

13 December 2021

Greater Cambridge Shared Planning  
South Cambridgeshire District Council  
South Cambridgeshire Hall  
Cambourne Business Park  
Cambourne  
Cambridge  
CB23 6EA

Ref: CLAC3008

Dear Sir / Madam

**GREATER CAMBRIDGE LOCAL PLAN - FIRST PROPOSALS CONSULTATION 2021  
SUBMISSION ON BEHALF OF CLARE COLLEGE, CAMBRIDGE**

This representation has been prepared by Turley on behalf of Clare College, Cambridge in respect of the Greater Cambridge Local Plan (GCLP) – First Proposals Consultation 2021. Clare College have land interests within the Local Plan area both within the City of Cambridge and South Cambridgeshire:

- **Land within Cambridge:** whilst the historic College site is accessed from Trinity Lane, extending westwards to Queen's Road, the College have a range of other sites across the City for student accommodation and teaching purposes. The College continues to invest in acquiring sites to improve the teaching and welfare facilities of the College, which will continue to occur during the Plan period;
- **Clare College Sports Ground, Bentley Road, Cambridge (HELAA Ref: 48066):** this lies to the south of the City and is accessed from Bentley Road to the west. To the north of the site is Cambridge University Press, the guided busway and railway line to the east and Long Road to the south. The site has been assessed by the Council as unsuitable for development. The College reserve their right to make representations to this assessment as part of future Local Plan Consultations; and,
- **Land south of Ickleton Road, Great Chesterford (HELAA Ref: 47934):** this lies to the south of South Cambridgeshire District Council's administrative area, close to the border with Uttlesford District Council. The site is to the south of Ickleton Road, to the east of the M11/A11 junction and to the west of Great Chesterford and the railway line. The site has been assessed by the Council as unsuitable for development. The College reserve their right to make representations to this assessment as part of future Local Plan Consultations.

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This representation comments upon the broad spatial strategy set out in the First Proposals Consultation Document, including the suggested policy directions set out by the Council. These comments are offered to the Council in the context of the College's land interests.

## How much development, and where?

### Policy S/JH: New Jobs and Homes

The Council states that the new Local Plan will meet the following objectively assessed needs for development in the period 2020-2041:

- 58,500 jobs; and,
- 44,400 homes.

The housing figure equates to an average of 2,114 homes per annum, with a suggestion that this will meet an objectively assessed housing need for 2,111 homes per annum that has been rounded upwards in deriving the total figure. It is noted that the Plan seeks to provide for approximately 10% more homes than are calculated as being needed, a total of around 48,840 homes.

In justifying a housing need figure above the Standard Method, the First Proposals cite evidence assembled in the two studies set out below:

- Greater Cambridge Local Plan: Housing and Employment Relationships (November 2020), GL Hearn; and
- Greater Cambridge Employment Land and Economic Development Evidence Study (November 2020), GL Hearn, SQW and Cambridge Econometrics

The latter of these two studies presents two alternative forecasts of potential economic growth over the Plan period:

- A Central Scenario under which 58,400 new jobs would be created, claimed to represent the *'most likely outcome taking into account long term historic patterns of employment'* with the Housing and Employment Relationships study also describing it as *'a 'business as usual' growth scenario'*;
- A Higher Scenario under which 78,700 new jobs would be created, with this *'higher outcome placing greater weight on fast growth in the recent past, particularly in key sectors'* and the Housing and Employment Relationships study describing it as *'a plausible but more aspirational growth outcome'*

The Housing and Employment Relationships study concludes that housing provision in line with the Standard Method will not support either of these economic growth scenarios. It estimates the housing need associated with supporting each would be as follows:

- Central scenario – 41,900 to 44,310 homes (1,996-2,110dpa) with the range reflecting alternative commuting assumptions, the upper end assuming that there is a 1:1 or balanced commuting ratio for new jobs and the lower end assuming continued in-commuting;
- Higher scenario – 53,500 to 56,490 homes (2,549-2,690dpa) with the range again reflecting alternative commuting assumptions

The emerging Local Plan is proposing to deliver 44,400 homes, which supports 58,500 new jobs, aligning with the Central Scenario for growth in the District over the Plan period.

As set out in the Council's Topic Paper on the Development Strategy (September 2021) at Section 5.3, the evidence base has identified that Greater Cambridge is a centre of excellence and a world leading economy of international importance, of which Clare College contributes to. Whilst the focus is within the knowledge-based economy, other types of industry provide a wide diversification of jobs and services in Greater Cambridge, including education, retail, leisure, tourism and agriculture, all of which are highly important. This together with the important strategic position of Greater Cambridge within the Oxford-Cambridge Arc means that there is significant opportunity to plan for the higher jobs scenario, which in turn needs to be supported by a higher housing requirement to ensure that an appropriate level of market and affordable homes can be delivered within the Plan period. Of relevance to the College is also the need to deliver student accommodation for their undergraduate and postgraduate population and that the First Proposals document confirms that these units also contribute to the overall housing requirement.

Whilst the College support that the Council have set a housing figure higher than the Standard Method, the College would suggest that the Council could be more ambitious and plan for higher housing and employment growth in the District to align with their Local Plan evidence base.

### **Policy S/DS: Development Strategy**

The proposed development strategy for Greater Cambridge directs the vast majority of growth to the Cambridge Urban Area, the edge of Cambridge and new settlements.

Of the allocations proposed, the majority of these are existing commitments (adopted allocations, sites with planning permission etc.). The Council are only proposing a need for an additional 11,640 homes to be allocated through the emerging Local Plan.

Within the Cambridge Urban Area, one new housing allocation is proposed, which has the capacity to deliver approximately 12 new homes. The remaining allocations are brought forward from the 2018 Local Plan and many of these were previously allocated in the 2006 Local Plan. As such, there is a view that if the sites have not been brought forward successfully in the last 15 years, given the increased demand for housing in the City, then it is questionable whether they will be in a position to deliver much needed housing during the next Plan period.

The remaining housing delivery is allocated to areas of major change and larger urban extensions on the edge of Cambridge at North East Cambridge, Cambridge East and North West Cambridge. Whilst the approach to these sites again is supported by Clare College, it is considered that these larger sites need to be complemented with a selection of sustainable small and medium scale sites which have the prospect of being delivered early within the Plan period, such as those within the ownership of Clare College and identified at the beginning of these representations.

Such housing delivery would help meet local housing needs over the Plan period, providing a greater variety in the type and location of development delivered. It is important to highlight that the NPPF is clear in paragraph 69 that *'small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly'* and that local planning authorities should *'promote the development of a good mix of sites'*.

It is considered that the Councils strategy focuses on the delivery of very large sites with few smaller allocations. Clare College would suggest that this approach may mean that particularly in the earlier years of the Plan period, the Council will struggle to deliver the required levels of housing, because it takes longer

for larger sites to begin completing new homes. Therefore, Clare College would like to suggest that the Council consider an approach whereby these larger sites are complemented by a range of sustainable smaller and medium scale sites, both within the City Centre as well as in rural area of South Cambridgeshire such as their sites at Bentley Road and Great Chesterford.

As part of their strategy, the Council have stated that their top priority is to reduce carbon emissions and to that end provide jobs and homes in close proximity to one another and major public transport routes. Land at Bentley Road (HELAA Ref: 48066) is adjacent to the Guided Busway and associated pedestrian and cycle route, providing direct access to Cambridge Station, the City Centre and the Cambridge Biomedical Campus. As such, it is a highly sustainable location, close to services and facilities, a wide range of employment opportunities and public transport connections to London and other regional centres. Likewise, Land at Great Chesterford (HELAA Ref: 47934) is in very close proximity to the railway station at Great Chesterford, with direct connections to London, Cambridge and Bishop Stortford/Stansted Airport. The settlement of Great Chesterford itself benefits from a wide range of services and facilities as well as employment opportunities. Furthermore, it is well connected to the research and development institutes at Babraham, Great Abington and Hinxton. As such, Clare College would suggest that both of these sites are well placed to assist the Council in achieving their top priority to reduce carbon emissions. They should both be considered further in the next stage of the Local Plan and as smaller sustainable sites, which could be allocated to deliver much needed housing early in the Plan period.

We trust that this representation will be given full consideration by the Council as part of the preparation of the Draft Local Plan.

Should any further information be helpful to the then please do not hesitate to contact me.

Yours sincerely



Sophie Pain  
Associate Director

