

Greater Cambridge Local Plan Regulation 18: Issues and Options Consultation 2020

Submission on behalf of Lancashire Industrial
and Commercial Services Ltd

February 2020

Turley

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Lancashire Industrial and Commercial Services Ltd

Our reference

LANC3001

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1. Introduction

- 1.1 In March 2019 Lancashire Industrial and Commercial Services Ltd (LICS) submitted representations to the Greater Cambridge Call for Sites to promote their site, Land at Ely Road, Milton. Turley prepared the representations on behalf of LICS, submitting a Form, a Supporting Statement and Site Plan.
- 1.2 This representation to the Greater Cambridge Local Plan Regulation 18: Issues and Options Consultation 2020 (the Consultation) provides general comments to the document. Specific comments are also made in relation to Land at Ely Road, Milton and support its development as part of the Greater Cambridge direction for growth. Many of the questions raised within the consultation document, along with the supporting text, raise points relevant to the proposal for Land at Ely Road, Milton which are addressed in these responses.
- 1.3 Full details of the site on Land at Ely Road, Milton, are provided in the Call for Sites representation, so this is not repeated here. However, for ease of reference, some brief commentary on the site is provided, along with a Site Plan in Appendix 1.
- 1.4 The site is located on the east side of Ely Road, some 1km to the north of the centre of Milton and in total is circa 14 hectares in area. The site has a direct and straight frontage to Ely Road of some 300m which includes an existing vehicular access without any obstacles to visibility. It is currently in use as a 'foot-golf' course and has a parking area and a building originally granted consent pursuant to a planning permission for a golf practice centre. The whole of the planning permission has not yet been implemented.
- 1.5 The land at Ely Road Milton has been leased to a series of operators whose businesses have failed either going into administration or liquidation over the years. The site is currently leased to a 'foot-golf' business for 10 years subject to landlord break clauses.
- 1.6 Land at Ely Road, Milton is considered appropriate for residential (including affordable housing) and / or, specialist housing and / or employment, together with associated open space and recreational use.

2. Consultation Response

2.1 This section of the report provides a detailed response to the Consultation, on behalf of LICs. This is set out in sections that correspond with the chapters of the consultation document. The questions that the consultation document raises are also set out with a response.

2.2 The comments made are focused on jobs, homes, infrastructure and where to build.

JOBS

24. How important do you think continuing economic growth is for the next Local Plan?

2.3 Cambridge is a renowned area for high quality employment and innovation in business. The South Cambridgeshire Economic Assessment and Strategy (2010) sets out that South Cambridgeshire has a history of significantly higher employment growth than the rest of the UK on average. The document further adds that 'South Cambs plays a key role in the economic prospects of the greater Cambridge sub-region' and that it is 'a major provider of employment opportunities.'

2.4 The Greater Cambridge Shared Planning Service (hereby referred to as the Councils) have a target of doubling the total economic output of Cambridgeshire and Peterborough over the next 25 years. Continuing economic growth for the next Local Plan is therefore a key priority. Accordingly, all future site allocations and policies must support this ambition and aid the Councils in achieving this aim.

2.5 It is acknowledged that Cambridge is surrounded by the Green Belt, and that Land at Ely Road, Milton is within the Green Belt. Further commentary is provided on Green Belt release in a later section of these representations. Some Green Belt will need to be released as part of the overall spatial strategy to enable suitable further employment development and facilitate continued economic growth in the area.

25. What kind of business and industrial space do you think is most needed in the area?

2.6 It is important to provide for a wide variety of businesses and industries in the Cambridge area. The Issues and Options document is clear in recognising that the economy in the area is not just technology. A key feature of the economy in South Cambridgeshire is business parks. If the Councils are to pursue their ambition of doubling the total economic output of Cambridgeshire and Peterborough over the next 25 years, it is essential to provide accommodation for a range of new business types.

2.7 Office space for professional services is considered to be fundamental. The South Cambridgeshire District Council Employment Land Review: Update and Review of Selective Management of Employment Policies (2012) provides that the bulk of new job growth 'is expected in professional services'. The policy led projections for growth within the report conclude that 23,110 additional jobs will need to be accommodated between 2011 and 2031 with 52% of these being for B Use Classes.

28. In providing for a range of employment space, are there particular locations we should be focusing on? Are there specific locations important for different types of business or industry?

2.8 It is considered that Milton forms a suitable location for employment growth. Milton is highly accessible and is linked by a pedestrian and cycle bridge over the A14 to the Cambridge Science and business park. The site is only 1.0km from the nearest Park and Ride site which gives direct access to the Science Park, the area covered by the North East Cambridge Area Action Plan and the Centre of Cambridge. The site is also only within about 1.75km of Cambridge North Railway Station. Regular bus services serve the village linking it to Cambridge city centre to the south and Ely to the north, including the Guided Bus which has stops at the Science Park and Cambridge North Station. As such, Land at Ely Road, Milton is a sustainable location for development.

2.9 The Issues and Options document places a key emphasis on the need to meet the net zero carbon target by 2050. This runs in tandem with the goal of doubling the economic output of Cambridgeshire and Peterborough over the next 25 years. It is therefore most logical to direct employment development to locations where the need to travel is reduced in order to meet both targets. Milton clearly benefits from a wide range of public transport opportunities, as well as being accessible by foot and cycle from residential areas, and close to existing hubs of employment.

2.10 There is an evidenced need for more employment space, and in particular office space in and around the north of Cambridge. The 'Employment Land Review' (Report to South Cambridgeshire District Council and Cambridge City Council, SQW July 2012) published to inform the recently adopted Local Plan stated:

'Demand for office space is particularly focused on two areas of pressure: the city centre, and the northern fringe around Cambridge Science Park. The market signals are very clear that increasing provision elsewhere will not on its own solve the problem – more has to be done to increase supply in those locations where firms most want to be. (Paragraph 3)'

2.11 Although work has now started on the preparation of the North East Cambridge (Cambridge Northern Fringe) Area Action Plan, any significant provision of new employment space as part of that allocation is unlikely to be delivered in the foreseeable future as it is contingent on the relocation of the Sewage Works. In early 2019 Anglian Water agreed to relocate the Sewage Works, with funding having been secured from the Government's Housing Infrastructure Fund. Nonetheless the location of the relocated Sewage Works is at present highly uncertain.

2.12 The Land at Ely Road, Milton site has the potential to provide office space close to the Science Park for employment use either as part of a mixed use residential allocation, or as a satellite employment allocation in its own right. This would allow scope for the creation of significant new B1 floorspace early within the new Plan period in an attractive landscape setting which is accessible to Cambridge by non-car modes.

HOMES

31. How should the Local Plan help to meet our needs for the amount and types of new homes?

2.13 The Local Plan should meet housing needs by providing the necessary supply of housing. In doing so the Councils must allocate a sufficient number of sites to provide realistically deliverable developments, becoming available when they are needed. The National Planning Policy Framework (NPPF) sets out the Government's objective of 'significantly boosting the supply of homes' and stresses the importance of providing 'a sufficient amount and variety of land ... where it is needed' (Paragraph 59). The Council should therefore look to identify a wide range of sites across the full spectrum of development scales to ensure consistent delivery throughout the Plan period.

2.14 As stated at 2.5 it is acknowledged that Cambridge is surrounded by the Green Belt, and that Land at Ely Road, Milton is within the Green Belt. However, some Green Belt will need to be released to enable sufficient residential development to meet the growing needs of the area.

32. Do you think we should plan for a higher number of homes than the minimum required by government, to provide flexibility to support the growing economy?

2.15 The Issues and Options document sets out that the next Local Plan period will be 2017-2040. The currently allocated sites and planning permissions are likely to provide 36,400 homes, and a further 9,660 may be built after 2040. A number of sites are already planned which will contribute to future housing need for the next Local Plan. However, the current calculations using the Standard Method indicate a need for 1,800 homes per year or 40,900 for plan period 2017-2040.

2.16 In addition, job growth has been faster than expected and is likely to continue to grow meaning demand for housing has been exceptionally high and housebuilding has not kept up with the demand. In the Issues and Options document it is set out that if job growth is achieved then 2,900 homes a year will need to be built, equating to 66,700 homes between 2017-2040. There is therefore likely to be an additional need beyond the local housing need derived from the Standard Method of an additional 30,000 homes.

2.17 As has been set out earlier in this report, continued economic growth within the Greater Cambridge area is a key priority. The resulting implication of this is a significant demand for more housing to meet the needs of those employed in the area. The Councils clearly acknowledge this in their Issues and Options document by providing the higher end figures set out above in paragraph 2.16.

2.18 The need for housing and the ambition for economic growth are inherently linked. Therefore in order to double the total economic output of Cambridgeshire and Peterborough over the next 25 years, the delivery of a higher number of homes than the minimum required by government is required.

33. What kind of housing do you think we should provide?

- 2.19 It is important that wide range of housing types are provided, and are facilitated by both allocations and policy as part of the new Local Plan. Clearly there is a need for both market and affordable housing; it is also important that the new Local Plan provides additional types of housing.
- 2.20 The Issues and Options document sets out the need for diverse housing, including housing for older people. This provision is key to ensuring that older people are able to downsize into appropriate accommodation in the right locations. This would in turn release housing stock for other households. The need for student accommodation is also considered in the Issues and Options document, and this is an important requirement for Cambridge where there are universities, colleges and schools that need accommodation to house their students.
- 2.21 With regards to Land at Ely Road, Milton, the development of this site would provide an opportunity to deliver more diverse housing. For example, in order to meet the needs of the elderly the site is highly suitable for specialist retirement accommodation given the range of services nearby and the availability of public transport. This could be either in combination with market and affordable housing or as an allocation in its own right. The location of the site immediately adjacent to the College of West Anglia means the site would be suitable for student accommodation.

INFRASTRUCTURE

37. How should we encourage a shift away from car use and towards more sustainable modes of transport such as public transport, cycling and walking?

- 2.22 This questions relates very closely to the following section; determining where to build new development. In order to encourage more sustainable modes of transport, development must be delivered in locations that provide opportunities for alternative means of travel to the private car.
- 2.23 Development in Milton will help facilitate a shift away from car use. Milton is highly accessible and is linked by a pedestrian and cycle bridge over the A14 to the Cambridge Science Park. Cambridge Research Park is accessible by footway, cycle path and bus to the north along the A10. The Land at Ely Road, Milton site is only 1.0km from a Park and Ride site which gives direct access to the Science Park, the area covered by the North East Cambridge Area Action Plan and the Centre of Cambridge and will be within about 1.75km of Cambridge North Railway Station. Regular bus services serve Milton village linking it to Cambridge city centre to the south and Ely to the north. The Guided Bus has stops at the Science Park and Cambridge North Station.
- 2.24 The Issues and Options document places a key emphasis on the need to meet the net zero carbon target by 2050. It is therefore most logical to direct development to locations where the need to travel is reduced and where there are sustainable travel options. Milton clearly benefits from such a wide range of public transport

opportunities, as well as being accessible by foot and cycle from residential areas and close to existing hubs of employment.

WHERE TO BUILD

39. Should we look to remove land from the Green Belt if evidence shows it provides a more sustainable development option by reducing travel distances, helping us reduce our climate impacts?

2.25 The most sustainable location for development will inevitably be adjacent to existing development, and in particular, adjacent to Cambridge itself. This is where the majority of services and facilities are, along with public transport opportunities, employment and housing. Development must be delivered in locations that offer the most sustainable transport options in order to meet the target for net zero carbon by 2050. Given that the Green Belt closely wraps around the extent of Cambridge, in order to deliver sustainable development some Green Belt release will be necessary.

2.26 Furthermore, the Green Belt curtails the boundaries of many villages that surround Cambridge, which also acts to restrict growth in these locations. Many of these settlements are sustainable for further growth in their own right, as well as due to their proximity to Cambridge.

2.27 Over the past 20 years there have been numerous reviews of the Green Belt, and the value of the areas within it. Where areas of the Green Belt have been deemed to be of lesser value and importance within the reviews, sites in sustainable locations should be those first considered for release and subsequent development. The land around Milton is such an area and therefore the Land at Ely Road, Milton must be considered for development.

2.28 A review of the Cambridge Green Belt was undertaken in 2012 and again in 2016, but the area north of the A14 was not included in these reviews. The most recent study of the Green Belt that covers this site dates from 2002 (Cambridge Green Belt Study, LDA, 2002). This describes the Land at Ely Road, Milton as being within an area defined as 'rural land within the Green Belt' (Plan 'townscape and landscape analysis') and in terms of its townscape and landscape role is within a very large area defined as 'outer rural areas of the Green Belt'. These areas are described as 'areas of landscape from which distinct views of the city are scarce or absent. The function of this landscape is in providing a backdrop to views of the city, and in providing a setting for approaches to connective, supportive and distinctive areas of townscape and landscape'.

2.29 On the plan 'Special Qualities to be safeguarded' the Land at Ely Road, Milton is within a very large area defined as 'Rural Land' and on the plan 'A vision of Cambridge' Land at Ely Road, Milton is with the 'Outer Green Belt' with the objective to 'maintain and enhance the quality of the open, rural landscape, the diversity of character and the qualities of views, approaches and villages. Improve access and recreational facilities'.

2.30 In respect of the 'Outer Green Belt' the study concludes (page 66) that it plays 'a lesser role in contributing to the distinctiveness of Cambridge and its setting, and are less finite

as land that plays this role continues to an undefined extent beyond the Green Belt boundary. Outer rural areas might have the potential to accommodate change (and development) that does not adversely affect their setting of and special character of Cambridge, subject to detailed assessment’.

2.31 The lack of any fine grain analysis of the Green Belt in the vicinity of the Land at Ely Road, Milton site inevitably means only the broadest of categorisation has been made and so it is necessary to consider other sources for more detailed analysis.

2.32 The removal of land from the Green Belt can be undertaken as part of the new Local Plan. The NPPF states this should only be where there are exceptional circumstances that are fully evidenced and justified. The test within the NPPF is that any harm to the Green Belt needs to be outweighed by other considerations.

2.33 It can be concluded from the published study that the Green Belt that covers the Land at Ely Road, Milton site plays a very limited role in achieving the purposes of the Green Belt. Dealing with each of the 3 purposes of the Cambridge Green Belt set out above:

- Unique character of Cambridge - the Land at Ely Road, Milton site is within a part of the Cambridge Green Belt which is described in the 2002 LDA study as ‘areas of landscape from which distinct views of the city are scarce or absent’ and therefore cannot reasonably be considered to form part of the ‘unique character’ of the city;
- Quality of setting of the city - the development of the Land at Ely Road, Milton site will have no impact on the quality of the setting of Cambridge and indeed Milton. The area is considered as playing a lesser role in contributing to the distinctiveness of Cambridge and its setting in the 2002 LDA study; and
- Prevent communities from merging into one another - the development of the Land at Ely Road, Milton site will not lead to the coalescence of settlements. The Land at Ely Road, Milton site is on the edge of Milton and village of Waterbeach is some considerable distance to the north. The development would form a natural expansion of the village of Milton.

2.34 Turning then to the factors set out in the Local Plan which define the special character of Cambridge and its setting and the extent to which development of the Land at Ely Road, Milton site may affect them:

- Key views of Cambridge - the 2002 LDA study accepts there are no key views of the city from the outer Green Belt;
- A soft green edge to the city – the Land at Ely Road, Milton site has extensive tree and hedge planting and a golf course on much of the northern and western boundaries which will be retained as unbuilt and opportunities taken to enhance planting and biodiversity so maintaining a ‘green edge’;
- A distinctive urban edge - the development of the Land at Ely Road, Milton site would have no impact on the urban edge of the city – see above comment’;

- Green corridors penetrating into the city. The Land at Ely Road, Milton site is not within any identified green corridor;
- Designated sites and other features – the Land at Ely Road, Milton site is not within or in close proximity to any designated site that contributes positively to the character of the landscape setting;
- The distribution, physical separation of Green Belt villages – as set out above the Land at Ely Road, Milton site relates to an adjacent village and it is within an area defined to the west by the A10 and is a considerable distance from Waterbeach to the north. The development would form a logical and natural expansion to Milton; and
- A landscape that retains a strong rural character. The development of the Land at Ely Road, Milton site would not affect the rural character of the area. As noted in the 2002 LDA study the outer Green Belt plays a lesser role in contributing to the distinctiveness of Cambridge and its setting. Land of a similar nature and appearance that plays a comparable role to the setting of Cambridge continues to an undefined extent beyond the Green Belt boundary.

2.35 It is considered that the harm to the Green Belt arising from the development of the Land at Ely Road, Milton site would be extremely limited. It is therefore appropriate for the land to be removed from the Green Belt, in order to deliver development in a sustainable location.

40. How flexible should the Local Plan be towards development of both jobs and homes on the edge of villages?

2.36 Many villages within the Greater Cambridge area are sustainable in their own right, with local services and public transport facilities. Furthermore, a large number of villages in the area are in close proximity to the outer fringe of Cambridge. Therefore several villages within the Greater Cambridge area are sustainable for the development of both jobs and homes. The new Local Plan should look to allocate appropriate levels of employment and housing to the edge of these villages.

2.37 As has been demonstrated throughout this representation, Milton is such a village that is sustainable in its own right. The adopted South Cambridgeshire Local Plan lists Milton as a Minor Rural Centre, which is the second highest type of settlement in the hierarchy. Minor Rural Centres are considered to have a higher number of services than most settlements in the District, and accordingly there is scope for larger scale development in these settlements. Milton is in close proximity to Cambridge, and in particular is very near to Cambridge Science Park and Cambridge Research Park, both major employment hubs. Milton is therefore a village that should be taking a significant amount of employment and housing growth in order to meet the needs of the area.

42. Where should we site new development?

2.38 The Issues and Options document provides 6 different locations where growth could be focused. These include the following:

- Densification of existing urban areas
- Edge of Cambridge: outside Green Belt
- Edge of Cambridge: Green Belt
- Dispersal: New settlements
- Dispersal: Villages
- Public transport corridors

2.39 It is considered that growth should be delivered in all of these locations. Many of the locations overlap, for example, public transport corridors will also likely be on the edge of Cambridge and through villages, as well as in the Green Belt. It is however clear that there are very limited opportunities for growth on the edge of Cambridge outside the Green Belt, with the only site being Cambridge Airport. This is however a very strategic scale of site and conditional upon the relocation of the airport after 2030.

2.40 Whilst densification of urban areas can provide for sustainable development, there is a finite limit as to how much growth can be delivered in this way. In addition, property prices in the urban area of Cambridge do not provide for the range of households that need to live in the area. As such it is important that development is delivered at the edge of the city, as well as within surrounding villages. This will ensure that a variety of housing can be delivered in order to meet local needs.

2.41 These representations have been clear in advocating new development in Milton. The village is considered to be a sustainable location for development and as such a degree of development should be sited there. The Land at Ely Road, Milton site would provide for an appropriate level of development that could incorporate residential, employment and generous amounts of public open space.

45. What do you think about developing around the edge of Cambridge in the Green Belt?

2.42 As has been set out earlier in this representation, it is considered that the edge of Cambridge in the Green Belt should be developed for employment and residential uses, in appropriate locations.

2.43 The most sustainable location for development will inevitably be adjacent to existing development, and therefore adjacent to Cambridge itself, along with its fringe villages. This is where the majority of services and facilities are, along with public transport opportunities, employment and housing. In order to meet the target for net zero carbon by 2050, the only realistic option is for development to be delivered in locations that offer the most sustainable transport options.

2.44 Over the past 20 years there have been reviews of the Green Belt, and the value of certain parts of it. It is considered that where areas of the Green Belt have been deemed to be of lesser value and importance, and where sites are in sustainable locations, those sites should be considered first for release and subsequent development. The Land at Ely Road, Milton is such an area, being a village to the fringe of Cambridge.

47. What do you think about growing our villages?

- 2.45 As set out, many villages within the Greater Cambridge area are sustainable in their own right, with local services and public transport facilities. Furthermore, a large number of villages in the area are in close proximity to the outer fringe of Cambridge. As such, several villages within the Greater Cambridge area are sustainable for the development of both jobs and homes. Therefore the new Local Plan should look to make an allocation for appropriate levels of employment and housing growth within and to the edges of villages.
- 2.46 Paragraph 72 of the NPPF sets out that ‘the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities.’ As such there is clear national policy encouragement for the growth of villages. Paragraph 78 adds that ‘planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby’.
- 2.47 As has been demonstrated throughout these representations, Milton is such a village that is sustainable in its own right, but is also in very close proximity to Cambridge, and in particular is very near to Cambridge Science Park and Cambridge Research Park, both major employment hubs. Milton is therefore a village that is able to accommodate a reasonable amount of new employment and housing growth in order to meet the needs of the area.

48. What do you think about siting development along transport corridors?

- 2.48 In order to achieve a move towards more sustainable modes of transport, and meet the net zero carbon target by 2050, it is considered very important that employment and residential development is sited along transport corridors. Without easy access to public transport, or cycling and walking routes, there will continue to be a reliance on the private car.
- 2.49 As has been set out above, Milton forms a sustainable location for development, largely owing to its location along a key transport corridor. Milton is bordered by both the A14 and the A10. Milton is highly accessible and is linked by a pedestrian and cycle bridge over the A14 to the Cambridge Science Park. Cambridge Research Park is accessible by footway, cycle path and bus to the north along the A10. The site is some 1.0km from a Park and Ride site which gives direct access to the Science Park, the area covered by the North East Cambridge Area Action Plan and the Centre of Cambridge and within about 1.75km of Cambridge North Railway Station. Regular bus services serve the village linking it to Cambridge city centre to the south and Ely to the north, including the Guided Bus which has stops at the Science Park and Cambridge North Station.
- 2.50 The Cambridge and South Cambridgeshire Sustainable Development Strategy (2012) states that ‘access to high quality public transport, including bus and rail services, as well as cycling and walking routes is a key objective of the existing development strategy’. This document aims to enable sustainable development. It states that ‘locating jobs,

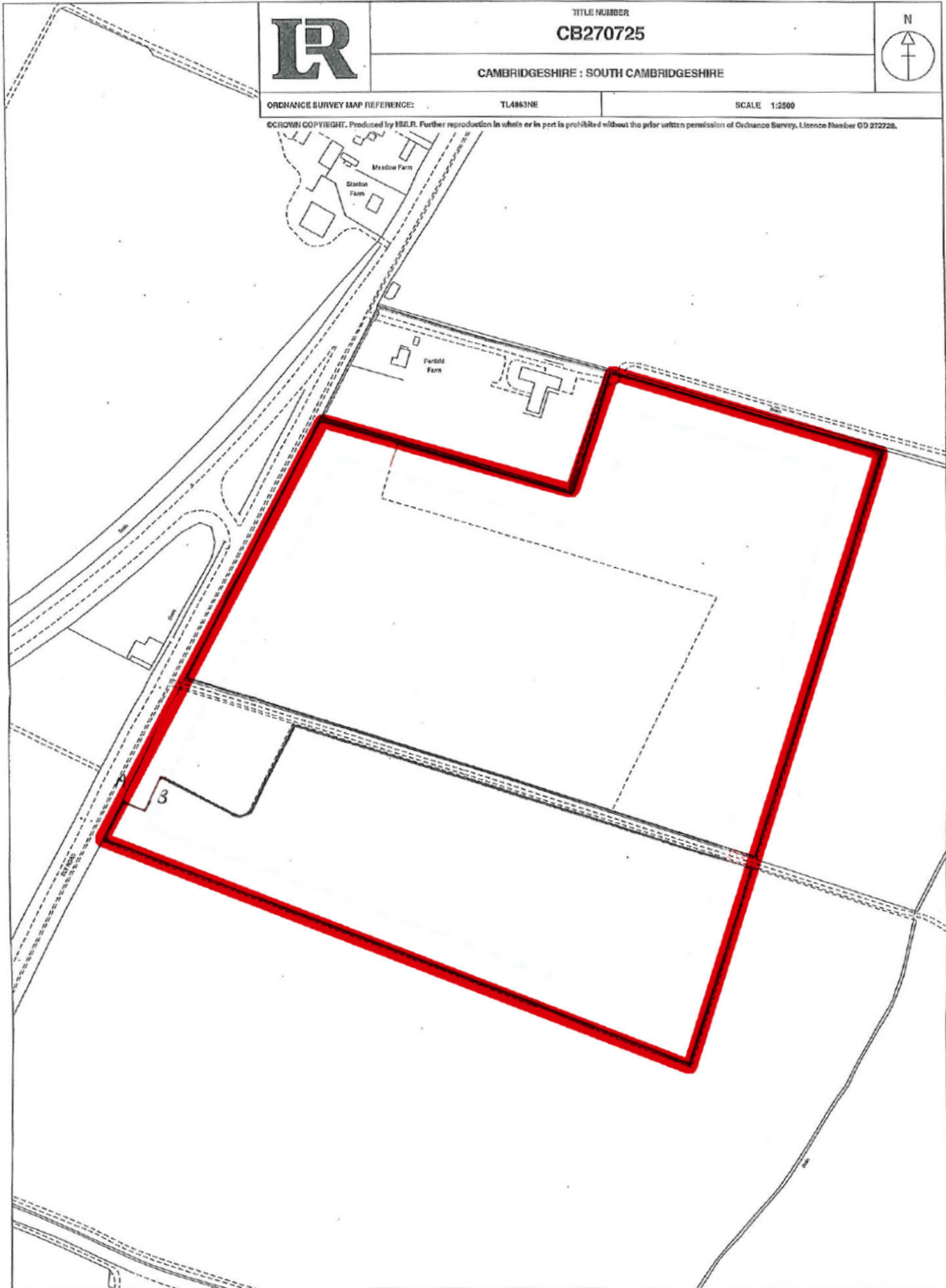
housing and other services in close proximity is a key objective...to make efficient use of land and reduce the need to travel.' The allocation of the Land at Ely Road, Milton site for residential and employment development would satisfy this objective.

3. Summary

- 3.1 This representation has been written on behalf of Lancashire Industrial and Commercial Services Ltd (LICS) to the Greater Cambridge Local Plan Regulation 18: Issues and Options Consultation 2020.
- 3.2 These representations have provided general comments to the Issues and Options document subject to consultation and specifically relate to the Land at Ely Road, Milton site put forward by LICS as part of the Call for Sites. These representations support its development as part of the Greater Cambridge direction for growth.
- 3.3 It is clear that in order to meet the targets for housing, economic progression and net zero carbon, growth will need to be delivered across the range of locations suggested by the Councils. The Councils should therefore look to identify a wide range of sites across the full spectrum of development scales in order to ensure consistent delivery throughout the Plan period.
- 3.4 Importantly, Milton is a settlement that provides a logical and sustainable location for development, benefiting from sustainable travel opportunities and being in very close proximity to the city. Through the submission of the Land at Ely Road, Milton site for development, it is clear that there is opportunity for sustainable development in the village. The Land at Ely Road, Milton site is available, achievable and deliverable. As such there is a realistic prospect of development coming forward here at an early stage in the new Plan period.
- 3.5 The Councils are therefore encouraged to develop their growth strategy to include provision for housing and employment development in Milton, and in particular the Land at Ely Road, Milton site, as part of the new Local Plan.

Appendix 1: Land at Ely Road, Milton Site Plan

Land at Ely Road, Milton



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