

**LAND SOUTH OF
CAMBRIDGE RD, MILTON**

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

Written Response on behalf of U&I PLC

Monday, 13 December 2021

Carter Jonas

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0.0 INTRODUCTION

0.1 This document sets out written representations on behalf of U+I 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 This response concerns a site of 1.86 hectares, identified as Land South of Cambridge Road, Milton, whose red-line boundary is provided in Appendix A ("the Site"). The Site lies to the north of the A14 and adjoins the village of Milton. The Site has recently been used by Balfour Beatty as an offices and storage compound for the A14 Improvement Works since 2018, and photos of the Site (from Google Streetview), are provided in Appendix B. Balfour Beatty has now completed the relevant works on the A14 and has vacated the Site.

0.3 In terms of the broader context, U+I 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 (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).

0.4 In order to deliver the comprehensive redevelopment envisaged in the NEC AAP, a number of existing industrial /non-conforming uses (to residential) will need to either be re-accommodated within a mixed use, higher density, development superblock within NEC AAP or, more likely, be relocated from areas such as Cowley Road Industrial Estate to another location close to the north-eastern edge of Cambridge.

0.5 A Commercial Advice and Relocation Strategy has been commissioned by GCSP to consider this matter in greater detail, and its findings are expected imminently. It is unfortunate that this has not been made available to comment upon during this consultation process.

0.6 Notwithstanding this, it is considered that the Site has significant potential to accommodate the existing, important, businesses in the NEC AAP that will be displaced as a consequence of the major residential-led mixed use development that will be brought forward, following the decommissioning and relocation of the Waste Water Treatment Works.

0.7 Pre-Application Advice was sought from GCSP in respect of a series of development scenarios for the Site, as provided in Appendix C. The purpose of this was to explain the flexibility of the Site, and the attitude towards development of U+I to support those businesses that play a vital role in the wider economy and have a demonstrable need to be on the North-Eastern edge of Cambridge on a site that has excellent connectivity to the strategic highways network and pedestrian/cycle connectivity into Cambridge via the Jane Costen bridge.

0.8 A series of preliminary technical documents were also provided to support the pre-application request and can also be found in Appendix C.

0.9 The Site is currently located within the Green Belt, and this representation requests that it is released and allocated to accommodate commercial/employment uses for those business displaced from the NEC AAP

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 essential that any increase to housing is supported by a commensurate increase in the level of jobs (and vice versa), in order to maintain to maintain an appropriate balance of locating homes close to opportunities to work, within or on the edge of Cambridge, where it is accessible to public transport and/or good pedestrian / cycle / micro-mobility connections.
- 1.4 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.
- 1.5 It is essential that housing and jobs requirements in Policy S/JH are based on delivering the higher growth level option.

Policy S/DS: Development Strategy

OBJECT

- 1.6 Whilst we broadly, partially, 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) we object on the basis that it does not identify the Site as a suitable 'receptor' site for displaced commercial uses from NEC AAP.
- 1.7 Paragraph 140 of the NPPF allows Green Belt boundaries to be altered through the plan-making process provided exceptional circumstances exist, and those exceptional circumstances should be based on evidence and justified. It is considered that exceptional circumstances exist to release the Site, which is related to the specific need to provide land for existing businesses that will be displaced by the NEC AAP.
- 1.8 Paragraph 141 requires plan-making authorities to examine all other reasonable options to meet identified development needs before considering whether exceptional circumstances exist to justify

changes to Green Belt boundaries i.e. make as much use of previously developed land, increase the density of development, and consider whether development needs could be accommodated in neighbouring areas. In the case of Cambridge increasing densities and reusing previously developed land is not straightforward and may be inappropriate because of heritage assets and the difficulty of finding alternative sites for existing uses. The adopted Local Plans for Cambridge and South Cambridgeshire already identified previously developed land opportunities, and the emerging GCLP seeks to do them same. As such, previously developed land opportunities that are deliverable have already been identified within and on the edge of Cambridge.

- 1.9 Paragraph 142 requires any review of Green Belt boundaries to consider the need to promote sustainable patterns of development, and that where the release of land from the Green Belt is necessary that priority is given to previously developed land or sites that are well-served by public transport. It is acknowledged in emerging GCLP and the associated Sustainability Appraisal that the edge of Cambridge is a sustainable location because of its close proximity to employment and the opportunity to travel by non-car modes of transport.
- 1.10 The Site is ideally located to NEC AAP, being on the fringe of it, well connected to the strategic highway network and will be extremely well connected to NEC AAP via existing pedestrian and cycle routes across the Jane Costen bridge, that will lead directly into St John's Innovation Park and the wider NEC area beyond it. Therefore, the release of the Site from the Green Belt would be consistent with the approach in national policy to give priority to those Green Belt sites that will support active travel.

Section 2.6: Rest of Rural Area / Policy S/RRA: Allocations in Rest of the Rural Area

OBJECT

- 1.11 The successful delivery of the redevelopment of NEC is a key part of the development strategy for emerging GCLP. However, the redevelopment of NEC is reliant in part on the timely relocation of existing business from land to be redeveloped by other uses. It is considered that the relocation process would be made easier if additional land was identified in emerging GCLP for relocated businesses from NEC, whether temporary or permanent.
- 1.12 It is requested that the Site should be allocated in emerging GCLP as a suitable relocation site for some businesses that will be displaced from the NEC AAP. This outcome would represent the exceptional circumstances to justify the release of land from the Green Belt.
- 1.13 It is considered that, taking into account the current Green Belt status of the Site, land could be suitable for a range of potential industrial uses (or other uses that would be deemed 'non-conforming' to the residential uses within the NEC AAP). The Site is ideal for this type of end-use – there are no existing residential receptors within close proximity (the nearest residential property in Milton is 125m away, but this would be separated by the intervening existing Industrial Park and Tesco), and the nearest new residential receptor in NEC AAP will be over 100m away and separated by the A14 (and therefore any residential edge of NEC AAP will be protected by new acoustic barriers on the southern edge of the A14).

Policy S/NEC: North-East Cambridge

SUPPORT

- 1.14 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.
- 1.15 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.
- 1.16 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

- 1.17 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).
- 1.18 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;
- 1.19 Whilst U+I 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).
- 1.20 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.
- 1.21 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/MU: Meanwhile Uses During Long Term redevelopments

SUPPORT

- 1.22 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 J/NE: New Employment Development Proposals

SUPPORT

- 1.23 We broadly support the intent of the policy but consider that GCSP should be taking 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.
- 1.24 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

HELAA Site Assessment – Land South of Milton, North of the A14 (Site Ref. 47943)

- 1.25 U&I's comments and suggested amendments to the site assessment are as follows:
- **Proposed Development** – refers to Residential, Market and affordable housing, Specialist/other forms of housing, Office, Research and Development. We would request this be amended to B2/B8/sui generis uses applicable to other uses currently in NEC AAP i.e. those that might be considered non-conforming to residential;
 - **Flood Risk** – it is considered that this should be categorised as 'green'. The Site lies within Flood Zone 1, and any planning application would need to be accompanied by a site-specific Flood Risk Assessment, demonstrating how any localised flood risk arising from the proposed development could be adequately mitigated. Furthermore, the proposed use would be considered less vulnerable in flood risk terms.
 - **Landscape and Townscape**: the Site lies between the existing urban edge of Milton (with Tesco to the north, the industrial park to the east, and separated from NEC AAP by the A14. The northern edge of NEC AAP (opposite the Site) has been considered acceptable (in Landscape / Townscape assessment) for new development of 3-6 storeys. It therefore seems perverse that the Site can be assessed as 'Red' in Landscape and Townscape terms and would request this be

changed to Green. The intended uses for the Site would be industrial / storage / sui generis uses, that are likely to be typically 1-2 storeys in height. The Site also benefits from landscaping on its boundaries, to help soften the impact of any new development.

- **Site Access** – we would request that this is changed to ‘Green’, given that the assessment notes that the proposed site is acceptable in principle subject to detailed design. There are potential access constraints, but these could be overcome through development.

- **Noise, Vibration, Odour and Light Pollution** – we would request that this is changed to ‘Green’, given that the assessment notes that ‘the proposed site will be affected by road traffic noise from nearby main roads but is acceptable in principle subject to appropriate detailed design considerations and mitigation. The proposed site will be affected by noise from nearby industrial/commercial activities but is acceptable in principle subject to appropriate detailed design considerations and mitigation. The site is capable of being developed to provide healthy internal and external environments in regard to noise / vibration/ odour/ Light Pollution after careful site layout, design and mitigation. Furthermore, the proposed use for industrial / storage / sui generis would be less sensitive (than for a residential use, for instance).

- **Strategic Highways Impact:** The good accessibility of the Site by sustainable modes of transport and future improvements to public transport, walking and cycling, would provide employees with an alternative to the car for journeys to work and reduce traffic impacts from the promoted development. If the Site is to be used as a ‘receptor’ site for existing industrial uses in NEC AAP, such uses will already be making a contribution to the strategic network (in terms of existing trips) and therefore the proposed use of this Site will have a negligible impact.

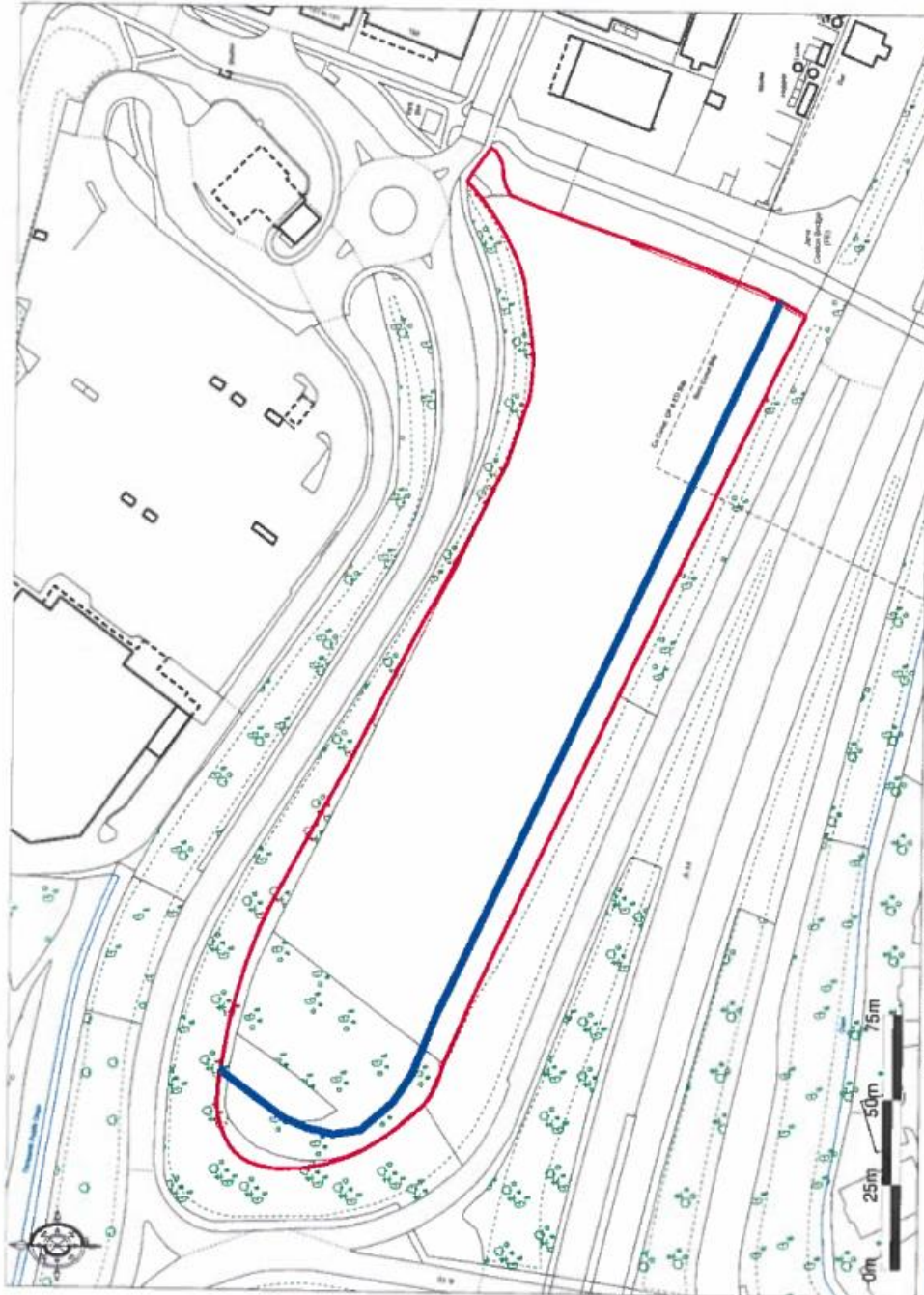
- **Green Belt:** The Site is currently located within the Green Belt. The Site has been assessed as having ‘moderate high’ Green Belt value. In comparative terms, this performs well in the context of other Green Belt sites in the north of Cambridge. Notwithstanding this, in terms of the five spatial ‘Purposes’ of Green Belt, namely:
 - (a) to check the unrestricted sprawl of large built-up areas;
 - (b) to prevent neighbouring towns merging into one another;
 - (c) to assist in safeguarding the countryside from encroachment;
 - (d) to preserve the setting and special character of historic towns; and
 - (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

1.26 It is considered that only (b) and (e) would potentially be relevant here. In terms of (b) the Site lies in between the urban edge of Milton, and the northern edge of Cambridge. Theoretical coalescence between Milton and Cambridge has already, in effect, taken place by the presence of the industrial park, and its relationship to the north of Cambridge. However, this is physically separated by the permanent presence of the A14. The same would be true if the Site is developed. In terms of (e), it is considered applicable, albeit in the opposite manner of how (e) is intended. The release of land from the Green Belt here will assist in urban regeneration, by providing a receptor site that aids relocation of existing sites and facilitates NEC’s delivery.

- 1.27 It is considered that the Site provides lower value in Green Belt terms than has been assessed and its release would provide significant benefits insofar as providing a receptor site for important commercial/employment uses that would be displaced by the wider regeneration taking place at NEC.

APPENDICES

A SITE PLAN



B SITE PHOTOGRAPHS



C SUPPORTING TECHNICAL WORK

