



Planning Policy
Cambridge City Council
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By Email

23 January 2025

Our Reference: 717604

Dear Sir / Madam,

Draft Supplementary Planning Documents Consultation

On behalf of Hill Residential Ltd (Hill), we have set out below a response to the Greater Cambridge Shared Planning Service (Cambridge City Council and South Cambridgeshire District Council) on the following draft supplementary planning documents (SPDs), which are out for consultation until 24 January 2025:

- Draft Greater Cambridge Planning Obligations SPD
- Draft Cambridge Biomedical Campus SPD
- Draft Greater Cambridge Health Impact Assessment SPD.

It is noted that these SPDs are intended to provide further information and detailed guidance on policies in the current Cambridge City Council and South Cambridgeshire Local Plans (both adopted 2018).

Draft Greater Cambridge Planning Obligations SPD

The aim of the SPD is to provide greater clarity on the process and expectations around planning obligations, with the objective of speeding up the planning process. It provides guidance on when planning obligations may be sought, the form an obligation may take, and how the scale of any obligation is to be determined and secured.

This draft SPD has been reviewed in the context of the three tests for planning obligations set out in Regulation 122 of the Community Infrastructure Levy (CIL) Regulations 2010, paragraph 58 of the National Planning Policy Framework (NPPF, 2024), and the associated advice within the Planning Practice Guidance (PPG).

The SPD seeks to follow guidance in the PPG, in particular, paragraph 004 (23b-004-201901) which states that policies on planning obligations should be informed by evidence and that it is not appropriate to set out formulaic approaches to planning obligations in supplementary planning documents.

Hill welcomes this approach and the SPD's confirmation that each application is to be assessed on its merits and only those obligations necessary to make the development acceptable in planning terms will be requested. While formulae are used for certain types of infrastructure, this is intended to provide an indication of the level and/or cost of an obligation to inform negotiations specific to a development proposal.

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Chapter 7: Community Facilities

In paragraph 7.11 the SPD states that new developments will be required to mitigate their impact on community facilities through on-site provision or financial contribution towards off-site provision for smaller developments. It stipulates that the 'scale and range of provision or contribution' will be appropriate to the level of need generated by the development and adaptable to changes in population and demographics. It goes on to note that for sites of 200 dwellings or more, detailed assessments and strategies regarding community need and how the need will be met, will need to be prepared.

However, Hill has concern with the approach set out in paragraph 7.22 that the obligations for community facilities within large scale phased schemes could include temporary 'meanwhile uses'. Hill recognises the value that such meanwhile uses can add during longer-term delivery programmes. However, provision needs to be proportionate and reasonable. Hill recommend adding the following wording: "*Where a need is identified planning obligations may be sought, subject to viability and in accordance with paragraph 58 of the NPPF, including: Meanwhile uses...*". This will ensure any obligations of this nature align with the requirements of national policy and are necessary, directly related to development and fair and reasonable in scale and kind. Further it will help avoid any adverse impact upon the viability of sustainable development coming forward.

The South Cambridgeshire Local Plan (2018) sets a standard of 111m² per 1,000 people for contributions towards community facilities. This equates to 0.111m² per person, so 1m² would support 10 people (rounded up from 9.009). The cost of provision of a community facility is identified in the SPD as £4,020 per m² and the maintenance cost is identified as £117.57 per m² (it is unclear if this is per year or total cost, it is assumed to be the latter). Therefore, the total cost to provide 1m² of community space is £4137.57, which would equate to £413.76 per person. For a 1-bed property with an assumed population of 1.23 people (average occupancy set out in Appendix A) this would give a contribution of £508.92. It is therefore unclear how the value of £789.63 set out in the table after paragraph 7.28 has been reached. Similar uncertainty surrounds the contributions set out for the other sizes of dwellings.

These costs should be reviewed to ensure they align with the adopted policy standards which have been tested at examination, in order to not undermine the deliverability of the Local Plan and have an adverse impact upon the viability of sustainable development coming forward, which would be in conflict with paragraph 34 of the NPPF.

Chapter 9: Libraries and Lifelong Learning

This chapter sets out obligations in relation to new library provision to meet developments need. This appears to be based on Cambridgeshire County Council Planning Obligations Strategy and the standard approach to securing obligations within it. It is suggested that this separate consideration of obligations for libraries be either moved to be included within Chapter 7: Community Facilities, or cross referenced in Chapter 7 for clarity.

Chapter 13: Burial Space

The South Cambridgeshire Local Plan (2018) Policy SC/4 'Meeting Community Needs' includes provision for burials in the list of services and facilities to be provided, however there is no table or level of contributions / requirements set out within policy. In contrast, the draft SPD sets out requirements and contributions which were not tested as part of the Local Plan process. This could undermine the deliverability of the Local Plan, potentially impacting the

ability for allocated sites to deliver policy compliant viable schemes, in conflict with paragraph 34 of the NPPF.

Notwithstanding the above, it is noted that paragraph 13.8 of the draft SPD identifies that 1ha of cemetery can accommodate around 3,000 burial plots (3.33m² required per plot). The SPD is not clear if one plot equates to one individual or if there could feasibly be several individuals within the one plot (cremations assumed). The table (following paragraph 13.9) setting out the burial space required per dwelling size, appears to be referencing the average occupancy per dwelling size (as set out in Appendix A), thus suggesting that 1 person requires 1m². This does not seem correct in the context of the information presented in paragraphs 13.8 and 13.11 and the table following paragraph 13.11 which sets out the contributions by dwellings size.

Specific requirements / contributions should be removed from this chapter and the obligation should be left for negotiation on a case by case basis since these were not tested at local plan examination, in accordance with the NPPF and PPG.

It is also noted in the supporting text of The South Cambridgeshire Local Plan (2018) Policy SC/4, that in reflecting Planning Practice Guidance, the Council does not seek tariff style Section 106 contributions for general off site infrastructure improvements from sites under 10 dwellings (and which have a combined gross floor space of no more than 1,000m²). Many of the obligations set out in the draft SPD that relate to general off site infrastructure improvements set out, in some instances, that obligations will be sought from all residential developments, regardless of size. This should be reviewed and amended in line with the adopted local plan and the PPG.

Chapter 14: Public Open Space

It is noted that parts of the South Cambridgeshire Open Space in New Developments SPD (adopted 2009 and providing guidance on the design of open spaces) is now superseded by this SPD, in particular the costings of obligations. The costing section of Chapter 14 is detailed and well-structured resulting in the process being generally clear to the reader, providing separate analysis for the Cambridge City and South Cambridgeshire areas. However, it would be useful to include an explanation of the different 'capital costs' (cost per m²) of open space land uses in the two areas as it is surprising that the capital cost per m² is so different between them. It is also noted that the 'capital costs' section of the SPD does not include the land value, and this is considered separately. This is a different approach from the adopted South Cambridgeshire Open Space SPD where the capital payments of off-site contributions appear to include the land value in the 'per person' cost.

This should be reviewed and clarified. Any changes should be proportionate, transparent and based on evidence of need, ensuring that changes do not undermine the deliverability of the Local Plan, in accordance with the NPPF and PPG.

Chapter 22: Healthcare

The detailed overview of the methodology for calculating primary care infrastructure needs is welcomed. It is noted in paragraph 22.29 that in estimating the impact of a development on the registered patient population, an average household size of 2.4 people is identified. It is unclear why this value has been specified given the more detailed population by dwelling size (as set out in Appendix A) used in other chapters of the SPD. This should be reviewed and clarified.

As a general point, it is suggested that all tables within the SPD be given identification numbers. This would enable appropriate cross referencing within the document and more importantly, avoid any confusion when the SPD is utilised by the LPA/applicants in the future.

Draft Cambridge Biomedical Campus SPD

This SPD sets out the guidance on the implementation of the policies within the Local Plans (2018) in respect to future development at the Cambridge Biomedical Campus. Whilst the development at the biomedical campus itself is understandably the focus of the SPD, Chapter 5: Obligations and Mitigation, identifies that new development at the campus could put pressure on the wider area beyond the campus boundary. Appendix 1 identifies the wider relevant adopted policies, including Cambridge Local Plan *Policy 3: Spatial strategy for the location of residential development*, which identifies that between 2011 and 2031, the plan needs to provide 14,000 additional homes to meet the objectively assessed need.

Hill is concerned that the draft Cambridge Biomedical Campus SPD has not considered the future housing need in the surrounding area associated with additional population that the development of the Biomedical Campus will support through new employment opportunities (which are in themselves strongly welcomed). This should be considered given the potential significant impact on local housing need.

Draft Greater Cambridge Health Impact Assessment SPD

This SPD has been developed to assist applicants in meeting the policies of the local plans which focus on promoting healthy and inclusive communities, providing guidance on the process of undertaking a Health Impact Assessment (HIA).

It is noted that the implications of HIA and environmental impact assessment are included in the SPD. Hill specifically welcomes the approach set out in paragraph 4.10, specifically, the opportunity to undertake pre-application consultation to determine if health can be incorporated as part of the environmental statement or if an independent HIA would be required, as it reduces the need for duplicated information. The inclusion of an HIA Checklist in Appendix 3 and the clear preference for applicants to utilise it as necessary is also helpful.

We trust the above is clear and that the comments raised by Hill will be fully considered and addressed in the progress of the draft SPDs. Please do contact me should you wish to discuss any of the above. In the meantime, we would be grateful if you could confirm receipt of this representation.

Yours sincerely,



Sophia Goodhead MRTPI
Technical Director

cc Alexandra Woolmore

Hill Residential Ltd.