

Planning Policy
Cambridge City Council
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By Email: local.plan@greatercambridgeplanning.org

24 JANUARY 2025

Our Ref:
UAC100/RB/DW

Dear Sir or Madam,

**DRAFT GREATER CAMBRIDGE PLANNING OBLIGATIONS
SUPPLEMENTARY PLANNING DOCUMENT: Consultation
Response Submitted on behalf of Urban&Civic**

This response to the Draft Greater Cambridge Planning Obligations Supplementary Planning Document ('SPD') is submitted on behalf of our client Urban&Civic ('U&C').

U&C is a wholly owned subsidiary of The Wellcome Trust. U&C is the Master Developer delivering the Waterbeach Barracks development, the majority part of the Waterbeach New Town allocation within the adopted South Cambridgeshire Local Plan.

Waterbeach Barracks is a strategic mixed-use development subject to outline planning permission ('OPP') (granted in September 2019) for up to 6,500 dwellings, employment, retail, community, leisure and sports uses and open spaces. Waterbeach Barracks is the majority part of the 'Waterbeach New Town' which is allocated by the adopted South Cambridgeshire Local Plan (September 2018).

The Waterbeach Barracks outline planning permission is subject to the a comprehensive Section 106 Agreement ('S106') which contains agreed commitments to various planning obligations. Whilst these will not be directly affected by the adoption of the SPD, we trust that our consultation response will provide helpful insight from the perspective of U&C as master developer and its experiences of delivering strategic development with Greater Cambridgeshire and more widely, creating value and maintaining success; as well as mitigating impacts for neighbouring communities and the wider area.

U&C is an important stakeholder and partner delivering growth in the Greater Cambridgeshire Area with a long-term interest in the delivery of successful, sustainable development, supported by effective transport infrastructure. Alongside its role for Waterbeach Barracks, U&C is currently focused on the delivery of strategic mixed-use development in Huntingdonshire at Alconbury Weald and St Neots (Wintringham) and in South Cambridgeshire at the Wellcome Genome Campus at Hinxton.

U&C welcomes this opportunity to engage with the Greater Cambridge Shared Planning service ('GCSP') on the draft Obligations SPD.

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Summary: Coordinated Policy Development

Cambridgeshire is entering a period of unprecedented change and growth. Policy, guidance and legislative changes at all levels from national to local will need to be managed and coordinated to secure the growth potential of the area, while supporting important environmental, economic and social safeguards and priorities to ensure that growth benefits all. The demand for growth needs to be balanced with commensurate investment in infrastructure. Whilst the wider conversation with statutory partners continues to meet this challenge, delivering growth of the ambitious scale, in the face of infrastructure challenges is an undertaking that cannot be underestimated.

The aspiration of bringing consistency and transparency to the discussion of obligations by all stakeholders, officers and politicians is recognised and welcomed. To emphasise, the current backdrop of this includes developers investing considerable funding to support the existing infrastructure challenges, and the numerous interrelated but separate bodies and workstreams underway in the area. There will need to be eventual alignment between Greater Cambridge Local Plan process, the work of the Cambridge Delivery Group and Water Scarcity Group, in addition to work being undertaken by the Cambridgeshire and Peterborough Combined Authority ('CPCA'). The further information awaited from Government on devolution and a new plan making process provides further complexity.

Any new or evolved planning obligation requirements should be underpinned by an understanding of infrastructure gaps and demands, but also the most appropriate mechanism to address mitigation and/or need. Any new approach to obligations should be informed by the emerging Local Plan and its wider evidence base; this will ensure a coordinated and informed approach to growth and associated infrastructure delivery. It will also ensure that unintended consequences, risk and competing calls upon funding through obligations are properly evaluated and balanced. This is especially important where obligations arise in relation to existing need, rather than direct impacts.

There are several aspects of the current proposals which relate to the process of assessing mitigation and obligation, which we wish to comment on. These topics are set out overleaf.

Child Yield Multipliers

U&C works closely with Cambridgeshire County Council ('CCC') as the Education Authority, on future trajectories and child yield to help finalise the timing and scale of school places within new developments. We note that the proposed Child Yield Multipliers are in excess of those adopted by CCC within its *Planning Obligations Strategy* (March 2016) across several age categories and dwelling sizes. It should be noted that the Education Evidence Review mechanism within the Waterbeach S106 agreement is underpinned by CCC's detailed multiplier.

It is unclear how the multipliers set out within the SPD have been calculated and their applicability in the context of CCC's role as the Education Authority. This is particularly relevant in the context of key discussions with CCC and education partners which framed in the context of evidence of falling school numbers alongside a long-term reduction in birth rates. It would be useful for this to be considered and set out with a robust process.

In paragraph 11.9, there is ambiguity in the wording which states "(not school rolls)", which needs to be clarified. In this regard, existing school capacity must be taken into account so a development's contribution reflects only the additional capacity required (as per our understanding of DfE guidance).

Affordable workspace

The aspirations behind affordable workspace are laudable, and at Waterbeach Barracks we have been involved in activating meanwhile-community-uses in existing buildings at early stages of development to meet local demand. It should be recognised however that delivering this with ongoing subsidy within new built commercial spaces will be a challenging obligation for many developers, as well as creating onerous management approaches which may lead to additional costs for developers. These aspects will need to be considered as part of the viability process to ensure the obligation is proportionate and sustainable.

Employment and Skills Plans

U&C's S106 Agreement at Waterbeach Barracks includes obligations relating to jobs and skills, and U&C welcomes the broadening of this vision and the suggestion that this will be carried forwards further development projects in South Cambridgeshire. This will support U&C drive to create a better skills ecosystem for the construction and development sectors in the county, embedding this approach more widely. The obligation enables the support of some important initiatives in the area including FutureIn, Constructed Pathways, New Meaning, Form the Future, Abbey People, and many more partners within the public and charitable sector working hard to ensure the growth agenda brings benefits, opportunity and aspiration to more people across the area.

BNG / Open Space

We welcome the continued vision from GCSP to support the role of development in being part of the Doubling Nature by 2050 commitment, and providing quality green spaces, at appropriate quantum, for people and nature. We are aware of the progress being made to deliver a Local Nature Recovery Strategy for Cambridgeshire and Peterborough. We see an opportunity here for this forthcoming strategy to be embedded into this Planning Obligations SPD. The SPD should also set out a clear process on how development proposals which are unable to provide on-site nature/wildlife mitigation can provide meaningful off-site mitigation in line with the vision for the forthcoming Local Nature Recovery Strategy.

We would like to take this opportunity to encourage GCSP to support Natural Cambridgeshire, the County Council, and the Cambridgeshire and Peterborough Combined Authority in progressing forthcoming Local Nature Recovery Strategy.

Conclusions

U&C welcomes the efforts to add transparency to the planning obligations process, and hope that this response can help strengthen areas where aspects of the SPD may need clarity; ensure the aspirations are deliverable; and allay potential unforeseen impacts for developers. U&C look forward to future opportunities to be involved to help shape the planning obligations process and welcome further discussion on this consultation response with the Greater Cambridge Shared Planning service.

Yours sincerely,

HARRY JONES
SENIOR ASSOCIATE

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