

**WILBERFORCE ROAD,
CAMBRIDGE
GREATER CAMBRIDGE
LOCAL PLAN -
PREFERRED OPTIONS
CONSULTATION 2021**


Quality Assurance

Site name: Wilberforce Road, Cambridge

Client name: Emmanuel College, Cambridge

Type of report: Greater Cambridge Local Plan – Preferred Options Consultation 2021

Prepared by: Guy Kaddish MRTPI BSc DiP TP MRTPI

Signed 

Date December 2021

Table of Contents

1.0	Introduction	1
2.0	Spatial Strategy	2
	Policy S/DS: Development strategy	2
	Policy S/RRA: Site Allocations in the Rest of the Rural Area	3
3.0	HELAA Proforma - Site Reference: 40518	5
	Flood Risk	Error! Bookmark not defined.
	Landscape and Townscape	5
	Biodiversity and Geodiversity	Error! Bookmark not defined.
	Historic Environment	Error! Bookmark not defined.
	Site Access	Error! Bookmark not defined.
	Transport and Roads	Error! Bookmark not defined.

1.0 Introduction

- 1.1 These representations have been prepared by Bidwells on behalf of Emmanuel College, Cambridge (hereafter 'the College') in response to the Greater Cambridge Local Plan Preferred Options, "First Proposals" 2021 consultation.
- 1.2 These representations follow those previously submitted in respect of land at Wilberforce Road, Cambridge (hereafter "the site") to the 2019 Call for Sites and 2020 Issues & Options consultations. The site has the reference 40380 from the Council's Housing and Economic Land Availability Assessment (HELAA).
- 1.3 Those technical documents from the earlier site submissions remain up to date and relevant to support this current representation; namely:
- Initial Heritage Appraisal
 - Ecology Report
 - Flood Risk and Drainage Appraisal
 - Highway Access Appraisal
 - Vision and Delivery Document (Masterplanning)
- 1.4 These representations continue to promote the site for residential development through the Preferred Options consultation for the landscape-led delivery of up to approximately 120 dwellings and seek to give further certainty on the deliverability of the site. They also provide further clarification on technical points raised by the HELAA proforma and respond to the following proposed policies in the Preferred Options consultation document:
- Policy S/DS: Development Strategy; and
 - Policy S/LAC: Other site allocations in Cambridge

2.0 Spatial Strategy

Policy S/DS: Development strategy

- 2.1 The College supports the principle of the proposed development strategy for Greater Cambridge and the approach to directing development to locations where active and new public transport is the natural choice, where green infrastructure can be delivered alongside new development, and where jobs, services and facilities can be located near to where people live. This approach is consistent with the NPPF, which at paragraph 11.a) states that all plans should promote a sustainable form of development.
- 2.2 The College supports the principle of including allocations for housing and employment in areas that can provide for sustainable development. In this regard locations within Cambridge City can be well-located to bus routes, cycle paths and pedestrian paths; offering immediate infrastructure to realistically encourage people to use sustainable modes of transport. The Council's evidence base finds that the transport modes associated with a development site will create the site's biggest carbon impact; therefore, the usage of sustainable transport can have the biggest impact to reduce carbon impacts from new development; a significant material consideration against the Local Plan's Big Themes.
- 2.3 An aspect of the Development Strategy that does raise concern is the reliance on too few sites to deliver the significant majority of the Council's Local Plan housing needs. As a result, to re-risk a position whereby the Council would not then fulfil its Local Plan housing requirement or cannot retain a rolling five-year housing supply, the Local Plan needs to allocate more smaller sites. This adds resilience to the supply by introducing more sites that can deliver homes at any one time and allow different size sites to come forward at different stages in the housing market and economic cycles.

Housing Need

- 2.4 Allied to the position that more smaller sites are needed, there is a requirement for more homes than the First Proposals Local Plan currently suggests.
- 2.5 It is acknowledged that economic growth must be sustainable and that it would be inappropriate to determine a level of need that is undeliverable, as advocated by the NPPF. It is also acknowledged that it is difficult to determine exactly how much employment need there is in the context of such a vibrant economy. It is unique and therefore the approach to assessing need set out in the PPG is perhaps not the most appropriate. Certainly, extra care is needed when considering the veracity of economic models, such as the EEFM, that have consistently downplayed economic growth from key sectors over several iterations in recent years. It might therefore be more appropriate, at least as a reasonable alternative, to reverse the analysis and instead consider the available capacity for growth in the area and determine how this sits with the various economic projections under consideration.
- 2.6 On the subject of reasonable alternatives, the SA accompanying the (Greater Cambridge Local Plan) GCLP first proposals consultation fails to even consider the potential effects of a higher level of economic growth. This is clearly unreasonable; the evidence base itself highlights the

uncertainty as to the level of employment need and identifies methodologies and scenarios that would result in a considerably higher level of employment need than the first proposals suggest.

2.7 In terms of housing need, in the case of Greater Cambridge this is simply a function of facilitating economic growth and determining the acceptable level of commuting. The latter will inevitably be a strategic matter for the purposes of the Duty to Cooperate unless the GCLP can show that it is accommodating its full objectively assessed housing need.

2.8 At this stage, with such considerable uncertainty regarding how much greater the employment need is, it is certainly the case that the actual housing need is far higher than that set out in the First Proposals consultation and therefore more land needs to be allocated for housing. To provide for that additional housing it would be appropriate to allocate more homes in sustainable locations. Land at Wilberforce Road, Cambridge accords with the proposed development strategy and offers an appropriate location to allocate some of the additional housing needs, for the following reasons:

- Directing development to where active and public transport is the natural choice:

To the north of the site is Madingley Road and its bus stops within close proximity to the Wilberforce Road/Madingley Road junction. The Citi 4, 8, U, X3 Express and Park-and-Ride buses all use these nearby bus stops.

- Where green infrastructure can be delivered alongside new development:

The proposals include for a significant part of the site to be newly formed public open space as a significant public benefit.

The site offers the opportunity for 20% Biodiversity Net Gain.

- Where jobs, services and facilities can be located near to where people live:

The site is about five minutes cycle and 20 minutes walk from Cambridge City Centre and quicker into the West Cambridge University Campus. This puts a significant quantum of jobs, services and facilities within cycling and walking distance, alongside the many buses available to Madingley Road. The site offers a true foundation for sustainable development.

- A Considerate Landowner

The College recognise and endorse the Big Themes underpinning the emerging Local Plan; not least to progress the agenda around sustainability, ecology, inclusivity and sustainable transport. The site is primed to be delivered in a manner to fully engage with these leading issues.

Policy S/LAC: Other Allocations in Cambridge

2.9 The College supports Policy S/LAC, but objects to the limited allocations to be made by it.

2.10 Appropriate locations within Cambridge offer those sites to provide for truly sustainable development. Locations that can rely on existing sustainable transport infrastructure and be within easy access to a host of job opportunities, shops, services and facilities.

2.11 Policy S/LAC does roll forward a number of allocations from the adopted 2018 Cambridge Local Plan; however, it only proposes only one single, modest allocation within Cambridge for some 12 dwellings. It is hard to follow how a strategy for sustainable development could lead to only one small site within Cambridge being allocated.

2.12 This representation directs that additional housing sites will be needed from those currently within the First Proposals Local Plan iteration; to help meet that increased housing requirement, additional, appropriate and deliverable sites should be allocated within Cambridge. Such sites could help address the Council's Big Themes underpinning the approach to the emerging Local Plan. In particular, land at Wilberforce Road, Cambridge (Site reference: 40380) for the following reasons;

- Directing development to where active and public transport is the natural choice:

To the north of the site is Madingley Road and its bus stops with close proximity to the Wilberforce Road/Madingley Road junction. The Citi 4, 8, U, X3 Express and Park and Ride buses all use these nearby bus stops.

- Where green infrastructure can be delivered alongside new development:

The proposals include for a significant part of the site to be newly formed public open as a significant public benefit, along with the green structure to the boundary.

The site offers the opportunity for 20% Biodiversity Net Gain.

- Where jobs, services and facilities can be located near to where people live:

The site is about five minutes cycle and 20 minutes walk from Cambridge City Centre and quicker into the West Cambridge University Campus. This puts a significant amount of jobs, services and facilities within cycling and walking distance, alongside the many buses available to Madingley Road. The site offers a true foundation for sustainable development.

- A Considerate Landowner

The College recognise and endorse the Big Themes underpinning the emerging Local Plan; not least to progress the agenda around sustainability, ecology, inclusivity and sustainable transport. The site is primed to be delivered in a manner to fully engage with these leading issues.

3.0 HELAA Proforma - Site Reference: 40380

- 3.1 An assessment of the site has been undertaken as part of the HELAA (Site reference: 40380). Overall, the HELAA assessment of the site is favourable, rating the site green for being available and achievable. The responses below address the HELAA items that suggest the site is 'red' for suitability.

Landscape and Townscape

- 3.2 **HELAA Comment:** TPO on-site; Urban Area; Central Conservation area; Landscape Character Assessment (2021) Landscape; Character Area - Urban
- 3.3 The site is a large sports field, designated as Protected Open Space and located within a Conservation Area. The site forms part of a series of open landscapes within the city which contribute to the sense of openness and provide local views. In landscape terms, development of the site would cause harm to the local openness, character and views in this area, which would be unalterable and not possible to mitigate against.
- 3.4 **College Response:** The Masterplan Strategy submitted to the Issues and Options Stage showed an initial development concept. A concept that recognises the existing green features on the site along with how the site is experienced within views from the Conservation Area. As such, development is only proposed to the north and west edges of the site, thereby leaving a large swathe of open space to the south east of the site facing onto Wilberforce Road.
- 3.5 The concept layout is only an initial approach and is readily available to be refined through stakeholder engagement to ensure any development is of the appropriate scale and form to respect its setting.

Open Space/ Green Infrastructure

- 3.6 **HELAA Comment:** Within 50m of an Amenity Green Space; Within or Partially within an Outdoor Sports Facility; Within 50m of a Semi-Natural Green Space; Within or Partially within Protected Open Space; Site is a formal sports playing fields and is protected open space. Its loss will impact on formal sports provision for the University of Cambridge.
- 3.7 **College Response:** The site has become redundant in the College's sports portfolio, with replacement facilities secured to the south of the City Centre. As a result, the site can be put forward to the Local Plan to secure a long-term beneficial use.
- 3.8 The Council make reference to the loss of the site and so having an impact on the University of Cambridge formal sports provision; however, the party that is best placed to assess that matter, is the College that own and operate the facility. It has replacement facilities and so there would be no reduction in the sports offer. The sports offer is very important as part of showing world-class facilities to attract the very best students; it is not in the interests of a College to diminish the quality of its sports facilities; hence this proposal only comes forward because the College has replacement facilities.

- 3.9 Furthermore, the land is currently private and fenced off. As part of a redevelopment of the site, a significant area of open space would become available for public enjoyment; as a notable and tangible benefit to the locality. A matter of material weight to the assessment of the Protected Open Space; and a matter that could be included within any site allocation policy. The image below is a copy of the Concept Masterplan from the Issues and Options submission, which shows the broad area of public open space, which is substantial in size and would generate a public benefit against the existing facility which needs to be fenced off in its current use.



Plan: Concept Masterplan

4.0 Conclusions

- 1.1 These planning representations have been prepared by Bidwells LLP on behalf of Emmanuel College, Cambridge in response to the Greater Cambridge Local Plan First Proposals Consultation.
- 1.2 The representations support the identification of Land at Wilberforce Road, Cambridge as an 'included' site in the HELAA and the Greater Cambridge Local Plan (Site Reference: 40380). This representation highlights that it is not the intention of the College to develop the whole site, but rather to provide a significant area of public open space as part of the scheme, which will form a significant public benefit. The College has replacement facilities available and the repurposing of the site will not, in any way, decrease its sports offering (which is vitally important to the College).
- 1.3 Alongside, it is evident that the Local Plan should be catering for additional homes, to support the economic needs of the area and that such additional homes should be allocated, in part, within Cambridge, as a significant base for sustainable development. Additional homes on additional sites will also provide a robustness to the housing trajectory to reduce the current risk of over relying on a small number of sites to fulfil a rolling five-year housing supply and to fulfil the Local Plan housing needs. As such the site should be allocated at the next publication stage of the emerging Local Plan.
- 1.4 Land at Wilberforce Road is available in the next five years and within single ownership. It lies within walking and cycling distance of a plethora of services, facilities and jobs; further supported by being a short walk from a principal bus corridor served by several bus routes.
- 1.5 Emmanuel College look forward to working with Greater Cambridge and stakeholders to take forward a successful residential-led development; one that can bring benefit to the locality and delivered in a manner to help the Council meet its Big Themes underpinning the emerging Local Plan.



BIDWELLS