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# Greater Cambridge Local Plan First Proposals Public Consultation 2021

Representations on behalf of Mission Street Ltd

December 2021

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<b>Project Ref:</b>	33024/A5/P1/RM/SO	33015/A5/P1/RM/SO
<b>Status:</b>	Draft	Final
<b>Issue/Rev:</b>	01	02
<b>Date:</b>	December 2021	
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Ref: 33024/A5/P1/MH/RM/SO  
File Ref: 33024.P1.GCLP.RM  
Date: December 2021

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## 1.0 INTRODUCTION

- 1.1 These representations have been prepared by Barton Willmore LLP on behalf of Mission Street Ltd. These representations respond to the Greater Cambridge Local Plan First Proposals (GCLP FP) consultation which follows an initial Call for Sites and series of workshops held with a range of local stakeholder groups. The First Proposals are now presented for formal public consultation in accordance with Part 6 of The Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.2 Mission Street are actively involved in the delivery of refurbished and new employment floorspace in the sub-region, having an active interest in the redevelopment of the site known as Burlington Park in Foxton, South Cambridgeshire.
- 1.3 These representations are submitted in response to the formal public consultation, and references relate directly to the GCLP FP consultation open until 13 December 2021. Section 2 sets out points of general comment on the FP document in the context of supporting documents, Topic Papers and the Evidence Base; Section 3 provides a discussion of the Burlington Park Site and directly related policy; and Section 4 provides a summary and series of conclusions.
- 1.4 We have selected those policies within the GCLP FP document that relate to Mission Street's employment development interest in the area the most, which includes matters on the following topics:
- Wellbeing and Social Inclusion and the creation of inclusive employment and business opportunities, to provide a balanced approach;
  - Employment and Economy, given the related benefits developments that sites such as Burlington Park could bring to the Greater Cambridge Area;
  - Connectivity and Travel, considering the way forthcoming infrastructure such as the Foxton Travel Hub could positively relate to employment sites;
  - Climate Change and Sustainability, to tailor individual sites to provide the most suitable benefits in regard to such matters; and
  - Natural Environment, considering the implications any development may have on biodiversity and ecology, and how this may impact the delivery of development proposals.

- 1.5 These representations seek to build on the positive work that has been inputted into the GCLP FP and ensure that the plan maximises opportunities to positively plan for sustainable development.

## 2.0 GREATER CAMBRIDGE LOCAL PLAN FIRST PROPOSALS

### Wellbeing and Social Inclusion

#### ***WS/IO: Creating inclusive employment and business opportunities through new developments***

- 2.1 The inclusion of the reference to providing employment and training opportunities in relation to wellbeing and social inclusion is welcome and demonstrates that a holistic approach has been taken to growth.
- 2.2 A high degree of affluence is observed particularly within South Cambridgeshire where 88% of the population is qualified at level 2 or higher, compared to the national average of 78.2%. This suggests that the local population is one well placed to further develop and take on high skilled jobs. This trend should increase over time with the increased focus the Wellbeing and Social Inclusion Topic Paper places on training and upskilling as activities to support core themes (Section WS/IO).
- 2.3 The achievement of such activities and outcomes will in turn mean that an increased number of high skilled jobs will be needed within the area to support the careers and livelihoods of local people and strengthen the local economy. Within South Cambridgeshire there are less high skilled jobs than within the city of Cambridge and therefore the focus for the creation of such jobs across Greater Cambridgeshire should primarily be on South Cambridgeshire District.
- 2.4 To achieve an increase in high skilled jobs, we suggest that text should be included within Policy WS/IO that supports employment related development that would generate high skilled jobs within the local area. This would draw on the identified strengths of the local economy to generate more knowledge driven employment clusters Suggested text is included below:

**Consistent with the actions to upskill the local population, within South Cambridgeshire District, proposals for employment related developments will be encouraged and supported where evidence has been submitted that a development would generate higher-skilled occupations.**

## **Employment and Economy**

### ***J/NE: New employment development proposals***

- 2.5 We agree with the policy direction that employment development under E(g), B2 and B8 use classes, will be supported in the plan. We support the direction that employment development will be supported in towns and villages where it is of an appropriate scale and character to their location and scale of settlement.
- 2.6 Accessibility is highlighted as a key factor within policy J/NE in determining the accessibility of employment development proposals. However, in the interests of a holistic long term vision of growth, we recommend that a degree of flexibility be specifically applied in such cases to take into account the long term connectivity and travel projects – such as the Foxton Travel Hub – that are underway or due to come forward within the plan period or other such contextual development that may better enable long term sustainable transport opportunities in the future when considering the immediate requirements and acceptability of a proposal.
- 2.7 We recommend the following text is included within Policy J/NE:

**A degree of flexibility will be provided when considering the accessibility and transport options available to a proposal for employment development, to consider nearby short, medium and long term sustainable transport projects that may influence the sustainability of a proposal beyond the nearby infrastructure currently available.**

### ***S/DS: Development Strategy***

- 2.8 The Cambridge economy is internationally renowned for its world leading research institutes and related businesses, as discussed on page 35 of the GCLP FP document. The same section of the document highlights that a need for 'additional research and development laboratory space' has been identified, and that the broad distribution of growth includes substantial growth settlements close to the edges of Cambridge (see GCLP FP document Figure 10).

- 2.9 The opportunities for such growth have been enhanced through recent projects and proposals coming forward such as the Foxton Travel Hub which will enhance the sustainability credentials of employment proposals in nearby areas.
- 2.10 In the recent Budget announced by the National Government, a very strong focus was observed on the desire to grow the Research and Development economy across the country, further emphasizing the mandate for such development to be pursued and supported.
- 2.11 Therefore, given this need and the express high level of high skilled jobs provision within Cambridge, combined with the need to balance such employment opportunities more widely across the Greater Cambridge area, we suggest that a high priority and degree of support should be given to Research and Development related proposals. The following text is suggested to be included within Policy S/DS as a strategy proposal:

**Supporting proposals for Research and Development employment-related schemes, particularly within sustainable settlements across South Cambridgeshire District.**

***J/AW: Affordable workspace and creative industries***

- 2.12 Whilst it is recognised that there is a need to support start-up businesses and SMEs, the requirements of Policy J/AW are questioned based on a lack of evidence justifying the level of affordable workspace and what scale of development should provide it. The plan must also recognise that employment space rents across the City and South Cambridgeshire differ greatly, depending on locations; indeed, it is this range of rents across types of product that provides the necessary ecosystem for research and development companies to thrive.
- 2.13 Indeed, the proposals at Burlington Park will aim to deliver a diversity of research and development floorspace of different sizes and rental points, providing an alternative to other, high-rental location, whilst still being in the Southern Cluster. This would allow Burlington Park to support the local R&D ecosystem and help companies at all stages of their development continue to thrive.
- 2.14 The Jobs Topic paper references London Authorities and the Greater London Authority as providing 'good examples' of planning policies that seek to secure affordable workspace. The citing of these authorities as good examples is flawed and the Council should consider comparisons carefully. The job market and skills found within these authorities will differ



from Greater Cambridgeshire and therefore drawing the comparison and providing a blanket percentage requirement for affordable workspace across employment development will not necessarily be as appropriate within the unique circumstances of the area and the need may also vary depending on the surrounding uses and context.

- 2.15 We suggest that affordable workspace provision be flexibly sought on a proportionate, site by site basis.
- 2.16 Clarity must be given on how affordable workspace is to be calculated and applied across the districts.
- 2.17 Clarification should be given as to what constitutes a 'larger commercial development' in the context of the requirement to deliver affordable workspace.
- 2.18 Flexibility should also be included within the policy so that the rate of affordable workspace is proportionate to the scale of the development.

### **Connectivity and Travel**

#### ***I/ST: Sustainable transport and connectivity***

- 2.19 We express support in principle for Policy I/ST, in respect of the encouragement given towards innovative and flexible solutions to internalise trips and reduce vehicle use.
- 2.20 However, as per our comments in respect of Policy J/NE, in the interests of a holistic, long term vision of growth, we recommend that a degree of flexibility be specifically applied in such cases to take into account the long term connectivity and travel projects – such as the Foxton Travel Hub – that are underway or due to come forward within the plan period or other such contextual development that may better enable long term sustainable transport opportunities in the future when considering the immediate requirements and acceptability of a proposal. The text we suggest above in respect of that policy could similarly be drafted into Policy I/ST.

### **Climate Change and Sustainability**

- 2.21 Climate Change is cited as being the 'highest priority theme' based on the results from the First Conversation consultation in 2020.

- 2.22 We echo the results of the consultation that flexibility in policies is required, to allow adaption for changes in technologies, innovation and viability. We consider that this flexibility should be applied to related policies such as Policy CC/NZ where the needs and merits of individual schemes and their context should be considered in applying set operational standards.

***I/EV: Parking and electric vehicles***

- 2.23 The inclusion of requirements for Electric Vehicle Charging (EVC) is consistent with the wider sustainability and Climate Change agenda at both local and national levels.
- 2.24 The specific levels of demand however, for EVC points needs to be supported by further evidence, as the levels of provision for employment and retail developments appear arbitrary.
- 2.25 Within the Infrastructure Topic Paper, respondents of previous consultations have cited the need for flexibility about electric vehicle parking standards. Paragraph 5.1 of the topic paper states a need to provide flexibility over the amount of car parking provided while reflecting the national drive to switch to electric vehicle charging.
- 2.26 Given the uncertainty regarding electric vehicle uptake and the lack of evidence determining the extent of EVC points for employment development, we recommend that the level of EVC points should be considered on a case-by-case basis in the context of other transport options and the level of demand at the time so as to be adaptable to changing circumstances and contexts.
- 2.27 With regard to car, mobility and cycle parking standards more generally, the direction for policy to take into account factors such as mix, land uses, location and accessibility in informing the requirements for a specific development is welcomed, as often parking standards are too rigid without taking into account the specific characteristics of the site.
- 2.28 Similarly with regard to cycle parking, while sustainable transport modes should be encouraged, this may also warrant the flexibility of being applied on a site by site basis as well, as the location of the development – such as whether it is in a city location or a more rural location for example or what public transport connections there are nearby – may strongly impact what demand there is likely to be for such parking provision.
- 2.29 We therefore iterate that such flexibility within parking standards should be reflected within the final policy for both vehicular and cycle parking.

## Natural Environment

### ***BG/BG: Biodiversity and geodiversity***

- 2.30 The Environment Bill received Royal Assent on 9 November 2021. Schedule 14 (Biodiversity Gain as condition of Planning Permission), Part 7A of the Environment Act 2021 states under point 2 (Biodiversity Gain Objective) (3) that the relevant percentage for biodiversity net gain is 10%.
- 2.31 The proposed policy direction under Policy BG/BG of the GCLP FP document seeks to double this requirement for biodiversity net gain to 20% and to set a requirement to use the Defra Biodiversity Metric 3.0 'or its successor' to measure net gain.
- 2.32 The reasons cited within the GCLP FP document to require this higher level of gain are the wider aim of the Oxford-Cambridge Arc to double the area of land managed primarily for nature and to deliver a minimum of 20% biodiversity net gain in the context of a 'relatively low level of designated sites and priority habitats that Greater Cambridge has compared with other English areas'.
- 2.33 While the Biodiversity and Greenspaces Topic Paper and supporting evidence base are commended and provide strong insight into the ecological status of the area, investigations into how such requirements may impact the financial viability of developments appears to be limited. In this regard there is an over reliance on the impact assessment published by the Government in relation to biodiversity rather than further financial assessment at a more local level.
- 2.34 Therefore, given the local aims and constraints cited within the Topic Paper and evidence base, a stronger analysis of local financial viability evidence needs to be gathered to justify the higher than national requirement for biodiversity net gain, particularly given the relatively low level of designated sites and the ecological constraints identified within the local area, meaning that expensive off-site contributions may be needed to meet the 20% net gain requirement currently proposed which would likely have a high impact on design and viability of schemes, particularly on greenfield sites.
- 2.35 It is also noted that while the policy seeks to establish a preferred metric, the Environment Bill 2021 Schedule 14, Part 7A under point 4 states that the Biodiversity Value and metric are to be produced and published by the Secretary of State, and that the Secretary may from time-to-time revise and republish the biodiversity metric.

- 2.36 The proposed direction and wording of local policy should therefore be revised to match national policy, simply citing that the Secretary of State preferred metric and value will be used when measured biodiversity gains rather than specifying a specific metric within local policy.

### **3.0 BURLINGTON PARK**

- 3.1 The Site known as Burlington Park in Foxton Parish and Neighbourhood Plan Area, is partially located within a Conservation Area and is partially within the Village Development Framework Area.
- 3.2 The Foxton Neighbourhood Plan (FNP) was made on 5 August 2021 after a successful referendum which took place on 22 July 2021. The FNP as made now forms part of the development plan for South Cambridgeshire. The Western portion of the site is allocated for new employment provision in Foxton under FNP Policy FOX/16.
- 3.3 Mission Street's vision for of the Site is to enable its sustainable future for employment use through refurbishment and new build. Such a scheme is currently being drafted for discussion with the local authority and parish, and submission as a full planning application targeted for early 2022, considering the unique setting, constraints and employment needs for the area.
- 3.4 The site is immediately available for redevelopment. The proposals will significantly improve a brownfield industrial site in an accessible and sustainable location. This is consistent with the spatial strategy set out within the GCLP FP document that allocations, policies and decisions should be strongly influenced by making the best use of suitable safeguarded and brownfield land, and there are relatively few such opportunities immediately available. Such a proposal would be consistent with the employment uses sought for the area under emerging Policy J/NE and would both support and benefit from the forthcoming Foxton Travel Hub, creating an increased usage and demand for such a service, while the coming forward of the travel hub serves to increase the sustainability of the site, both environmentally and economically.
- 3.5 The scheme would also accord with emerging GCLP Policy S/DS in providing sought after Research and Development space, which is both a local and national priority moving forward.
- 3.6 In relation to adopted policy, the Adopted South Cambridgeshire Local Plan (SCLP) (2018) aims to build on the strengths of the Cambridge sub-region as a 'premier location' for high technology research and development in Europe through the creation of planning policies favouring research and development. The SCLP 2018 provides more flexibility than past policies to build on the sub-region's strengths while supporting sustainable growth of other sectors.

- 3.7 Policy E/12 of the South Cambridgeshire Local Plan supports new employment development (B1, B2 and B8 uses) or expansion of existing premises provided that the scale of development would be in keeping with the character and scale of the location. Foxton is categorised as a 'Group Village' in the Local Plan and is therefore a location where limited development will be supported to meet local need. It should be noted that B1 Business is revoked from 1 September 2020. It is effectively replaced with the new Class E(g).
- 3.8 Mission Street's proposals are supported by both adopted and emerging local policy and are deliverable within 2022. The scheme would provide employment space in the form of a highly sought after research and development use in an sustainable and appropriate location, and should be supported and taken into account as a valuable employment development opportunity moving forward within the GCLP.

## 4.0 SUMMARY AND CONCLUSIONS

4.1 These representations have been produced on behalf of Mission Street in response to the formal public consultation on the GCLP FP document. Our comments are summarised below. We have proposed solutions in each case where applicable within this representation:

- Additional text should be included within Policy WS/IO that supports employment related development that will generate high skilled jobs within the local area;
- A degree of flexibility should be specifically applied within Policy J/NE to take into account the long-term connectivity and travel projects that are underway or due to come forward within the plan period or other such contextual development that may better enable long term sustainable transport opportunities in the future when considering the immediate requirements and acceptability of a proposal;
- A high priority and degree of support should be given to Research and Development related proposals and explicitly stated within Policy S/DS;
- Policy J/AW – clarification and flexibility is sought in regard to the application of affordable workspace provision;
- Flexibility should be applied to related policies such as CC/NZ where the needs and merits of individual schemes and their context should be considered in applying set climate change and sustainability related operational standards;
- For employment developments, we recommend that the level of electric vehicle charging points should be considered on a case-by-case basis in the context of other transport options and the level of demand at the time so as to be adaptable to changing circumstances and contexts;
- A stronger base of local financial viability evidence needs to be gathered to justify the higher requirement than the national minimum for Biodiversity Net Gain;
- Proposed policy should be worded to reference the National Secretary of State preferred Biodiversity Net Gain value and metric.

4.2 We have also outlined Mission Street’s interest in Burlington Park and the potential we see for redevelopment to enhance its employment usages and sustainability as an example of an available Site that could deliver much desired further Research and Development space in a sustainable location.





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