

**NORTH-EAST
CAMBRIDGE 'CORE
SITE', COWLEY ROAD,
CAMBRIDGE**

**GREATER
CAMBRIDGE LOCAL
PLAN 'FIRST
PROPOSALS' (REG 18)**

**Written Response on behalf of U&I PLC /
TOWN**

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0.0 INTRODUCTION

0.1 This document sets out written representations on behalf of U+I / TOWN, to a formal consultation by Greater Cambridge Shared Planning Services ('GCSP') on the Greater Cambridge Local Plan 'First Proposals' (Preferred Options, Regulation 18, 2021) ('First Proposals').

0.2 U+I and TOWN have been selected by Anglian Water and Cambridge City Council (as landowners) to act as Master Developer for the comprehensive redevelopment of the existing Waste Water Treatment Works ('WWTW'), council depot and golf driving range (to be referred collectively as 'the Core Site'), for the delivery of approximately 5,500 homes, 23,500m² of new business space, 13,600m² of new shops, community, leisure and recreation space (as currently set out in the North East Cambridge Area Action Plan ('NEC AAP') Proposed Submission Regulation 19 document). For the avoidance of doubt, these representations are submitted on behalf of U+I and TOWN as master developers rather than the landowners themselves.

0.3 Regeneration of the Core Site will be facilitated by the relocation of the WWTW, which will be funded from the Homes England's Housing Infrastructure Fund, and which is currently going through a Development Consent Order approval process. Anglian Water will be submitting separate representations to the First Proposals, on this specific element.

0.4 U+I/TOWN have been actively involved in the policy formation process of the NEC AAP and are therefore looking to ensure there is policy consistency between the NEC AAP Proposed Submission and First Proposals documents.

0.5 Consideration will need to be given to the prospect of policy inconsistencies between the Greater Cambridge Local Plan ('GCLP') and NEC AAP.

0.6 As a point of broad principle, we would request that relevant GCLP policy (particularly where performance standards are stated) provides appropriate wording that defers to more area/site-specific policy, where it is being formed in other Development Plan Documents, such as NEC AAP. In the event of any inconsistency, this will ensure that there is a clear understanding over which policy takes preference. For instance, if a 20% biodiversity net gain ('BNG') target is ultimately adopted in GCLP policy, and a minimum 10% BNG is sought in NEC AAP, then there would be a clear signal in the GCLP policy that the NEC AAP policy is the correct standard to apply.

1.0 POLICY RESPONSE

Policy S/JH: Level of Jobs and Housing

OBJECT

- 1.1 The Cambridgeshire and Peterborough Devolution Deal committed to delivering substantial economic growth and to double economic output during the next 25 years. The Cambridge and Peterborough Combined Authority and the Greater Cambridge Greater Peterborough Enterprise Partnership acknowledge and support the economic growth potential of the Greater Cambridge area and consider that there is a need to substantially increase housing delivery in order to support economic growth (that is needed to meet the objective of doubling GVA by 2040) and address the significant housing affordability issues that exist (Cambridgeshire and Peterborough Independent Economic Review). At present there is an imbalance between rates of economic growth and housing delivery in Greater Cambridge.
- 1.2 These factors support a significantly higher number of homes than are proposed in the preferred 'medium plus' growth option of Policy S/JH. It is considered that the 'medium plus' growth option makes insufficient upward adjustments to the housing requirement (from Section Id.2a of the Planning Practice Guidance) to take into account growth strategies, strategic infrastructure improvements and housing affordability in Greater Cambridge.
- 1.3 It is suggested that the emerging GCLP should have selected the higher growth level option to support economic growth, address housing affordability, and reduce in-commuting. A higher growth level option would be consistent with the Government's aspirations for the Oxford to Cambridge Arc.
- 1.4 It is requested that housing and jobs requirements in Policy S/JH are based on delivering the higher growth level option.

Policy S/DS: Development Strategy

SUPPORT

- 1.5 We broadly support this approach, given that it identifies North-East Cambridge for the creation of new compact city district on brownfield land, noting that it has already been identified for homes and jobs growth.
- 1.6 However, we are extremely concerned by the 'Homes' target for NEC that is stated in the table on page 32, which refers to 3,900 homes between 2020 and 2041. Fundamentally, this is at odds to the trajectory that has been agreed with Homes England as a pre-requisite for the substantial public funding that has been agreed in principle to relocate the WWTW.
- 1.7 We would therefore instead support a policy that recognises 5,600 homes will be provided on the Core Site by 2041. Consideration will also then need to be given to other housing that is expected to come forward within the NEC AAP.

Policy S/NEC: North-East Cambridge

SUPPORT

- 1.8 We support this approach but would request that GCLP policy for S/NEC is entirely consistent with NEC AAP. A simple policy that specifies reference to NEC AAP will enable GCLP policy to remain up to date, as and when changes are made through the examination and adoption process.
- 1.9 We would note that Policy 1 of the NEC AAP Proposed Submission states 'approximately 8,350 new homes, 15,000 new jobs', as opposed to 'up to' as set out in S/NEC.
- 1.10 S/NEC policy should therefore be amended to refer to 'approximately' and provide a clearer link to NEC AAP.

Policy BG/BG: Biodiversity and Geodiversity

OBJECT

- 1.11 The policy wording suggests that there will be a requirement for development to achieve a minimum 20% biodiversity net gain, which has been based on the *South Cambridgeshire District Council Doubling Nature Strategy (2021)*, the draft *Cambridge City Council Biodiversity Strategy 2021 – 2030*, and the *Oxford-Cambridge Arc Environment Principles (2021)*.
The Environment Act 2021, however, states that a minimum of 10% Biodiversity Net Gain should be achieved, and specifies the three forms for doing so:
- Post-development biodiversity value of the onsite habitat;
 - the biodiversity value, in relation to the development, of any registered offsite biodiversity gain allocated to the development;
 - the biodiversity value of any biodiversity credits purchased for the development;
- 1.12 Whilst U+I/TOWN recognise the importance in providing significant biodiversity improvements through development, it is considered that the mandatory minimum limit should reflect the legislative target. However, policy could still actively encourage schemes to exceed the minimum, recognising that those that do will be considered as a planning 'benefit' of development in sustainability terms (the greater the increase, the greater the weight attached to the assessment of benefit in any planning balance).
- 1.13 In terms of implications for the Core Site in North-East Cambridge, the NEC Ecology Study (2020) recommended that a target for a net gain of 10% is applied for all developments within NEC. Where this is not achievable within the site boundary then offsite measures should be provisioned.
- 1.14 By way illustration, a 20% gain to the 36.76 biodiversity units that have been identified in the Ecology Study would result in the need to achieve 44.112 biodiversity credits, in order to satisfy policy requirements. This seems highly ambitious, given the level of density that will need to be achieved across the Core Site to meet NEC strategy objectives. We will continue to make representations on this point as the NEC AAP progresses. GCSP must also consider alternatives to on-site provision where the necessary biodiversity net gain cannot be achieved on site. This could include a range of options including biodiversity net gain 'credits' being able to be purchased from other sites.

- 1.15 Ultimately, the aim of BNG is to leave the natural environment in a measurably better condition than beforehand. Therefore, if it can be robustly demonstrated that on-site provision is not achievable, the opportunity to measurably improve the natural environment of other appropriate receptor sites through off-site provision should still have a significant value attached to it.

Policy WS/HD: Creating Healthy New Developments

SUPPORT

- 1.16 We broadly support the 10 principles for creating healthy places. The vision for North-East Cambridge is of a healthy, inclusive, walkable, low-carbon new city district with a vibrant mix of high quality homes, workplaces, services and social spaces, fully integrated with surrounding neighbourhoods.
- 1.17 One of the five strategic objectives of the NEC AAP is for a healthy and safe neighbourhood and notes the principles of the Health New Towns programme.

Policy WS/MU: Meanwhile Uses During Long Term redevelopments

SUPPORT

- 1.18 We support the inclusion of a Meanwhile Use policy and agree that it can play an important role on strategic development sites. Phases of development can occur over a significant period of time, and therefore utilisation of vacant/redundant land/buildings for social and/or economic purposes can help activate an area and provide short/medium term benefits that might not otherwise be realised.

Policy GP/LC: Protection and Enhancement of Landscape Character

COMMENT

- 1.19 The policy notes that '*the edges of Cambridge and the villages are an important area of transition which require sensitive landscaping to protect the setting of the settlements and to provide a well-defined edge which respects townscape and the countryside beyond*'.
- 1.20 The Core Site at North-East Cambridge will need to be planned to a high density in order to fully achieve the the strategic objectives of the NEC AAP, as well as to hit the quantum of development required under Homes England's Housing & Infrastructure Fund. This will require a number of buildings that are taller than may otherwise be commonly found in the north of Cambridge (including surrounding villages, such as Milton). The masterplan for the Core Site will take great care in how its development edges interface with the landscape and setting of nearby settlements, as well as adjoining 'bad neighbour' uses currently in existence. The policy will need to recognise the strategic objectives of NEC AAP and avoid imposing conditions that could unreasonably restrict development.

Policy GP/QD: Achieving High Quality Development

SUPPORT

Policy GP/QP: Establishing High Quality Landscape and Public Realm

SUPPORT

Policy J/NE: New Employment Development Proposals

SUPPORT

- 1.21 We broadly support the intent of the policy but consider it essential that GCSP takes a more ambitious approach in seeking to capture and accommodate the substantial demand in office, R&D, lab and associated manufacturing space in the Greater Cambridge area. There is a need to provide sufficient supply in order to meet the balanced homes/jobs requirements and to reflect the high employment density and employment skills these uses engender.
- 1.22 The Greater Cambridge Local Plan Strategic Spatial Options Assessment (Housing and Employment Relationships Nov 2021), upon which the homes and jobs growth of the First Proposals has been based ('Central Growth'), considered a Higher Growth option of 78,742 jobs in the Plan Period. It noted that *'this is a plausible but more aspirational growth outcome'*. We believe that the Higher Growth option should be pursued to reflect the Combined Authority's commitment to doubling GVA by 2040 and capitalise on the significant appetite for research/knowledge-based, commercial development in the City.

Policy J/AW: Affordable Workspace and Creative Industries

SUPPORT

Policy H/HD: Housing Density

SUPPORT

Policy H/CB: Self and Custom-build Homes

OBJECT

- 1.23 The concern we have with this policy is the ability for the Core Site scheme to comply with the amount of Self-build/custom build being sought, given the high-density development that is envisaged. We would seek reference in the policy to wording that reflects the relevant policy in the NEC AAP i.e. to support 'custom-finish' as well.

Policy I/ST: Sustainable Transport and Connectivity

SUPPORT

