

Written Representations to the Greater
Cambridge Local Plan – Regulation 18: Issues
and Options 2020

On Behalf of Downing College, Cambridge

February 2020

Turley

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Client
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Our reference
THEC3010

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1. Introduction

- 1.1 These representations have been prepared by Turley on behalf of Downing College, Cambridge (“the College”). The representations have been prepared in response to the consultation on the Greater Cambridge Local Plan - Regulation 18 - Issues and Options 2020 and its supporting evidence base.
- 1.2 Downing College welcomes Cambridge City Council and South Cambridgeshire District Councils’ (“the Councils”) decision to review and update their Development Plan collectively. This decision followed the insertion of a policy into each of the adopted Local Plans (2018) by the Local Plan Inspectors, which committed the Councils to an early review of their Development Plans.
- 1.3 Downing College is pleased to have the opportunity to engage in the emerging Local Plan making process at this early stage. The College has reviewed its assets and is considering how the College site will change over the next 20 years through the development of an appropriate long-term plan. The College is interested in understanding how the emerging Local Plan will enable the changing needs of educational institutions to adapt to the learning and welfare needs of their students and staff, especially in locations which must consider the impact on heritage assets. As owners and occupants of listed buildings within a Conservation Area, Colleges have an important part to play in the future protection and enhancement of these heritage assets, whilst ensuring that these buildings function efficiently and effectively for College life.
- 1.4 These representations support the review of the Local Plan and cover the following matters:
 - Recognition that there is a need to consider different options to achieve zero net carbon within new and adapted buildings, especially those within a historic context;
 - That the Council needs to undertake research to understand the complexities of student accommodation provision before determining how much should be allowed for within the emerging Local Plan;
 - Understanding the change in working patterns so that public transport options are responsive to demand; and
 - Consideration in the emerging Local Plan of the difference between University Development and College Development.
- 1.5 A site plan of Downing College is included at Appendix 1.

2. Consultation Response

- 2.1 This section of the report provides a detailed response to the Consultation, on behalf of Downing College, Cambridge. The comments are set out as responses to the relevant questions in the consultation document.
- 2.2 The comments are focused on how the emerging Local Plan should consider how buildings can achieve improved levels of energy efficiency within a heritage context; the different needs and types of student accommodation, and the need to improve transport infrastructure to ensure that those working in the City Centre are able to reach their jobs in an affordable way.

CLIMATE CHANGE

Question 8) How should the Local Plan help us to achieve net zero carbon by 2050?

Question 22) How do you think we should protect, enhance and adapt our historic buildings and landscapes?

- 2.3 Downing College is committed to finding ways to reduce its carbon footprint, whilst improving the performance of its buildings. The College has recently appointed consultants to explore this issue and provide options for the existing building stock and also advise on how future building projects can deliver significant environmental improvements.
- 2.4 It is widely recognised that, in principle, new buildings can be designed to achieve net zero carbon, even within an historic environment. However, Downing College, as is the case with many of the Cambridge Colleges, has an existing stock of buildings which are either listed in their own right or are located within Conservation Areas. Whilst their adaptation is not prevented, their designations as heritage assets understandably mean that first and foremost their significance needs to be protected and enhanced.
- 2.5 The College considers that the emerging Local Plan needs to recognise that the means of achieving net zero carbon in a new building is considerably different from adapting or refurbishing a building, especially when heritage assets of varying degrees of importance are located within or adjacent to sites. It is important at this early stage of the emerging Local Plan to understand this context, given that across the Greater Cambridge area there are 89 Conservation Areas and 3,519 listed buildings.
- 2.6 The College suggests that the Council should undertake a number of pieces of research to inform its evidence base for this emerging Local Plan in respect of this issue. This research should include:
- Collaborative research with Historic England and others to identify feasible options and/or a methodology for historic buildings or those in an historic setting to be adapted sensitively in order to improve their thermal performance;
 - Review of options for carbon offsetting within the Greater Cambridge area and the production of an Supplementary Planning Document

(SPD) as part of the emerging Local Plan as per the London Plan. If carbon offset funds are considered an appropriate option for the Greater Cambridge area, then the inclusion of a range of funds which are proportionate and relevant to the project that is being carried out should be contained in an SPD including historic and heritage schemes. This recommendation is particularly important for Colleges, such as Downing, which are land locked in the City and have a finite quantity of land for such offsetting as part of future projects.

- 2.7 By declaring a climate emergency, the Councils have recognised the importance of finding ways to reduce the impact of development on the environment. The College would emphasise that if change is to happen, organisations and research institutes need to collaborate. The emerging Local Plan must incorporate the findings of such research in any future wording and guidance that it produces, offer solutions, and be proactive in its recommendations, rather than putting the entire emphasis on the applicant to provide information and solutions. The process should be two way and rely heavily on experience, lessons learnt from other projects, and best practice.

Question 9) How do you think we should be reducing our impact on the climate? Have we missed any key actions?

- 2.8 The current Cambridge Local Plan (2018) identifies a strategic district heating area, which covers much of the City Centre. It identifies that Cambridge shows significant potential for the development of district heating networks in the City Centre. However, apart from where large developments on the fringes of the City can support the construction of this type of infrastructure, the application of this policy has been ambiguous. The supporting text to the existing policy is clear that *'a benefit of such a network is that it provides developers with a ready-made solution for them to meet future planning policy and zero carbon policy requirements at minimum cost'*.
- 2.9 Therefore, as part of the emerging Local Plan, the College considers that the Councils must identify how these networks can be delivered and by doing so show how constrained City Centre sites, where opportunities for other renewable and low-carbon energy generation may be limited, could link into the networks. Sites with heritage assets or in areas of high archaeological potential that would have difficulty harnessing solar, wind, or ground source heat, would then have a feasible route for developing buildings that are net zero carbon.
- 2.10 Finally, the College considers that currently the practice amongst officers of resisting even relatively minor changes to heritage assets is a barrier to development, even when the benefits in sustainability terms are significant. Such practice has very clear implications for institutions with a portfolio of heritage assets because it affects their ability to meet climate change targets. If this nationally significant issue is to be addressed, a more balanced and pragmatic approach needs to be adopted by the Councils.

Addressing the Differing Needs of Student Accommodation

Question 33: What kind of housing do you think we should provide?

- 2.11 At Section 4.6.3 of the Consultation document, the Councils ask respondents to consider the broad range of housing that the emerging Local Plan will need to consider. It outlines a range of different types of housing, including student housing, which is in line with paragraph 61 of the National Planning Policy Framework (“NPPF”).
- 2.12 The College suggests that the Councils go further than simply considering whether Cambridge needs more student accommodation so that students do not increase the demand for local housing as set out in point 3 on page 64 of the consultation document. In Cambridge the student population is diverse and has different needs across a variety of educational institutions. National Planning Practice Guidance (“NPPG”) sets out that at the strategic policy-making stage, *‘Local Planning Authorities will need to engage with universities and other higher educational establishments to ensure they understand their student accommodation requirements in their area’* (Ref: 67-004/20190722).
- 2.13 This requirement is not new for the Councils, which as part of the adopted Local Plan (2018) undertook an Assessment of Student Housing Demand and Supply for Cambridge City Council (ASHSD, 2017). One of its important themes was that Cambridge had a diversity of students across different educational institutions. The City Council, therefore, proposed to consider this theme within their next Strategic Housing Market Assessment for the next Local Plan.
- 2.14 A further important theme recognised in the ASHSD was that *‘whilst undergraduates are likely to want some form of institutionally provided accommodation, there is a large postgraduate population, some of whom will desire a more ‘home-like’ form of accommodation’*.
- 2.15 This situation continues to be the case: the University of Cambridge, together with the Colleges, is seeking student population growth at a rate of 0.5% for undergraduates and around 2% for graduate students. It is this latter group who are likely to have different accommodation needs together with other sectors of the academic population such as post-doctoral researchers and contract researchers.

Downing College Context

- 2.16 For the last full academic year (2018-2019), the College had 812 students (470 undergraduates and 342 postgraduates), 49 Fellows, and 177 staff. Over recent years, the Council will be aware that Downing has been working hard to achieve their objective of accommodating all their undergraduate and postgraduate students for the first four years of study in accommodation within the bounds of Regent Street, Lensfield Road, Tennis Court Road, and the Downing Site. At present the College accommodate 543 of these undergraduates and postgraduates within this area.

- 2.17 However, as the table below shows, over the last 10 years, Downing has seen the most growth in the postgraduate population.

| Years | Undergraduates | Graduates | Total |
|--------------------------|----------------|-----------|-------|
| 2008-2009 | 442 | 246 | 688 |
| 2018-2019 | 470 | 342 | 812 |
| % increase over 10 years | 6% | 39% | 18% |

- 2.18 The postgraduate community comes from diverse backgrounds, e.g. overseas, and in many cases require accommodation as a couple or a family, given where they are in their academic careers. As such, their needs are very different from those of undergraduate students.
- 2.19 Furthermore, the College is finding that in order to attract the talent of potential postgraduates, it must be able to offer not only a high standard of living accommodation that works for individuals, couples, and families but also up-to-date welfare and social facilities.
- 2.20 As this early stage of the Plan makes process, the College urges the Councils to undertake the relevant research to ascertain what type of student accommodation the emerging Local Plan needs to account for in line with the requirements of the NPPF and NPPG. In order to broaden the Councils' understanding of the student population and in line with national planning guidance, this research should be undertaken in collaboration with Colleges, the University of Cambridge, and Anglia Ruskin University, together with other educational establishments such as language schools. It is a complex subject and, as set out in the ASHDS, there are few other Local Planning Authorities which have had to grapple with the same demands for student accommodation. The Councils need to be forward-thinking and collaborative in order to address the requirements of the academic community.

Infrastructure Needs

Question 36) how should the Local Plan ensure the right infrastructure is provided in line with development?

Question 37) How should we encourage a shift away from car use and towards more sustainable modes of transport such as public transport, cycling and walking

- 2.21 The Consultation document identifies at Section 4.7.3 that there is a need to '*reduce the need to travel and increase access to sustainable transport options*'.
- 2.22 Some sectors of the economy can adapt their working practices to reduce the need to travel to work through the use of technology to enable, for example, home working. However, for the College, many jobs rely on staff being on-site e.g. College porters, chefs, and housekeeping. A review of their addresses reveals that a high proportion of staff live outside the City Centre, within South Cambridgeshire or further afield, due to the absence of affordable housing within the City. Furthermore, a number of College jobs do not have 'regular' working hours. Therefore, the availability of alternative transport

options, together with its affordability is fundamental if there is to be a shift from the private car towards alternative transport.

- 2.23 In order to encourage people to shift away from car use, the Councils must recognise the different working patterns of people coming into the City and whether public transport is affordable for them. Distance or safety may deter staff who start work at 5 am from walking or cycling to work, whether at the College or elsewhere, such as at the hospitals. Public transport would be the only alternative option, but the shift from cars to public transport will only happen if public transport is convenient, affordable, and has good availability.
- 2.24 This section of the consultation document is heavily focused on how new development can be designed to provide for new transport infrastructure improvements, which the College recognises as being important. But there is a wider point: how transport infrastructure can be improved and integrated into existing settlements to allow people to make the change to more sustainable means of commuting.

Facilities to Respond to Student Needs

Question 50) What do you think should be in the next Local Plan? Are there issues, ideas or themes that you don't feel we have yet explored?

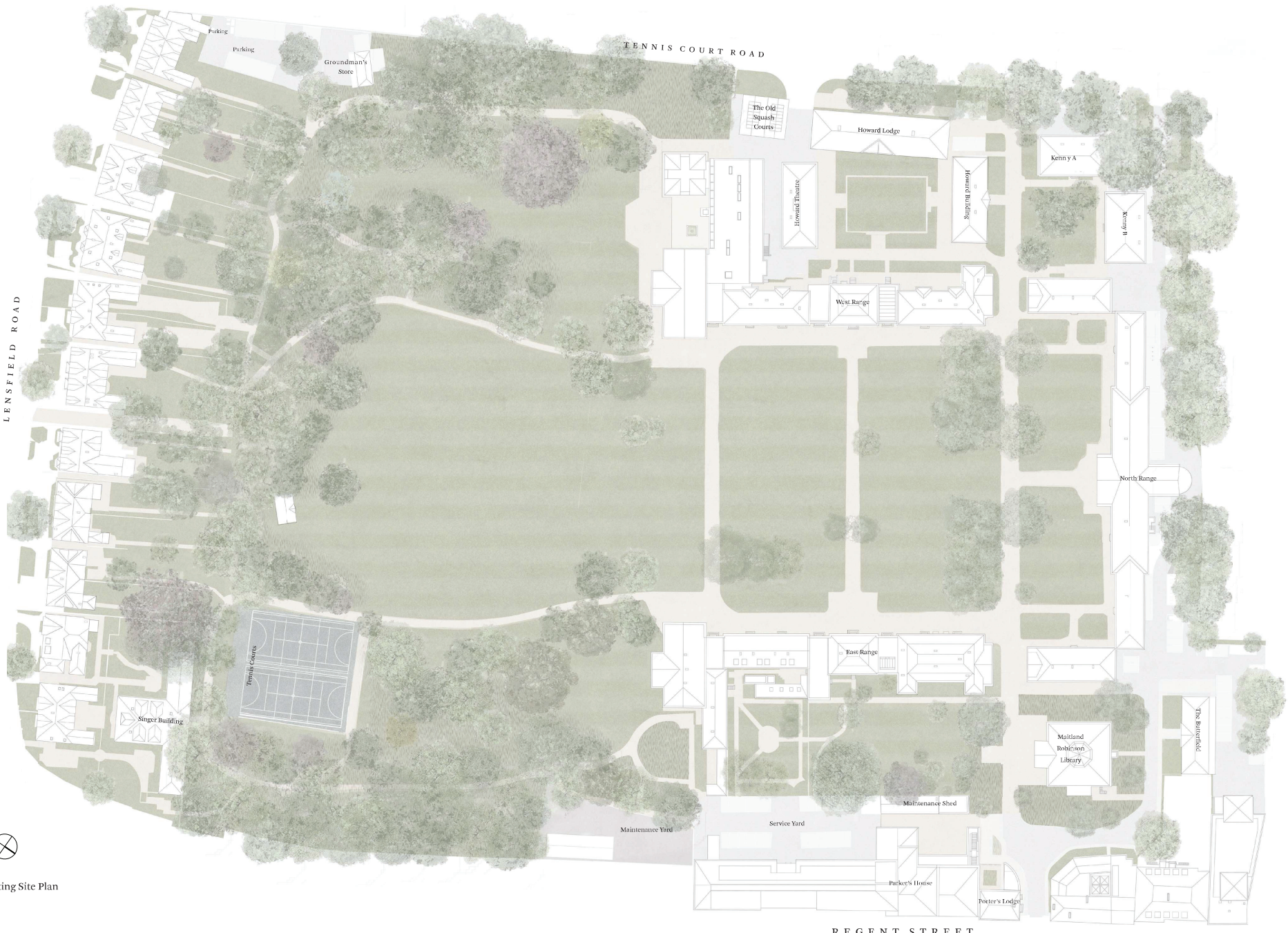
- 2.25 The adopted Local Plan for Cambridge City Council recognises the benefits of developments which are for the purpose of faculty, research, and administrative sites for the Universities and where educational facilities are seeking to improve the quality and range of teaching accommodation.
- 2.26 Over recent years, a common theme which the Cambridge Colleges, including Downing, have identified, is that the social spaces within the College environment are now being used in different ways. Typically, attendance at College bars is declining, and there is a greater demand for flexible spaces which can change from day to evening, enabling cafe settings as well as other spaces which can accommodate hobbies such as watching films, exercise, or contemplation. Managing students' wellbeing whilst they are studying is an increasingly important issue for the College. Spaces where students can relax and spend time away from study is as important as spaces for study and teaching.
- 2.27 In addition to students' social needs, it has become apparent to the College through surveys that students seek flexible and adaptable work spaces which can accommodate the latest technology. Not all learning happens in lecture theatres: people need and enjoy different working environments.
- 2.28 The College has found that its students seek out appropriate co-working or study environments off-site. It has become increasingly important for the College to create these spaces on-site so that students can seek advice from each other, share ideas, and be close to resources. If their fellow students are available on-site, international students integrate more quickly into College life.
- 2.29 The College suggests that the emerging Local Plan should recognise those schemes that provide flexibility and the adaptation of spaces to support teaching and learning within the College environment and not just as part of the University. These are two separate

organisations, which whilst delivering educational teaching in harmony are nevertheless separate entities. The College considers that this differentiation is occasionally blurred or misunderstood and needs to be clearer in future planning policies.

3. Summary

- 3.1 These representations have been prepared by Turley on behalf of Downing College, Cambridge (“the College”). They have been prepared in response to the consultation on the Greater Cambridge Local Plan Regulation 18: Issues and Options Consultation 2020 and its supporting evidence base.
- 3.2 These representations are supportive of the Councils’ decision to embark on an early review of their Local Plans. It is appreciated that this initial consultation is at an early stage of the Plan-making process. However, in order to comment more constructively on the direction of this emerging Plan, the Councils need to undertake further research, as suggested in these representations, to form the underlying evidence base.
- 3.3 At this stage, issues of importance to the College around how it accommodates its students and provides for their social and welfare needs is given little commentary in the consultation document. The College, therefore, hopes that the Councils take up its invitation to meet and discuss the diversity of its accommodation needs over the next Local Plan period, so that this information, together with that of other educational institutions, is used to inform the first draft of the emerging Local Plan.

Appendix 1: Site Plan of Downing College



Existing Site Plan

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