

**Representations to the Greater Cambridge
Local Plan - The First Proposals Regulation 18
Consultation**
West Cambourne,

On Behalf of MCA Developments Ltd

November 2021

Turley

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Client
MCA Developments Ltd

1. Introduction

- 1.1 These representations are submitted by Turley on behalf of Taylor Wimpey UK Ltd and the Vistry Group (the applicants) who together comprise the consortium MCA Developments Ltd (MCA (herein referred to as MCA), in response to the Greater Cambridge Local Plan – First Proposals Regulation 18 Consultation (January 2020). MCA are the developers behind Cambourne, a maturing new settlement, located within the administrative area of South Cambridgeshire (SCDC) approximately 7 miles to the west of Cambridge. The aim of this document is to assist the Council in formulating their Local Plan.
- 1.2 We have set out below responses to the questions raised in the Draft Consultation Document in the order in which they appear.
- 1.3 The remaining part of this document is structured as follows:
- Chapter 2 – Vision and Development Strategy
 - Chapter 3 – New Settlements: Cambourne
 - Chapter 4 – Conclusion
- 1.7 MCA would be pleased to discuss any aspect of these representations in more detail if this would be of assistance to the Council and we look forward to engaging positively with the Council and other stakeholders in the ongoing preparation of the emerging Local Plan

2. Vision and Development Strategy

Vision

- 2.1 The proposed Vision for Greater Cambridge is set out at page 20 of the Draft Local Plan and states that:

“We want Greater Cambridge to be a place where a big decrease in our climate impacts comes with a big increase in the quality of everyday life for all our communities. New development must minimise carbon emissions and reliance on the private car; create thriving neighbourhoods with the variety of jobs and homes we need; increase nature, wildlife and green spaces; and safeguard our unique heritage and landscapes.”

- 2.2 Whilst MCA supports the Council’s objectives with regards to climate changes and protecting the environment, it is disappointing that the Vision as currently drafted makes no reference to the Oxford-Cambridge Arc.

- 2.3 The Oxford-Cambridge Arc is an area covering Oxford, Milton Keynes and Cambridge, identified by the Government as a unique opportunity to become an economic asset of international standing. In July the Government held a 12 week consultation which closed on 12 October 2021 seeking views on the vision for the Arc. The consultation document ‘Creating a vision for the Oxford-Cambridge Arc’ (July 2021) confirmed that it is still the Government’s intention to prepare a ‘Spatial Framework’, which will provide a national planning policy framework for the Arc.

- 2.4 As set out at paragraph 1.1 of the Government’s consultation document the Oxford-Cambridge Arc ‘is a national economic priority area’. Its world-class research, innovation and technology can help the UK prosper in a changing global economy. But success cannot be taken for granted. As advised by the National Infrastructure Commission, without urgent action, a chronic under-supply of homes could jeopardise growth, limit access to labour and put prosperity at risk.

- 2.5 If the Arc to reach its full potential local authorities will need to plan positively in their areas to deliver the transformational growth required. On this basis we would suggest that the Vision is revised as follows:

“Greater Cambridge is a leading UK and global hub of innovation, which plays a key role in the internally recognised Oxford-Cambridge Arc. We want Greater Cambridge to be a place of great prosperity and innovation where a big decrease in our climate impacts comes with a big increase in the quality of everyday life for all our communities. New development must minimise carbon emissions and reliance on the private car; create thriving neighbourhoods with the variety of jobs and homes we need; increase nature, wildlife and green spaces; and safeguard our unique heritage and landscapes.”

Policy S/JH: New Jobs and Homes

- 2.6 Policy S/JH of the Draft Local Plan proposes to meet the following objectively assessed needs for development in the period 2020-2041:
- 58,500 jobs
 - 44,400 homes, reflecting an annual objectively assessed need of 2,111 homes per year
- 2.7 For housing, Paragraph 60 of the National Planning Policy Framework (NPPF) states that Local Plans should support the Government's objective of significantly boosting the supply of homes, providing, as a minimum, the number of homes informed by a local housing need assessment, using the standard method in national planning guidance. National guidance says that there will be circumstances where it is appropriate to consider whether actual housing need is higher than that indicated by the standard method.
- 2.8 For Greater Cambridge the housing need using the Standard Method would equate to 1743 homes per annum. However, rather than planning for the minimum calculation using the Standard Method, the Councils' strategy is to propose a higher housing figure of 2,111 homes per annum. This higher figure is based on the medium growth scenario identified in the Greater Cambridge Employment Land and Economic Development Evidence Study, published in 2020. This study also set out a higher growth scenario placing greater weight on the high historic growth rate between 2001- 2017. Based on the higher growth scenario, the modelling predicted that 78,700 jobs would be required over the plan period.
- 2.9 Whilst MCA is supportive of the Councils' decision to plan for higher levels of growth than the standard method, it is disappointing that the Council have decided to base their strategy on the medium rather than the higher growth scenario. The Greater Cambridge economy is dynamic and does not readily align with national or regional forecasts for jobs growth. It has a world-renowned life sciences cluster which has the potential to drive growth beyond typical regional or national rates.
- 2.10 We would strongly advise the Council to ensure that their objectively assessed is more aligned with the higher jobs growth aspirations. An indicative calculation based on Cambridgeshire and Peterborough Independent Economic Review suggests that if the jobs growth is achieved, around 2,900 homes a year would need to be built in Greater Cambridge, an indicative total of 66,900 homes over 2020-2041.
- 2.11 As set out in the Government's most recent consultation document the Arc has the potential to be one of *'the most prosperous, innovative and sustainable economic areas in the world'*. However this transformational growth will only be achieved if local authorities truly plan positively for the housing and economic needs of the area. On this basis we would strongly urge the Council to plan for the higher growth scenario which is more aligned with past growth rates in the Greater Cambridge area.

Policy S/DS: Development Strategy

- 2.12 At page 29 of Draft Local Plan the Councils' set out the proposed development strategy for Greater Cambridge. The Plan states that the 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.
- 2.13 To provide for these new homes in the Plan period, the proposed development strategy for Greater Cambridge is to focus the majority of development on larger scale sites within and around the edge of Cambridge and at new settlements as follows:
- North East Cambridge – redevelopment of the existing waste water treatment works to deliver 8,350 new homes.
 - Cambridge East – development of the Marshalls airport site to deliver approximately 7,000 new homes.
 - Intensification of Development at North West Cambridge – review of the site wide masterplan to deliver between 1,000 and 1,500 additional new homes.
 - Expansion of Cambourne to around 2,000 new homes; and
 - Continuing development at the new settlements of Northstowe, Waterbeach and Bourn – but at faster housing delivery rates so that more homes are provided by 2041.
- 2.14 MCA strongly supports the proposed expansion of Cambourne for circa 2000 homes, which aligns with the Councils' objective to provide jobs and homes in close proximity to major public transport routes. As stated page 44 of the Draft Local Plan locating growth at Cambourne takes advantage of the proposed new East West Rail station at Cambourne and the Cambourne to Cambridge Public Transport Scheme being brought forward by the Greater Cambridge Partnership.
- 2.15 Notwithstanding these proposed new transport links, Cambourne is an established and successful new settlement which benefits from a range of services and facilities, including three primary schools, secondary school, library, health centre, Morrison's superstore, pub, leisure centre, numerous restaurants and takeaways together with a number of retail uses and professional services within two parades of shops.
- 2.16 The development of Cambourne West, a fourth linked village will further enhance the range of services and facilities at Cambourne. In 2017 South Cambridge District Council (SCDC) granted planning permission for the development of 2350 homes at Cambourne West including a new retail and community hub, two primary schools and an extension to the existing secondary school.
- 2.17 Cambourne is one of the largest and most sustainable settlements in Greater Cambridge, which since development commenced in 1998 has continued to make an invaluable contribution to Greater Cambridge's housing land supply. The settlement is not only well placed in terms of access to major transport corridors and new infrastructure, including

the new rail station as part of East West Rail but benefits from an extensive range of shops, services, facilities and recreational opportunities. For the reasons set out above, Cambourne is considered a logical location to accommodate additional growth to meet the needs of South Cambridgeshire and Cambridge City. The proposed expansion of Cambourne is considered a soundly based strategy, which is justified by the Councils' supporting evidence base and will deliver sustainable development in accordance with the policies of the NPPF.

Policy S/SH: Settlement Hierarchy

2.18 The purpose of Policy S/SH is group together similar settlements into categories that reflect their scale, characteristics and sustainability. In view of its sustainable credentials MCA strongly supports the Councils decision to reclassify Cambourne from a rural centre to a town.

2.19 As set out at page 49 of the Draft Local Plan:

“Cambourne is a growing centre, with a growing level of services, facilities and transport opportunities. This has been recognised by it now having a town council, and it is considered that this should be recognised in the local plan”

2.20 Cambourne performs far beyond the role of a rural centre and MCA agrees that this should be recognised in the new Local Plan. Given the excellent range of services and facilities in Cambourne and the wider catchment it serves, the Councils' are considered completely justified in the new Local Plan to include Cambourne in the 'Towns' category of the settlement hierarchy.

3. New Settlements – Cambourne

- 3.1 Policy S/CB: Cambourne of the Draft Local Plan seeks *‘to identify Cambourne as a broad location for longer term strategic scale growth’* and carry forward *‘the existing allocation for a new mixed-use development at Cambourne West.... but to be expanded to include the full extent of the planning permission’*.
- 3.2 As stated previously in our response to Policy S/DS: Development Strategy, given Cambourne’s position in the settlement hierarchy and proximity to new major public transport schemes, MCA strongly supports the Councils’ decision to identify Cambourne as a broad location for longer term strategic scale growth. Cambourne has been identified as the location for a new railway station as part of the East West Rail scheme to connect Oxford with Cambridge and potentially beyond, along with the Cambourne to Cambridge public transport scheme being brought forward by the Greater Cambridge Partnership. The Draft Local Plan recognises that these schemes *‘provides an opportunity to consider how further development could make the most of these connections, but also make the overall Cambourne area a more sustainable place’*.
- 3.3 MCA is also supportive of the Councils’ decision to carry forward *‘the existing allocation for a new mixed-use development at Cambourne West.... but to be expanded to include the full extent of the planning permission’*. Policy SS8: Cambourne West in the adopted South Cambridgeshire Local Plan (2018) currently requires at part 12 (g) *‘Vehicular access to be provided through an enhanced route through the Business Park, one or more access points from the Caxton Bypass, and via Sheepfold Lane’*
- 3.4 The outline planning application for Cambourne West, approved in 2017, did not include an access through the Business Park, as this land was under the control of a third party. As set out in the Committee Report, relating to the West Cambourne outline planning application, dated 11th January 2017, Officers were satisfied to approve the application without the business park access but on the basis that the *‘opportunity would still exist with any future application for the development of the business park land’*. To provide the Council with comfort that the business park access could be delivered in the future, the site wide masterplan submitted by MCA as part of the planning application was designed to facilitate an access. In addition plans were submitted as part of the application, demonstrating how the business park road could be brought up to adoptable standards.
- 3.5 In May 2021, it was announced that the South Cambridgeshire Investment Partnership (SCIP) a 50:50 partnership between South Cambridgeshire District Council and the Hill Group, would be purchasing the remaining undeveloped land at the Business Park. It is our understanding that it is the intention of SCIP to submit an application for the development of the site to provide 275 homes.
- 3.6 As set out at paragraph 260 of the Committee Report, relating to the West Cambourne outline planning application, Officers stated that:
- “...the council would continue to encourage the delivery of an all vehicle access through the business park due to the benefits through greater connectivity that it would bring for early Cambourne West residents”*

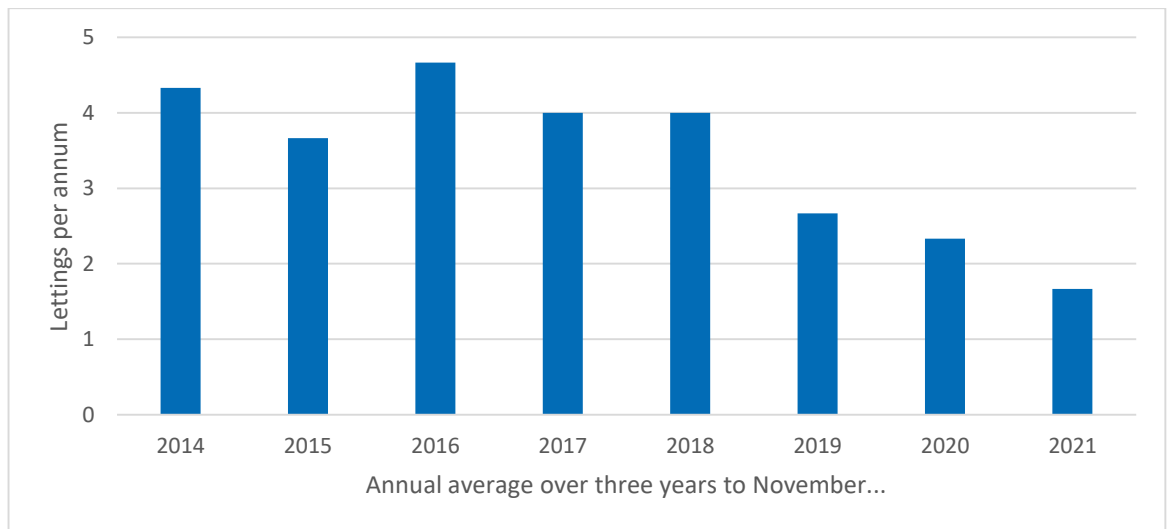
- 3.7 A top priority of the Draft Local Plan is to minimise vehicular movements. It has always been the Councils' aspiration that walking and cycling links through the business park would be delivered as part of any vehicular connection. This would mean greater permeability between Cambourne and Cambourne West for pedestrians and cyclists. Given that the legal impediments to the delivery of the road no longer exist and for the benefit of Cambourne residents, it should be a requirement in Policy S/CB: Cambourne of the new Local Plan that future planning applications for the development of land at the Business Park should be required to provide an enhanced access through the Business Park to the development at Cambourne West.
- 3.8 As has been the approach at North West Cambridge, when drafting Policy S/CB: Cambourne for the next stage of the Local Plan, the Councils' should be seeking to maximise the opportunities for intensifying development within the existing boundary of Cambourne West. The updated policy should enable the development of additional dwellings on the site beyond those identified in the current outline planning permission at Cambourne West, provided through changes to the dwelling mix and appropriate intensification of development areas that have yet to be built. MCA are currently undertaking a detailed review of the site wide masterplan, and will advise in due course the likely increase in dwellings that could be achieved.
- 3.9 Under Policy SS/8 of the adopted Local Plan any future planning application would need to provide an equivalent quantity of employment land to that lost on the Business Park (8.1ha), to be delivered in the northern part of the Cambourne West site rather than its current location. The outline planning application submitted by MCA and approved by SCDC made for provision 6.25ha of employment space for offices. At the time the outline planning application was being determined, SCDC provided limited justification with regards to the need for this level of employment land at Cambourne West. As set out at paragraphs 208 and 209 of the Officer's Committee Report dealing with the application:
- "The history of Cambourne has shown that the employment and retail units are rarely built on a speculative basis and have only come forward when an occupier has been identified.... the reality is that the majority of employment in Cambourne is outside the business park and can be found in the schools, hotel, retail units etc. There are also a large number of residents who run successful companies out of their homes."*
- 3.10 Current lettings data from CoStar, the commercial property database, provides a more up to date indication of the role of Cambourne in accommodating demand for office space that arises throughout South Cambridgeshire on an annual basis.
- 3.11 CoStar has recorded some 1,125 lettings of office space throughout South Cambridgeshire over the last ten years to November 2021, but only 34 – or little more than three lettings per annum, on average – have been in Cambourne¹. It has therefore been the location for **only 3% of all such lettings** in South Cambridgeshire, which is

¹ Lettings have been assigned to Cambourne based on postcodes

notable where the town accommodates more than twice as much (7%) of the district's population².

- 3.12 While around three lettings have been recorded annually in Cambourne over the whole decade, this had been slowing even prior to the pandemic as shown by Figure 1 below which tracks the annual average over rolling three year periods. This shows, for instance, that there were more than four transactions per annum on average in the three years to November 2016, which remained relatively stable over the subsequent two years. This was followed, however, by the recording of less than three office lettings per annum over the three years to November 2019, which has fallen even further to the point where there have been only 1.7 lettings per annum over the past three years – equivalent to **one office letting every seven months**.

Figure 1: Office lettings per annum in Cambourne – rolling three year average

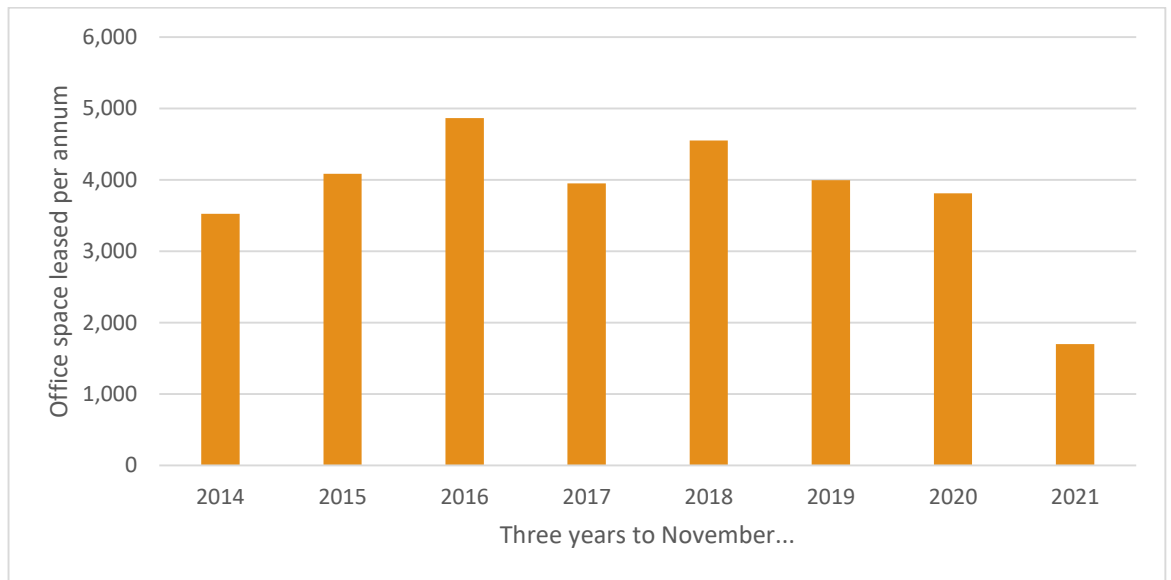


Source: CoStar; Turley analysis

- 3.13 **The amount of office space taken up in Cambourne has also been falling**, averaging nearly 4,900sqm per annum over the three years to November 2016 before reducing by almost a fifth to a little under 4,000sqm per annum over a similar period to November 2019, predating the pandemic. This has since more than halved to the point where only 1,700sqm of office space has been taken up annually in Cambourne over the last three years, the reduction being far starker than seen across South Cambridgeshire where the rolling average has fallen by only a quarter.

² ONS (2021) Population estimates, mid-2020. This is the number of residents living in the officially defined Built-up Area (BUA) of Cambourne, divided by the number of people living in South Cambridgeshire (10,544/160,904)

Figure 2: Office space leased per annum in Cambourne – rolling three year average



Source: CoStar; Turley analysis

- 3.14 The above analysis indicates that **there has long been relatively limited demand for office space in Cambourne**, which appears to have reduced even further during the pandemic. On this basis, we do not consider it justified and appropriate under proposed Policy S/CB to reserve the entire 6.25ha of employment space at Cambourne West for the provision of further office space.
- 3.15 For the reasons stated above and to be considered sound, MCA request that in drafting Policy S/CB the Council ensures the following:
- There is an requirement as set out under Policy SS/8 of the adopted Local Plan, to provide an enhanced access through Cambourne Business Park to link with the development at Cambourne West;
 - The Policy is not overly prescriptive and allows for the intensification of development areas that have yet to be built at Cambourne West; and
 - The Policy promotes and allows for the development of residential uses on land previously identified for employment on the Cambourne West Masterplan. This is on the basis of clear evidence demonstrating that the market for employment floorspace in this location is limited.

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