

1. Introduction

1.1 This Position Statement has been prepared on behalf of Falmouth University, the University of Exeter and Falmouth Exeter Plus. This statement is in relation to Matter 6 Falmouth and Penryn Spatial Strategy and Allocations under the wider Cornwall Site Allocations DPD. The content of this Statement supplements the representations previously submitted to Cornwall Council in respect of the Pre Submission draft Cornwall Site Allocations DPD on behalf of these parties in August 2017 (Representation reference: 221 Falmouth Exeter Plus (on behalf of Falmouth University and the University of Exeter)).

1.2 Our pre-submission representations were broadly supportive of the approach being taken by Cornwall Council as regards student accommodation but set out our concerns in three broad areas. Firstly, in relation to the sufficiency of allocations in the draft DPD in the context of the delivery of new Purpose Built Student Accommodation (PBSA) against likely demand. Secondly, addressed points in relation to three specific sites. Thirdly, set out our concerns that unless this new PBSA was in the right location (i.e. well located for access to the university campus but also sufficiently well connected to Falmouth town) there was a real risk that it would not provide a competitive alternative to HMOs in Falmouth and would either therefore not be backed by funders and developers or even if it were built, would not be full and not reduce pressure on the HMO market, thereby undermining Article 4. This was and is the key issue as far as the local community is concerned.

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1.3 Since August 2017 a number of things have progressed that have had a generally positive impact on our assessment of the situation. A number of PBSA sites in Falmouth town have been granted planning consent on Appeal and these, as we understand it, will be reflected in the revised DPD. In addition, the owner/developers of three brownfield sites are actively working with substantial teams and resources on planning applications that are expected to come forward over the next couple of months.

1.4 This Statement relates to the provision of student accommodation only and specifically addresses questions d. f. and g. of the Inspector's Issues set out in Matter 6: Falmouth and Penryn Spatial Strategy. These questions relate to the strategic approach to the provision of student accommodation with respect within Falmouth and Penryn, the suitability of the sites put forward for allocation and if the sites can be delivered at a sufficient rate and to a suitable timescale.

2. Response to Inspector's questions Matter 6 - General Issues

d. Is the approach to the provision of student accommodation appropriate with respect to its relationship to the market and affordable housing within Falmouth and Penryn?

2.1 Firstly, we support the overall strategy set out by Cornwall Council which seeks support the growth of the universities in line with The Cornwall and Isles of Scilly Strategic Economic Plan but also to address the growth in number of Homes of Multiple Occupation (HMO) and support Article 4 Direction in Falmouth.

2.2 The Universities are key to the delivery of the SEPs vision that “ *By 2030 Cornwall and the Isles of Scilly will be the place where business thrives and people enjoy an outstanding quality of life.*” We make a significant and direct contribution to the following objectives;

- Provision of STEAM based skills;
- Commercialisation of Research and Knowledge Transfer;
- Supporting Clusters and supply networks;
- Research development and innovation hubs;
- Ensuring that young people living in Cornwall can access further and higher education

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Cornwall's productivity in 2015 equalled £25.6 per hour, £6.20 below the UK average. This is equal to 80.4% of the UK average, the 3rd lowest of comparable regions. An historic overreliance on low value sectors has seen productivity stagnate and decline, causing low wages and underemployment. The impact can be seen in communities across Cornwall and is reflected in social challenges such as poverty, intergenerational worklessness and low aspiration. At a local level, Penryn and Falmouth continue to have pockets of severe deprivation with some neighbourhoods falling within the 30% most deprived in the Country. The Universities are key to increasing wages, productivity and skills. Falmouth University contributes £58m pa to the Cornish economy, with University of Exeter contributing £50.8m pa. Ensuring an appropriate planning framework is in place is vital to safeguard and accelerate this economic contribution.

2.3 In March 2017 the student number cap at the Penryn campus was increased from 5,000 to 7,500 and obligations on the universities were agreed to link this growth to the delivery of new PBSA. All parties agree that the key to this is the planned developments of a relatively small number of new PBSA schemes by private sector developers on suitable sites as designated by a planning process. It is our view, very much in line with the position set out by Cornwall Council, that the need in this regard is for 2,000-2,500 beds over the next 3-5 years to both accommodate actual and projected growth and to support the intended effect of the Article 4 Direction by reducing the pressure on the HMO market.

2.4 It is important to note that c1,000 of this need is for first year students who want to be on campus. Returning second and third year students typically want to be more independent and will seek to live in or within easy reach of Falmouth town. This difference is important as only sites which are attractive to students will get funding, be built and offer a genuine alternative to HMOs.

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While the universities' welcome the designation of specific PBSA development sites they also recognise the inevitable attrition and delay experienced by emerging planning and development proposals (due to ownership, infrastructure and funding etc). Therefore there needs to be more potential sites and bed capacity identified in the DPD than is needed accepting that not all will be delivered.

2.5 Since the student number cap was increased the universities have added c400 beds to their stock of own or managed accommodation. In addition to this some 680 PBSA beds have obtained planning consent on appeal, mainly on sites in Falmouth town centre. One of these sites (Packsaddle Hill [135 beds]) is currently under construction and will deliver for September 2018. The others (Ocean Bowl [190], Roselyn [117], Fishstrand [116] and the Coachworks [135]) are targeting September 2019 delivery. If we assume that only 600 of these newly consented beds are delivered, then this will provide 1,000 of the c2,500 need leaving c1,500.

2.6 In the light of these recent "on the ground" changes and subject to the suggested recommendations for minor changes we set put below, we believe that the emerging DPD provides a basis to deliver the student accommodation strategy as set out by Cornwall Council.

2.7 We support the Council's position, that the balance of PBSA required should be delivered on the following DPD sites:

- On campus consented site (1,000 beds)
- Parkengue – FP M2 (1,000 beds)
- Falmouth Road (Ponsharden) –FP-H4 (400 beds)
- Treliever – FP M3 (400-500 beds)

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2.8 The on campus site and Parkengue are effectively the same site as they adjoin (see plan in section 3 below). With the projected first year demand being around 1,000 there is a limit to the student demand for on campus accommodation. There is therefore an element of “either or” between the two and funders/developers are highly unlikely to build 2,000 beds on this combined as there will be a high risk of voids. The on campus consented site is a steeply sloping, un-serviced and difficult to access greenfield site and it has so far proved difficult to attract a funder/developer consortium to build as currently designed. Contrast this with the flat, serviced, accessible brownfield sites on Parkengue next door, where we have two credible well funded private sector owner/developers (StudyTel and John Lewis Partnership) actively pursuing schemes through planning. This project also has the added benefit of regenerating the existing Industrial Estate by providing new employment space. Our strategy therefore is to seek to amend the DPD so that it gives us the flexibility we need to deliver PBSA across the joint (on campus / Parkengue) site in a way which reflects the reality of the physical site conditions and therefore the likelihood of timely investment and delivery. We are therefore seeking to maximise the number of beds we can secure from the Parkengue developers whilst still developing a complimentary and deliverable scheme on campus.

2.9 As will be set out in more detail in section 3 below, the Falmouth Road (Ponsharden) site is key to meeting the demand from returning students. This is the only site suitable for a significant PBSA development that, because of its location will support the strategy of getting students out of HMOs and delivering the objectives of Article 4.

2.10 An outline planning application for another site, Penvose Farm, is due to be considered at the Strategic Planning Committee meeting in mid February. For the avoidance of doubt, whatever the outcome of this meeting, our position as set out in this paper remains unchanged.

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2.11 Subject to sufficient PBSA capacity being added to the DPD in locations that meet student demand (as described above) we believe that the stated strategy is credible and deliverable.

3. Response to Inspector's questions Matter 6 – Site specific issues

- f. Are the individual allocated sites and proposed land uses suitable, having regard to planning and environmental constraints?*
- g. Is there robust evidence that the allocated sites and infrastructure will be delivered at a sufficient rate and to a suitable timescale to ensure that the minimum numerical development requirements of the Town Strategy and of the adopted LPSP will be met, including with reference to the five year housing land supply required by national policy?*

Parkengue FP-M2

3.1 The universities welcome the inclusion of the Parkengue sites in Penryn and highlight the inherently sustainable location for development. The site minimises travel distances, maximises utilisation of existing campus resources and better integrates the campus into the immediate surrounding areas and uses. The universities are strong advocates of the potential for PBSA to contribute to a mixed development, complementing business uses and amenities on lower floors and contributing to the overall economic reinvigoration of Kernick Estate as a strategic employment site. This will be achieved by leveraging its unique location adjacent to the universities' campus.

3.2 Assessment of the Parkengue sites indicates that the development capacity could be at least 1,000 bedrooms rather than the 550 in the Allocations DPD and the universities urge the Council to amend this specific constraint. Successful development at this scale is possible with a well-designed and comprehensive masterplan proposal that doesn't adversely affect either business use or visual impact. The universities are actively working with John Lewis Partnership and StudyTel to produce a joint masterplan for the combined Parkengue sites that underpins the delivery of up to 1,000 beds within the context of known site constraints and which recognises the needs of both Campus and Kernick stakeholders.

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3.3 We believe that increasing the capacity to 1,000 will provide the scale and critical mass to attract funders and developers to deliver PBSA at an accelerated rate. The Kernick sites are brownfield, flat, serviced and accessible and are far more likely to be deliverable in the short term than any unserviced greenfield site. They also have very credible owner/developer/funder groupings behind them and have significantly progressed through the design and planning process.

3.4 The scale and critical mass that 1,000 beds will provide will not only provide the business case to fund the regeneration of the employment space but is vital to on-going care, security and operational management of the students once the site is occupied.

3.5 The potential mixed use business and student residences developments on Kernick offer the opportunity to transform and the industrial estate by creating modern, appropriate employment spaces which can deliver real, long lasting, social and economic benefits to the local area. In addition it supports the continued delivery of Higher Education in Cornwall.

3.6 Since March 2017 Falmouth University has owned and occupied for academic purposes, the former Allen & Heath warehouse and associated land which is the middle of the three sites within the designated FP-M2 area. The plan image below shows the campus boundary, including this acquisition, in blue with the Parkengue DPD site hashed red. The light blue shaded area on campus is the existing consented PBSA site which adjoins Parkengue.

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Falmouth Road (Ponsharden) FP-H4

3.7 The universities support the designation of the Ponshardon site on the edge of Falmouth for high density including for PBSA development of approximately 400 rooms.

3.8 The Ponshardon site is already designated in the current Allocation DPD as suitable for 210 units of high-density residential development. However the sites topography and location on a busy roundabout in non-residential area lessen its development potential with dwellings for permanent occupation. However for transient occupation use such as PBSA it would be an ideal location, particularly given the sites location on the main bus route mid-way between the two university campuses and close to local amenities.

3.9 The developer, Curlew Capital, has acquired the site and is progressing a mixed use scheme through planning including c400 student beds. We recommend amending the DPD wording to allow for development on this site to include student accommodation whilst still retaining some or all of the proposed C3 residential units.

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3.10 This would be a new development on the very edge of town which would provide PBSA on a site that credibly provides an alternative to HMOs. Unless attractive PBSA for returning students is part of the overall solution, the risk is that students will continue to seek out HMOs where ever and how ever they can. This site has the capacity for an element of retail and social development which together with the two supermarkets and the fast food restaurant that are immediately adjacent to it, has the potential to create an attractive serviced environment for the new community.

3.11 Given the sites location and potential development scale the universities consider this designation will be more widely supported compared to other recent applications in Falmouth town centre. PBSA development at Ponsharden will make a significant and timely contribution to reduce pressure on the local housing market and achieve the Article 4 objectives. Therefore the universities strongly recommend that the Council amend the wording of FP-H4 accordingly to allow for mixed use.

4. Conclusion

4.1 The universities strongly support the principles and strategic approach of the Site Allocations DPD to manage future growth in student accommodation in Falmouth and Penryn. The likely solution to the PBSA challenge has become clearer and more certain in the months since we submitted representations on the Pre Submission draft. A number of sites have obtained planning consent and we assume will appear in the revised DPD. In addition, a number of site credible sites with well funded developer/owners have come forward with significant investment and are progressing applications. We are seeking only two minor amendments to the wording in the draft DPD in the light of the latest circumstances.

4.2 The universities are committed to working with Cornwall Council, private sector developer partners and the community to accommodate student growth in up to 2,500 newly built PBSA beds. This will reduce demand for the HMO sector in line with local community wishes.

4.3 To achieve this and support the success of Article 4, PBSA needs to be in suitable locations to match the demand from first year and returning students. A mix of “on or adjoining campus” for first years and “in or on the edge of town” for returners.

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4.4 The universities recommend amending the policy wording to support greater PBSA development at Parkengue (Ref FP-M2) of up to 1,000 beds recognising that the scale of any eventual development will be subject to the normal full planning process.. The universities are working positively with the other parties who have land interests within the emerging allocation to prepare a joint masterplan that will underpin the submission of individual planning applications for mixed used student accommodation led redevelopment proposals which retain/replace and enhance existing employment space. This masterplan has been the subject of positive engagement with Cornwall Council Planning Officers.

4.5 The universities recommend amending the policy wording to include approximately 400 student accommodation beds as part of a mixed use development of the Falmouth Road (Ponsharden) site (Ref FP-H4) to meet the short to medium term need to 2023 to relieve pressure on the HMO sector in Falmouth.

4.6 The universities also support the designation of Treliever (Ref FP-M3and M4) for future growth adjacent to the campus. This should focus on innovation, research and employment uses as a part of a wider mixed use masterplan with supporting uses including a proportion of PBSA scaled to meet longer term demand beyond 2023.

4.7 If our recommendations are adopted we are confident that the Cornwall Council strategy and emerging DPD will provide a credible and deliverable approach to meeting demand for PBSA.

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4.9 These representations continue the universities' commitment to working with Cornwall Council through the planning policy process to responsibly manage growth in Falmouth and Penryn and ensure the benefits of higher education to Cornwall are sustainable and the wishes of the local community are respected.