Application Number	16/1691/FUL	Agenda Item	
Date Received	3rd October 2016	Officer	Sav Patel
Target Date	28th November 2016		
Ward	West Chesterton		
Site	Block B Student Castle 1 Cambridgeshire	Milton Road	Cambridge
Proposal	Change of use of first and second floor of Block B and ground floor DDA room (no. G01) in Block A from Student accommodation to Student accommodation and/or Apart-hotel (sui generis) - in the alternative.		
Applicant	S C Mitcham's Corner Lto C/O Agent	b	

SUMMARY	The development accords with the Development Plan for the following reasons:
	The proposed change of use from student accommodation to apart-hotel use is acceptable as there is no policy basis on which this use could be refused;
	The aparthotel use is unlikely to give rise to significant levels of private car journeys which would harmfully impact upon on street parking in surrounding trees;
	The site is located within a highly sustainable location which is suitable for this form of short stay accommodation;
	The aparthotel use would not have any significant adverse impact on the residential amenity of local residents.
RECOMMENDATION	APPROVAL

# 0.0 Update

- 0.1 This planning application was previously presented to Planning Committee at the 5<sup>th</sup> July meeting. Members resolved to not support the Officer recommendation, which was for approval, and agreed to defer the application to allow officers to draft potential reasons for refusal. Members agreed at the meeting on the key issues that the application could be refused upon. They are set out below:
  - 1. Loss of student accommodation with reference to the Student Study and NPPG;
  - Lack of commercial vehicle and servicing provision (policy 8/9);
  - Loss of disabled student accommodation and the appropriateness of the location of the aparthotel wheelchair accessible room (policies 3/12(b), 3/7(m), 7/10(d));
  - 4. Impact of parking from hotel visitors on the amenity of local residents (policy 3/4);
- 0.2 Before members consider the draft refusal reasons, it is important to note that the basis of planning decisions is that they should be rooted in an adopted policy framework.
- 0.3 The fundamental basis of the planning system is that is it a 'plan-led' process and planning law requires applications for planning permission to be determined in accordance with the development plan unless there are material considerations that indicate otherwise. In this instance, the development plan consists of the National Planning Policy Framework (NPPF 2012) and the saved policies in the adopted Cambridge Local Plan 2006.
- 0.4 The NPPF represents up-to-date government planning policy which must be taken into account in the decision making process and provides the overarching framework for local planning authorities to produce their Local Plans. This is to ensure policies are up-to-date and consistent. The NPPF states that local planning authorities should take a positive approach in decision-taking and should seek to approve applications for sustainable development where possible that improve the economic, social and environmental conditions of the area.

- 0.5 The role of the Local Plan is fundamental to the decision making process and so is at the core of the planning system. The Local Plan is the starting point for considering whether applications can be approved or refused. However, where a Local Plan is absent, silent or the relevant policies are out of date, paragraph 14 of the NPPF requires applications to be determined with a presumption in favour of sustainable development unless any adverse impact would significantly and demonstrably outweigh the benefits.
- 0.6 In view of the above, I set out below the draft refusal reasons and my assessment of each for members of the planning committee to consider.
  - 1. Loss of student accommodation with reference to the Student Study and NPPG;
- 0.7 Refusal reason:

The part retrospective change of use of the first and second floors of Block B of the Student Castle development from student accommodation to apart-hotel use would diminish and therefore harm the supply of an identified purpose built student housing need/shortage for Cambridge as set out in the Assessment of Student Housing Demand and Supply for Cambridge City Council (2007).

<u>Commentary</u>

- 0.8 There are no policies in the adopted Local Plan (2006) that protect against the loss of student accommodation to other uses. The Local Plan does support the provision of short-stay accommodation under policy 6/3, however, it does not provide any specific guidance to prioritise short-stay use over any other use.
- 0.9 There is no specific reference in the NPPF to student accommodation. The key policy principles in the framework are relevant to informing any Local Plan's policy approach. 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). The NPPF does not refer directly

to the higher education sector, or to the provision of student accommodation.

0.10 To help provide further context to the objectives of the NPPF, the government produced the National Planning Practice Guidance (NPPG) in 2014. The NPPG expands on key topics to provide further guidance on the plan making process and is continually updated. While the initial versions of the NPPG did not include any reference to provision for student accommodation in the methodology for assessing housing need, a revision to the NPPG in March 2015 confirms 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 with universities and other higher educational engage establishments understand their student to better accommodation requirements."

- 0.11 Therefore, whilst the provision of student housing is identified as being an area that LPAs need to factor into their consideration in the plan making process, the above does not form a strong basis to support a reason for refusal. This is because there is no policy basis to refuse the loss of existing student housing.
- 0.12 The NPPG has informed the evidence base of the emerging Local Plan (2014). Policy 46 (Development of student housing) makes provision for the loss of existing student accommodation, saying that it will be resisted unless adequate replacement accommodation is provided or there is no longer a current or future need for it. If this was an adopted policy, in my view a justifiable reason for refusal akin to the draft provided could be advanced. However, it is an emerging policy that has a

significant number of objections to it and so can only be afforded very limited material weight.

- 0.13 In terms of the Assessment of Student Housing Demand and Supply report, whilst it has been endorsed by the Council's Development Plan Scrutiny Sub-Committee on 25 January 2017, it has little material weight in the decision making process. The study is an evidence base for the emerging Local Plan and does not of itself amount to policy. My view is that the adopted Local Plan does not provide any basis upon which to refuse the application on the grounds of student need and there is insufficient national guidance to indicate support for this approach.
- 0.14 Therefore, in view of the above, I advise members not to pursue this possible reason for refusal.
  - 2. Lack of commercial vehicle and servicing provision as per policy 8/9;
- 0.15 Refusal reason:

The apart-hotel use makes inadequate provision for access and for parking of servicing and commercial vehicles. The current arrangements are resulting in obstructions being caused along the main vehicular access road off Victoria Road, which is also used by residents in Corona Road to access their garages. The proposal would potentially exacerbate this conflict and is therefore contrary to policy 8/9 of the Cambridge Local Plan (2006).

#### <u>Commentary</u>

0.16 Concerns have been raised by local residents regarding the current access and parking arrangement along the main vehicular access point. The concerns specifically relate to vehicles such as contractors vans parking along either side of the access road thus obstructing access to and from the existing garages which serve the properties in Corona Road. The access road off Victoria Road is the main emergency entrance into the core of the site. The site does not contain any car parking spaces apart from three disabled spaces which are located adjacent to the side elevations of Block A and C. No other car parking spaces are proposed within the site. Therefore

no provision was made for service or commercial vehicles at the time of the approved student housing scheme (14/0753/FUL). With regards to refuse collection, the applicant is proposing to utilise the existing on site refuse provision, which is operated by a private waste contractor. The details of the storage arrangements are currently being assessed as part of the discharge of condition 15 (14/1938/COND15).

- 0.17 According to the Student Castle Management Plan (2014), which was submitted with the previous approved planning application (ref:14/0753/FUL), it states that the site will be serviced by its own on-site management team which includes a maintenance team, housekeeping team and security team. However, no specific details were provided at the time of the previous application about how these teams operate in terms of their access and parking arrangements. Therefore, without the provision of sufficient safeguards in place for the approved student housing use, it is difficult to see how such servicing provision can be retro-fitted into the site without making significant alterations to the internal layout. However, there is space at the front of Block A and Block B that could be used to accommodate service vehicles on a temporary basis without causing any obstructions to residents of Corona Road or to the emergency access.
- 0.18 In my view, whilst there are grounds on which a reason for refusal could be advanced, it may be difficult to defend because the Council would have to demonstrate an exacerbation of the existing servicing issue and this is intended to be incorporated into the existing servicing arrangements. In addition, there are alternative arrangements at the applicant's disposal that could be utilised to address the servicing issues that could be secured via condition as suggested below:
  - 1. Within 6 months from the date of this permission, the approved Proposed External Works Hard Landscaping Plan (drawing no.290-01-Rev30) of application 14/1938/S73 shall be implemented and accommodate provision for service vehicles to car in front of Block A and Block B on a temporary basis so to avoid parking along the access road.

Reason: To avoid causing an obstruction for emergency vehicles within the site (Cambridge Local Plan policies 3/7 and 8/9).

- 3. Loss of disabled student accommodation and the appropriateness of the location of the aparthotel wheelchair accessible room (policies 3/12(b), 3/7(m), 7/10(d);
- 0.19 Refusal reason:

The apart-hotel use does not make appropriate provision (in terms of amount and location) for occupiers who require disabled access provision. The proposed accessible room is located within Block A which is in an entirely separate building to the main apart-hotel and as such any disabled occupier who requires any form of additional care/assistance would be isolated from their travelling group or carer. On this basis, the apart-hotel use would fail to provide a sufficient number of accessible rooms, contrary to policy 6/3 and it would also not be socially inclusive or offer a safe living environment for disabled occupiers in conflict with policies 3/7(m) and 3/12 (b).

#### **Commentary**

- 0.20 In policy terms, the apart-hotel use is more akin to a hotel use as it has similar functions and facilities such as a reception area, cleaning/towel service and shared facilities such as a gym. Therefore, paragraph 6.9 of policy 6/3 (Tourist Accommodation) is relevant as it states that hotels or guest houses with over ten bedrooms should have between 6% and 10% of accessible rooms. The apart-hotel use is for 25 rooms. Therefore, the applicant should be providing between 2 (6% of 25 = 1.5) and 3 (10% of 25 = 2.5) accessible rooms according to the supporting text of the policy.
- 0.21 Policies 3/7 and 3/12 require new development to be safe and accessible. Other than this, there is no other specific guidance on the provision of accessible rooms for apart-hotels. Guidance on internal layouts for accessible rooms is provided under separate legislation which cannot be used to assess this proposal.
- 0.22 The applicant proposes to use the existing accessible room in Block A on a flexible basis so that it can be used by disabled customers as part of the apart-hotel use if/when required. The applicant has confirmed that there are no adaptable rooms in Block B as they are not suitable for conversion due to their size and would require substantial internal alterations. The applicant

accepts this is a constraint of the scheme but has also confirmed that since opening they have not had any disabled students with accessible needs staying or show an interest in the accommodation. Therefore, along with the flexible use of the accessible room in Block A, the applicant has also proposed to offer nine 'convertible' rooms within Blocks A, E and F. which suitable for adaption if/when the need arises to are accommodate disabled students or users of the apart hotel use. This may be appropriate for students, whose needs would be able to be accommodated well in advance of their stay, but it appears to me to be an unworkable solution for disabled aparthotel visitors, who may be booking at much shorter notice and would have no confidence that an accessible room would be available either at their time of booking or arrival if the singular room in Block A was already in use by a student or booked by another disabled visitor.

- 0.23 The accessible room in Block A is also detached from the aparthotel use in Block B and could result in a wheelchair user being isolated from their group/carer with no specific management or security provision in place in case of emergency. The Access Officer has confirmed his concern with this arrangement. The applicant believes the accessible room in Block A is in a suitable location as it is close to the main reception.
- 0.24 The planning policies specifically referenced in the draft reason for refusal concern the accessibility of buildings/places for those with disabilities:
- 0.25 3/7(m) states, 'a consideration for the needs of those with disabilities to ensure *places are easily and safely accessible*'. (my italics)
- 0.26 3/12(b) states, 'are convenient, safe, and *accessible for all users and visitors*;' (my italics)
- 0.27 These policies are primarily concerned with ease of access to a particular building or place as opposed to a specific internal configuration of a building to meet disabled needs. There is also no requirement or guidance on the location of wheelchair accessible rooms within developments.
- 0.28 Members should bear in mind that the proposal is for student housing and/or apart-hotel use in the alternative. If approved,

this would give the applicant the flexibility to switch between both uses in Block B making it difficult to distinguish between uses. There is no hierarchy of importance as to the needs of disabled students versus disabled customers of the apart-hotel.

- 0.29 As such, the drafted reason for refusal could be advanced but it would be difficult to justify on the basis that the numbers of disabled rooms suggested by policy 6/3 is only guidance and that the specific policies (3/7 and 3/12) do not primarily concern themselves with internal configurations.
- 0.30 Instead, I recommend a condition to increase the overall number of accessible rooms in the development as a whole, to ensure that there is sufficient provision for both uses in any circumstance. I set out below the wording of the condition:

No development shall take place until the details of additional accessible room(s), in combination to that identified in Block A, have been submitted to and approved in writing by the Local Planning Authority. The accessible room(s) shall be converted within 6 months of this decision or in accordance with an alternative phasing plan. The accessible room(s) shall be retained in perpetuity for use for both disabled students and disabled visitors to the apart-hotel. The development shall be carried out in accordance with the approved plans.

Reason: To ensure the mixed uses provide an appropriate level of provision of accessible rooms in case of competing needs from both disabled students and disabled visitors (Cambridge Local Plan 2006 policies 3/7(m), 3/12 (b), 6/3 and 7/10(d)).

- 4. Impact of parking from hotel visitors on the amenity of local residents (policy 3/4);
- 0.31 Refusal reason:

The apart-hotel use generates car parking from customers staying and accessing the site which is causing obstructions to the internal access way and putting pressure on the surrounding streets. The apart-hotel use is generating additional traffic and movements that are having a detrimental impact on the residential amenity of the local residents in terms of onstreet car parking and noise disturbance. The apart-hotel use is therefore contrary to policies 3/4 and 8/2 of the Cambridge Local Plan (2006).

#### **Commentary**

- 0.32 Concerns have been raised about the amount of car parking within the site and vehicles blocking the side access leading onto Victoria Road at the rear of the properties in Corona Road. Local residents have submitted photographs which are available to view on Public Access showing the parking situation on the site at certain times of the day. Students residing at Student Castle are restricted from owning a motor vehicle as part of the signed S106 agreement for the development. The photos from local residents appear to suggest students are parking their cars on the site. This is a separate issue to the apart-hotel use and the enforcement team are aware of this situation and are investigating. It should be noted that the customers of the apart-hotel use are not subject to the same controls as the students.
- 0.33 Notwithstanding this, the applicant's Transport Assessment (TA) includes an on street car parking survey of surrounding streets and argues that there is sufficient capacity within the surrounding streets to accommodate additional car parking generated from the apart-hotel use. In total, the survey has found there is enough capacity within the surrounding roads to absorb any increase created by the 25 rooms in the apart-hotel. The TA also argues that occupiers of the apart-hotel use will be made aware of the lack of car parking provision on site and encourage the use of alternative modes of transport to access the site. The Highway Authority (HA) has assessed the car parking survey and has raised issues with the survey in terms of the number of spaces identified being within the Residents Parking Scheme zone or in time-limited bays. However, no objection has been raised and the HA has advised that whilst parking is unlikely to result in any significant adverse impact upon highway safety, there is potentially an impact upon residential amenity which the Planning Authority may wish to consider when assessing this application.
- 0.34 The site is located within a sustainable location as it is close to a busy local centre and within walking distance of bus stops. The site offers a drop off point at the front of Block A and Block B for anyone arriving by taxi. I would expect most of the

customers using the apart-hotel would be arriving by taxi due to the location of the site, its proximity to the local centre and the controlled parking zones that operate within the surrounding streets.

0.35 Therefore, given the site constraints in terms of the lack of car parking within the site and accessible location, I do not consider the harm and therefore the reason for refusal could be easily substantiated.

#### Conclusion

- 0.36 The loss of student accommodation with reference to the Student Study and NPPG should not be advanced as a reason for refusal. There is no policy basis for this.
- 0.37 A reason for refusal could be put forward regarding the lack of commercial vehicle and servicing provision to satisfy policy 8/9 in respect of the apart-hotel use but it would be difficult to argue any harm over and above the existing situation and improved servicing provision could be conditioned.
- 0.38 A reason for refusal could be advanced regarding the number of wheelchair accessible rooms for both uses, but this could be conditioned to be increased. It would be difficult to argue deficiencies in the internal location and configuration of the wheelchair accessible room in Block A given the wording of the Council's policies.
- 0.39 The impact of parking from hotel visitors on the amenity of local residents is difficult to quantify and is lessened by the sustainable location of the site. A reason for refusal could be advanced but the Council would have to gather additional evidence from the hotel use impact to demonstrate the harm.

# 1.0 SITE DESCRIPTION/AREA CONTEXT

- 1.1 The Student Castle site is a 'T shaped' parcel of land situated on Mitchams Corner, at the junction of Milton Road and Victoria Road, with frontages on Milton Road, Victoria Road and Corona Road. The surrounding area is mixed in character with the Staples site opposite to the south; residential properties adjacent to the site on Victoria Road to the west; commercial and residential properties adjacent to the site on Milton Road to the north; and residential properties adjacent to the site on Corona Road to the north.
- 1.2 Planning permission was granted for the erection of student accommodation comprising 211 student rooms (following demolition of existing buildings) and a commercial unit in 2014. This application relates specifically to Block B which occupies the north-east corner of Student Castle and to one DDA compliant room in Block A which faces the Mitchams Corner roundabout. At ground floor level facing Milton Road Block B accommodates a vacant retail unit. The first and second floors accommodate 13 and 12 student studio rooms respectfully. Access to the first and second floors of Block B is via a stairwell/lift core on the south side of the building.
- 1.3 The site lies within the Castle and Victoria Conservation Area. The Portland Arms Public House is a Building of Local Interest (BLI).

# 2.0 THE PROPOSAL

- 2.1 Planning permission is sought for change of use in the alternative to allow the first and second floors of Block B and the identified room in Block A as aparthotel rooms or student rooms. If planning permission is granted the terms of consent are such that there would be flexibility of use over a 10 year period and whichever use is in situ at the end of this period will become the lawful use.
- 2.2 The application is accompanied by a Planning Statement which confirms that occupiers of the aparthotel will have full access to communal facilities, gym, library and laundry and will be offered breakfast and use of concierge facilities. Cleaning, towels and toiletries will also be provided. In this way the applicant argues

that the use differs from serviced apartments which operate as short term flats with no shared facilities or reception. The rooms will be available on short term lets of 90 days or less duration. A similar scheme has been carried out in the City of Refuse facilities and arrangements would remain York. unchanged, four additional cycle parking spaces would be provided and space allocated specifically for use by occupants of Block B. The identified room in Block A is the only DDA compliant room in the development. To date the providers have not had a request to use this accommodation by a student with If such a demand arises they have given a disabilities. commitment to convert one of nine 'adaptable' rooms to meet that need.

2.3 During the course of consideration of the application the agents submitted a response to the comments made by the Policy team and further information regarding transport impacts.

#### 3.0 SITE HISTORY

Reference 06/0075/OUT	<b>Description</b> Outline consent for residential development and related infrastructure	<b>Outcome</b> A/C
13/1326/FUL	Erection of student accommodation comprising 260 student rooms (following demolition of existing building) and a commercial unit to be used for A1 food retail purposes; together with bicycle and car parking and associated infrastructure.	REF
14/0543/FUL		A/C
14/1938/s73	Courtyard extension/communal facilities/gym	A/C

15/1827/FUL	Single storey extension to Block A	A/C
17/0438/FUL	Minor Works Application for Adjustment of existing Louvre Vent, two new Louvre Vents, two Satellite Dishes, a newspaper Drop-box, new Entrance Doors, replacement Delivery Doors and adjustment to existing Bollards at proposed Co-Op Convenience Store	Pending

# 4.0 PUBLICITY

4.1	Advertisement:	No
	Adjoining Owners:	Yes
	Site Notice Displayed:	Yes

#### 5.0 POLICY

#### 5.1 Central Government Advice

National Planning Policy Framework 2012 Planning Practice Guidance 2014 Circular 11/95 – The Use of Conditions in Planning Permissions (Annex A)

# 5.2 Cambridge Local Plan 2006

3/1 Sustainable development
3/4 Responding to context
3/7 Creating successful places
3/11 The design of external spaces
4/4 Trees
4/11 Conservation Areas
4/12 Buildings of Local Interest
8/6 Cycle parking
8/10 Off-street car parking

# 5.3 Supplementary Planning Documents

Cambridge City Council (May 2007) – Sustainable Design and Construction:

# 5.4 City Wide Guidance

Cycle Parking Guide for New Residential Developments (2010)

#### Area Guidelines

Buildings of Local Interest (2005) Castle and Victoria Road Conservation Area Appraisal (2012)

# 6.0 CONSULTATIONS

# Cambridgeshire County Council (Highways Development Control)

Application as submitted

6.1 Concerned about lack of on-site car parking provision in an area where on street provision is uncontrolled. There is likely to be a demand for parking generated by the proposal and this would be likely to appear on-street in direct competition with existing businesses and residential uses. The development is therefore likely to impose additional parking demands upon the on-street parking on the surrounding streets and, whilst this is unlikely to result in any significant adverse impact upon highway safety, there is potentially an impact upon residential amenity which the Planning Authority may wish to consider when assessing this The applicant must provide a short Transport application. Statement explaining, inter alia, any changes in traffic generation (all mode) and parking demand resultant from the proposal.

Following additional transport information

6.2 The increase in traffic movements from 100 movements to 127 movements is unlikely to have a in significant addition impact upon the network. Further information has been provided in relation to on street parking and this parking is unlikely to result in any significant adverse impact upon highway safety.

#### **Environmental Health**

6.3 The development does not include an new external noise sources, therefore there are no recommended conditions.

Construction works have been controlled under previous consents.

#### Shared Waste Service

6.4 Existing waste storage area is deemed as illegal and insufficient by the City Council. Therefore any further pressures on it by the change in use of one of the blocks to hotel, with limited management of both the wider site around the bin store and the use of the bins therein mean we object to this proposal

# Planning Policy team

6.5 Application as submitted

#### Student Accommodation

While the NPPF does not specifically refer to student accommodation it does require that local planning authorities (LPA) '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).

The National Planning Practice Guidance (PPG) was first published in March 2014 and has been updated subsequently. While initial versions of the PPG did not include any reference to provision for student accommodation in the methodology for assessing housing need, a revision to the PPG in March 2015 confirms 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."

#### Hotel/Aparthotel

The proposal should be assessed as a 'hotel'. National policy in the NPPF lists hotels as a main town centre use; therefore new hotel developments should be directed to town/city centres. In Annex 2 of the NPPF, references to town centres or centres apply to city centres, town centres, district centres and local centres. Para 24 of the NPPF, advises local planning authorities to apply a sequential test to planning applications for main town centre uses that are not in an existing centre and not in accordance with an up-to-date Local Plan. The location of the proposed aparthotel is adjacent to but not inside the existing Mitcham's Corner District Centre and therefore is considered to be an edge of centre site.

#### Assessment of Student Housing Demand and Supply

The Council's recently published Cambridge Centre for Housing and Planning Research's Assessment of Student Housing Demand and Supply for Cambridge City Council (January 2017) is a material consideration. Given the identified need for student accommodation to serve both Anglia Ruskin University and the University of Cambridge, it is considered that the existing student accommodation units at Student Castle are necessary for student accommodation provision and should not be used as aparthotel accommodation.

#### Cambridge Hotel Futures Study

This study was published in 2012 and identifies the potential need for a 4 star aparthotel to meet some of the demand for additional 4 star hotel accommodation and serviced apartments. The proposed use do not represent this standard of accommodation and therefore do not meet the needs identified in the study. They are in an edge of centre location and are neither of the right quality nor located close to the market they might serve, compared to other locations (either in the city centre or close to centres of major change) such as North West Cambridge or the Cambridge Biomedical Campus.

#### Recent Hotel Developments in Cambridge

Cambridge is already delivering a significant increase in hotel room provision, many of which are co-located with other complementary uses close to their intended market such as tourist locations, important transport and employment centres as well as large faculty campuses. There is no proven need for the proposed additional 25 units especially with the quantum of new units expected to enter the market over the next 12-18 months which includes 133 aparthotel units, approximately 200 metres from the application site.

#### Local Plan Policy

#### 'Saved' policies of the Cambridge Local Plan (2006)

Policy 6/3 Tourist Accommodation supports development which maintains, strengthens and diversifies the range of short-stay accommodation. It is not clear how the proposal will meet the identified need for 4 star aparthotel accommodation or diversify the range of aparthotel accommodation given the 133 aparthotel units which are coming forward nearby. In the absence of non-compliance with policy 6/3 a sequential test is required to demonstrate that no suitable sites in existing centres exist that could accommodate this proposal.

There is no proven need for the proposed new aparthotel units in Cambridge given the expected increase in hotel rooms already under construction and planned over the next 12-18 months. Additionally, the recently published Assessment of Student Housing Demand and Supply for Cambridge City Council highlights a much greater need for student accommodation provision.

#### Emerging Cambridge Local Plan 2014: Proposed Submission

At this time, the policies in the emerging Local Plan can be given little weight.

#### <u>Summary</u>

There is no proven need for the proposed new aparthotel units in Cambridge given the expected increase in hotel rooms already under construction and planned over the next 12-18 months. Additionally, the recently published Assessment of Student Housing Demand and Supply for Cambridge City Council highlights a much greater need for student accommodation provision and the proposal will not meet the identified need for high quality aparthotel accommodation.

- 6.6 In the light of Legal Advice regarding student accommodation policy in the City, the Policy Team has been asked to provide updated comments. These have been discussed by Officers and a copy of the final comments will be attached to the Amendment Sheet.
- 6.7 The above responses are a summary of the comments that have been received. Full details of the consultation responses can be inspected on the application file.

#### 7.0 REPRESENTATIONS

- 7.1 Councillor Sargeant has commented on this application. He objects to the application and considers that it should be refused. He makes the following comments:
  - A Transport Assessment is required
  - It is correct to say that there is no car parking standard for aparthotels in the Local Plan but the applicants for the aparthotel at Milton Road/Gilbert Road accepted that parking provision should be between the parking for hotels and that for standard residential developments in order to cater for the needs of the guests and staff. It was also accepted that occupiers of aparthotels are more likely to use a car than shorter stay hotel guests. It is noteworthy that the comparison with Student Castle York is not robust because this has parking on site. The application should be rejected on the ground so lack of car parking.
  - Lack of off road car parking will put unacceptable pressure on the highway network.
  - The level of public transport provision is not, in practice, as frequent as set out in the application. 60% of local workers rely on cars and users of the aparthotel are unlikely to be different.

- The students are subject to proctorial control and this was considered important to allow planning permission to be granted. There will be no such restriction on the use as an aparthotel.
- Disabled guests would be accommodated in a separate block which does not accord with Policy 6/3.
- 7.2 County Councillor Scutt has commented on this application. She objects to the application and considers that it should be refused. She makes the following comments:
  - The original application was approved despite residents' concerns about parking and the student accommodation use circumvented the need for parking provision.
  - There is an existing severe problem in the area in terms of access to on-street parking. This raises concerns in relation to emergency access and public health risk (collection of rubbish).
  - It seems 'unconscionable' that the developers have gained approval on the basis that the use will not add to problems and now seek permission for a use which will do so.
  - The Milton Road/Gilbert Road aparthotel includes car parking on site on the understanding that users will have/hire cars.
  - Use of a separate building to accommodate disabled guests appears to be discriminatory, inconsistent with the Equalities Act provision and should not be approved.
  - A visitor with a disability is more likely to need a car.
  - Car parking provision at the Student Castle York scheme shows a recognition for the need for cars/hire cars to be accommodated.
  - The accommodation has not been available long enough to allow demand to be assessed.
  - Endorses comment made by Councillor Sargeant.

- Rooms are being advertised as available before the application has been considered.
- 7.3 The owners/occupiers of the following addresses have made representations:
  - 7 Corona Road
  - 8D Corona Road
  - 14A Corona Road
  - 10 Corona Road
  - 15 Corona Road (x2)
  - 26 Chesterton Hall Crescent,
  - 52 Chesterton Road
  - The Portland Arms, 129 Chesterton Road
  - 47 Greens Road
  - 3 Gurney Way
  - 15 Herbert Street
  - 119 High Street East Chesterton
  - 126 Milton Road
  - 26 Trafalgar Road
  - 33-35 Victoria Road
  - 45 Victoria Park
  - 123 Victoria Road
- 7.4 The representations can be summarised as follows:

Principle of change of use

- If the original plan had been for a hotel, car parking would have been needed. (2)
- The lack of parking facilities means that if the application is to be approved it should require the whole development to be subject to normal charges levied on residential development.
- It would not be possible to enforce a limit on the number of rooms used as a hotel, which would increase adverse impacts.
- What street parking is available in the area should be used in relation to the rejuvenation of Mitcham's Corner and not committed to the Student Castle hotel use.

- Availability of aparthotel rooms is already being publicised online.

# Parking impact (residential amenity)

- Adverse impact on on-street car parking available to residents in terms of amenity (4)
- Concern of highway authority supported.

#### Waste facilities

- Inadequate/inappropriate facilities for waste management
- Concerns of refuse consultee supported (2)

#### Issues relating to current use

- Drivers of vehicles accessing Student Castle already block emergency vehicle access to the site and flats in Corona Road. This existing problem should be dealt with via installation of yellow lines. (Photos of vehicles blocking the entrance were attached)
- Occupation restrictions are not being adhered to.
- The applicant is arguing that there is less demand for the accommodation than they expected but the issue is not lack of demand but cost of accommodation.
- It is too early to judge the need for student accommodation.
- Use of shared facilities could lead to security problems and would undermine the expected amenity for students.
- Trees shown to be retained have been removed.

#### Other issues

- The student use is controlled by contract/proctorial control but this would not apply to the aparthotel which would affect residential amenity.

- Mixing students and hotel accommodation would be a bad mix as each has different needs and expectations.
- 7.5 Representations have been received from Friends of Mitcham's Corner (FOMC) as follows:
  - FOMC object to the application on the following grounds:
  - General concerns about developers in the area changing plans after planning permission has been granted.
  - The proposed use will significantly increase car use which, given the no-car policy, will have two adverse effects, vehicles dropping off and picking up will block the gyratory and there will be increased demand for on-street parking.
  - There are many other student accommodation applications in the city and it is not clear why this one needs diversifying.
- 7.6 The above representations are a summary of the comments that have been received. Full details of the representations can be inspected on the application file.

# 8.0 ASSESSMENT

# Principle

- 8.1 I understand most of the rooms on the first and second floor of Block B are currently being occupied as aparthotel rooms. Therefore, the proposal seeks part retrospective planning permission.
- 8.2 The proposal seeks part retrospective planning permission for the change of use of the existing student accommodation use (Sui-Generis) of the first (13 studio units) and second (12 studio units) floors of Block B to student accommodation or an Aparthotel use in the alternative. The ground floor commercial use would remain. The proposal also includes a DDA compliant room within Block A. The studio units would be approximately 21 sqm and the applicant has proposed for these to be occupied on short lets of no more than 90 days.

8.3 The term 'in the alternative' would give the applicant flexibility to implement either student accommodation or aparthotel use over a 10 year period and whichever use is in place at the end of the 10 year period becomes the lawful use. Subject to approval, the applicant has advised that they will review the occupancy of Block B on an annual basis and adjust the use depending on market demands/requirements.

Policy position

- 8.4 Whilst the recent Assessment of Student Housing Demand and Supply for Cambridge City Council (the Study) demonstrates that there is a need for more purpose built student accommodation, there are no policies in the current adopted Local Plan (2006) which protect against the loss of student housing. Furthermore, as the Study has not been through a public consultation process, its status is a background document and it has limited weight. In term of the emerging Local Plan (2014), policy 46 is relevant (Development of student housing). Policy 46 makes provision for the loss of existing student accommodation by saying that it will be resisted unless adequate replacement accommodation is provided or it is demonstrated that the facility no longer caters for current or future needs. However, there are significant objections to this policy and so whilst it reflects the Council's future approach to student accommodation schemes, it has limited weight and cannot be used to support a refusal reason based upon the potential loss of the 25 student units.
- 8.5 As the proposal is for an aparthotel use which is a form of temporary short stay accommodation, policy 6/3 (Tourist Accommodation) of the Local Plan (2006) is relevant. Policy 6/3 supports tourist accommodation which maintains, strengthens and diversifies the range of short-stay accommodation. The location of the site is ideally situated for this purpose being adjacent to a Local Centre, on an arterial road, within walking distance of the City Centre.

Milton Road County Primary School Appeal Site (ref: 14/052/FUL)

8.6 The Committee will be aware that an Inspector recently upheld an appeal against the Council's refusal of a mixed use scheme on the above site, which included a 133 unit aparthotel complex (see Inspector's decision attached in Appendix 1). The Inspector was convinced that there was a need for aparthotel use which was not being met in purpose designed accommodation and that a number of residential apartment buildings are being used to meet the aparthotel needs. This is contributing to the loss of private housing. Furthermore, in terms of needs there is no requirement in the adopted Local Plan (2006) to establish or prove there is a need for this type of use. The applicant is proposing a flexible use to ensure maximum occupancy rates of the units within the site whether that is for students or students and visitors.

8.7 Therefore, on the basis that there are no adopted policies which resist the loss of student accommodation, there being a need for aparthotel uses and a policy which supports short term tourist accommodation, and given that the site is within a highly sustainable location, the principle of the proposed use in the alternative is acceptable in policy terms. Furthermore, in my view, I see no reason why the proposed aparthotel use would not comfortably sit alongside the student accommodation as part of a mixed use scheme.

#### Context of site, design and external spaces

8.8 The proposal does not include any external alterations for consideration.

#### Impact on the Conservation Area

- 8.9 The proposal does not include any external alterations that would impact the character and appearance of the Conservation Area.
- 8.10 In my opinion the proposal is compliant with Cambridge Local Plan (2006) policy 4/11

#### **Residential Amenity**

Impact on amenity of neighbouring occupiers

8.11 The proposal does not include any external alteration to Block B, as built. Therefore, there would be no impact on the residential amenity of the surrounding neighbours over and above that which already exists in terms of overlooking, overshadowing and overbearing. Concerns have been raised regarding cars currently being parked along access between 12 Victoria Road and Block A which includes the rear garden boundaries of the properties in Corona Road in terms of access for emergency vehicles. The students occupying the approved development are prohibited from keeping or parking a car or other motorised vehicle on the site or in the City of Cambridge. This restriction forms part of the S106 agreement that was signed for the approved scheme. The manager of the site is responsible for ensuring the restrictions are applied.

- 8.12 The issues of parked car owned/used by students is not directly related to the proposed change of use and therefore whilst it cannot be considered, I have advised the Enforcement Team to investigate this. I have received several photographs from a local resident which shows cars being parking on both side of the access road. I have addressed the potential issue of car parking associated with the aparthotel use below.
- 8.13 In terms of the impact on the residential amenity of the neighbouring occupiers from the proposed comings and goings, in my view, this would not be materially different from that of the approved student accommodation use. The proposal is to use 25 of the 211 rooms for aparthotel use which is 12% of the total. Therefore the overall use of the site as student accommodation would not materially change.
- 8.14 The occupiers of the aparthotel use will have access to the on site facilities such as gym, laundry, library and common room. These are spread out across the site. The occupiers will also be offered breakfast and clean towels and toiletries as part of their stay. The rooms would have basic facilities such as kitchen and ensuite and so would be self-contained studio units with access to shared facilities. Student Castle the operator of the student accommodation development on the site has several sites throughout the UK and has experience in managing these types of development.
- 8.15 I do not consider there would be any demonstrable conflict between the occupiers of the aparthotel use and student occupiers. The site is carefully managed 24 hours a day by on site supervision. This will continue to operate for the aparthotel

use. On this basis, there is no reason why both uses are not able to coheres and cohabit on the same site.

8.16 In my opinion the proposal adequately respects the residential amenity of its neighbours and the constraints of the site and I consider that it is compliant with Cambridge Local Plan (2006) policies 3/4 (3/14) and 4/13.

#### **Highway Safety**

- 8.17 The proposal does not raise any highway safety issues as the aparthotel use is car-free. The County Highway Officer has not raised any concerns with regards to highway safety.
- 8.18 In my opinion the proposal is compliant with Cambridge Local Plan (2006) policy 8/2.

#### Car and Cycle Parking

Car Parking

- 8.19 The Local Plan (2006) policy 8/10 (Off-Street Car Parking) states that off street car parking must be in accordance with Parking Standards. However, there are no parking standard for aparthotel uses. The application does not include any car parking for the 25 rooms aparthotel use.
- 8.20 Concerns have been raised from local residents regarding the lack of car parking provision and the impact this would have on the surrounding streets. In order to understand the current capacity levels of on street parking within the surrounding streets (within 250 metres of the site), the applicant has submitted a car parking survey which demonstrates that there sufficient capacity to accommodate any increases.
- 8.21 As the aparthotel use is partly in use, the transport statement provides some figures of the approved and proposed trip generation rates. The survey of the student use generates 100 movements per day of which 8 will be by car. In terms of the proposed trip general, the transport consultant has used typical movement rates of a residential unit which is 5.1 movements. The aparthotel use would therefore generate 127.5 movements by all modes which is an increase on overall movement also

uses a comparable site in York consisting of 16 rooms, which has an approximate occupancy rate of 50%, of which 50% of guests arrived by car and 50% arrived by train. Using the same rate for the application site, this would result 12 rooms being occupied and 50% of the visitors arriving by car which equates to 6 cars. In the applicant's view, there is sufficient capacity within the surrounding streets to accommodate 6 cars on street.

- 8.22 The existing students are prohibited from keeping cars in Cambridge which is secured in a legal agreement and tied to each individual student's tenancy. Therefore, if the vehicles that are being reported within the site owned or used by students then this is a matter that will need to be investigated. However, this is outside of the consideration of this application.
- 8.23 In terms of the aparthotel use, whilst there is no parking available on the site, it would not be possible to prohibit or restrict occupiers from keeping or owning a car or motor vehicle. Therefore applicant has proposed give all occupiers a travel pack on arrival to make them aware of the public transport links including service times and cycle routes to discourage the use of cars. Furthermore, the site is located within a highly sustainable location in terms of proximity to the bus stop, shops, restaurants/pubs and other amenity such as public parks. Milton Road is one the main roads within Cambridge and so there is a regular bus (Citi1 every 12 minutes) that stops a 200 metres from the site.
- 8.24 Due to the proximity of local amenities to the site nearby, lack of car parking on site and the hassle of having to car on street in a surrounding street, is likely to deter/discourage potential occupiers from using a car. The Local Plan encourages a mode shift away from private car use particularly in areas where there is good access to public transport. I am therefore satisfied that the any car parking demand associated with the aparthotel use would have limited impact upon on-street within the surrounding due to the low level of demand. This is consistent with the assessment of the Inspector for the Milton Road Primary School appeal site, in that the site is within walking distance of the city centre and cycling distance of large parts of the city.

Cycle parking

8.25 One cycle space per unit would be provided. As with the car parking, there are no standards for aparthotel uses. In my view the proposed provision of one space per unit is acceptable.

#### Waste

- 8.26 The waste provision for the aparthotel use will be incorporated into the existing waste management for the student accommodation site. A private management company will clean and remove waste from each unit.
- 8.27 In my opinion the proposal is compliant with Cambridge Local Plan (2006) policies 8/6 and 8/10.

#### **Third Party Representations**

8.28 I have addressed a number of the issues raised by third party representations:

Representations	Response
Principle of change of use	
If the original plan had been for a hotel, car parking would have been needed. (2)	The site is located within a highly sustainable location in terms of proximity to shop, service and the city centre. The Local Plan (2006) encourages a modal shift away from private car use in locations that have good accessibility to public transport.
The lack of parking facilities means that if the application is to be approved it should require the whole residential to be subject to normal charges levied on residential development.	Future occupiers in my view would be deterred from arriving by private car due to the lack of parking and proximity of local services. Also, if any occupiers do arrive by car it is likely to be in a taxi.
It would not be possible to enforce a limit on the number of rooms used as a hotel, which would increase adverse impacts. What street parking is available in the area should be used in	The application site relates only to 25 rooms in Blocks A & B and planning permission would be needed to increase that number. It is not possible to limit the use of existing on street car parking

relation to the rejuvenation of Mitcham's Corner and not committed to the Student Castle hotel use.	in this area
Availability of aparthotel rooms is already being publicised online.	Officers are aware of this. No enforcement action is being taken until the current planning application has been determined.
Parking impact (residential amenity)	
Adverse impact on on-street car parking available to residents in terms of amenity (4)	See para 8.9 to 8.14
Concern of highway authority supported.	The Highway Authority has not raised any concerns relating to highway safety but has identified potential issue with residential amenity impact which is a matter for the City Council.
Waste facilities	See para 8.16
Inadequate/inappropriate facilities for waste management	See para 8.16
Concerns of refuse consultee supported (2)	The approved waste storage provision will not be affected by the aparthotel use.
Issues relating to current use	
Drivers of vehicles accessing Student Castle already block emergency vehicle access to the site and flats in Corona Road. This existing problem should be dealt with via installation of yellow lines. (Photos of vehicles blocking the entrance were attached)	There is no evidence that the access is being blocked or block for significant periods of time. There are vehicles shown on the photographs either side of the access but none are blocking the access. The access is not adopted by the County Highway Authority and therefore installation of yellow lines cannot be applied as it is private land.
Occupation restrictions are not being adhered to.	The enforcement team will be notified of this to investigate any alleged breach.
The applicant is arguing that there is less demand for the accommodation than they	standard of student

expected but the issue is not lack of demand but cost of accommodation.	which is not linked to a particularly education institution. Nevertheless, this is not a material planning consideration.
It is too early to judge the need for student accommodation. Use of shared facilities could lead to security problems and would undermine the expected amenity for students.	This is not a material planning consideration. Disagree. The existing security features are sufficient to protect all occupiers. Any security breach would need to be dealt with by the relevant authorities.
Trees shown to be retained have been removed.	The proposal does not seek any loss of retained trees. If there is any issue with loss of retained trees then this will be an enforcement issue.
Other issues The student use is controlled by contract/proctorial control but this would not apply to the aparthotel which would affect residential amenity.	The aparthotel use would not be controlled by proctorial control as there is no requirement to do so. However, the site including the aparthotel site will be supervised 24 hours a day so any nuisance that is caused can be dealt with immediately.
Mixing students and hotel accommodation would be a bad mix as each has different needs and expectations.	The aparthotel use would be located entirely within Block B. Whilst occupiers would be able to use the communal facilities I do not consider the mixing of student and occupiers in the aparthotel would raise any conflicts.
County Councillor Scutt has commented on this application.	
The original application was approved despite residents' concerns about parking and the student accommodation use circumvented the need for parking provision.	The aparthotel proposal is a car free scheme. In this sustainable location a car free is acceptable.
There is an existing severe problem in the area in terms of	See para 8.9 to 8.14

access to on-street parking. This raises concerns in relation to emergency access and public health risk (collection of rubbish).	
It seems 'unconscionable' that the developers have gained approval on the basis that the use will not add to problems and now seek permission for a use which will do so.	The aparthotel use would not cause any significant harm to the residential amenity of the surrounding residents in my view.
The Milton Road/Gilbert Road aparthotel includes car parking on site on the understanding that users will have/hire cars.	The low number of units in the aparthotel use is likely to mean a low number of occupiers arriving in private cars. All patrons are made aware of the lack of parking and encourage use of public transport.
Use of a separate building to accommodate disabled guests appears to be discriminatory, inconsistent with the Equalities Act provision and should not be approved.	The size of the units in Block B are not compatible to accommodate disabled guests.
A visitor with a disability is more likely to need a car.	The existing site makes provision for 3 disabled spaces which will be available for the aparthotel use.
Car parking provision at the Student Castle York scheme shows a recognition for the need for cars/hire cars to be accommodated.	Each proposal is assessed on its own merits. In this case, the location of the site in terms of its proximity to the local shops, services including public transport links and the city centre would not require additional car parking to be provided.
The accommodation has not been available long enough to allow demand to be assessed.	
Endorses comment made by Councillor Sargeant.	Noted.
Rooms are being advertised as available before the application has been considered.	

	application has been determined.
Councillor Sargeant has commented on this application.	
A Transport Assessment is required	Information regarding transport impact has been submitted and the Highway Authority considered it to be adequate.
It is correct to say that there is no car parking standard for aparthotels in the Local Plan but the applicants for the aparthotel at Milton Road/Gilbert Road accepted that parking provision should be between the parking standard for hotels and that for residential developments in order to cater for the needs of the guests and staff. It was also accepted that occupiers of aparthotels are more likely to use a car than shorter stay hotel guests. It is noteworthy that the comparison with Student Castle York is not robust because this has parking on site. The application should be rejected on the ground so lack of car parking.	There is no car parking standards for aparthotel uses in the adopted Local Plan. Approved purpose built aparthotel site on Milton Road was for 133 units which made specific provision for car parking. Due to the constraints of the site additional car parking is not possible on the application site. In my view, given the small scale of the aparthotel use (25 units) this is acceptable.
Lack of off road car parking will put unacceptable pressure on the highway network.	The applicant has demonstrated through a car parking survey that there is sufficient capacity within the surrounding streets. Whilst some of the streets are controlled parking zones, there is unlikely to be a significant or material increase in car parking associated with the aparthotel use.
The level of public transport provision is not, in practice, as frequent as set out in the application. 60% of local workers rely on cars and users of the aparthotel are unlikely to be different.	There is a regular bus service nearby, there are shops and services on Milton Road and the city centre is within walking and cycling distance.

The students are subject to proctorial control and this was considered important to allow planning permission to be granted. There will be no such restriction on the use as an aparthotel.	The aparthotel use will be managed and maintained in combination with the student housing.
Disabled guests would be accommodated in a separate block which does not accord with Policy 6/3.	Policy 6/3 state provision should be made for disabled visitors. The applicant is proposing to use a ground floor unit in Block A for any disabled visitors. This does not conflict with policy 6/3.
Friend of Mitchams Corner object to the application on the following grounds:	
General concerns about developers in the area changing plans after planning permission has been granted.	Each planning application is considered on its own merits. There is no restriction on the developers changing their plans subject to the revised plans being acceptable and in accordance with the adopted Local Plan.
The proposed use will significantly increase car use which, given the no-car policy, will have two adverse effects, vehicles dropping off and picking up will block the gyratory and there will be increased demand for on-street parking. There are many other student	The proposal will not significantly increase car usage or have a significant material impact upon on street car parking, in my view. There is sufficient space to allow the dropping off and picking up without impact on the existing highway network.
accommodation applications in the city and it is not clear why this one needs diversifying.	consideration.

# 9.0 Conclusion

9.1 The proposal, which is part retrospective, seeks planning permission to change the use of student accommodation within the first and second floor of Block B to aparthotel use. The proposal does not include any external alterations to Block B or any other part of the site.

- 9.2 There is no policy basis which resists the loss of student accommodation. The aparthotel use would provide a form of short stay accommodation for which there is a demand and which is supported by the adopted Local Plan (2006). The site is a suitable location for an aparthotel use due to proximity to local shops and services, public transport links, cycle routes and the city centre. All these provisions are within walking or cycling distance.
- 9.3 Concerns have been raised regarding the lack of car parking and the impact this would have upon surrounding streets. However, I do not consider the likely level of private car journeys made to the site will have a significant material impact on the capacity of on street parking on surrounding streets. The applicant ensures all visitors are aware of the site's lack of car parking provision and will encourage visitor use alternative modes of transport to arrive and leave the site.
- 9.4 The aparthotel use and student accommodation use are compatible in my view as the both provide a form of residential accommodation albeit for different requirements. The aparthotel units are to be located within Block B rather than mixed in with the student units, which is an acceptable way to manage both uses.

#### **10.0 RECOMMENDATION**

**APPROVE**, subject to the following conditions:

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

Reason: In accordance with the requirements of section 51 of the Planning and Compulsory Purchase Act 2004.

2. The development hereby permitted shall be carried out in accordance with the approved plans as listed on this decision notice.

Reason: In the interests of good planning, for the avoidance of doubt and to facilitate any future application to the Local Planning Authority under Section 73 of the Town and Country Planning Act 1990.

3. The aparthotel use hereby approved shall only provide shortstay accommodation for customers/visitors with a maximum stay duration of no longer than 90 days in any one calendar year.

Reason: In order to ensure the use is distinguishable from C3 residential use.

4. Within 6 months of the date of this decision notice, a Travel Plan shall be submitted to and approved in writing by the Local Planning Authority. The Travel Plan shall specify the methods to be used to discourage the use of the private motor vehicle and the arrangements to encourage use of alternative sustainable travel arrangements such as public transport, car sharing, cycling and walking. The Travel Plan shall be implemented as approved upon the occupation of the development and monitored in accordance with details to be agreed in writing by the Local Planning Authority.

Reason: In the interests of encouraging sustainable travel to and from the site (Cambridge Local Plan 2006, policies 8/2, 8/3 and 8/4).

**INFORMATIVE:** The applicant is encouraged to ensure all future tenants/occupiers of the flats are aware of the existing local car club service and location of the nearest space.