

Greater Cambridge Planning Policy Team
Planning Policy
Cambridge City Council
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Email only to local.plan@greatercambridgeplanning.org

24 January 2025

Dear Sir/Madam,

Greater Cambridge Planning Obligations SPD Draft Consultation – Winter 2024

Jaynic Properties Ltd are providing representations in respect of the above referenced public consultation. Whilst in principle we are supportive of the Council's desire to provide supplementary planning guidance in support of Policy 85: Infrastructure delivery, planning obligations and the Community Infrastructure Levy of the Cambridge City Local Plan 2018 and Policy TI/8: Infrastructure and New Developments of the South Cambridgeshire Local Plan 2018, alongside other policies within the adopted development plans that seek to secure infrastructure necessary to support the needs generated by proposed developments. Jaynic have commercial land interests in South Cambridgeshire and therefore the representations are focussed on this regard.

Section 5: Green Infrastructure

Green Infrastructure has been defined in this section as consisting of multi-functional networks of protected open space, woodlands, wildlife habitat, parks, registered commons, village and town greens, nature reserves, waterways and bodies of water, historic parks and gardens, and historic landscapes. Different aspects of green infrastructure provide recreational and/or cultural experiences, while supporting and enhancing biodiversity and geodiversity, enhancing air and/or water quality and enriching the quality of life of local communities.

The SPD states that all new residential and commercial development is to make provision to enhance the Green Infrastructure network. Applications should consider and detail how they are addressing the requirement to enhance the Green Infrastructure network.

Whilst we acknowledge that it is a requirement for all development to contribute to the Green Infrastructure Network, where Green Infrastructure enhancement is not part of an onsite proposal, there needs to be an off-sites contributions table for commercial which reflects the residential dwelling contributions table and sets out the Council's expectations for financial contributions based on commercial floorspace where Green Infrastructure cannot sufficiently be provided on site.

Section 6: Biodiversity

Greater Cambridge Shared Planning Biodiversity SPD (2022) provides practical advice and guidance on how to develop proposals that comply with the NPPF and the district-wide policies. The SPD guidance foresees changes subsequently brought about through the Environment Act 2021, including the introduction of statutory BNG of 10%, with an aspirational vision to achieve 20% BNG encouraged as best practice.

In respect of delivery of BNG, the SPD advises that the Councils will seek to use planning conditions to secure on site habitat creation and its long-term management, and obligations, such as s106 Agreements, where BNG is on land outside the applicant's control.

We acknowledge that BNG is now mandatory and that the 10% gain is the current requirement in the Local Planning Authority with an aspiration for 20%. We ask for clarification as to the length of validity for older surveys to be used for planning applications, where there has been no material change to the onsite habitat. We ask the Council to quantify a validity period for clarity and assume that the timescales will reflect the industry standard validity set out by the CIEEM.

Section 7: Community Facilities

The SPD states that all new residential, mixed-use, and major commercial developments are to make provision for community facilities to meet the needs arising from the development proposal.

Large scale commercial developments (above 5,000m²) will be required to consider how the needs of their workers and visitors will be met for social and leisure facilities. If the need cannot be met through existing or additional onsite facilities an offsite contribution to address the impact on facilities is necessary and will be sought.

Jaynic are of the opinion that with regards to commercial development, community facilities should be on a case-by-case basis, particularly as in some locations there are already other facilities which can be utilised by new occupiers, and providing additional such space could jeopardize the sustainability of the existing facilities. Jaynic also query how Greater Cambridge are determining the quantum of off-site contribution for commercial units, there is no table with figures like there is for residential.

Chapter 12: Public Art

South Cambridgeshire Local Plan 2018 Policy HQ/2 encourages the provision or commissioning of public art that is integrated into the design of development as a means of enhancing the quality of development proposals. Policies HQ/2 and SC/4 further require the provision of public art to involve the local community, suggesting it could also be community-led, and should have regard to the local circumstances of the site and/or local aspirations. The policies also clarify the approach to be taken where a scheme is unable to achieve suitable provision onsite and, where public art is provided, that a contribution or commuted sums will be required for ongoing maintenance and to cover the cost of decommissioning where appropriate.

The SPD states that all forms of development are required to make provision for public art. For Outline planning permission, planning applications should provide a Public Art Strategy, including indicative

budget. For Full Planning and Reserved Matters applications, these should be supported by a Public Art Delivery Plan.

Jaynic acknowledges that the supporting text of Policy SC/4 of the South Cambridgeshire Local Plan (2018) sets out the wide range of approaches which constitute public art. It states that it could include designing a development so that functional elements such as lighting, seating, fencing, landscape, fountains and water features, and signage are bespoke, or it could be a landmark work such as a sculpture.

Jaynic query the necessity of the additional work involved in the application concerning the provision of a Public Art Strategy followed by a Public Art Delivery Plan, especially as the SPD already stipulates that the provision of public art should be a three-way partnership between the developer, an art consultant, and the Council, in consultation with the local community.

Given the nature of the types of development Jaynic undertake from a commercial perspective, whilst it is acknowledged that future employees of future occupiers can enjoy the enhanced urban realm due to the public art installations, we query whether provision should be made for public art to be provided in a more public setting in proximity to a development site, particularly where the end development might be a commercial/business park, or industrial site.

Section 14: Public Open Space

Jaynic acknowledges the Greater Cambridges' position regarding open space being an essential part of our places and is needed to provide for the outdoor recreation needs of residents as well as making a significant contribution to setting character, amenity and biodiversity.

The SPD states that large scale commercial developments (above 5000m²) will be required to consider how the needs of their workers and visitors will be met for social and leisure facilities. If the need cannot be met through existing or additional onsite facilities this could mean off site contributions to address the impact on facilities is necessary and will be sought. A definition of what these social and leisure facilities constitute would be useful within the SPD for future development proposals.

In South Cambridgeshire, the standard requires a minimum 0.4ha. per 1,000 people of informal space. Informal open spaces are used by people of all ages for informal unstructured recreation such as walking, relaxing, or a focal point, ranging from formal planted areas and meeting places to wilder, more natural spaces, including some green linkages. Where onsite provision is not made, or only partially made, offsite contributions may be required to support the improvement of existing facilities or spaces or delivery of new spaces or facilities to meet the needs generated by the development.

Jaynic are of the opinion that the SPD is not explicit enough when stating that it is only informal open space being sought on commercial development. Commercial does not feature as an exemption in the relevant categories. In addition, there are no quantified tables showing the amount of contribution required for a commercial developer. Furthermore, the range of developments which fall under the category of commercial are vast and therefore, whilst informal open space on a city centre scheme under class E might be suitable, an industrial estate might be less suitable. In these less suitable

developments, open space should be focussed more on the sustainable green linkages which provide access to services and facilities for the employees of the occupiers.

Section 15: Indoor Sports, including Swimming

South Cambridgeshire Local Plan 2018 Policy SC/4 Meeting Community Needs require all housing developments to include or contribute to the provision of the services and facilities necessary to meet the needs of the development, including sports facilities.

All residential development, and potentially some forms of commercial development. Large scale commercial developments (above 5000m²) will be required to consider how the needs of their workers and visitors will be met for social and leisure facilities. If the need cannot be met through existing or additional onsite facilities this could mean off site contributions to address the impact on facilities is necessary and will be sought.

Jaynic maintain that,, whilst some informal outdoor space should be provided for in commercial developments, green linkages to services and facilities are more significant for employees and should be counted in the requirement, the adopted policy does not require commercial developments to contribute to indoor sports facilities and there Jaynic object's to commercial developments being required to do so, particularly when residential development is already providing such contributions. The SPD needs to be clarified further, and exemptions made clear. If the Council do want to keep the inclusion of commercial, they should have a table quantifying the requirements.

Section 19: Planning Obligations to support local employment and skills

While many areas of Greater Cambridge are comparatively affluent, there continue to be concentrations of poverty and deprivation in particular communities in Cambridge. The Cambridge City Council Community Wealth Building Strategy 2024 includes the strategic objective of increasing skill levels and social mobility. Employers can contribute directly to improved outcomes for local residents through adopting positive business practices such as providing local employment, apprenticeships and skills and training programmes. The Employment and Skills Plan should address opportunities that could be made available during both the construction and operational phases of a development.

Jaynic understands that the Councils are still in the process of preparing a template for the Employment and Skills Plan, that the developer will be responsible for the delivery of the Employment and Skills Plan, and they must use their best endeavours to meet their employment and skills obligations on-site. It should also be noted that the Occupier should also be involved in the Plan.

Section 20: Planning Obligations to support affordable workspace

Jaynic acknowledges the Councils' position and view that the successful economy of the Cambridge area means that rents for employment space are high. This makes it difficult for some types of businesses, such as micro business or social enterprises, which are important for creating successful places. Rather like affordable housing, there is potential for large new commercial developments to make provision for this type of space, where suitable units are let at below market rates.

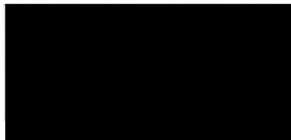
The adopted Cambridge and South Cambridgeshire Local Plans do not include policies requiring affordable workspace provision. The potential for a requirement is being explored through the emerging Greater Cambridge Local Plan. However, the provision of affordable workspace within new commercial developments is encouraged. This section of the SPD sets out how it will be applied and managed if developers make provision within a scheme.

The provision of an element of affordable employment space will be most suited to large commercial schemes, and as a minimum over 10,000m², in use classes E(g), B2 and B8. In London typical agreements have secured 10% of space within qualifying schemes.

Jaynic appreciates that the new Local Plan provides an opportunity for a policy on affordable workspace to be inserted. However, at present there are no policies within the adopted Local Plan and with the emerging Local Plan only commencing works this Autumn/Winter 2025, we are of the opinion that this should be something that is examined through the Local Plan process with an appointed Inspector, as the threshold of affordable housing would be. Whilst Jaynic would not be averse to providing a certain amount of affordable workspace on commercial development in South Cambridgeshire, further clarity is required to understand the how this will be practically carried out, for example through S106.

Jaynic Properties Ltd trusts that the Planning Policy Team finds these representations useful at this time and we look forward to participating in future public consultations relating to the review of the Local Plan.

Yours sincerely,



Rachael Morey
Senior Planning Manager

