Lifetime Home.</i>	This additional modification is made to support the change to Policy 51 (see above) to reflect the change in national policy in respect of optional accessibility standards which replaced Lifetime Homes and the Wheelchair Housing Design Standard. This diagram is now out of date.
245	Site R17, Mount Pleasant House, Mount Pleasant, Appendix B: Proposals Schedule	Capacity: <del>50 dwellings</del> <del>88 dph</del> <u>270 student rooms</u>	This main modification is proposed as a result of discussions with the landowner of Mount Pleasant House to bring forward development on the site. The landowner has confirmed that mainstream residential accommodation will not be deliverable on this site, primarily due to viability issues, and that student accommodation is being pursued and is the subject of a current planning application (Reference 16/1389/FUL).  This main modification is in keeping with the requirements for

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			<p>plan-making in that it is positively prepared, justified and effective. This allocation is deliverable for student accommodation. On the information which has now been provided, the allocation is not deliverable as mainstream housing. As such, the modification seeks to provide an allocation which, on all of the information presently available, is deliverable on the site.</p>
253	<p>Site U1 Old Press/Mill Lane, Appendix B: Proposals Schedule</p>	<p>Capacity:  <del>Up to 150 dwellings,</del> <u>Student accommodation: Indicative capacity of 350 student rooms*</u>            up to 6,000 sq m commercial use,            up to 75 bedroom hotel and up to 1,000 sq m other uses</p> <p>* The indicative capacity of this site is subject to detailed testing, including consideration of the site's constraints, particularly the historic environment.</p> <p><b>Note for the Inspectors: The Council has been working with the University of Cambridge to progress pre-application discussions on this site. Since the Old Press/Mill Lane Supplementary Planning Document was adopted in January 2010, the</b></p>	<p>This main modification is proposed as a result of discussions with the University of Cambridge to bring forward development on the Old Press/Mill Lane site. The University of Cambridge has confirmed that mainstream residential accommodation will not be deliverable on this site and that student accommodation is being pursued. This is not incompatible with the aspirations of the adopted Old Press/Mill Lane SPD.</p> <p>This main modification is in keeping with the requirements for</p>

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		<p>circumstances of a number of the existing buildings on the site have changed, and there is now additional potential for student accommodation. This has resulted from changes in the usage of buildings owned by the University of Cambridge. This indicative figure of 350 student rooms could increase as pre-application discussions progress. As such, the Council and the University of Cambridge would provide an update to the examination at the appropriate time.</p>	<p>plan-making in that it is positively prepared, justified and effective. This allocation is deliverable for student accommodation. On the information which has now been provided, the allocation is not deliverable as mainstream housing. As such, the modification seeks to provide an allocation which, on all of the information presently available, is deliverable on the site.</p>