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Dear Sirs,

**SUBMISSION OF REPRESENTATIONS ON BEHALF OF CAM CONSERVATORS  
LAND AT FEN ROAD, CAMBRIDGE**

Savills (UK) Ltd is instructed by Cam Conservators to submit representations to the Greater Cambridge Local Plan (GCLP). For context, the Conservators of the River Cam are the statutory navigation authority for the River Cam from Bottisham Lock to the Mill Pond in Cambridge. Their responsibility spans both the administrative boundaries of Cambridge City and South Cambridgeshire District Council. The Conservators' mission is as follows:

- maintain the River Cam between Mill Pit and Bottisham Lock in a good navigable condition;
- strike a balance between the needs of all the river users and riverside landowners and residents; and
- manage the river in a manner sensitive to environmental interests.

The consultation on the of the GCLP sets out the broad framework for growth of the area and is very high level with regards to detail. We have therefore reviewed the questions set out throughout the document titled '*The First Conversation*', therefore the responses are set out below with the question above and the response subsequently set out after. It should also be noted that the responses below are made in accordance with the Call for Sites submission made on the 22<sup>nd</sup> March 2019 for the site known as 'Fen Road, Cambridge'.

**Question 2: Please submit any sites for employment and housing you wish to suggest for allocation in the Local Plan. Provide as much information and supporting evidence as possible.**

Whilst the Councils have requested that sites submitted to the Strategic Housing and Employment Land Availability Assessment (SHELAA) are not resubmitted through this Regulation 18 Issues and Options Consultation, it should be acknowledged that Cam Conservators continue to support the promotion of their site at Fen Road for a mix of uses comprising new residential development and a new residential marina for permanent residential moorings.

**Question 5: Do you think we have identified the right cross-boundary issues and initiatives that affect ourselves and neighbouring areas?**

Cam Conservators support the cross-boundary issues identified in the document. It is in the Cam Conservator's particular interest that wildlife habitats and green infrastructure are dealt with as a cross boundary issue as well as water, including supply, quality, waste water and flood risk. This is particularly important with regards to the river and as part of their mission to manage the river in a manner sensitive to environmental interests. The existing allocation for residential moorings along the river adjacent to Fen Road spans both Councils'

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administrative boundaries, therefore it is imperative that all parties and stakeholders work together to ensure that the allocation can be delivered along with the proposed residential development.

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

The National Planning Policy Framework (2019) states in paragraph 170 that *'planning policies and decisions should contribute to and enhance the natural and local environment... taking into account relevant information such as river basin management plans.'*

The emerging Greater Cambridge Local Plan should acknowledge the important role the River Cam plays in all three objectives of sustainability. It is noted that the River is referenced in particular as playing an important role *'in linking semi-natural habitats, including ecologically designated sites in Cambridge such as Stourbridge Common, Sheep's Green, and Coe Fen Local Nature Reserves.'* It is also noted that there has been a decrease in biodiversity in the area and the impact this has had on wildlife, particularly in relation to the River Cam.

The River itself as well as land directly adjacent, including the Tow Path is used by a range of people including the following:

- Ramblers/Walkers/Joggers;
- Cycling;
- Private Punts/Canoes;
- Hire Canoes/Punts;
- Live on Boarders;
- Boats Resident and Visiting;
- University/College Rowing;
- City Club Rowing/ CRA;
- Swimmers;
- Fishing

The vast range of users demonstrates that the River plays an important role and its natural environment should be conserved for future users. Within the NPPF the definition of *'Open Space'* includes *'all open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.'* Therefore, the Cam Conservators strongly support the recognition that the natural environment must be a key theme through the emerging Greater Cambridge Local Plan.

The proposed residential development at the site known as Fen Road, Cambridge will create revenue which will be directly reinvested into improvements to the River Cam and land within the jurisdiction of Cam Conservators and therefore improve the natural environment and benefit the wide range of river users. Furthermore, the provision of a new marina will provide the much needed slack water for larger native fish species like carp and eels.

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

The Issues and Options Document acknowledges that the Cambridge green space network needs to continue to be attractive, accessible and well-designed as well as be protected. The River Cam and Tow Path provide a fundamental green network for a range of users and stakeholders. It is important that the Cam Conservators are involved with the aims and strategic objectives to maintain and improve the green space network within their responsibility.

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

It is acknowledged that DEFRA is piloting a 'biodiversity net gain calculator' and there is the ability for Local Authorities to prepare their own calculator, it is highly recommended that there is a clear, transparent and

consistent guide to assist in the application of such a tool. This will be of benefit to Developers, the Councils and the local community.

The Issues and Options Document identifies that net gains can be achieved from building design level through to strategic landscape management level. Importantly, net gain can be achieved through off-site measures. These measures could become more prevalent through developments within Cambridge City Centre. Here, the river network could provide important spaces for biodiversity net gain. In support of the proposed residential and marina development on land at Fen Road, Cambridge, the provision of a new marina would provide the much needed slack water for larger native fish species like carp and eels. This would also provide opportunities for habitat creation and enhancement along the river network. This is particularly the case at the Cam Conservator's 11 acre site at Clayhithe, where there exists opportunities for habitat enhancement.

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

As aforementioned the River plays a fundamental role providing the facility for a range of activities to take place with Cambridge and South Cambridgeshire. Any capital raised by Cam Conservators is reinvested into the River. Therefore, any profits made by the development of the site at Fen Road, Cambridge will be reinvested and therefore support the activities of River users.

The River and the land within the responsibility of the Cam Conservators not only provides recreation space for a range of users but also areas which can enhance mental health as well as physical health and well-being. The Tow Path is already used both by commuters as well as recreational walkers and cyclists. It is important that Cam Conservators are supported through the Local Plan to ensure that the needs of the users can continue to be met.

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

As explained within the previous submission to the SHELAA, there exists an extreme lack of residential moorings on the River Cam. Both Councils are aware of the issues around the availability of both narrow and wide berth boat licences. There is currently a 10 year waiting list for residential narrow boat licences and a 20 year wait for wide berth boat licences. Furthermore, the current facilities are substandard along the river with no refuelling station existing within Cambridge City. This results in boat users having to take their boats to Ely over 15 miles away to refuel. There is only one pump out point, where boat users can dispose of their raw sewage close to Jesus Green Lock. The only water point to fill the boat up with clean water is also located at Jesus Green Lock.

The new Local Plan should acknowledge the different types of housing which the local population may require outside of the normal income measurements. It is important that housing for '*different groups of the community*' and planning so that those '*needs are met*'. It is clear that in the two most recently adopted Local Plans for both Cambridge City and South Cambridgeshire, the needs of the river users who reside on the River Cam have not been met.

It is imperative therefore that this Greater Cambridge Local Plan looks to understand and provide sufficient allocations for residential moorings, including continuing to allocate the Marina at Fen Road, however, it is also important that the proposed residential development on land adjacent to the River is also allocated for residential development, in what is a highly sustainable location.

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

To ensure the Local Plan is inclusive there is a need for the Local Plan to provide for a wide range of housing including a diverse range of tenures. It is also recommended that the emerging Local Plan is informed by a robust evidence base to establish the size, type, and tenure of housing needed in the area.

As explained in the response to question 31 above, there needs to be a sufficient amount of residential moorings proposed to be allocated in the Greater Cambridge Local Plan. The severe lack of moorings and the resulting issues need to be taken into consideration by the Councils when preparing this combined Local Plan.

**Question 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?**

Cam Conservators strongly supports a Green Belt Review to be undertaken to assess the possibility of removing land from the Green Belt where sustainable development could be located. The release of sites from the Green Belt will unlock the potential for sustainable sites such as '*Land at Fen Road, Cambridge*'.

**Question 42: Where should we site new development?**

There needs to be a balanced approach to the location for new development across Greater Cambridge to support the area as a whole. Of the options presented at Fig 26 (page 81), none of the options should be pursued in isolation. Instead a blended option, favouring sustainable and accessible locations should be supported.

Specifically, there is a great need for a marina within walking distance of Cambridge City Centre. Currently, moorings are provided in three locations, with a fourth known as Riverside, already providing problems through unauthorised moorings. Both Cambridge City and South Cambridgeshire District Councils recognise the need for a residential "live on board" facility. In the previous Cambridge City Local Plan (2006) the site was allocated for Off-River Moorings under allocation 3.01 and within the Cambridge City Local Plan (2018) policy 54: Residential Moorings specifically states the criteria required to be met for residential moorings. In addition, the policy references the allocation RM1 at Fen Road, which is being promoted as per question 2 above. Within the South Cambridgeshire Local Plan (2018) the site is referenced in policy H/7: Residential Moorings.

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

As explained in the section above, Cam Conservators maintain that the land known as Fen Road, Cambridge should be developed to provide a marina with residential moorings as well as a quality residential development of both apartments and houses. Cam Conservators are of the opinion that there is sufficient justification and evidence that the site known as '*Fen Road, Cambridge*' should be removed from the Green Belt for residential development, particularly due to the highly sustainable credentials of the site.

We hope that these representations are of assistance in taking the plan forward. Should you require any further clarification on the issues raised in this representation please do not hesitate to contact me.

Yours sincerely,

**Rachael Morey MRTPI  
Planner**