

**EMMANUEL COLLEGE
SPORTS GROUND, 15
WILBERFORCE ROAD,
CAMBRIDGE, CB3 0EQ
GREATER CAMBRIDGE
LOCAL PLAN – ISSUES
AND OPTIONS
CONSULTATION 2020**

Quality Assurance

Site name: Land at Wilberforce Road, Cambridge

Client name: Emmanuel College

Type of report: Issues and Options Representation

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Signed

Date February 2020

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Signed

Date February 2020



Table of Contents

1.0	Introduction	1
2.0	The Site	3
	Site Description	3
	Planning History	4
3.0	Development Proposals	5
	Description of the Proposals	5
	Justification	6
	Summary of Technical Assessments	7
	Summary	8
4.0	General	9
5.0	Themes	10
	Theme 1 Climate Change	10
	Theme 2 Biodiversity and Green Spaces	11
	Theme 3 Wellbeing and Social Inclusion	12
6.0	Homes	16
7.0	Infrastructure	18
8.0	Where to Build?	19
	'Protection of Open Space' (Policy 67) Cambridge Local Plan 2018	19
	'Community, Sports and Leisure Facilities' (Policy 73) Cambridge Local Plan 2018	23
Appendix 1	PROTECTED OPEN SPACE MAP	

1.0 Introduction

- 1.1 These representations follow those previously submitted in respect of Emmanuel College Sports Ground, 15 Wilberforce Road, Cambridge, CB3 0EQ (hereafter “the site”) to the 2019 Call for Sites consultation and seek to continue to promote the site for residential development through this Issues and Options consultation. Development of the site will comprise the context-led delivery of up to 120 dwellings.
- 1.2 The site is being promoted as it represents a sustainable location for development which will help to meet the housing needs of Greater Cambridge in the next Local Plan period. The land is available, achievable and suitable and the development proposals will bring a number of benefits to support the delivery of a sound and sustainable spatial strategy as part of the Local Plan, including:
- The opportunity to deliver a valuable amount of market and affordable housing to help meet the needs of Cambridge;
 - Locating residential development in a sustainable location. The site is approximately 1.6km from Cambridge City Centre and is well placed for future residents to be able to walk and cycle, rather than travel by private car, to access higher-order services and facilities. In addition, the site benefits from being located within 500 metres of a bus stop, which is served regularly by services travelling to Cambridge City Centre, Cambourne, and various University of Cambridge institutions;
 - Making efficient use of land in a sustainable location, as supported by Paragraph 122 of the NPPF;
 - Development in a non-Green Belt location;
 - The delivery of over one hectare of public open space;
 - Supporting Cambridge’s economy, including local shops and services; and
 - Enhancing biodiversity levels across the site through proposed planting and increasing natural capital.
- 1.3 These representations are accompanied by the following documents:
- Preliminary Ecology Appraisal (Ecology Solutions);
 - Flood Risk and Drainage Site Appraisal (EAS);
 - Highways Access Review (EAS);
 - Initial Heritage Appraisal (Bidwells);
 - Housing Needs Assessment (Bidwells);
 - Site Location Plan (Bidwells); and
 - Vision and Delivery Document (Bidwells).
- 1.4 These representations respond to the following questions in the Issues and Options consultation document:
- 2;
 - 4;
 - 6;
 - 7;

- 8;
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- 37;
- 42;
- 43; and
- 49.

2.0 The Site

Site Description

- 2.1 The site is located in the Newnham Ward of Cambridge and thus lies within Cambridge City. The site measures approximately four hectares (ha) and is currently private land used as a playing field by Emmanuel College.
- 2.2 The site is bound to the east by Wilberforce Road with residential development beyond, to the south by Stacey Lane with meadowland beyond, to the west by sports pitches and tennis courts, and to the north by residential development. There are a number of mature trees located along the site's western and northern boundaries, with nine being protected under a Tree Preservation Order.



Figure 1: Google Maps Extract Showing Site in Context

- 2.3 The site is not subject to any further environmental designations and is located within Flood Zone 1, as indicated by the Environment Agency's Flood Maps, and therefore has a 0.1% chance (low probability) of flooding. The vast majority of the site is also at a very low risk of surface water flooding, both in terms of depth and velocity. A low risk of surface water flooding is found along the southern boundary.
- 2.4 The site is located within the West Cambridge Conservation Area and a Grade II listed building (Emmanuel College Sports Pavilion, including Groundsman's House and Stable) is located in the south-eastern corner of the site. In addition, a further Grade II listed building (9 Wilberforce Road) is located to the east of the site beyond Wilberforce Road.

- 2.5 The site is currently designated as Protected Open Space by the adopted Cambridge City Local Plan (2018).
- 2.6 The site is well served by public transport, with the nearest bus stop located approximately 300 metres to the north-north-east, along Madingley Road. In addition, the site benefits from being in close proximity to good cycle and pedestrian links, with journeys between the site and the city centre taking less than 10 minutes and 25 minutes respectively. It is therefore considered that the site would be a sustainable location to site residential development.

Planning History

- 2.7 The site has no history of planning applications pertaining to residential development on the site. It should be noted, however, that part of the site was discounted from the Council's previous SHLAA in 2013 (Site 182). This was due to the Planning Inspector for the 2006 Local Plan concluding that there was no reasonable prospect of the site coming forward for college or university faculty development. It was concluded that the site's environmental and recreational value merited continued protection against the needs of the spatial strategy at that time.
- 2.8 Site 182 included the Emmanuel College Sports Ground but also the Cambridge Lawn Tennis Club and disused hockey pitch; the proposal is now focussed solely on the Emmanuel College Sports Ground.

3.0 Development Proposals

Question 2: Please submit any sites for employment and housing you wish to suggest for allocation in the Local Plan.

- 3.1 The site was submitted as part of the Call for Sites consultation in 2019 and Emmanuel College is continuing to promote the site for allocation in the Local Plan. The site is an opportunity to deliver a medium to large scale residential development to help meet the housing needs of the Greater Cambridge Authority.

Description of the Proposals

- 3.2 A concept masterplan has been prepared to show how up to 120 new dwellings could be delivered on the site. The proposed development density would be 30 dwellings per hectare, with a net density likely being in the region of 40 dwellings per hectare. Such a density is consistent with national policy, as indicated by Paragraph 123 of the NPPF, and the context of the site.



Figure 2: Concept Masterplan

- 3.3 The proposals seek to incorporate a range of features which would culminate in the delivery of key public benefits.

- 3.4 One such feature is the proposed oval of open space which is to be the focal point of the development and will enable a large part of the site to be made permanently available to the community. It is considered that the size and location of the public open space would create an appropriate setting for the Grade II listed building in the south-east of the site.
- 3.5 The existing Grade II listed building and its associated structures would be retained, with options for their conversion to be explored such as the provision of a community facility for future and existing residents.
- 3.6 The existing boundary vegetation would be protected, retained, and strengthened along residential boundaries. The scheme would seek to reinforce these existing corridors and would also provide access to the proposed biodiversity enhancements surrounding the oval-shaped area of public open space.
- 3.7 Further features of the concept masterplan, including commentary on the site's opportunities and constraints, can be found in the accompanying Vision and Delivery Document.

Justification

- 3.8 Whilst it is acknowledged that the land is designated as protected open space in the adopted Cambridge City Local Plan (2018) and has been discounted in the previous Call for Sites exercise in 2013, the site's circumstances have since changed. Emmanuel College attained planning permission (REF: 08/0873/FUL) for the change of use of agricultural land to a playing field at land adjacent to Rutherford Road, which was implemented in 2011. This playing field is considerably larger (over seven hectares) in comparison to the site at Wilberforce Road and would comprise a greater quality of sports pitches due to the ability to include a contemporary sustainable drainage system. Consequently, it is Emmanuel College's intention to relocate the existing sports ground provision at Wilberforce Road to the land adjacent to Rutherford Road, in order to make more efficient use of the land and concentrate the College's sport provision in one location.
- 3.9 Such justification is therefore considered to satisfy the criteria set out in Paragraph 97 of the NPPF (pertaining to the development of open space, including playing fields), as it has been demonstrated that the playing field at Wilberforce road is surplus to requirements, and the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location (at land adjacent to Rutherford Road). Consequently, it is considered that the principle of relocating the existing sports provision at Wilberforce Road to the land adjacent to Rutherford Road would be acceptable.
- 3.10 Although it is noted that Emmanuel College Sports Ground is located within the Conservation Area and is adjacent to a Grade II listed building, such constraints are considered to be overcome via the proposed layout concept masterplan, which indicates an extensive provision of public open space and tree planting. Such measures would retain the existing open space within the curtilage of the on-site listed building, while the proposed dwellings would be sited relatively far away and screened from view via tree planting.
- 3.11 The listed building on-site could be put to a long-term beneficial use whether this be residential or community uses.
- 3.12 The concept masterplan indicates that the proposed development would seek to retain and protect the nine TPO-protected trees on-site.

- 3.13 Notwithstanding the above points, it is evident that the residential development of the site would result in the following benefits:
- The opportunity to deliver a valuable amount of market and affordable housing to help meet the needs of Cambridge;
 - Locating residential development in a sustainable location. The site is approximately 1.6km from Cambridge City Centre and is well placed for future residents to be able to walk and cycle, rather than travel by private car, to access higher-order services and facilities. In addition, the site benefits from being located within 500 metres of a bus stop, which is served regularly by services travelling to Cambridge City Centre, Cambourne, and various University of Cambridge institutions;
 - Making efficient use of land in a sustainable location, as supported by Paragraph 122 of the NPPF;
 - Development in a non-Green Belt location;
 - The delivery of over one hectare of public open space;
 - Supporting Cambridge's economy, including local shops and services; and
 - Enhancing biodiversity levels across the site through proposed planting and increasing natural capital.

Summary of Technical Assessments

- 3.14 A Highways Access Review has been carried out to support this promotion. The assessment acknowledges that the proposed access can achieve more than satisfactory visibility splay off Wilberforce Road, with a 2.4m x 90m splay being possible.
- 3.15 The Review also illustrates that the site is in a highly sustainable location, with future residents being able to access a wide range of facilities available within Cambridge City Centre without relying on the use of a private car.
- 3.16 A TRICS assessment has been undertaken using the nationally recognised trip rate database to determine the likely vehicle trip rate generated as a result of the proposals. This assessment indicates that the proposals would result in an imperceptible impact on the local highway network.
- 3.17 A Flood Risk and Drainage Site Appraisal has also been undertaken to support this promotion. This report notes that the site is wholly within Flood Zone 1 and mostly at a very low risk of flooding, although the southern boundary is at a low risk of surface water flooding with low depths.
- 3.18 The report indicates that there is a low potential for infiltration drainage, due to the clay-based geology of the site. It is therefore likely that an attenuation strategy would be implemented subject to further infiltration testing on site.
- 3.19 In terms of foul drainage, the closest public sewer is immediately adjacent to the east of the site within Wilberforce Road. Therefore, connection to the public foul sewer would be required for the development.
- 3.20 A Preliminary Ecology Appraisal also accompanies this submission. This document indicates that the site falls within the Impact Risk Buffer Zone of the Histon Road SSSI, which is located approximately 2.3km to the north. It should be noted, however, that Natural England do not consider new residential development within this risk zone to constitute a risk to the SSSI.

- 3.21 A non-statutory County Wildlife Site, Coton Path Hedgerow, is located close to the south-west boundary of the site, while a City Wildlife Site, Adams Road Sanctuary, is located on land to the east of the site. Neither of these sites are likely to be directly adversely impacted by future redevelopment of the site.
- 3.22 The Preliminary Ecology Appraisal also notes that the site has a baseline biodiversity value of 7.46 habitat units. In order to achieve no net loss to biodiversity, the report stipulates that 1.05 hectares of grassland would need to be created (26% of the total site area). To achieve a 10% net gain, then 1.17 hectares of grassland would need to be retained and enhanced (29% of the total site area). Such calculations, however, do not take into account the opportunity for the provision of additional ecological compensatory measures such as the provision of bird and bat boxes across the site. It is therefore likely that less grassland would need to be retained and enhanced in order to achieve a biodiversity net gain, on the basis that additional ecological mitigation is provided as part of the development.
- 3.23 In terms of protected species, the report indicates that the site has the potential to support the following fauna:
- Birds;
 - Bats; and
 - Great Crested Newts.
- 3.24 The Preliminary Ecological Appraisal therefore concludes that follow-up surveys of the above species should be undertaken in order to demonstrate that no harm would come to them as a result of the proposed development.
- 3.25 An Initial Heritage Appraisal also accompanies this representation, which should be read in conjunction with the Vision and Delivery Document. This report indicates that the illustrative layout of the proposed development would likely result in less than substantial harm to the significance of the on-site and adjacent heritage assets. However, the principles set out in the concept masterplan are considered to provide a suitable approach to the development of the site which takes account of the heritage considerations, although further detail at the design stage would be required to determine the exact levels of impact arising.

Summary

- 3.26 Emmanuel College Sports Ground represents a sustainable residential development opportunity which would greatly assist the Greater Cambridge Authority in contributing to its housing need. The site has good public transport links and is located in close proximity to Cambridge City Centre, therefore indicating that future occupiers would likely use sustainable modes of transport to access key services and facilities.
- 3.27 While the indicative proposals indicate the loss of Protected Open Space, a suitable, larger alternative playing field used by Emmanuel College has been secured at land off Rutherford Road, Cambridge, which has been in use since 2011. Such a justification satisfies the criteria of Paragraph 97 of the NPPF, as it has been demonstrated that the playing field at Wilberforce Road is surplus to requirements, and the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location. The proposals therefore provide a further key public benefit, in that they present an opportunity to unlock a significant amount of public open space which was previously in private use and thus inaccessible to the public.

4.0 General

Question 4. Do you agree that planning to 2040 is an appropriate date in the future to plan for? If not, what would be a more appropriate date and why?

- 4.1 Agree - The proposed Local Plan period up to 2040 is considered appropriate and accords with the requirements set out within the NPPF for local authorities to identify a sufficient supply and mix of sites between years 1-15 of the plan (Paragraph 67).

5.0 Themes

Question 6. Do you agree with the potential big themes for the Local Plan?

- 5.1 Agree - The four big themes for the Local Plan are considered suitable and all are considered to be important in the consideration of the spatial distribution of growth in the district, and for the determination of planning applications. The four big themes will generate a new way of planning, this may require a different way to make decisions; to allow other impacts to happen in order to achieve these four priorities. The Local Plan policy framework will need to allow for a clear planning balance to take place to assess and prioritise impacts.

Question 7. How do you think we should prioritise these big themes? Allocate 10 points across the following four themes:

- 5.2 The four big themes are all considered to be important aspects to achieving positive development. All four themes should be used to inform the spatial strategy within the Local Plan in terms of distributing growth and determining planning applications to deliver growth. It is therefore not considered necessary to rank the options in order of preference.

Theme 1 Climate Change

Question 8. How should the Local Plan help us achieve net zero carbon by 2050?

- 5.3 The increased focus on climate change is welcomed. Climate change policy and good practice is changing quickly, and the plan will need to build in suitable flexibility to accommodate these changes within the lifetime of the plan. Climate change scenarios predict extensive changes by 2050, much of which is dependent on government and human action so there is substantial uncertainty over outcomes.
- 5.4 A needlessly stringent policy may inadvertently impede progress towards later years in the plan, or undermine results by not allowing for site-specific refinement. For example, policy for electric vehicle charging points should be sufficiently flexible to accommodate that quickly changing technology, as well the current grid challenges in implemented EV charging places. Energy policies should include flexibility for changing legislation, and technology, as well as the opportunity to refine a plan-wide policy for site specifics. As the Zero Carbon Futures Symposium Report (2019) submitted within the evidence base notes on page 10: where targets are too limited, and without consideration of project contexts, policy can drive dysfunctional behaviour such as photovoltaic solar panels being installed on North facing roofs merely to achieve policy compliance not to produce effective carbon reductions.
- 5.5 Allowing for changing technologies and approaches should also help with viability as technology and approaches improve and are more widely adopted, thereby reducing costs. Escalating targets and policies may be able to accommodate these changes, while providing clarity to developers on the costs of development over time.
- 5.6 The local plan Sustainability Appraisal (SA) should address variable climate change scenarios, as we would expect that different climate change scenarios will be of interest at examination. Lack of rigorous assessment of these scenarios in the SA could lead to the plan being found unsound.

Question 9. How do you think we should be reducing our impact on the climate? Have we missed any key actions?

- 5.7 Greater Cambridge is a leading local authority on climate change policy, such as through the early declaration of a climate change emergency and also through the newly adopted Sustainable Development SPD. This leadership should continue, as it is central to the sustainable development of Cambridge, leading to better development for people, the environment, and for economic development. It should be borne in mind that Cambridge's knowledge economy increasingly demands high sustainability standards: sustainability, health and wellbeing, with climate change at the heart, is a key part of continuing Cambridge's economic development. This should remain a priority as part of a policy framework that recognises climate change as a key part of sustainable development across social, environmental and economic objectives.

Question 10. Do you think we should require extra climate adaptation and resilience features to new developments?

- 5.8 A policy approach with multiple options for delivering net zero carbon is likely to be most effective in delivering development, as well as carbon neutrality. A multi-pronged approach should allow different solutions for different developments, reflecting context. For example, for some developments, Passivhaus energy standards may be achievable (going well above and beyond minimums set out in the Building Regulations), but for others, Building Regulations may need to be followed but an offset solution, such as a green bond or offset fund, could be used to achieve a net carbon reduction. Possible options need to be worked up in more detail as the Plan progresses and must build in flexibility.

Question 11. Are there any other things we should be doing to adapt to climate change? We want to hear your ideas!

- 5.9 To form a flexible policy framework, so as not to stifle the benefits of new technology or modern methods of construction.

Theme 2 Biodiversity and Green Spaces

Question 12. How should the Local Plan help us improve the natural environment?

- 5.10 This Local Plan must deliver effective policy which protects and enhances natural capital. We support delivery of net gain for new development. Such policy must be flexible enough to enable creative and cost-effective solutions for the delivery of net gain and support the Vision for the Natural Future of Cambridgeshire in 2050 as outlined by Natural Cambridgeshire and affiliated organisations.
- 5.11 An off-site net gain solution should be clearly allowed for by policy. While it is a Local Plan priority as a part of one of the four big themes, the Local Plan policy must allow for a planning judgement and balanced decision to allow for site and development specific issues to be taken into account.

Question 13. How do you think we should improve the green space network?

- 5.12 This should come through from an up-to-date base assessment of Greater Cambridge assets, which leads to a Local Plan wide (and beyond) strategy. For example, landowners of existing

green spaces could be surveyed to assess their current usage and whether they are publicly accessible. It may be apparent that some green spaces are defunct and/or not publicly accessible, which would then encourage a strategy to identify new green spaces that can be accessed by the public. Development proposals could then be shaped around any identified priorities.

- 5.13 As part of a policy framework, it would also be logical to enable a level of flexibility with regard to the provision of green spaces. In some circumstances it may not be possible to deliver a sufficient amount of green space as part of a development. Policies should therefore allow for off-site mitigation and off-site net gain enhancements which can be used to improve the wider green space network.

Question 14. How do we achieve biodiversity net gain through new developments?

- 5.14 The new Local Plan must ensure that policy in this matter is sufficiently flexible to accommodate the required biodiversity net gain in the most effective and efficient way for each development, with both on-site and off-site solutions possible.
- 5.15 A flexible, diverse approach should be allowed which entails no restrictive elements. For example, policies should not include an exhaustive list of what features must be required to deliver a biodiversity net gain. Rather, it is considered best to allow applicants to bring forward bespoke solutions based on their expertise and the context of their respective sites.

Question 15. Do you agree that we should aim to increase tree cover across the area?

- 5.16 Yes. With the right trees, in the right areas. A policy framework to seek tree cover increase, but allows for a planning balance within decision-making to enable the benefits and impacts of each development to be assessed.
- 5.17 This could be part of an on-site/off-site solution, which could generate notable s106 funds to achieve significant, meaningful and long-term planted and ecological areas. Ecological outcomes rather than an unconditional focus on native species should be considered in new planting.

Theme 3 Wellbeing and Social Inclusion

Question 16. How should the Local Plan help us achieve ‘good growth’ that promotes wellbeing and social inclusion?

- 5.18 Policies should highlight wellbeing and social inclusion as a key priority for new developments.
- 5.19 Good growth that promotes wellbeing (including health) should be inclusive and include anti-poverty measures including:
- Energy efficient homes and employment space that deliver low energy and water bills;
 - Promotion of commercial development and job creation that offers the Living Wage and opportunities for those on lower incomes to increase wages to easily access jobs;
 - Allow for a wide range of social infrastructure and open space in new developments that provide pathways to free (i.e. no charge to the user) opportunities for improved health outcomes;

- Promotion of low cost housing proportionate to income in the area;
- Promotion of ‘fully accessible’ social housing, within active travel of employment;
- *“ensure delivery of planned investment in transport infrastructure that improves connectivity between key employment locations and more deprived areas”* Anti Poverty Strategy (DG23)

5.20 A spatial strategy that connects homes with jobs; good quality public transport; facilities/services and high-quality open spaces.

5.21 A policy framework that allows for innovative ways to deliver ‘affordable housing’; being a housing solution that provides for homes that are cheaper to buy or rent, whatever the planning mechanism; so long as the mechanism is robust and can be secured within a planning decision.

5.22 Assessment of schemes throughout the combined authority areas using a Health Impact Assessment (HIA) methodology that reflects best practice. Thresholds for HIAs should reflect the scale of the scheme and its ability to effect health outcomes.

5.23 Develop a policy framework that is based on empirical evidence of how good growth is delivered, rather than rely on policies based on perceived and sometimes unproven determinants of wellbeing and social inclusion. Focus policies on what really makes a difference.

5.24 Engagement with the combined authority, county council and CCG to understand community care and primary health care issues and needs, and to ensure facilities are available to deliver funded services.

Question 17. How do you think our plan could help enable communities to shape new development proposals?

5.25 Policies and procedures that encourage meaningful consultation and require developers to demonstrate how schemes have been influenced by local communities.

5.26 Community engagement should be sought during the design process, during construction and through opportunities to influence the scheme and /or be engaged in its management and maintenance after completion (where relevant), particularly in circumstances where unforeseen consequences emerge.

5.27 Such measures would assist with addressing the concerns of the community during the development management process.

Question 18. How do you think we can make sure that we achieve socially inclusive communities when planning new development?

5.28 First and foremost, to form a spatial strategy that ensures that new development is accessible or can be made accessible. Providing everyone with the opportunity to walk, bus and cycle to jobs, schools, shops, services and social activities.

5.29 Tenure blind development, with flexible housing mix policies to allow for the right homes in the right location. A clearer policy framework to support housing for elderly persons and increasing need for a range of homes and supported living.

5.30 Socially inclusive communities are created by people, but it helps if infrastructure is provided in time for first residents, either as a temporary facility or a smaller version of the final product. Ensure that support systems/management strategies are in place for community infrastructure. In new settlements, community development workers are key to establishing links between people and opening connecting newcomers to the wider environment.

5.31 Build in public realm to all forms of development (housing, employment and leisure) that encourages informal meeting and 'bumping' into people.

5.32 Ensure delivery of truly affordable homes.

Question 19. How do you think new developments should support healthy lifestyles?

5.33 A spatial strategy that can support connected spaces where people do not have to rely on the private car for their daily routine of school, work, shopping and leisure. Enabling active lifestyles and opportunities for social interaction is a priority.

5.34 Providing open space within developments where possible, alongside a policy framework to allow for off-site enhancements where appropriate, particularly when they can improve provision for existing communities. Standards within policies that determine the quantity and quality of provision should reflect an evidence based assessment of need and benefits delivered.

5.35 Consider the needs of all age ranges and abilities in the detailed design of open spaces and public realm.

5.36 Ensure that new developments encourage healthy eating choices through the provision of healthy options (including supermarkets) and minimising/preventing fast food outlets.

Question 20. How do you think we should achieve improvements in air quality?

5.37 Principally through the reduced use of polluting vehicles by:

- Locating development, particularly schools, places of work and other facilities that have a high footfall, where there is good access to active travel and affordable, frequent, reliable and high quality public transport options;
- Better cycle lanes, parking and cycle security – achieved by developments directly and through a coordinated s106 infrastructure programme;
- Reducing the volume of HGV movements in the city;
- Encouraging the use of less polluting vehicles particularly during rush hours when emissions from stationary traffic makes conditions for pedestrians and cyclists and other vulnerable groups particularly bad.

5.38 Tree planting in urban areas would also assist with tackling air pollution. Species in these locations should be selected for their pollution absorbing properties.

Question 22: How do you think we should protect, enhance and adapt our historic buildings and landscapes?

5.39 As part of a flexible development strategy, it is likely that an increase in the built density within Cambridge will be required. Given that the majority of Cambridge lies within a Conservation Area

and comprises many listed buildings, it is almost inevitable that new development will have a level of impact on such designated heritage assets. It needs to be acknowledged, however, that when determining applications within Cambridge a planning balance will likely need to be made in terms of weighing heritage conservation against the demand for new housing and economic growth and the associated public benefits.

- 5.40 Paragraph 196 of the NPPF notes that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. A similar line of enquiry is stipulated in Paragraph 195 regarding proposals which would result in substantial harm to or the total loss of the significance of heritage assets.
- 5.41 The proposed policy framework should therefore take the above into account. Where a proposal would result in a level of harm to a designated heritage asset in Cambridge, it should be balanced against the public benefits of the scheme. Although decisions will be made on a case by case basis, it is considered that great weight should be given to proposals which would provide substantial public benefits, including the provision of high-density, well-designed housing on sites which are in close proximity to the city centre and/or public transport routes. While it is acknowledged that many sites in central Cambridge comprise, are adjacent to, or are within designated heritage assets, the opportunity to provide extensive public benefits associated with large scale developments should not be balanced against the potential harm to designated heritage assets.
- 5.42 Paragraph 200 of the NPPF notes that Local Planning Authorities should look for opportunities for new development within Conservation Areas and the setting of heritage assets, to enhance or better reveal their significance. Proposals that achieve these elements should be treated favourably within the emerging policy framework. An example of how this could be achieved would be for proposed developments to concentrate public open space around designated heritage assets. Such measures would likely enhance the significance of designated heritage assets, while at the same time still ensuring the delivery of much needed dwellings and employment floorspace.

6.0 Homes

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

6.2 There should be flexibility within the Local Plan to respond to changing housing needs over the Local Plan period. It is important to identify a baseline housing need but there should be scope for further development to come forward if it meets a particular housing need. This would support the Government's objective of significantly boosting the supply of homes to ensure that a sufficient amount and variety of land can come forward where it is needed and that the needs of groups with specific housing requirements are addressed, as indicated by Paragraph 59 of the NPPF.

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

6.3 Yes, strongly agree – The Councils correctly recognise that housing is one of the most important issues in planning and one that for Greater Cambridge must extend beyond considerations of meeting the minimum needs as calculated using the standard method. Using the Government's approach results in a local housing needs assessment of circa 1,800 dwellings per annum (dpa). However, it is important to recognise that the Government state in the PPG that this is the minimum number of homes that must be planned for and that it does not attempt to predict the impact of other factors. Therefore, in an area with strong economic growth, and aspirations to maintain this growth, as well as the affordability of its housing stock continuing to decline it will be important for the Greater Cambridge Plan to establish a housing requirement that seeks to address both these concerns.

6.4 What is evident from the evidence base supporting the local plan is that 1,800 dpa minimum established using the standard method will not be sufficient to support the economic growth expectations of Greater Cambridge. The work of the Cambridge and Peterborough Independent Economic Review (CPIER) sets out a compelling case for higher levels of housing growth within the Greater Cambridge area and warns of significant negative impacts on both the local and national economy should housing needs continue to be constrained. It is noted that the consultation document recognises this fact and it must play a significant factor in the decisions regarding this local plan. The economy of Cambridge is too important nationally for the Council to plan for the minimum number of homes required by the standard method.

6.5 However, the increased demand for housing arising from the economic success of Cambridge also makes the area increasingly unaffordable. Whilst this is an undoubted concern for all residents of Cambridge looking to meet their housing needs, it is also an issue for businesses looking to move to the area. It is interesting to note from the CPIER report that the Greater Cambridge area would seem to have been underestimating jobs growth and its impact on the demand for new housing. Whilst the insufficient supply of housing does not appear to have, at present, impacted on economic growth, the ramifications of under provision can be seen in the housing market where affordability has worsened significantly over the last 10 years. Housing that is available at a reasonable price is key to attracting and retaining skilled employees. Without it there must be a concern that Greater Cambridge may not be able to achieve its aspirations for continued economic growth and that it may actually suffer if this issue is not addressed.

6.6 Coinciding with the above point, a Housing Needs Report accompanies this representation that undertakes an objective review for what the future housing needs of Greater Cambridge are. It finds that there is an underlying and systemic affordability issue that is making it increasingly

difficult for those on lower incomes to afford to live in the Greater Cambridge area. Alongside, the Cambridge economy has seen a prolonged and steady increase, which has attracted a larger workforce and increased the pressure on the housing market; availability and affordability. Alongside this trend is a clear political aspiration to see the Cambridge economy grow further; mostly clearly expressed by the Combined Authority that has a growth target as set out in its Devolution Deal of doubling GVA over 25 years. All of this clearly points to the need to plan for an amount of housing well above the minimum housing requirement.

- 6.7 All these factors will require the Councils to establish a housing requirement far in excess of the minimum number of homes that results from the application of the standard method. It is evident that the Greater Cambridge area has been providing too little housing in recent years and the substantial uplifts being suggested are clearly necessary. The option of delivering at least 2,900 homes per annum within this local plan is supported.

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

- 6.8 There should be flexibility within the Local Plan to respond to changing housing needs over the Local Plan period. Consideration of individual site circumstances and the circumstances of a local area should be taken into account to determine the appropriate type of housing for development sites. Separate housing needs assessments should be used to inform the appropriate size, type and tenure of housing needed for different sections of the community, as set out within the Greater Cambridge Housing Strategy 2019-2023.

- 6.9 Flexibility will be key to a successful Local Plan, through market housing, low-cost and affordable housing.

6.10 **Question 35. How should we ensure a high standard of housing is built in our area?**

- 6.11 Local Plan policies can require a high standard of design for new residential development, leading from Government policy and guidance. Appropriately worded design policies should require a high quality design for new dwellings. This could include sustainable design principles including measures to improve the energy efficiency of new homes, water saving measures, use of efficient insulation material and heating systems, the reduction and recycling of construction materials, provision of appropriate amenity space and accessibility. Policy should not be prescriptive for precisely how it will be accomplished, it can set a policy-level, but developers should be able to use a host of options to achieve the target.

- 6.12 Health impact assessments on developments of a scale that can deliver meaningful health improvements can create a higher level of built environment in housing developments.

7.0 Infrastructure

Question 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?

- 7.1 Greater Cambridge should continue to press ahead with ambitious public transport infrastructure projects, such as the CAM. It is evident that Cambridge's public transport offering is not sufficient to give enough people a real alternative to otherwise using the private car. Furthermore, given the area's potential for rapid growth, such transport infrastructure could assist in transforming the economy and improving people's daily lives.
- 7.2 It is questionable, however, as to whether such transport infrastructure projects can be delivered during the proposed plan period. Throughout the plan period, it will be important to promote the development of sites that lie in close proximity to major corridors and/or are within walking and cycling distance to Cambridge City Centre. By siting development in these locations, people will be more likely to use sustainable transport modes to access key services and facilities.

8.0 Where to Build?

8.1 **Question 42. Where should we site new development? Rank the options below 1-6 (1 Most Preferred 6-Least Preferred)**

8.2 No single solution will deliver a sound Local Plan; rather, a combination of approaches to the distribution of spatial growth will be necessary in order to establish the appropriate locations of new housing and employment development in the district. A hybrid approach will be required, but underpinned with a focus on transport corridors and accessible areas.

Question 43. What do you think about densification?

8.3 While no single solution to development would deliver a sound Local Plan, the densification of Cambridge is considered to be a logical part of the solution when taking into account the potential economic growth raised by the CPIER report.

8.4 Paragraph 122 makes it clear that planning policies should support development that makes efficient use of land. Given the current and emerging local market conditions and its compact nature, as well as its capacity for future public transport infrastructure projects, it is considered that densification in Cambridge would be suitable.

Question 49. Do you have any views on any specific policies in the two adopted 2018 Local Plans? If so, what are they?

'Protection of Open Space' (Policy 67) Cambridge Local Plan 2018

8.5 Policy 67 of the Cambridge Local Plan (2018) currently requires the following when considering development proposals on areas of land protected as open space:

“Development proposals will not be permitted which would harm the character of, or lead to the loss of, open space of environmental and/or recreational importance unless:

a. the open space can be satisfactorily replaced in terms of quality, quantity and access with an equal or better standard than that which is proposed to be lost; and

b. the re-provision is located within a short walk (400m) of the original site.

In the case of school, college and university grounds, development may be permitted where it meets a demonstrable educational need and does not adversely affect playing fields or other formal sports provision on the site. Where replacement open space is to be provided in an alternative location, the replacement site/facility must be fully available for use before the area of open space to be lost can be redeveloped.”

8.6 The designation of protected open spaces within the Cambridge Local Plan is too broad, the policy serves to protect most spaces in the City for recreation and environmental 'importance', using a broad 'catch all' assessment criteria and then applies an overly restrictive 400m distance restriction to any relocation. The 400m restriction does not allow for any balance of the issues, or benefits that may be accrued from a relocation that happened to be over 400m away.

- 8.7 This is highlighted by Emmanuel College Sports Ground which is identified within the Local Plan as a Protected Open Space and an Outdoor Sports Facility 'Emmanuel College Playing Field (REF: SPO 16). The site is identified as having both environmental and recreational importance within the Open Space and Recreation Strategy (2011), however, the Strategy does not set out in any further detail as to how this assessment has been made. It is therefore not clear how the Council have determined that the site is of environmental and recreational importance.
- 8.8 Paragraph 7.48 of the Local Plan requires that replacement sites / facilities should be no more than a short walk (400m) from the site that is to be replaced. The plan in **Appendix 1** shows that the 400 metre radius around the site is heavily constrained and already features residential development, Green Belt land and other protected spaces. There is limited opportunity to re-providing the open space within a 400-metre radius of the site, if that was the appropriate response. Major benefits could be achieved, in theory, by providing for a new purpose-built facility that was more than 400m away, but the policy is overly-restrictive to not allow a judgement to be made.
- 8.9 The **Appendix 1** Plan shows all the currently Protected Open Spaces and their 400m isochrones to reflect the 400m described in adopted Cambridge Policy 67. This vast protection of spaces arises through an assessment criteria that is too broad and essentially forms a 'catch all' approach, protecting whole sites, when for example the environmental 'importance' only applies to a part of the site; such as with Emmanuel College Sports Ground and its planted boundaries, but yet the whole site is protected.
- 8.10 The approach to recreation protection is also not a robust policy position. Emmanuel College Sports Ground is now surplus to requirements following the land at Rutherford Road being secured as an alternative, larger location for College sports provision (REF: 08/0873/FUL), yet it is given the full protection of Policy 67 for its recreational importance. The Local Plan also requires that replacement sites/facilities should be provided so as not to increase any identified deficiencies in open space in the ward where the site is located. In the case of Emmanuel College Sports Ground, the site is located within the Newnham Ward, where no deficiencies are identified within the Open Space Strategy (2011). In this case the site would not lead to increasing deficiencies within Newnham, but this matter is not taken into account in making the designation, nor does Policy 67 allow for the same matter to be taken into account in application decision-making. On a related issue, Policy 67 does not relate well to NPPF paragraph 97 and its criterion (a) which allows for an assessment to be made to ascertain if the open space is surplus to requirements.
- 8.11 Paragraph 7.47 of the Local Plan identifies that there is a 'clear presumption' against the loss of open space of environmental or recreational importance, and that:
- “Any proposal involving the loss of open space must include an assessment (using the criteria listed in Appendix I) to determine the important aspects of the site that should be retained within the new development, in agreement with the Council. As part of any planning application, applicants will need to clearly demonstrate how the proposal will minimise its impact on the site’s intrinsic qualities and where possible enhance the remaining part of the site. Due regard must also be given to any potential impact on the character and wider setting of the site.”*
- 8.12 The criteria used to assess open space in Cambridge are currently set out in Appendix I in the Local Plan. The criteria are summarised below alongside an assessment as to why the criteria are not useful in their current state, highlighted by example with Emmanuel College Sports Ground.

CRITERIA FOR ENVIRONMENTAL IMPORTANCE	OUR ASSESSMENT
<p>a. Does the site make a major contribution to the setting, character, structure and the environmental quality of the city?</p>	<p>The site does not make a major contribution. The site is not referenced in the West Cambridge Conservation Area Appraisal in terms of its heritage contribution to the area. The tree line along the western boundary is identified as an important tree group on the Townscape Analysis map in Appendix 3 of the Appraisal, and this tree line can be retained without the need to protect the entire site as open space. The Townscape Analysis map also notes that there are Important Positive Views from the south-western boundary looking to the east and north-east. However, such views can be addressed without the need to protect the entire site as open space.</p>
<p>b. Does the site make a major contribution to the character and environmental quality of the local area?</p>	<p>The site is inaccessible to the public and is screened by existing trees along the western boundary.</p>
<p>c. Does the site contribute to the wildlife value and biodiversity of the city?</p>	<p>The accompanying Ecological Appraisal indicates that the site has the potential to accommodate bats, birds and great crested newts.</p>

QUESTIONS USED TO ASSESS ENVIRONMENTAL IMPORTANCE	OUR ASSESSMENT
<p>i. Does it make a major contribution to the setting of Cambridge?</p> <p>ii. Does it have positive landscape features and/or a sense of place sufficient for it to make a major contribution to the character of the city?</p> <p>iii. Is the site an important green break in the urban framework?</p> <p>iv. Does it have significant historical, cultural or known archaeological interest?</p>	<p>i. The site does not make a major contribution.</p> <p>ii. The site is not referenced in the West Cambridge Conservation Area Appraisal in terms of its heritage contribution to the area. The tree line along the eastern boundary is identified as an important tree group on the Townscape Analysis map in Appendix 3 of the Appraisal. This tree line can be retained without the need to protect the entire site as open space. The Townscape Analysis map also notes that there are Important Positive Views from the south-western boundary looking to the east and north-east. However, such views can be addressed without the need to protect the entire site as open space.</p> <p>iii. The site does not represent an important green break. The site is inaccessible to the public and is screened by existing trees along the western boundary. Further greenfield land can be found to the south of Emmanuel College Sports Ground and beyond the University Athletics Track.</p>

QUESTIONS USED TO ASSESS ENVIRONMENTAL IMPORTANCE	OUR ASSESSMENT
	<p>iv. The site is not referenced in the Cambridge Conservation Area Appraisal as being valuable in terms of its heritage status although it does contain a Grade II listed building. This listed building, however, can still be retained without the need to protect the entire site as open space.</p>
<p>i. Does it have positive features such as streams, trees, hedgerows or meadowlands which give it a sense of place sufficient to make a major contribution to the character of the local area?</p> <p>ii. Is it an important green break in the framework of the local area?</p> <p>iii. Does it form part of a network of open spaces in the local area?</p> <p>iv. Is it enjoyed visually on a daily basis from public places (e.g. footpaths, vantage points)?</p> <p>v. Does it have local historical or cultural interest?</p>	<p>i. The site does not contain any of these positive features, other than the tree line along the eastern and northern boundary. These can be retained without needing to maintain its designation as a protected open space.</p> <p>ii. The site is not an important green break. It is largely closed off from public access.</p> <p>iii. As above.</p> <p>iv. The site can be viewed along Wilberforce Road.</p> <p>v. The site is not considered to be important in terms of its historical or cultural interest. The site is not referenced in the West Cambridge Conservation Area Appraisal in terms of its contribution in heritage terms.</p>
<p>i. Does it have any nature conservation designation?</p> <p>ii. Is it adjacent to or an important link to sites with nature conservation designation?</p> <p>iii. Does it contain important habitats or species sufficient to make it worthy of consideration for any nature conservation designation?</p> <p>iv. Is it an important wildlife oasis in an area with limited wildlife value?</p>	<p>i. The site is not designated as a nature site.</p> <p>ii. The site is not adjacent to a nature conservation site.</p> <p>iii. The accompanying Ecological Appraisal indicates that the site has the potential to accommodate bats, birds and great crested newts.</p> <p>iv. The site is surrounded by residential development to the west, north and east.</p>

CRITERIA FOR RECREATIONAL IMPORTANCE	OUR ASSESSMENT
<p>d. Does the site make a major contribution to the recreational resources of the city?</p>	<p>The site does not make a major contribution to recreational resources of the city.</p>
<p>e. Does the site make a major contribution to the recreational resources of the local area?</p>	<p>The site does not make a major contribution to the recreational resources of the local area.</p> <p>The site is located within the Newnham Ward and whilst a detailed assessment of Newnham's open space provision has not been undertaken, no deficiencies are identified within the Open Space Strategy (2011). It is therefore considered that the loss of the playing field on the site would not lead to increasing deficiencies within Newnham.</p>

QUESTIONS USED TO ASSESS RECREATIONAL IMPORTANCE	OUR ASSESSMENT
i. Is it of a size, quality and accessibility such that people would travel to use it for recreational purposes, no matter where they live, work or study in the city? ii. Is it an important part of the network of significant recreational open spaces? iii. Is it part of the sports provision which help to meet demand from people throughout the city, no matter where they live, work or study?	The site has been surplus to requirements since Emmanuel College acquired and secured planning for a much larger playing field at land off Rutherford Road (REF: 08/0873/FUL), which was implemented in 2011. The site is therefore not an important part of the network of recreational open spaces.
i. Is it of a size and accessibility such that people who live, work or study in the local area do or could use it for recreational purposes? ii. Is it an important part of the network and hierarchy of recreational facilities in the local area? iii. Is it a significant linkage between recreational areas?	The site has been surplus to requirements since Emmanuel College acquired and secured planning for a much larger playing field at land off Rutherford Road (REF: 08/0873/FUL), which was implemented in 2011. The site is therefore not an important part of the network of recreational open spaces.

8.13 As set out above, removing the site's designation as a Protected Open Space will not lead to the loss of any sports/recreation facilities.

'Community, Sports and Leisure Facilities' (Policy 73) Cambridge Local Plan 2018

8.14 Policy 73 of the Cambridge Local Plan (2018) states the following:

"The loss of a facility or site that was last in use as a community, sports or leisure facility will only be permitted if it is demonstrated that:

i. the facility/site can be replaced within the new development or relocated to at least its existing scale, range, quality and accessibility for its users. For leisure uses, it should satisfy peak period need; or

j. the facility/site is no longer needed."

"In providing evidence that a facility/site is no longer needed, the guidance in Appendix K of the plan should be adhered to. The redevelopment of school sites for other uses will be permitted only if it can be demonstrated that they are not required in the longer term for continued educational use."

8.15 In terms of the site, criterion j is considered to apply given that the site has been surplus to requirements since 2011 and the facilities are no longer required. Paragraph K.3 of Appendix K requires that:

"Proposals for either replacement or relocated facilities should demonstrate:

a. equal or improved site accessibility to users by all means of transport including foot and cycle; and

b. sufficient spare capacity or agreement to accommodate displaced users at other equivalent community/leisure facilities with similar accessibility for users. For existing leisure facilities, in the absence of a robust district-wide needs assessment/capacity assessment, applicants will be expected to carry out such an assessment at their own cost; and

c. through local consultation, the level of interest in and viability of the continued use of the premises as a community/leisure facility.”

8.16 The Open Space and Recreation Strategy 2011 includes an assessment of sites identified on the Policies Map, including an assessment as to whether each site is important for environmental and/or recreational reasons, according to the assessment criteria listed in Appendix I of the Local Plan. It also identifies those wards with deficiencies in open space provision. The Site is referenced to as site SPO 16 in the Newnham Ward profile, comprising 4.02 hectares. The site is assessed as having both environmental and recreational importance.

8.17 An updated Open Space Assessment is required for Cambridge, in accordance with Paragraph 96 of the National Planning Policy Framework (NPPF) which requires the following:

“Access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.”

8.18 Paragraph 97 of the NPPF requires the following:

“Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- *An assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*
- *The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or*
- *The development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.*

8.19 NPPF Paragraph 97 is considered to be the basis to assess this policy matter. This Policy sets out three criteria, but these are a series of ‘or’, so only one criterion has to be engaged and compliant. The second criterion is the appropriate test for the development proposal because the open space is considered to be surplus to requirements, with a replacement provision being located at Rutherford Road, Cambridge, which comprises a greater quantity of land used as playing fields. Consequently, this NPPF matter is not reflected in adopted Policy 67.

Summary

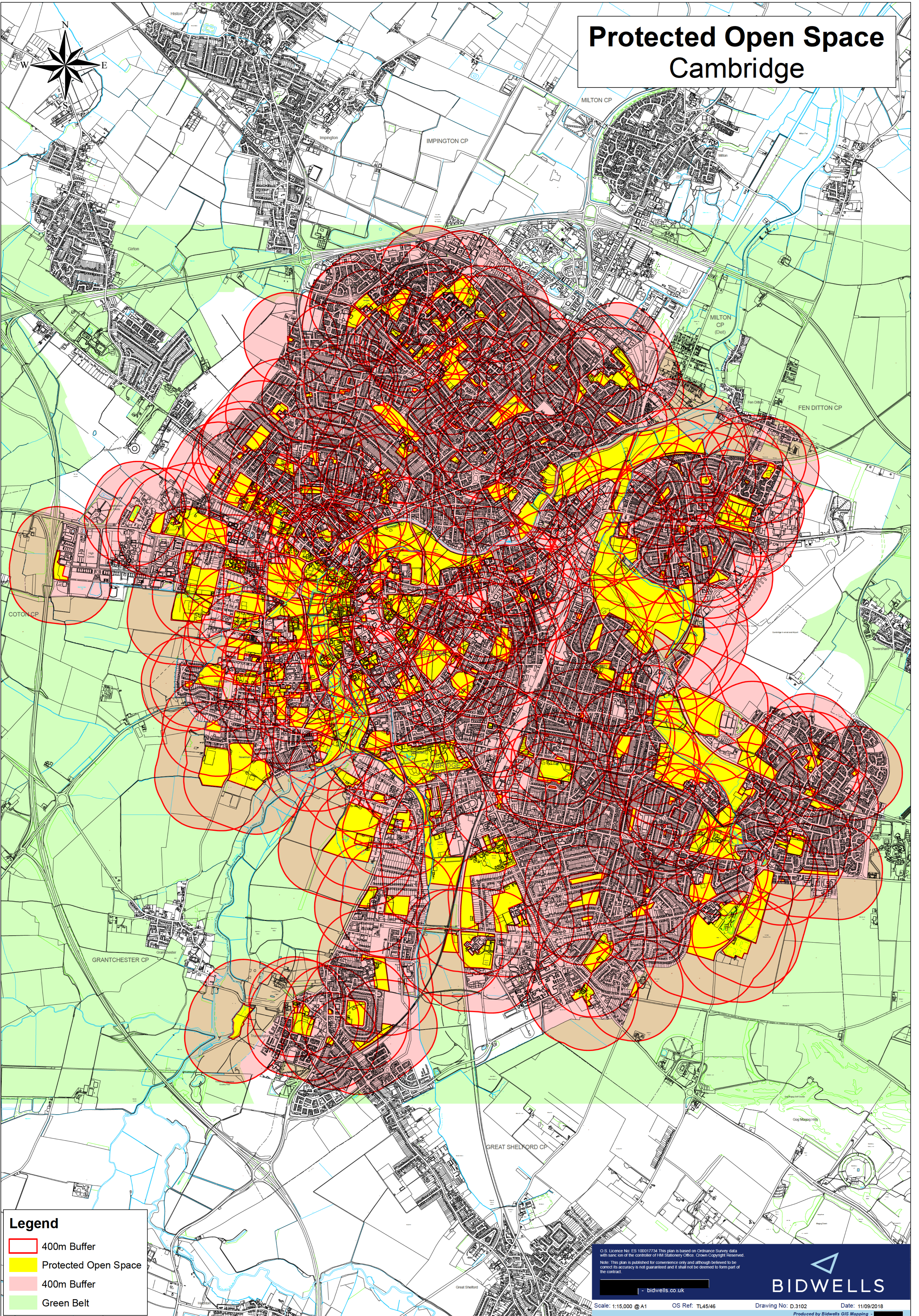
8.20 Policy 67 requires an overhaul so that it allows for a clearer NPPF para 97 structure and criteria assessment and to remove the 400m restriction, which is too onerous and could prevent a

planning judgement being made to account for benefits of a relocation. The assessment criteria to determine whether an open space should be designated is based on PPG17 and should have an overhaul to ensure there is a robust assessment criteria, to underpin the Big Theme around biodiversity and green spaces. By example, Emmanuel College Sports Ground should not be a protected open space; it has only planted boundaries to the west and north; comprises two Important Positive Views based in the southern portion of the site; and is surplus to requirements following the land at Rutherford Road being used as a larger, alternative playing field by Emmanuel College.

APPENDIX 1

PROTECTED OPEN SPACE MAP

Protected Open Space Cambridge



Legend

- 400m Buffer
- Protected Open Space
- 400m Buffer
- Green Belt

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