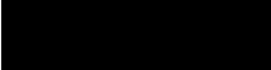


**LAND AT CAMBRIDGE
NORTH
GREATER CAMBRIDGE
LOCAL PLAN – FIRST
PROPOSALS
CONSULTATION 2021**

Quality Assurance

Site name: Land at Cambridge North
Client name: Brookgate Land Limited
Type of report: Regulation 18: First Proposals Consultation 2021

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Signed 

Date 6 December 2021

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Signed 

Date 10 December 2021

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1.0 Introduction

- 1.1 These representations have been prepared by Bidwells LLP on behalf of Brookgate Land Limited who control Land at Cambridge North (“the Site”) and in response to the Greater Cambridge Local Plan Regulation 18: First Proposals 2021 consultation (“the consultation document”). Please refer to **Appendix 1** for site location plan.
- 1.2 Brookgate Land Ltd is the development partner of Network Rail and D B Cargo UK (and through them Freightliner and Tarmac) who own Land at Cambridge North, formerly known as the Chesterton Sidings, and who collectively form The Chesterton Partnership.
- 1.3 Brookgate Land Limited has been working as promoter for The Chesterton Partnership in order to secure the rationalisation and redevelopment of the former Chesterton Sidings site. Planning permission has been granted for a 217 bed hotel (under planning application reference S/2372/17/FL) and a 90,000 sq ft office (under planning application reference S/4478/17/FL). Construction has now begun on these two important permissions which will serve to bring life to the Cambridge North station area and act as a catalyst for the development of the wider North East Cambridge AAP.
- 1.4 Brookgate Land Limited are now seeking to bring forward the next phase of development (the ‘commercial quarter’), alongside the emerging North East Cambridge Area Action Plan (NEC AAP) process, which will further build on the momentum created by the Station development and the hotel and office permissions.
- 1.5 The First Proposals consultation document sets out the Councils preferred approach to the level of growth that should be planned for, and where it should be planned over the plan period to 2041. It also describes the planning policies proposed to shape development and guide planning decisions. The First Proposals consultation is particularly seeking views on the emerging development strategy, the direction of travel for policies and issues the Councils should be considering as policies are prepared.
- 1.6 Land at Cambridge North currently falls within the ‘Cambridge Northern Fringe East and Cambridge North railway station’ major developed site in the adopted South Cambridgeshire District Council Local Plan, under Policy SS/4. As part of the First Proposals document, the intention is to introduce a new policy covering the whole of the NEC AAP area (Policy S/NEC: North East Cambridge). This will set out the vision for NEC AAP area, with the key requirements for the site to come forward in the NEC AAP itself.
- 1.7 The Greater Cambridge Housing and Economic Land Availability Assessment (HELAA) lists and maps sites within Greater Cambridge that may have potential for residential and economic development. A ‘Red, Amber, Green’ (RAG) scoring system was used to carry out the assessment. Sites were deemed to be unsuitable if they were assessed as ‘red’ against any of the criteria used.
- 1.8 The HELAA forms part of the evidence base for the emerging Greater Cambridge Local Plan and the outputs of the HELAA will assist the Councils in identifying the choices available for site allocations to meet development needs. Specifically, it has been used to inform the choices made at the First Proposals consultation stage, alongside a range of other evidence exploring the development needs of the area and how they should be met.

- 1.9 Land at Cambridge North is identified in the HELAA under site reference 51486. It scores green for being available and achievable but red for suitable on the basis of Site Access, Noise, Vibration, Odour and Light Pollution and Strategic Highways Impact.
- 1.10 These representations respond to the sites' assessment within the HELAA and also the draft policies of the First Proposals consultation document.

2.0 Background

The Site

- 2.1 Land at Cambridge North is located in the north-east of Cambridge, to the north of Cambridge North railway station. The land comprises former railway sidings.
- 2.2 The Site is bound by the Cambridge Water Recycling Centre (CWRC) to the north beyond which lies the A14. The Site is bound by the railway line to the east and existing residential development to the south. The Site is bound by the Cambridge Guided Busway (CGB) and existing commercial development to the west.
- 2.3 Brookgate Land Limited is the developer for The Chesterton Partnership in order to secure the rationalisation and redevelopment of the former Chesterton Sidings site. Planning permission has been granted for a 217 bed hotel (under planning application reference S/2372/17/FL) and a 90,000 sq ft office (under planning application reference S/4478/17/FL). Construction has now begun on these two important permissions which will serve to bring life to the Cambridge North station area and act as a catalyst for the development of the wider North East Cambridge AAP (NEC AAP).
- 2.4 Brookgate Land Limited are now seeking to bring forward the next phase of development; a commercial quarter, alongside the North East Cambridge Area Action Plan (NEC AAP) process which will further build on the momentum created by the Station development and the hotel and office permissions. The location of the commercial quarter is shown at **Appendix 2**. A further phase (the 'residential quarter') on the remaining land south of Cowley Road is likely to come forward in Q3 2022, with initial phases north of Cowley Road coming forward within 2 years.
- 2.5 Brookgate Land Limited has made clear from the outset and through the NEC AAP workshops their aspiration and intention to bring forward the commercial quarter as early as is practicable. The NEC AAP workshops have been extremely useful and clearly demonstrated that the next phase at Cambridge North would not in any way prejudice the outcome of the AAP process and the achievement of the comprehensive vision for the area as a whole that will be established by the NEC AAP. The commercial quarter would therefore be a policy compliant application, having regard to other relevant policies in the Plan.

The Opportunity

- 2.6 The NEC AAP is the largest brownfield site in Cambridge and is served by excellent public transport infrastructure. It therefore presents a significant opportunity to transform into a high-quality gateway to the city and act as a catalyst for the regeneration of the wider area. Proposals within the NEC AAP should therefore make optimal and efficient use of the site.
- 2.7 The tax payer, through the construction of the Station and the potential relocation of the water treatment work, has committed over £300M towards the regeneration of the area, it is imperative that a proper return is returned on this massive investment in the area.
- 2.8 The vision for the commercial quarter is to provide additional capacity to support the growing office, laboratory and R&D market, with associated increase in job creation. The vision for the residential quarter is to continue the successful transformation of this part of the city and address a specific need for more housing to serve the private rented sector, as part of a mixed tenure

development, thus making a significant contribution to meeting housing needs within Greater Cambridge in a manner that would diversify housing choices within the market.

- 2.9 A high density development would represent efficient use of land in a sustainable location and create the opportunity for people to live close to where they work. A higher density of people also helps to form a critical mass and sense of place to support the range of ancillary retail uses, services and facilities that would come forward alongside the residential and employment accommodation.
- 2.10 To meet the many aspirations the Council has for the NEC AAP site in terms of zero carbon, quality spaces, biodiversity and green spaces, and better connectivity, the land must be optimised, particularly that around Cambridge North station and at the residential and commercial quarter. This area can support the regeneration of the wider site and the investment made in delivering the Cambridgeshire Guided Busway (CGB).
- 2.11 The Site is bounded by the railway line to the east, the A14 to the north, the Cambridge Science Park to the west and the suburban Chesterton to the south. The City Centre is some 3.5km from the site. This physical context presents an opportunity to investigate heights and densities which might not be supported in other locations in Cambridge: taller buildings would have no impact on any existing residential properties with regard to sunlight and daylight but could;
- Make optimal and efficient use of the capacity of the site and release significant development pressure from the historic core of the City;
 - Optimise the effectiveness of substantial investment in public transport infrastructure and mobility corridors in terms of improved and more sustainable mobility choices and enhanced opportunities and choices in access to housing, jobs, community and social infrastructure;
 - Create an opportunity to define the north east corner of the City with striking buildings visible from the A14;
 - Support the additional uses and amenities that will make this a self-supporting district; and
 - Assist in reinforcing and contributing to a sense of place, such as indicating the main centres of activity, important street junctions, public spaces and transport interchanges. In this manner increased building height is a key factor in assisting modern placemaking and improving the overall quality of our urban environments.
- 2.12 There is a lack of Grade A office space in Cambridge. For the R&D and business services sector, the location decisional drivers are access and ability to recruit the right skill sets. Land at Cambridge North provides this, but the lack of available space and lack of development pipeline puts that resilience at risk and could undermine the growth of the R&D sector. Developing Land at Cambridge North can help address the demand and supply imbalance for quality office stock and professionally managed, high quality and flexible laboratory space in close proximity to the new transport hub.
- 2.13 There is also a clear demand for additional housing in Cambridge of a type and tenure that is affordable for renters. One of the possible groups are young professional households that make-up a considerable proportion of the renter population. These are people who often do not meet the criteria for social rented housing but cannot afford to buy their own home. The private rented sector can provide such accommodation.

- 2.14 The Cambridge private rented sector is quite unique with a population profile characterised by a number of demographics such as young adults principally living as couples with no dependent children. Contrary to popular opinion, the private rented sector is not dominated by all-student households, which account for only 7.5% of private rented households, as most students live in dedicated communal establishments. Rather, economic activity and employment rates are particularly high in the private rented sector in Cambridge with many working in financial, real estate, professional and administrative activities. Many are in professional or other senior occupations, despite the young age profile.
- 2.15 The proposed commercial and residential quarter at Cambridge North is capable of delivering a well-designed, high quality development that would make efficient use of a brownfield site in a highly sustainable location. The site's proximity to Cambridge North railway station, the Cambridge Guided Busway (CGB), frequent local buses (the Citi 2), the Park and Rides services, good cycle and pedestrian connectivity to Cambridge City Centre and the cycle network in general also enables opportunities to promote sustainable transport modes.

3.0 Impacts and Potential Mitigation

3.1 The HELAA scores the site 'red', and therefore not suitable, on the following topics;

- Site Access;
- Noise, Vibration, Odour and Light Pollution;
- Strategic Highways Impact

3.2 Commentary in response to the above is provided below:

Site Access

3.3 The HELAA states the following:

"If over 100 dwellings two points of access are required to accord with the advice of the Cambridgeshire Fire and Rescue.

No possibility of creating a safe access."

3.4 Both the current adopted Policy (SS/4) and the emerging North East Cambridge Area Action Plan (NEC AAP) acknowledges that residential use is acceptable in principle to come forward at Land at Cambridge North. Brookgate Land Limited have progressed detailed discussions with Greater Cambridge Shared Planning Service in relation to the residential quarter south of Cowley Road which could accommodate circa 440 dwellings. This included discussions with County Highways and at no point has a threshold for the level of development that can be served from a single vehicular point of access been identified. The Manual for Streets (MfS, 2007) emphasis on user hierarchy and the formation of movement frameworks across an area has shifted the focus away from the rigid approaches of street design and maximum housing numbers previously associated with the now superseded 'Design Bulletin 32' (DB32). In recent years, the MfS concepts have developed further into Low Traffic Neighbourhoods which seek to maximise connectivity by walking and cycling but limit vehicular access. These principles have been adopted in the development of the masterplan for the site, with a number of streets and spaces being provided for pedestrians and cyclists only, and external pedestrian and cycle connections being made into the wider area.

3.5 As part of the emerging North East Cambridge Area Action Plan (NEC AAP), it is intended for further points of access to be created from Milton Road for motorised traffic. The masterplan vision for the wider site includes vehicular connections into the parcels to the north and west of the site which would contribute to establishing a permeable network of streets to the east of Milton Road which this site would connect into.

3.6 Notwithstanding this, emergency vehicles access can be provided via Cowley Road and Milton Avenue, and via the busway and/or the connection through to Moss Bank to the south of the site.

3.7 This issue should therefore be changed to green in the HELAA.

Noise, Vibration, Odour and Light Pollution

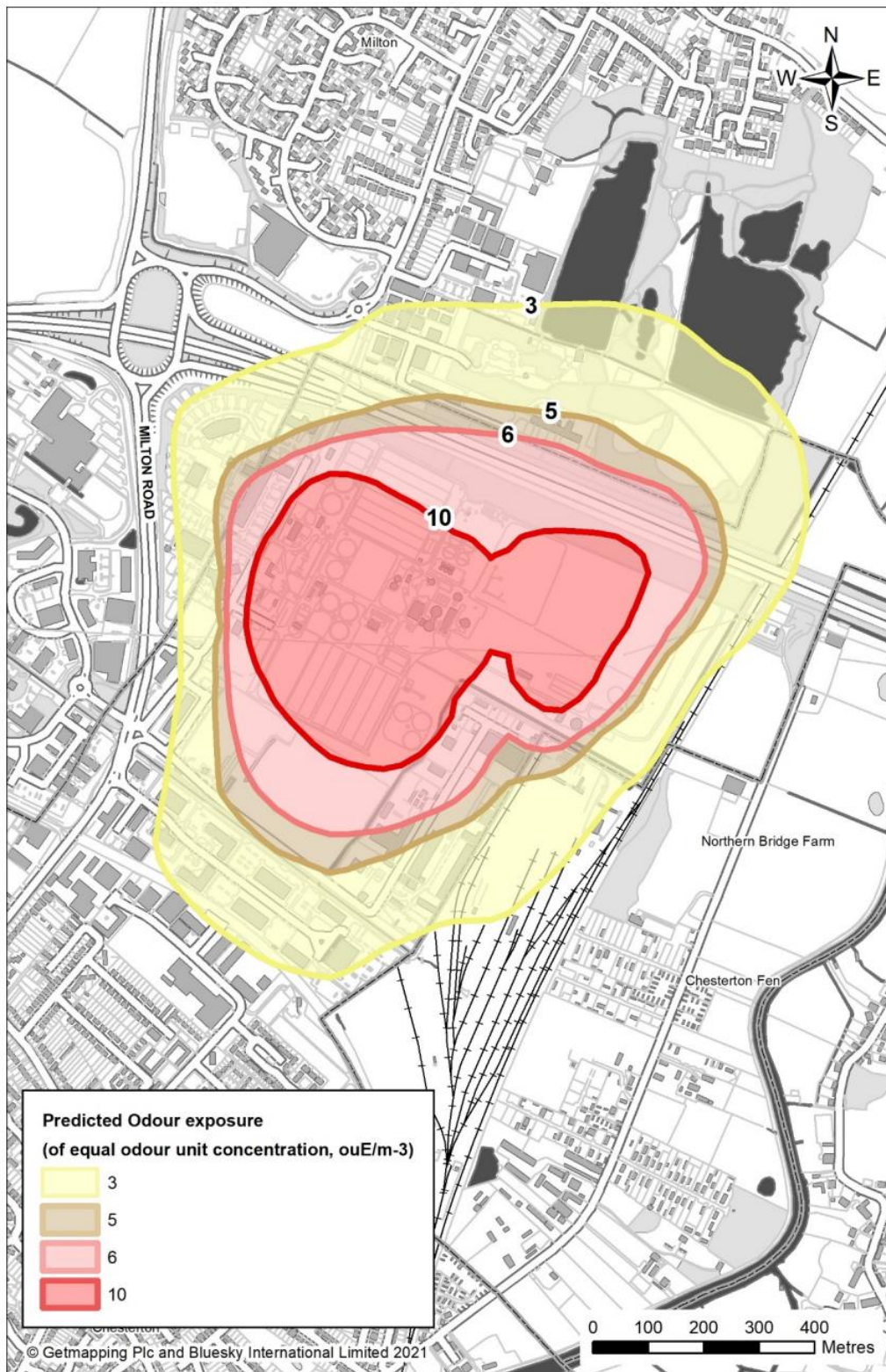
3.8 The HELAA states the following:

“The proposed site will be affected by road traffic noise from nearby main roads and noise from nearby industrial/commercial activities but is acceptable in principle, subject to appropriate detailed design considerations and mitigation. However, the site is not suitable for residential use due to the proximity of the Cambridge Waste Water Recycling Facility because of odour issues that cannot be suitably mitigated.”

3.9 The Councils published an updated Odour report in December 2020 to account for updates to the odour dispersion modelling software used to generate odour contours. An updated model output was subsequently presented to show predicted odour exposure contours in the vicinity of the CWRC for each individual meteorological year of a 5 year dataset (see Figure 1).

3.10 This confirms that land south of Cowley Road within the Cambridge North site falls outside of any odour contour and as such residential uses will be acceptable.

Figure 1: Odour Exposure Contours around Cambridge WRC
 (Updated dispersion modelling output - Olfasense Addendum Report, 21 December 2020)



3.11 The north-western section of Land north of Cowley Road falls within Contour Zone 3 where the Odour report states that residential uses are unlikely to be suitable even with mitigation.

However, in the medium-long term, the intention is for the relocation of the CWRC and the project is now in the pre-application phase for a Development Consent Order to allow this to take place.

3.12 This issue should therefore be changed to amber in the HELAA.

Strategic Highways Impact

3.13 The HELAA states the following:

“Within Highways England Zone 3 - A14 CNB

No capacity for growth. Sites would need to ensure no net increase in vehicles trips on the Strategic Road Network.”

3.14 The HELAA states that proposals within zone 3 are not ruled out at this stage but to be acceptable in planning terms development proposals will need to demonstrate (through a Transport Assessment and Travel Plan) no net increase in vehicles trips on the strategic road network.

3.15 Land at Cambridge North falls within the North East Cambridge Area Action Plan (NEC AAP). Emerging policy and development guidance for the NEC AAP area has confirmed that development will be subject to strict trip budgets which will limit the number of vehicle trips allowed to and from each site, and supported by reduced levels of car parking.

3.16 The trip budget principles and quotas, and the ratio of parking spaces that will be permitted for new development has been set out in the NEC AAP High Level Transport Strategy 2021. The trip budget has been calculated to ensure that there are no additional vehicle trips on Milton Road at peak times (from 2017 levels) and subsequently not result in queuing on the A14 at Milton Interchange (Junction 33).

3.17 Brookgate Land Ltd have worked closely with Greater Cambridge Shared Planning Service and the County Council to ensure their emerging proposals comply with the proposed trip budget for Land at Cambridge North.

3.18 This issue should therefore be changed to green in the HELAA.

4.0 Response to Policy S/NEC: North East Cambridge

- 4.1 Policy S/NEC is intended to set out the placemaking vision for, and the scale and scope of development at North East Cambridge and provide a robust planning framework for the comprehensive redevelopment of this site.
- 4.2 The policy direction is for North East Cambridge to be an inclusive, walkable, low-carbon new city district with a lively mix of homes, workplaces, services and social spaces, fully integrated with surrounding neighbourhoods.
- 4.3 To achieve the vision of a compact, walkable and mixed-use city district, the policy approach for North East Cambridge is for a higher density development. This will create a critical mass of new residents and workers to support these new services. It will also seek to place more homes closer to existing and future employment areas as well as public transport. The North East Cambridge site is well served by public transport and active travel options, including Cambridge North Station and the Cambridgeshire Guided Busway. It is expected that this will improve further with a number of planned projects such as the Chisholm Trail, Waterbeach to Cambridge Public Transport Corridor and Waterbeach Greenway.
- 4.4 Policy S/NEC and the policy direction is **supported**.
- 4.5 The NPPF confirms, at paragraph 120, that planning policies should “give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs” and “promote and support the development of under-utilised land and buildings”. Opportunities for densification of existing urban areas in locations well served by public transport should therefore be maximised wherever possible.
- 4.6 The early commercial and residential phases at Cambridge North provides an opportunity to meet an identified need for commercial uses and mixed tenure, Build to Rent housing. The Site also presents a significant opportunity for redevelopment whilst still being able to respond to local character. They have the potential to create a scheme of high design quality that would make a significant contribution to the emerging city district at Cambridge North. They will both generate the critical mass that generate exciting new places.
- 4.7 In summary, the Site also provides the following significant economic, social and environmental benefits:
- The opportunity to deliver employment and residential to help meet the needs of Cambridge;
 - Supporting the local economy and community, including local shops and services;
 - Development in a sustainable travel location: high (and improving) public transport accessibility; cycling accessibility to transport interchanges and Cambridge;
 - Development that brings health and wellbeing benefits to its residents and the wider community through:
 - high quality design;
 - new and improved public realm which offers mental and physical wellbeing benefits;
 - opportunity to travel sustainably helping to tackle air pollution as well as bring physical benefits;

- Helping to maximise the benefits arising from major investment in the station interchange associated with sustainable transport and active travel; and
- A development partner who wishes to work the community in order to shape a proposal which meets the needs of and can provide wider benefits to the city.

5.0 Response to Policy H/BR: Build to Rent homes

5.1 Policy H/BR sets out when and how proposals for Build to Rent homes would be supported.

5.2 The proposed policy direction states;

The policy will require that proposals for Build to Rent developments, or the amount of Build to Rent within a mixed tenure development, do not create an over-concentration of this tenure in a local area, are distributed across the development (if part of a wider mixed use or mixed tenure development), and meet specific criteria in terms of ownership and management, covenants, and tenancies....

...The policy will require at least 20% of homes on a Build to Rent development of 10 or more homes to be affordable private rented, and make clear that these homes will contribute towards the overall 40% affordable homes to be provided on a mixed tenure development. Affordable private rented homes must be designed to be indiscernible from market homes and that the affordable homes should be distributed throughout the site in small groups or clusters.

As new homes, all Build to Rent developments must meet the nationally described residential space standards and accessible homes standards, as set out in H/SS.

5.3 Policy H/BR is broadly **supported**. However, any potential restriction on quantum of Build to Rent (BtR) within a mixed tenure development, and in particular reference to the NEC AAP area, is not supported.

5.4 The NEC AAP instead needs to remain flexible in order to be able to respond to change and take a positive approach to housing development.

5.5 BtR housing responds to a particular local housing need and provides a means of widening housing choice for tenants, particularly those who may be renting long term, and also to deliver much needed housing within a faster timescale.

5.6 Contrary to popular opinion, the private rented sector is not dominated by all-student households, which account for only 7.5% of private rented households, as most students live in dedicated communal establishments. Rather, the Cambridge private rented sector is quite unique with a population profile characterised by young adults and many are in professional or other senior occupations, despite the young age profile.

5.7 These young professional households make-up a considerable proportion of the population and are people who often do not meet the criteria for social rented housing but cannot afford to buy their own home. The private rented sector can provide such accommodation.

5.8 The redevelopment of Land at Cambridge North offers an opportunity to provide a significant amount of rented accommodation in a highly sustainable location, making the best possible use of a brownfield site that is already allocated for residential development.

5.9 The Homes for Londoners Affordable Housing and Viability SPG (2017) confirms the significant benefits that BtR developments can secure in terms of their particular contribution to increasing housing supply, as outlined below:

- attract investment into housing market that otherwise would not be there, particularly since Build to Rent is attractive to institutional investors seeking long-term, inflation-tracking returns;
- accelerate delivery on individual sites as they are less prone to 'absorption constraints' that affect the build-out rates for market sale properties;
- more easily deliver across the housing market cycle as they are less impacted by house price downturns;
- provide a more consistent and at-scale demand for off-site manufacture;
- offer longer-term tenancies and more certainty over long-term availability;
- ensure a commitment to, and investment in, place making through single ownership; and
- provide better management standards and higher quality homes than other parts of the private rented sector.

5.10 Of particular relevance here is the reference to development at scale. In order to be attractive to investors and in turn ensure the development is commercially viable, BtR needs to be of sufficient scale and size. This critical mass is also important not just in terms of the nature of BtR but also in terms of management. Therefore, pepper potting is the wrong approach. The approach others are taking, such as the Greater London Authority, demonstrates a greater understanding of the economics of BtR. More research needs to be undertaken by the Councils to inform the Local Plan and NEC AAP and to recognise the contribution that BtR can make in sustainable locations.

5.11 The Cambridge North site is the optimal location for BtR within the NEC AAP site given its proximity to the Cambridge North station and transport interchange. This is a prime requirement for BtR operators.

APPENDIX 1
SITE LOCATION PLAN

APPENDIX 2
COMMERCIAL QUARTER (PHASE 2)

