

**Land to the South East of
Cambridge
Representations to the Greater
Cambridge Local Plan
Regulation 18: Preferred
Options 2021**

CEG

13 December 2021

LICHFIELDS

13577/04/MS/RC

Executive Summary

Lichfields is instructed by Commercial Estates Group (“CEG”) (on behalf of the two landowners – Guy’s and St Thomas’ Foundation and Peterhouse College) to submit representations in the context of CEG’s interests at Land South East of Cambridge (“the site”) in response to the Greater Cambridge Local Plan Regulation 18: Preferred Options Consultation (“GCLP”). The site is located to the south of the existing employment allocations GB3 and GB4, following the boundary of the Chalk Pits SSSI and Limekiln Road and down to Wort’s Causeway, east of the existing housing allocation GB1.

The key points made in these representations are summarised below.

The site and opportunities for development

- 1 Despite representing a location where employment growth would support the expansion of an important high technology research and development cluster at Peterhouse Technology Park (PTP) which would also represent sustainable development in line with the NPPF (and which would support the big themes in the GCLP), the south east of Cambridge City has been overlooked through the emerging local plan as an area for growth.
- 2 Details of the site were originally submitted through the Call for Sites process in Spring 2019 accompanied by an Options for Sustainable Growth (OFSG) document (March 2019). This set out five different scales and forms of development for the site, including some modest extensions as well as one which showed the entire site’s potential to deliver a sustainable mixed-use development. However, the Greater Cambridge Housing and Economic Land Availability Assessment published in September 2021 only assesses the development potential of the entire site (reference 40058) – ultimately ruling it out on landscape grounds - and does not assess the collection of smaller, individual parcels of land for development as were displayed in CEG’s OFSG document submitted.
- 3 Since the submission of the OFSG document, CEG has undertaken extensive discussions with the Wildlife Trust which forms part of the Cambridge Nature Network. These discussions have established the opportunity presented by the land South East of Cambridge to contribute towards the Nature Network aims. The Wildlife Trust has indicated that a scheme akin to the more modest proposals in the OFSG document, which enables delivery of strategic green infrastructure and priority chalk grassland habitats, would make a major contribution towards the Cambridge Nature Network.
- 4 Through two incremental and proportionate extensions to Worts’ Causeway and Peterhouse Technology Park (PTP) a new large strategic accessible natural green space could be enabled. It would provide a range of potential measures to encourage biodiversity all whilst enhancing landscape value. It would create new circular cycle/pathways (‘nature trails’) linking existing development with existing rights of way and Beechwoods Nature Reserve, Gog Magog and Wandlebury Country Park, and the Cherry Hinton Chalk Pits. It could even provide a visitor centre increasing opportunities for recreation and providing views south across the chalk grassland towards Beechwoods Nature Reserve.

Contribution to themes in the plan

- 5 The site has the potential to significantly contribute to mitigating against the impacts of **climate change** in a number of ways. It could provide a range of new housing and employment opportunities in an established location where sustainable transport is the key method of travel, helping reduce carbon emissions and pollution brought about through road congestion which is a key issue in Greater Cambridge. These are benefits which simply cannot be replicated on other sites, especially those in locations further afield, because they cannot necessarily rely upon development coming forward close to existing and well-established employment sites, such as those at PTP, the Biomedical Campus and Addenbrooke’s Hospital. The delivery of new homes to zero carbon standards will also help improve the standard of housing stock in Cambridge and reduce ongoing emissions from housing.
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- 6 As mentioned above the site can make a significant contribution to **biodiversity and green spaces** – under all options for development elements of formal and informal open space are proposed which will create access to new open spaces for workers and residents and help alleviate pressure on nearby habitats by providing alternative space for leisure.
 - 7 The site will directly result in the creation of new **jobs** through employment space under all options and the creation of new employment space is key in supporting Cambridge’s economic potential. In our view, insufficient job growth is planned for via Policy S/JH with the ‘Central Scenario’ for job growth pursued rather than the ‘Higher Scenario’ which is supported by recent evidence. Given the need to plan for higher employment growth, the spatial approach and proposed allocations for employment are somewhat limited and do not fully explore the potential of land South East of Cambridge to support an existing cluster. South East Cambridge is already one of the areas with the highest concentration of R&D employment, owing to the presence of PTP. There is a hub of existing development activity around the site with the expansion of PTP to deliver GB3, GB4 and E/2 as well as housing development of GB1 and GB2 to meet needs to 2031, reflecting both the demand for and appropriateness of growth in this area. The Councils should not arbitrarily limit themselves at this key stage in the local plan process by not countenancing Green Belt release, particularly in those locations such as South East Cambridge where release of such sites could in fact lead to more sustainable outcomes for commuting and ultimately climate change.
 - 8 The site has the potential to deliver **homes** through a comprehensively planned mixed-use development which incorporates a range of employment, community and open space alongside housing. Housing underpins every one of the themes in the GCLP and South East Cambridge can play a key role in meeting the overall needs of Greater Cambridge, which are likely to be under-estimated in the plan (based on employment growth likely being higher than estimated). The site’s location, close to a significant amount of existing employment, new employment and the city centre itself, means that new housing in this location can contribute to sustainable development from an economic, social and environmental perspective and will support every one of the themes in the GCLP.
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1.0 Introduction

- 1.1 Lichfields is instructed by Commercial Estates Group (“CEG”) (on behalf of the two landowners – Guy’s and St Thomas’ Foundation and Peterhouse College) to submit representations in response to the Greater Cambridge Local Plan (“GCLP”) Regulation 18: Preferred Options Consultation (‘the Reg 18 consultation’). The Joint Local Plan is being produced by Cambridge City Council and South Cambridgeshire District Council (‘the Councils’) for the combined areas. This document comprises a formal response to the consultation which launched on the 1st November 2021 and runs to 5.00 p.m. on Monday the 13th December 2021.
- 1.2 These representations are made in the context of CEG’s interests at land South East of Cambridge (‘the site’). The site is located to the south of the existing employment allocations GB3 and GB4, following the boundary of the Chalk Pits SSSI and Limekiln Road and down to Wort’s Causeway, east of the existing housing allocation GB1.
- 1.3 The Local Plan – First Proposals document continues the structure adopted in the first Reg 18 consultation held in January and February 2020 which focussed on four ‘big themes’ that will influence how Homes, Jobs and Infrastructure are planned for in the Greater Cambridge area. The ‘big themes’ proposed within the GCLP are:
- 1 Climate Change
 - 2 Biodiversity and Green Spaces
 - 3 Wellbeing & Social Inclusion
 - 4 Great Places
- 1.4 Alongside these, [5] ‘Jobs’, [6] ‘Homes’ and [7] ‘Infrastructure’ form three further themes in the GCLP. In this context, this representations document highlights the significant opportunity that the site presents in South East Cambridge and how development in this location can support the Councils in seeking to address and maximise the benefits from these themes, with a particular focus on climate change, biodiversity and green spaces, jobs and housing.
- 1.5 The representations are structured into the following sections:
- **Section 2** – provides an overview of the site, its location and the options for its development. It also reviews how the site has been considered as part of the consultation;
 - **Section 3** – provides narrative in relation to the ‘Climate Change’ theme, specifically on national context, approach in the GCLP, how the site contributes to this theme and how this compares with the other options for development;
 - **Section 4** - provides narrative in relation to the ‘Biodiversity and Green Spaces’ theme, explaining how the site contributes to this theme;
 - **Section 5** - provides narrative in relation to the ‘Jobs’ theme, including reviewing the Council’s proposed approach to overall scale and location of growth across Greater Cambridge, how the site could contribute to employment needs and how it compares with other options;
 - **Section 6** - provides narrative in relation to the ‘Housing’ theme, including the approach to housing requirements and delivery in the GCLP and how the site could contribute to this theme; and
 - **Section 7** – summarises the above and sets out our conclusions.

2.0 Land to the South East of Cambridge

Summary of our representation:

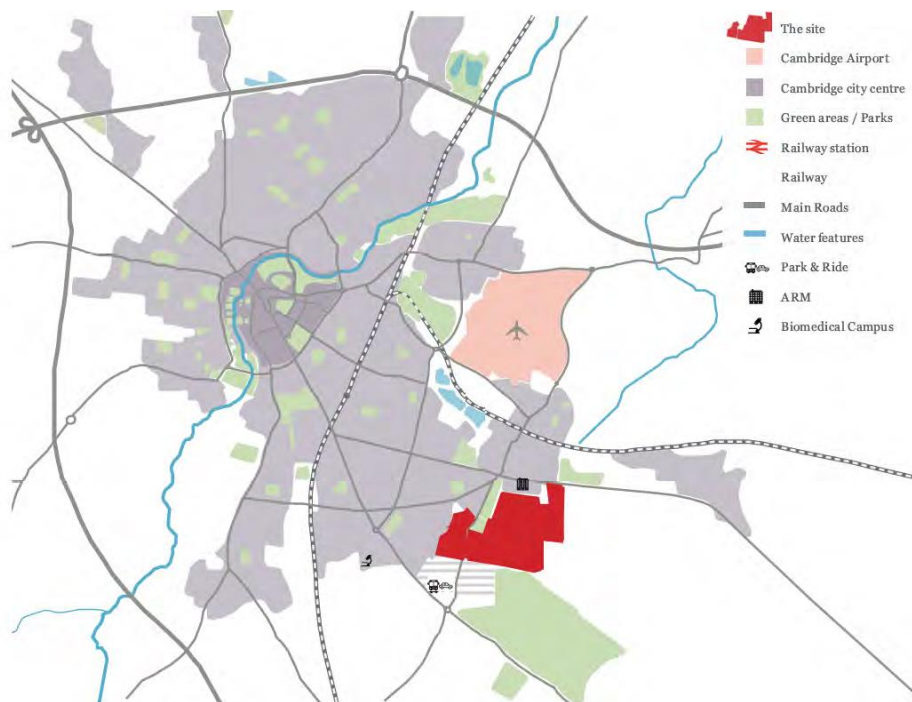
Land to the South East of Cambridge was originally submitted through the Call for Sites process in Spring 2019 accompanied by an Options for Sustainable Growth (OFSG) document (March 2019) which set out five different scales and forms of development for the site, including some modest extensions as well as one of which showed the entire site’s potential to deliver a sustainable mixed-use development. The options for growth reflected the site’s strategic locational advantage on the edge of Cambridge close to a number of existing employment areas and represents sustainable development from an economic, social and environmental perspective.

However, the Greater Cambridge Housing and Economic Land Availability Assessment published in September 2021 only assesses the development potential of the entire site (reference 40058) and does not assess the collection of smaller, individual parcels of land for development as were displayed in CEG’s OFSG document submitted. This results in the site being discounted on the basis of landscape impacts. CEG would like to reiterate it is open to development of the site as a series of smaller parcels and will be resubmitting these smaller parcels for re-assessment through the Call for Sites process after the closure of this consultation.

The site and options for development

2.1 Land at South East of Cambridge City (shown in Figure 2.1) is being promoted by CEG for a number of development options as part of the emerging GCLP, building on employment clusters in the local area which have become highly established in recent years (Addenbrookes, Peterhouse Technology Park and the Biomedical Campus) and planned growth in the current Cambridge/South Cambridgeshire Local Plans (including housing-led allocations at GB1 and employment allocations GB3 and GB4).

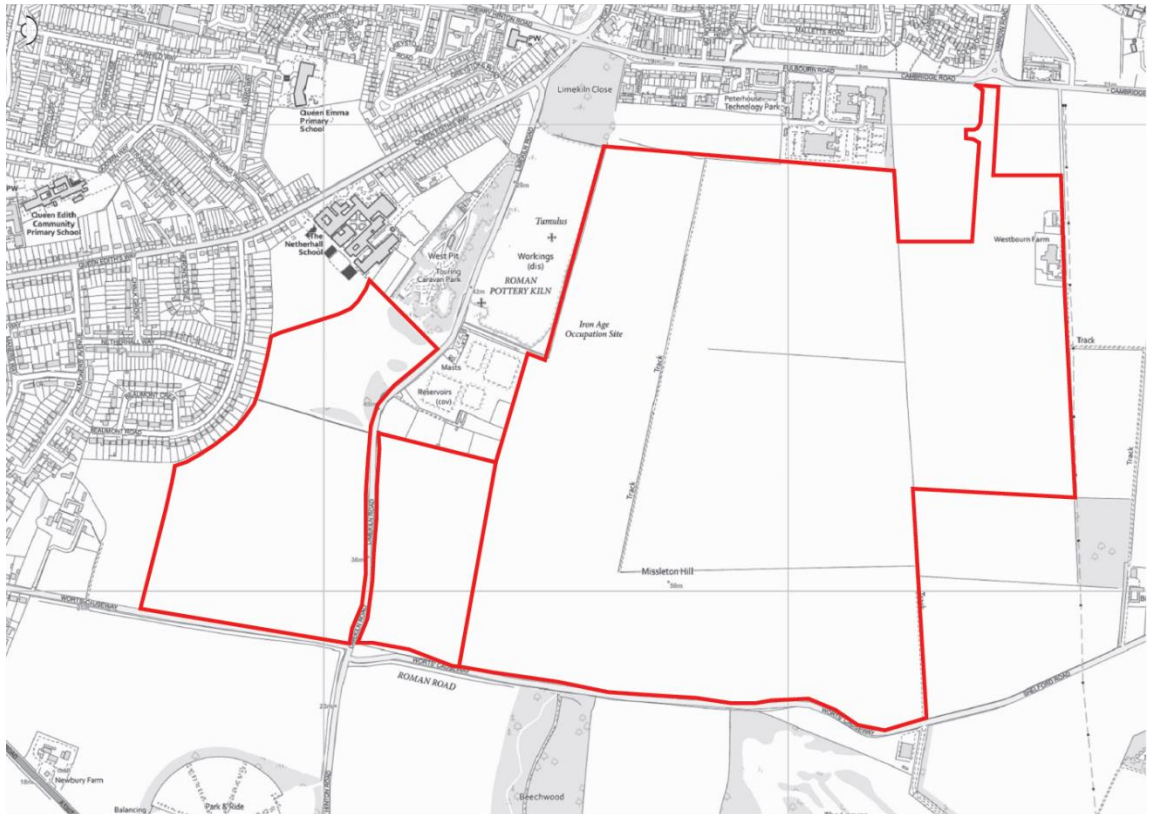
Figure 2.1 Site context within Cambridge City



Source: CEG

2.2 The extent of the site is shown in Figure 2.2, although CEG would like to re-iterate that whilst it is promoting the entirety of the red line area in response to this particular round of consultation on the Greater Cambridge Local Plan, there is flexibility over how it comes forward. This could comprise a single, holistic site-wide approach, or through a series of smaller individual extensions. The approaches are not mutually exclusive and CEG is keen to work with Greater Cambridge to establish the best approach to ensure the site is developed sustainably and effectively.

Figure 2.2 Site boundary map

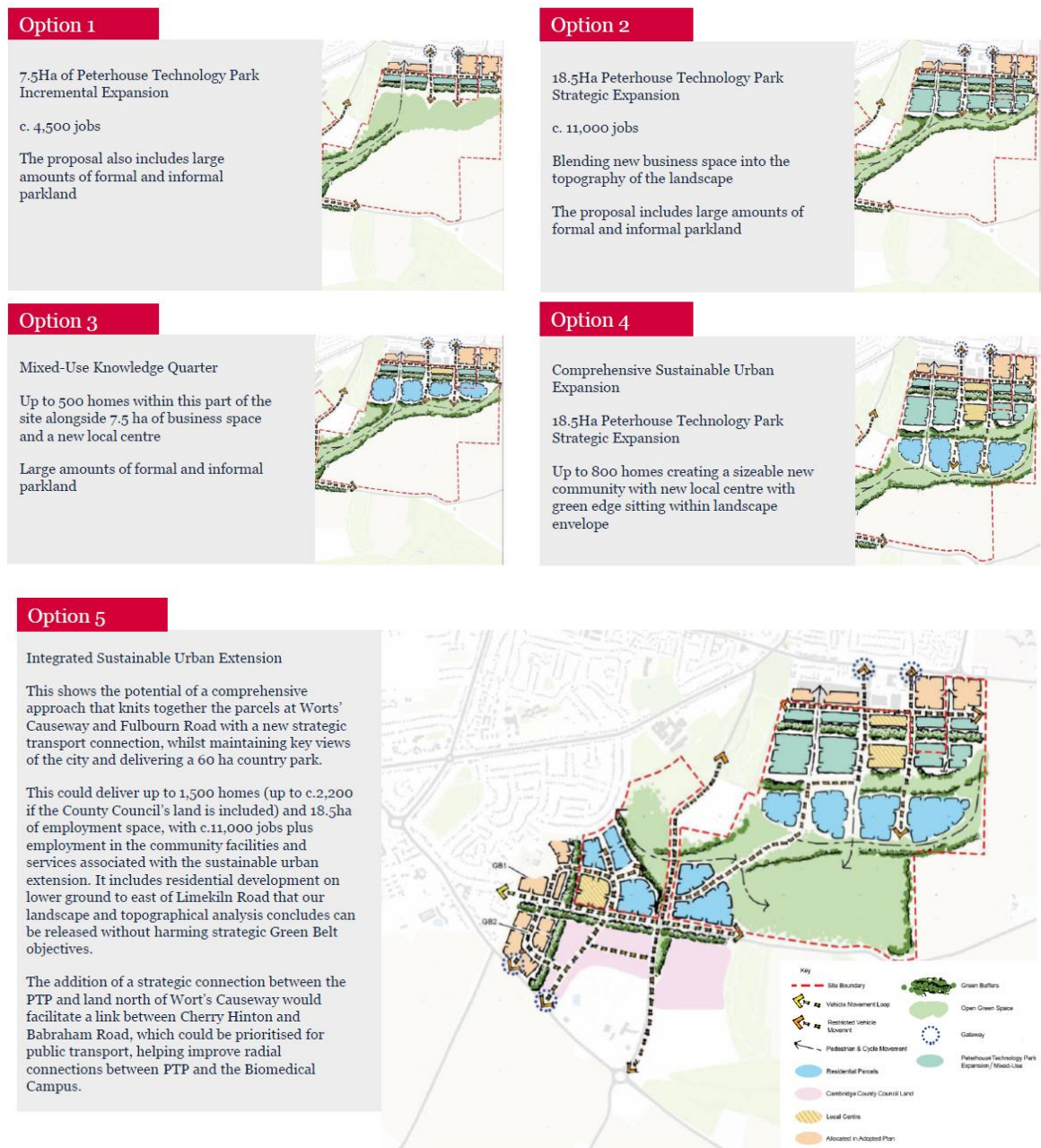


2.3 Reflecting the range of ways in which the site might come forward, details of the site were originally submitted through the Call for Sites process in Spring 2019 as part of the development of the new GCLP, accompanied by an Options for Sustainable Growth document (OFSG) (March 2019). This set out **five** different scales and forms of development for the site, illustrated in Figure 2.3, ranging from:

- 1 A 7.5ha extension to Peterhouse Technology Park, along with large areas of formal and informal parkland which would link the development west towards existing residential areas and the new area of development at the allocated GB1 site. This option for development would see new employment space which broadly follows the same principles as the current planned expansion of PTP in GB3/4, which are located just north of the site;
- 2 A larger – 18.5ha – extension to PTP, along with large areas of formal and informal parkland;
- 3 A ‘mixed-use knowledge quarter’ development including employment space as an extension to PTP (c.7.5ha), around 500 new homes along with a local centre and areas of formal/informal parkland;
- 4 A ‘comprehensive sustainable urban expansion’ incorporating the larger (18.5ha) extension to PTP along with 800 homes, local centre and green space; and

- 5 An ‘integrated sustainable urban extension’ which would represent a comprehensive development approach across the whole site, incorporating the larger expansion of employment space at PTP, 1,500 homes (although this could be c.2,200 if the County Council’s land were included), a 60ha Country Park and a new strategic transport link extending out of the site to the south-west which would link PTP with the Biomedical Campus.

Figure 2.3 Options for growth at land to the south east of Cambridge



Source: JTP and Lichfields - Options for Sustainable Growth document (March 2019)

Achieving sustainable development

- 2.4 The site represents a genuinely sustainable location for growth in Cambridge, fulfilling the economic, social and environmental objectives of sustainable development set out in the

National Planning Policy Framework (NPPF)– objectives which are also reflected in the ‘big themes’ of the Greater Cambridge Local Plan. These are summarised below, although the specific benefits of the scheme are discussed in more detail throughout these representations in the respective sections.

- 1 Economic sustainability** – The Government considers the Oxford-Cambridge Arc “*can be one of the most productive places in the world*”¹ and recognises the life sciences cluster in Cambridge as being the most productive in Europe, with 400 compares contributing £2.9bn to the UK economy and playing a critical role in developing the Covid-19 vaccine. In an area which is of key economic importance regionally, nationally, and internationally, it is vital that land can come forward to support economic growth in the right places. The site’s location is truly unique being near to a number of Cambridge’s key employment centres, including Peterhouse Technology Park, the Biomedical Campus and Addenbrooke’s Hospital, and reflecting this all options for the site’s development include an element of new employment space. This will provide opportunities for businesses that are located in these areas – or inward investment of businesses who want to be located in these areas – to expand and create jobs, capitalising on Cambridge’s success and reputation and making the most of its potential. A masterplan-led process allows the co-ordination of this employment growth along with infrastructure and other uses to ensure the site is developed sustainably.
- 2 Social sustainability** – Every option being considered for the site proposes substantial amounts of open space, accessible to local workers, existing residents and new residents (where options include housing), providing clear health and wellbeing benefits. Options which include housing will also deliver a wide variety of homes to meet the needs of current and future generations, including new services and facilities on-site. For existing residents in the nearby area, the site represents an opportunity to fill gaps in service provision, enabling residents to have more of their day-to-day needs met locally.
- 3 Environmental sustainability** – Located on the edge of Cambridge, the site is within good proximity to Cambridge Station and City Centre which are within walking/cycling distance or are accessible via public transport including the nearby Park and Ride. Under all options, the site will include a range of new cycling and walking networks to encourage sustainable travel, thereby minimising pollution. Landscape and natural habitats are also a central pillar to the development, which is why all proposals include green spaces and, for the more comprehensive options, a new country park. This carries clear biodiversity benefits by providing alternative open space for recreational use for local workers and residents.

How has the site been considered by the Councils?

- 2.5 The site was originally submitted through the Call for Sites process in Spring 2019, accompanied by its Options for Sustainable Growth document (2019). This Call for Sites was followed by a Regulation 18 (Part 1) consultation in early 2020, to which CEG submitted a Vision Document (February 2020) which reflected the opportunities of the site to helping meet identified priorities within the GCLP. This included a concept masterplan for the site in line with Option 5 (an integrated sustainable urban extension) showing a potential country park, local centres, employment space and new residential areas.
- 2.6 The Greater Cambridge Housing and Economic Land Availability Assessment (HELAA) published in September 2021² provides a detailed assessment of potential development on individual sites. The site (reference 40058) is referred to as ‘Land south of Fulbourn Road and north of Worts Causeway, known as Cambridge South East’ and its development potential is

¹ See OxCam Arc Spatial Framework consultation para 3.1.

² Available [here](#). See Appendix 4 (Part C) for the relevant proforma (site reference 40058).

given as 1,500 residential units, c.140,000sqm of employment space and various other community and commercial uses.

- 2.7 The site proforma within the HELAA concludes that the site is available and achievable, but not suitable. The site scored ‘Amber’ or ‘Green’ for all criteria - generally meaning that it was suitable or that any adverse impacts could be reasonably mitigated or compensated – except in respect of landscape. The HELAA deems the site unsuitable for development because it would have significant negative landscape and townscape impacts which cannot be mitigated (thus scoring it ‘Red’ in the assessment). This was due to the alleged isolated nature of the site and the exposure to wide views such that it would harm the setting of the historic city of Cambridge. The site proforma specifically states (inter alia):

“...The isolated nature and the openness of the site which is exposed to wide views from all directions except from the southwest means that there would be material harm to the surrounding countryside’s landscape character and views from the wider and local area. Any development would be difficult or impossible to mitigate in term of visual impact and harm to the openness of the Green Belt and setting of the historic city. A very small portion of the site forms part of the allocation that extends the Peterhouse Technology Park which is the only portion of the site suitable for development.”

- 2.8 Firstly, we note that scoring ‘Red’ on any element of suitability has not ruled out other sites for allocation in the draft Local Plan. North East Cambridge (site reference OS062) was assessed as ‘Red’ for Strategic Highways Impact and yet was overall assessed as ‘Amber’ for suitability and ultimately taken forward as a draft allocation in the Greater Cambridge Plan. This indicates that where a site scores ‘Red’ for just one element of suitability, it can be possible for appropriate mitigation to be achieved in order to allow sites to be allocated for development. It is CEG’s view that the landscape impacts of development at the site can be appropriately mitigated under all options, more easily under more incremental growth options not assessed in the HELAA, and that landscape impacts should not result in the site being ruled out for development.

- 2.9 Secondly – and most importantly - the site is clearly substantial in size and should not be ruled out of the HELAA in its entirety on the basis of potential landscape impacts that might occur if the whole site were developed. The site should have also been considered from the perspective of it being able to come forward via a collection of smaller, individual parcels of land for development, as displayed in CEG’s Options for Sustainable Growth document (shown above in Figure 2.3).

- 2.10 Utilising this approach, the site would not have been dismissed based on a landscape designation that affects a smaller, primarily south-eastern portion of the overall site. As set out in the initial Options for Sustainable Growth document, CEG is not fixed by a particular form or scale of development at the site. For example, an incremental approach to growth can be taken to the south of the existing employment space on Fulbourn Road comprising Peterhouse Technology Park (PTP); this is a strong option that would not result in significant or unmitigable landscape impacts. This level of development and employment growth would support the sustainable expansion of an important high technology research and development cluster, building on the principles already established through the allocation of GB3 and GB4 in the Cambridge Local Plan (2018) and E/3 in the South Cambridgeshire Local Plan (2018) which demonstrate the inherent suitability of this location in contributing to meeting the development needs of Greater Cambridge. On this basis, the site should instead be considered through the GCLP as a series of smaller options of land for development. The wider South East Cambridge site (i.e. beyond the extent of the developable area as shown in Figure 2.2) – subject to suitability – could also accommodate further growth.

- 2.11 The following sections provide commentary on how the proposed development at the site relates to and supports the themes within the GLCP.

3.0 Theme 1 – Climate Change

Summary of our representation:

Climate change forms a key theme in the Greater Cambridge plan and the plan recognises the role edge-of-Cambridge development could play in helping reduce impacts on climate change. Commuting evidence from Cambridge more widely and from the area around the site in particular shows there is clear trend towards more sustainable travel uses, which is to be expected given the proximity of homes to employment opportunities and other facilities and services. This scale of sustainable travel simply cannot be replicated in other areas – such as new settlements - where employment centres may be smaller and less well established, and which are less well served by existing transport networks and an abundant labour force.

Context

- 3.1 Climate change is fundamental to the NPPF’s environmental objective of sustainable development, stating that:

“The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.”

- 3.2 The emerging GCLP is strongly influenced by reducing climate impacts, through compact development located to connect homes with jobs and where active and sustainable travel can be maximised. The proposed development strategy for the Greater Cambridge area is subsequently focused on directing development where active and public transport is the natural choice, where green infrastructure can be delivered alongside new development, and where jobs, services and facilities can be located near to where people live (as set out in Policy S/DS).

- 3.3 CEG agrees with the emphasis placed on the need to decrease climate impacts and support the aim to help Greater Cambridge transition to net zero carbon by 2050. To achieve this, the Reg 18 consultation recognises that development should be sited in places that help to limit private car use and, in turn, carbon emissions. In the context of South East Cambridge, the Plan states that:

‘Our evidence shows that the edge of Cambridge could be a sustainable location for homes and jobs, being accessible to existing jobs and services.’

How does the site contribute to this theme?

- 3.4 Releasing land on the edge of Cambridge City would be highly sustainable, as travel to work patterns in this area are already characterised by active modes of travel, with many people cycling and walking to work compared to out-of-centre locations such as Cambourne. The sustainability of locating development on the edge of Cambridge is highlighted throughout the Greater Cambridge Local Plan Transport Evidence Report Preferred Option Update (October 2021)³. This report analysed several Strategic Spatial Options (SO) against a range of transport and highway metrics, and against their ability to minimise the need to travel by car and to reduce the carbon emissions associated with the transport demands of growth.

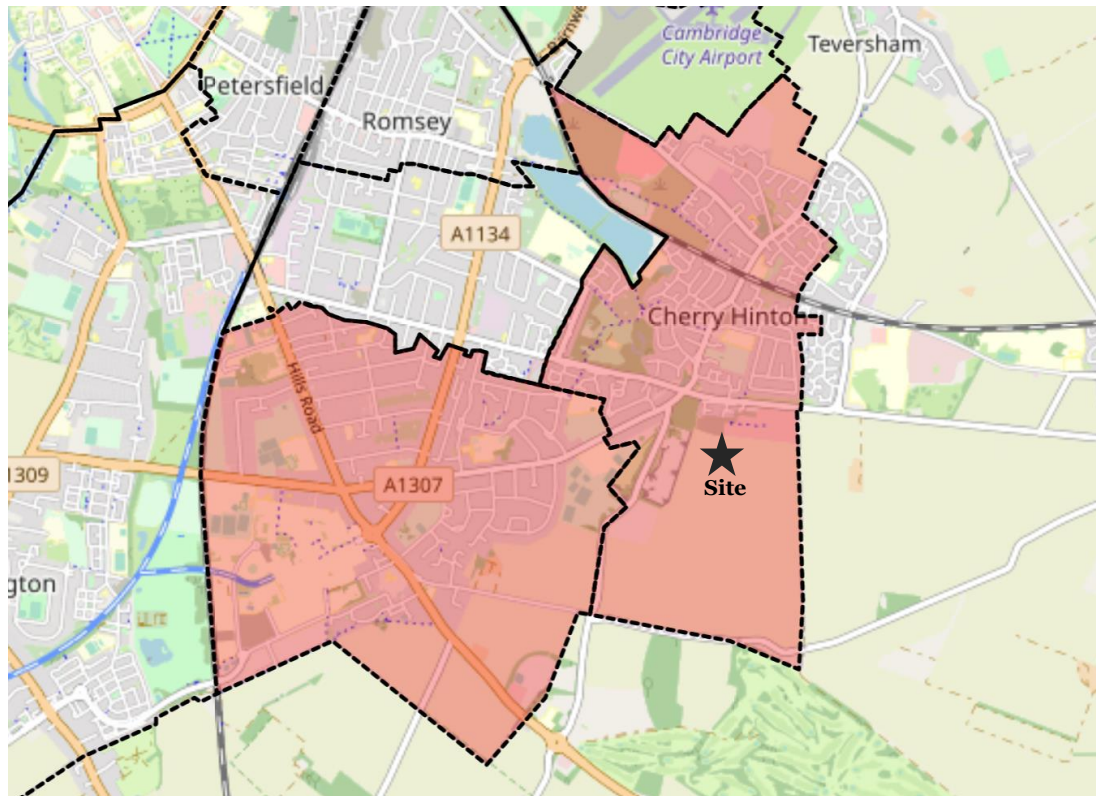
³ Greater Cambridge Local Plan Transport Evidence Report Preferred Option Update (October 2021) available [here](#)

- 3.5 The overall conclusions on the performance of each option demonstrate that SO3: Edge Green Belt (i.e. creating new homes and jobs in extensions on the edge of Cambridge, involving release of land from the Green Belt) is one of the most sustainable options, performing third best out of all eight options, with only SO1: 'Densification' and SO2: 'Edge non-Green Belt' performing better. The report states that focusing the development of new homes and jobs on the edge of the city, albeit in different locations spanning the Green Belt, ensures that a very good active travel mode share is achieved – equating to 42.2% of all trips for the whole SO. This is due to the relatively short distances between edge of city Green Belt locations and the various existing key urban areas, business parks and services that are clustered all over Cambridge.
- 3.6 Additionally, in comparison with other spatial options whose focus for development is away from the edge of Cambridge, SO3 performs well against the 'Public Transport trips' metric and ensures low car use, particularly when compared to those options with a focus of development in more rural areas. This is because sites on the edge of Cambridge benefit from being in close proximity to a well-established active travel and public transport network, meaning there is less of a requirement to create new links and/or that there is sufficient patronage to justify further investment. Any infrastructure required to facilitate active travel trips would also be generally cheaper and less difficult to deliver than large scale public transport or highway infrastructure – as would be required by sites beyond the edge of Cambridge, including new settlement options.

Commuting patterns

- 3.7 At a more localised level, to achieve sustainable travel outcomes including walking and cycling, one key element is to reduce the distance for people to travel to work, and where they cannot walk or cycle, try to ensure they can commute by sustainable means. An analysis of data on commuting patterns in South East Cambridge provides an insight into people's journeys and method of travel to work in the area, along with the associated impacts on climate change.
- 3.8 The site is located in the Cherry Hinton ward of Cambridge and is immediately adjacent to the Queen Edith's ward of Cambridge. Ward level data is the best available for the relevant datasets used in this section; the Cherry Hinton ward is referred to as Cambridge 011 Middle Super Output Area (MSOA) and the Queen Edith's ward is referred to as Cambridge 013 MSOA. The extent of these wards is shown in Figure 3.1.

Figure 3.1 Cherry Hinton and Queen Edith's wards, Cambridge



Source: Nomis

- 3.9 The most up to date data⁴ shows that of those living and working in the Cherry Hinton ward, 50% commute to work on foot and 28% commute by bicycle (a total of 78%). Similarly, of those living and working in the Queen Edith's ward, 63% commute to work on foot and 26% commute by bicycle (a total of 89%). However, Table 3.1 shows that these numbers change the further from the ward(s) the worker begins their journey. For those living in the rest of Cambridge City who work in the Cherry Hinton ward, 10% walk to work and 43% cycle, and in the Queen Edith's ward, 9% walk to work and 48% cycle; whilst this is still a majority using active travel modes, the proportion driving a car or van increases. For those workers living in South Cambridgeshire, there is a much more significant change; in the Cherry Hinton ward, only 23% walk or cycle and 74% use the car, while in the Queen Edith's ward, only 15% walk or cycle and 73% use the car.
- 3.10 This analysis illustrates that increased employment provision in this area would allow local people to live close to their place of work, subsequently reducing their need to travel in proximity to the site by unsustainable means, encouraging residents to walk or cycle to work. It also demonstrates the inherent sustainability of the South East Cambridge as a place of work in Cambridge; the majority of people living in the rest of Cambridge City still commuted by foot or bicycle to the two wards, and there was an increase in the proportion of people travelling to work by bus.

⁴ ONS (Census 2011) Location of usual residence and place of work by method of travel to work (WU03EW) available [here](#). Although some years old, this remains the most comprehensive dataset allowing an analysis of travel to work methods at various geographical levels.

Table 3.1 Travel to work in Cambridge 011 & 013 methods by usual place of residence (local authority or ward)

	Train	Bus, minibus or coach	Motorcycle, scooter or moped	Driving a car or van	Passenger in a car or van	Bicycle	On foot	Other method of travel to work
Place of work: Cherry Hinton ward (Cambridge 011)								
Cambridge 011 (site location)	0%	0%	0%	21%	1%	28%	50%	0%
Cambridge 013 (adjacent ward)	2%	4%	0%	34%	2%	48%	10%	0%
Rest of Cambridge City	0%	6%	0%	37%	2%	43%	10%	2%
South Cambridgeshire	0%	3%	0%	70%	4%	15%	8%	0%
Place of work: Queen Edith's ward (Cambridge 013)								
Cambridge 011 (site location)	0%	22%	2%	30%	7%	31%	8%	0%
Cambridge 013 (adjacent ward)	0%	1%	0%	8%	1%	26%	63%	1%
Rest of Cambridge City	0%	14%	1%	24%	3%	48%	9%	1%
South Cambridgeshire	0%	10%	1%	68%	5%	14%	1%	1%

Source: ONS - WU03EW - Location of usual residence and place of work by method of travel to work (MSOA level)

- 3.11 Essentially, if jobs need to be in/around Cambridge City and the most sustainable methods of travel to work arise when people live close enough to walk or cycle – reducing the need to travel – then employment development at South East Cambridge presents a desirable option. It is logical that the co-location of housing and employment will lead to the most sustainable outcomes and the delivery of more jobs which facilitate workers being able to live more locally will result in fewer car movements arising from commuting. Despite its current location in the Green Belt, the site is therefore a highly sustainable location when taking into account performance of the transport network, commuting patterns in the city and achieving the climate change objectives of the wider GCLP.

How do other options compare?

New settlements

- 3.12 Within the overarching climate change context, it is important to consider the proposed development at new settlements, as well as the associated impacts. Section 2.4 of the Reg 18 consultation document suggests that growth at Waterbeach, Northstowe, Bourn Airfield and Cambourne is an important part of the strategy for development – all of which lie beyond the Cambridge Green Belt to the north and west of the city (within the previous South Cambridgeshire plan area).
- 3.13 Such areas beyond Cambridge City and the edge of Cambridge are unproven employment markets. While Waterbeach does benefit from an existing agglomeration of employment uses, it is evident that businesses want to be sited where they can tap into the presence of other local business and research networks, a local highly skilled labour force and Cambridge University, and this means being located in or near the city. This is illustrated by the ongoing challenge that Cambourne and Northstowe face in delivering employment growth; while they may be effective in housing delivery terms, these new settlements do not contain established clusters of knowledge-intensive sectors and they struggle to recreate the economic magnetism of the city itself. Demand for employment space (including lab and office space) therefore remains in and on the edge of Cambridge City.

- 3.14 This is an important point within the climate change theme. As to be expected, locating employment development beyond the urban area of Cambridge will only serve to drive unsustainable travel patterns as local residents increasingly need to use the car to commute. This was highlighted throughout the transport evidence, in which new settlement strategic spatial options tended to score lower than those focused around the city or on the edge of the city, including in the Green Belt, because travel to work patterns are not characterised by active modes of travel. The combination of unproven employment markets and unsustainable travel patterns associated with the new towns therefore raises questions around the proposed strategy towards employment growth in these areas, and it is considered that this is contrary to the aims of the central climate change theme.

4.0

Theme 2 - Biodiversity and Green Spaces

Summary of our representation:

CEG has undertaken extensive discussions with the Wildlife Trust who form part of the Cambridge Nature Network. These discussions have established the opportunity presented by the land South East of Cambridge to contribute towards the Nature Network aims, namely the delivery of strategic green infrastructure.

Our proposals seek to deliver new homes and jobs in this location to facilitate the delivery of strategic green infrastructure and priority habitats. Although discussions are ongoing, the Wildlife Trust consider Options 1 and 2 to be the most acceptable at this stage from a nature conservation perspective. These two options are considered by the Trust to have the potential to make the most significant contribution to the Nature Network aims.

Our proposals for extensions to GB1 and Peterhouse Technology Park would provide a range of potential measures to encourage biodiversity all whilst enhancing landscape value and linking existing development with the Beechwoods Nature Reserve, Gog Magog and Wandlebury Country Park and the Cherry Hinton Chalk pits. CEG have engaged with the Wildlife Trust and are committed to continuing discussions about how best to support the Cambridge Nature Network.

Context

- 4.1 The NPPF sets out that local plans should take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure (paragraph 175). The Local Nature Partnership 'Natural Cambridgeshire' have set an ambition to double the area of rich wildlife habitats and natural greenspace in the area by 2050 – known as the 'doubling nature' initiative. Further to this and at a more local level, the Cambridge Nature Network, devised by two charities (Cambridge Past Present and Future and the Wildlife Trust BCN) and endorsed by the Greater Cambridge Councils, have been established.
- 4.2 These initiatives have emerged alongside a growing awareness that Cambridgeshire is one of the most nature depleted counties in the country and that, as an area of rapid economic and population growth, the provision and accessibility of natural greenspace has not kept pace with this⁵. Further, the report identifies the importance of the need to enhance and create green spaces for public recreation and refreshment, the Covid-19 crisis highlighting the need for publicly accessible green space. As a result, natural assets in Cambridgeshire are coming under increasing pressure from growing visitor numbers. The emerging GCLP is therefore a key element in supporting such initiatives and ensuring that the best opportunities to increase or improve new habitats and natural greenspaces are realised. The Reg 18 consultation recognises the importance of this by setting out an aim to:
- 'Increase and improve our network of habitats for wildlife, and green spaces for people, ensuring that development leaves the natural environment better than it was before'.*
- 4.3 In order to achieve this aim, one of the key policies proposed in the GCLP is 'Policy BG/GI: Green infrastructure' which identifies the existing green infrastructure network and the strategic initiatives intended to enhance it and addresses how development proposals should relate to green infrastructure. CEG fully support the Councils' aims and ambitions in this regard and consider that development of the site could promote the successful delivery of green infrastructure in a positive and collaborative way. As the Cambridge Nature Network's

⁵ Cambridge Nature Network: Final Report (2021) available [here](#)

report**Error! Bookmark not defined.** alludes, the reconnection of people to nature, particularly resulting from the pandemic, has led to an increased appreciation of the value of nature for recreation and health. A survey conducted by Cambridge Ahead during the pandemic found that access to nature was the top ranked concern of young employees (aged 21-35) and therefore it is felt that there should be an acknowledgement within policy that increasing access to green spaces through a joined up green infrastructure approach should be encouraged.

How does the site contribute to this theme?

- 4.4 The site is currently in agricultural use and is therefore not an overly nature rich environment, and neither is it currently accessible to the public. There are however several sites of nature importance abutting or in proximity to the site, including the Beechwoods Nature Reserve, the Limekiln Close Nature Reserve, the Cherry Hinton Chalk Pits (SSSI), the Gog Magog Golf Course (SSSI), and Wandlebury Country Park.
- 4.5 By adopting a green infrastructure-led approach to placemaking, the proposed development could restore natural biodiverse habitats within the wider site itself and establish a joined-up network of green spaces. This would not only provide for enhanced public access to green space for existing and new residents but also deliver significantly improved connections between the edge of Cambridge and surrounding countryside. In addition, it would help to relieve increasing pressure on existing local wildlife sites and nature reserves by offering an alternative location for visitors. The anticipated delivery of the residential allocations GB1 and GB2 – two of several new housing developments to the south of Cambridge – will also mean that more local residents will be living in the area who would benefit from an improved network of larger outdoor spaces close to their homes.
- 4.6 In fact, the recent Cambridge Nature Network report**Error! Bookmark not defined.** specifically identifies that:
- “there is very limited access to reach the large accessible greenspaces at Wandlebury / Magog Down from any direction, with significant demand from the communities of Queen Edith’s, Cherry Hinton, Stapleford, Great Shelford and Trumpington. In many cases this results in people driving short distances in order to access these green spaces. Direct connections from Cherry Hinton and Queen Edith’s to Beechwoods and the Roman Road and off-road connections from the Shelfords and Stapleford to Magog Down and Wandlebury would be highly beneficial.”*
- 4.7 CEG has engaged with the Wildlife Trust BCN (who form part of the Cambridge Nature Network) regarding the potential for development at the site, and these discussions have emphasised the opportunity presented by the wider South East Cambridge site to contribute towards the Nature Network aims. The Wildlife Trust have indicated that they support the delivery of strategic green infrastructure and priority habitats in this location.
- 4.8 This directly supports NPPF paragraph 120, which states that planning policies and decisions should encourage multiple benefits from both urban and rural land and take opportunities to achieve environmental gains, such as developments that would enable new habitat creation or improve public access to the countryside. The ability to open up this area of currently unused green space would provide further benefits to local residents through the introduction of active travel methods such as walking and cycling, which links to and encourages other key aims within the emerging GCLP related to climate change, sustainable transport and healthy living. In addition, the scale and nature of the site means that significant biodiversity net gains would be attainable on site, in accordance with national policy, the proposed GCLP Policy BG/BG: Biodiversity and geodiversity and the Environment Bill 2021.

- 4.9 The potential measures to encourage biodiversity and green spaces at the site are clearly shown in the illustrative landscape framework (Appendix 1). This framework demonstrates how an expansion to the south of PTP can be suitably developed to the northern part of the site, while creating new green infrastructure and enhancing landscape value. It shows that there is potential for the site to:
- Restore and enhance landscape features such as hedgerows within the site, supporting wildlife;
 - Provide a new large strategic accessible natural green space with areas of woodland, grassland and ecotones, supporting a variety of habitats;
 - Create new circular cycle/pathways ('nature trails') linking existing development in South East Cambridge with green infrastructure within the site as well as increasing access to existing rights of way network and other important natural greenspaces, including Beechwoods Nature Reserve, the core habitat area associated with Gog Magog Golf Course and Wandlebury Country Park, and the Cherry Hinton Chalk pits;
 - Build on existing woodland habitats by creating green buffers both within and to the south of the built edge including tree belts and dense hedgerows, retaining the wooded skyline and breaking up areas of development;
 - Retain a large area of open landform to the south – where the elevated land is – to provide a viewpoint and destination at the Ridgeline and Missleton Hill;
 - Provide a visitor centre within the site, further improving the accessibility and quality of green infrastructure in the area; and
 - Create an activity area to the immediate east of Cherry Hinton Chalk Pits, increasing opportunities for recreation and providing views south across the chalk grassland towards Beechwoods Nature Reserve.
- 4.10 This approach – a carefully planned and sensitively designed environment that allows nature and landscape to form an integral part of the development – reflects previously submitted documents providing landscape recommendations for the area (specifically the Cambridge South East Vision Document dated September 2013). The proposed built area for employment development could be accommodated while preserving the landform of the rising land to the south and providing a well vegetated edge to the built form, as shown in Figure 4.1 below.

Figure 4.1 Illustrative Landscape Framework



Source: Incola Landscape Planning

4.11

Figure 4.2 below illustrates the modest expansion of GB1 and southern expansion of PTP which could facilitate delivery of strategic green infrastructure. The images are an illustrative depiction only from the OFSG document.

Figure 4.2 Illustrative depiction of the extent of development around GB1



Source: JTP and Lichfields - Options for Sustainable Growth document (March 2019)

Figure 4.3 Illustrative depiction of the extent of development south of the PTP



Source: JTP and Lichfields - Options for Sustainable Growth document (March 2019)

4.12

Fundamentally, it would protect visual amenity and allow the proposed development to be delivered in this location without resulting in an adverse impact on the character or landscape setting of Cambridge, including key views from Missleton Hill, and most importantly ensuring that there is no impact on key views of Cambridge City. The provision and enhancement of green infrastructure in new development also plays an important role in supporting the climate change theme

5.0 Theme 5 - Jobs

Summary of our representation:

Insufficient job growth is planned for via Policy S/JH with the ‘Central Scenario’ for job growth pursued rather than the ‘Higher Scenario’ which is supported by recent evidence. The assessment of the scenarios looks at trends between 2001-2017 and 1991-2017; sectors such as tech and biomedical have accelerated over the Covid-19 period and certainly since 2017 outpacing the Central Scenario. This unfettered growth in challenging economic conditions points to continued long term growth associated with the ‘Higher Scenario’ and as such the employment figure in the plan should be cited as a minimum.

The spatial approach does not fully explore the potential of land South East of Cambridge to support an existing cluster. South East Cambridge is already one of the areas with the highest concentration of R&D employment, owing to the presence of PTP. There is a hub of existing development activity around the site reflecting both the demand for and appropriateness of growth in this area. The Councils should not arbitrarily limit themselves at this key stage in the local plan process by not countenancing Green Belt release, particularly in those locations such as South East Cambridge where release of such sites could in fact lead to more sustainable outcomes for commuting and ultimately climate change.

Context

- 5.1 The NPPF places great importance on building a strong, competitive economy, and states that:
- “Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.”* (Paragraph 81).
- 5.2 Planning policies and decisions should also *“recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries.”* (NPPF Paragraph 83).
- 5.3 The national and international significance of the Cambridge economy and its high technology clusters is recognised as a key component throughout the Reg 18 consultation. Cambridge has a leading presence in specialist sectors – including knowledge intensive businesses such as high-tech manufacturing, life sciences and healthcare – and the retention and ongoing growth of these dominating sectors needs to be fully supported by the GCLP. The strength of Cambridge’s economy is typically attributed to the spatial concentration of local business networks within and on the edge of the city itself, which encourages sharing of knowledge and labour through economies of agglomeration, as well as the presence of a local, highly-skilled workforce which is driven by the esteemed Cambridge University and other research organisations. This was exemplified by the recent re-location of AstraZeneca’s global headquarters to the city in order to build on its relationship with leading research, academic and healthcare organisations based in and around Cambridge, which make it ‘one of the most exciting bioscience hotspots in the world’⁶.

⁶ AstraZeneca in Cambridge – available [here](#)

Future scale of employment growth in Cambridge

- 5.4 In this context, the Reg 18 consultation sets out the level of needs in Greater Cambridge that development will meet over the plan period of 2020 – 2041. For jobs, Policy S/JH proposes that the GCLP will meet the objectively assessed need for 58,500 new jobs, around 20,000 of which would be office and industrial jobs and the rest for jobs in services and support uses such as shops, schools and healthcare. This identified need is based on, albeit 100 jobs greater, the ‘Central Scenario’ (referred to as KS3) in the Greater Cambridge Employment Land and Economic Development Evidence Study (‘the employment evidence’)⁷. The Higher Scenario (KS2) forecast a need for 78,700 jobs over the plan period, compared to the central growth scenario of 58,400 jobs. Importantly, this is concluded to be the preferred – and recommended – range, and as such the two figures represent an upper and lower employment forecast to 2041. As it stands, the emerging GCLP only provides for the lowest identified need in this range (being just 100 jobs over the lower figure).
- 5.5 The authors of this study, GL Hearn, considered that the Central Scenario was appropriate over the Higher Scenario as per the below:
- “The reduction in growth rates is important to consider as it allows for the rate of growth in percentage terms to slow as the sectors expand, avoiding unrealistic absolute year-on-year changes in the sectors as they get larger.”*
- 5.6 The highest growth projection scenario (KS1) was rejected because it *“exceeds historic rates due to high long-term annual growth rates for growing individual sectors leading to disproportionate absolute change. This rate or level of growth should not be considered realistic given the population, development and environmental implications.”*
- 5.7 Whilst it is noted that there is a possibility of individual sectors slowing in growth as they expand, those particular sectors which have primarily driven growth in Greater Cambridge such as tech and biomedical have not seen such a slowdown in growth. The assessment of the scenarios in the Greater Cambridge Employment Land and Economic Development Evidence Study looks at trends between 2001-2017 and 1991-2017, i.e. not taking into account growth in the past four years. Indeed, sectors such as tech and biomedical have accelerated over the Covid-19 period and certainly since 2017. It is therefore considered that the evidence to support the adoption of the Central Scenario is lacking, and that the prevalence of these high growth sectors and their unfettered growth in challenging economic conditions would point to continued long term growth with associated higher long term job growth for Greater Cambridge. On this basis, planning for the ‘Central Scenario’ is not a sound, or realistic approach to planning for job growth in Greater Cambridge.
- 5.8 Further, the Reg 18 consultation acknowledges that the employment evidence suggested providing flexibility in employment land in case the market delivers more jobs than anticipated. This reflects the Cambridgeshire and Peterborough Independent Economic Review (CPIER), which considered employment projections that were even greater than the ‘Higher Scenario’ set out by the Councils. In their final report published in September 2018⁸, the Independent Review judged that the most reasonable level of employment growth is that which assumes a continuation of recent higher employment growth rates, which have come in the context of nationally high employment growth, before gradually returning to longer-term levels. This would be in line with the much higher rates of growth that have been occurring in the Greater Cambridge area.

⁷ Employment Land and Economic Development Evidence Study (November 2020) available [here](#)

⁸ Cambridge and Peterborough Independent Economic Review: Final Report (September 2018) available [here](#)

- 5.9 Importantly, the Independent Review also notes that there has been an under-projection of employment growth in the area; in other words, high employment growth has been unanticipated and therefore not built into targets. The East of England Forecasting Model (EEFM) is the primary model used to inform local plans in this region, and the report states that EEFM's projections for employment growth in recent years fell below the actual output by a significant margin. In the aforementioned employment and economic evidence study, the Councils confirm that their preferred approach to employment forecasting involved using the EEFM; if employment growth continues to be significantly above that forecast by this model, then the GCLP will not provide for enough development (jobs and homes, which must be planned for in parallel to ensure unsustainable commuting patterns and worsening of affordability to not go unchecked). This is particularly significant given that the Reg 18 consultation is currently planning for the lower end of the recommended employment forecast.
- 5.10 The under-estimation of employment growth in Cambridge has been evident in recent years; since 2011 (the start of the current plan periods) Greater Cambridge has seen between 56% and 91% (depending on which source is used) of all jobs planned for in the 2011-31 period (41,400), despite only being around one-third of the way into the plan period. Given there is clear historic evidence of employment growth running higher than anticipated, it is vital that the GCLP recognises the likelihood of this continuing and allows for flexibility, particularly by expressing any employment figure in the plan as a clear 'minimum'. The Council should also consider an early review mechanism if employment growth continues to run substantially above anticipated levels, in order that sufficient sites can be brought forward more quickly to accommodate this growth.
- 5.11 Taking the above points together, there is clearly justification for including higher employment related figures in the GCLP. The national importance of the Greater Cambridge economy, combined with world-renowned clusters and the strong performance of knowledge intensive sectors, has the potential to drive growth beyond the relatively modest figure in the emerging GCLP. The persistently higher growth rates in the Cambridge city region are also emphasised by other relevant stakeholders, including Cambridge Ahead. The need for flexibility to respond to economic opportunities is central to the NPPF (as cited above) but also the PPG (ID: 2a-027) with its requirement for plans to "*consider and plan for the implications of alternative economic scenarios.*"

Spatial options for employment

- 5.12 When considering the Spatial Strategy that the Greater Cambridge Local Plan is pursuing, it is notable from a review of the First Proposals map that there is a lack of new housing or employment allocations located on the south eastern edge of Cambridge. As can be identified through the existing allocations from the Cambridge City Local Plan within Policy S/EOC: (Other site allocations on the edge of Cambridge), there are a number of strong employment and housing sites which are being retained, but no further allocations to help strengthen and build those new communities which were started under the existing Local Plan, and provide no further options for growth for those important business locations. Notably within South East Cambridge, these include Peterhouse Technology Park and the allocations GB1 -4 which provide for both housing and employment uses.
- 5.13 This is particularly surprising given the locational advantages that this particular area on the edge of Cambridge benefits from, notably the upcoming delivery of the Cambridge South train station that is proposed at the Biomedical Campus. As is confirmed by the Transport and Works Act Order (TWAo) application made by Network Rail on the 18th June 2021⁹ the proposed station will be supported by significant infrastructure upgrades, including the provision for

⁹ <https://www.gov.uk/government/publications/cambridge-south-infrastructure-enhancement-transport-and-works-order>

1,000 cycle parking spaces and improved roads/crossings to provide access to the station. As such, the station will be highly accessible by cycle, and sites with existing allocations such as the land south of Peterhouse will be easily accessible by cycle. It would therefore seem unnecessarily restrictive of Greater Cambridge to limit the allocations for employment growth in this area solely to the Biomedical Campus, and not to other strong employment locations such as those existing allocation sites GB3-4 which are within short public access of the new train station.

- 5.14 In addition to the overall need for new jobs, Table 3 in the Councils' employment evidence⁷ also confirms that there is a demonstrable need for B1a/b uses, with projections showing that there will be a significant undersupply across the GCLP period even after the potential contribution of B1 mixed sites is taken into account. The evidence suggests that this reflects that most of the projected demand in B1b is assumed to be for research and development (R&D) employment, and that if the 'higher growth scenario' was achieved over the plan period then the current pipeline of supply is likely to be insufficient.
- 5.15 Businesses evidently want to tap into the location of Cambridge, and our site's location to the south eastern edge of the city has existing connections to the rest of the Cambridge economy. Further Green Belt release would be justified in this area to facilitate further economic growth extensions at the PTP site in the context of Cambridge's local need. This leads us on to the consideration of the identified locations for employment growth in the Reg 18 consultation.
- 5.16 The GCLP consultation sets out the proposed strategy for development in Greater Cambridge and Policy S/DS provides detail on where the homes and jobs identified in Policy S/JH should be provided in order to meet the vision and aims of the local plan. The growth strategy appears to be separated into five distinct locations – namely the Cambridge urban area, the edge of Cambridge, new settlements, the rural southern cluster, and the rest of the rural area – with the amount of proposed development differing in these areas according to their scale, characteristics and sustainability.
- 5.17 While the development strategy is not overtly clear on which sites will specifically include employment uses to accommodate the need for new jobs, Policy S/DS suggests that the overall focus for employment growth – some of which relates to mixed-use sites – will be at North East Cambridge, Cambridge East, Cambridge Biomedical Campus, Babraham Research Campus and other new or continued sites, primarily within the Cambridge urban area and existing business parks at the Rural Southern Cluster. The policy clearly lists the specific sites that will contribute to meeting the housing need requirement, setting out the quantum of homes to be delivered at those sites over the plan period, however it does not provide the same transparent approach with regards to the supply of jobs (i.e. sites for employment).
- 5.18 The GCLP provides further detail on new employment development proposals in Policy J/NE. This policy supports employment development in Cambridge at the sites set out in the development strategy and within appropriate mixed use areas of major change and opportunity areas, and states that other employment proposals in Cambridge will be considered on their merits where they are of an appropriate scale, character and accessible location. The policy goes on to specify a range of sites which are particularly suited to supporting the need of clusters, which include significant opportunities at:
- North East Cambridge
 - West Cambridge
 - North West Cambridge
 - Cambridge Biomedical Campus
 - Welcome Trust Genome Campus

- Granta Park
- Babraham Research Campus
- New Towns at Northstowe and Waterbeach.

- 5.19 While the policy recognises that cluster related employment is not restricted to these areas, the GCLP is not currently proposing to direct growth towards South East Cambridge – and neither is it identified as a proposed location for further employment development. It is considered that, given the need to plan for higher employment growth, the spatial approach and proposed allocations are somewhat limited and do not fully explore the potential of South East Cambridge to support other existing clusters. The site provides an opportunity to deliver additional employment land in a sustainable location; fundamentally, it can facilitate growth despite its current location within the Green Belt.
- 5.20 As such, the Councils should not arbitrarily limit themselves at this key stage in the local plan process by not countenancing Green Belt release, particularly in those locations such as South East Cambridge where there is already an established employment cluster that could suitably accommodate further development. The expansion of the PTP cluster should be specifically supported by the GCLP, and the Green Belt release of such sites could in fact lead to more sustainable outcomes, for example by facilitating a nature network as discussed in the previous section, and by delivering jobs in close proximity to homes.

The needs of specific sectors

- 5.21 Moreover, the specific need for further employment provision in specialist sectors – as identified throughout the GCLP and supporting employment evidence – means that there will be demand for further expansion of clusters that currently support these types of businesses and/or technologies. Arm Holdings ('ARM') is the anchor tenant at PTP and is a driving force in the global semiconductor (computer chip) industry¹⁰. Its primary business is in the design of ARM processors (CPUs), for which it is considered to be market dominant, and it is one of the best-known 'Silicon Fen' companies (also known as the Cambridge Cluster).
- 5.22 There is currently a worldwide shortage in semiconductor production¹¹, which is not expected to end in the short-term, and ARM is therefore one of the companies that is well positioned to help address increasing industry demand. Millions of everyday products, such as cars, smartphones and fridges, rely on semiconductors and demand for new products that use semiconductors will only continue to grow. Further investment in semiconductor manufacturing capacity to boost supply is anticipated, and ARM is a leading global company set within the context of Cambridge's economy which has an international reach. The demand for further expansion of ARM at PTP, which has emerged as a significant high-tech employment cluster, beyond 2041 can therefore be expected.
- 5.23 Considering the strength of and continued need for specialist sectors in Cambridge, it is also of importance that jobs in these sectors are unlikely to have been – or will continue to be – negatively impacted by COVID-19. The Reg 18 consultation document states that the employment evidence is based upon pre-COVID-19 data. However, the strength of Cambridge's knowledge-intensive sectors, particularly its globally renowned life sciences cluster, has only been underscored by the recent COVID-19 pandemic and as a result, job growth has and will continue to trend upwards. A report by New London Architecture (NLA)¹² highlights the contribution of the life sciences sector to the national economy and states that it is one of the most resilient sectors. While one of the most significant impacts of COVID-19 is the rise of

¹⁰ Arm Company: About us – available [here](#)

¹¹ BBC: Why is there a chip shortage? (August 2021) – available [here](#)

¹² Knowledge Networks: London and the Ox-Cam arc – New London Architecture (NLA), June 2020. Available [here](#)

homeworking, the nature of most jobs in life sciences requires employees to be physically present. As the economy adjusts to the ‘new normal’ it therefore seems apparent that both the global reach of Cambridge’s life sciences cluster and demand for space in this sector will only continue to grow.

How does the site contribute to this theme?

- 5.24 The site is uniquely placed on the edge of Cambridge to make a substantial contribution to sustainable economic growth, capitalising on Cambridge’s economic success and maximising its future potential. Being located directly adjacent to PTP provides an option to expand PTP within an existing and highly-established employment cluster. The creation of new employment space in this location is also likely to encourage inward investment from businesses seeking to set up in or relocate to Cambridge who want to be in close proximity to city centre and specific nearby employment clusters including the Biomedical Campus and Addenbrooke’s Hospital.
- 5.25 South East Cambridge is already an established nucleus of employment led development; the employment evidence identifies it as one of the areas with the highest concentration of R&D employment, owing to the presence of PTP. This existing technology park is a large combined office/R&D site with a strong tech focus, providing a mix of dry laboratory and office floorspace. The park’s expansion has already been endorsed by the Councils, with development underway on the allocated GB3 and GB4 sites and further land at allocation E/2 to come forward in the short-term. The site is also in proximity to Cambridge Biomedical Campus, which is identified in the Reg 18 consultation as a location for potential expansion, and there are several housing allocations in the area including GB1, GB2 and H/3.
- 5.26 There is therefore a hub of existing development activity around the site, which reflects both the demand for and appropriateness of growth in this area – particularly over the longer-term plan period to 2040. Indeed, the expansion of PTP to deliver GB3, GB4 and E/2 was planned to meet needs to 2031, the end of the Local Plan period, development needs to 2040 would be greater than this on the basis that expansion is already underway with ten years of the plan period still to go. PTP forms an established employment cluster and expansion of this site would help to meet the significant growth in new jobs in Greater Cambridge. Employment growth has been less effective where the attempt has been made to disperse it to locations outside Cambridge beyond the Green Belt, and this is illustrated by the new settlement of Cambourne which has not achieved its potential. This can be explained by the simple point that businesses typically wish to be located in or near the city itself so that they can take full advantage of the spatial concentration of local business networks. To maximise the benefits that companies gain from this location, including access to a highly skilled labour force, other businesses and the university, employment land therefore needs to be located if not in the city then as close as possible, i.e. on the edge of Cambridge.

Inclusive & affordable employment

- 5.27 Policy WS/IO sets out how new developments should support the skills and training needs of local residents and provide opportunities for local businesses. The policy demonstrates that importance will be given to appropriately scaled developments that support local employment contributions to help to ensure that the local community benefits from the development.
- 5.28 CEG fully support this policy direction and the site presents a significant opportunity to make an important contribution to the Councils’ aims of creating inclusive employment in the area. Dependent on the scale of development at the site, this would be a notable local benefit of Green Belt release, which should be considered in the context of existing employment facilities at PTP. There is an established employment market in this location and expansion of this market could readily generate opportunities for local people to train in the higher-skilled sectors, through on-

site apprenticeships for example, providing significant community benefit. This would further support the provision of a skilled labour force and mitigate the need for greater in commuting to Greater Cambridge, linking to the climate change theme throughout the Reg 18 consultation.

- 5.29 On a similar note, Policy J/AW proposes the means by which affordable workspace, including for creative businesses, should be provided across Greater Cambridge. The policy requires affordable workspace – that is, workspace that has a rental value below the market rate (generally, 80% of the market rate or less) – to be delivered as a proportion of larger commercial developments. We support this proposed policy, in particular the inherent flexibility that is provided by including the potential for financial contributions to be made for equivalent off-site provision should on-site provision not be possible.
- 5.30 Delivery of employment development at the site, and the associated contribution it would make, would increase access to affordable flexible spaces for start-up businesses and small and medium-sized enterprises (SMEs) across Greater Cambridge. As noted in the GCLP, this plays an important role in helping to address social inclusion and it would therefore provide an additional benefit to Green Belt release in this location

How do other options compare?

New settlements

- 5.31 As previously noted, areas beyond Cambridge City are unproven employment markets; demand for employment space remains primarily in and on the edge of Cambridge City.
- 5.32 The emerging GCLP identifies Cambourne as a broad location for longer term strategic scale growth, with part of the settlement's role to be a growing employment centre to provide local opportunities for its residents and nearby communities. However, Policy S/CB states that future development at Cambourne will need to consider: *The economic role of the place, and which employment sectors would benefit from the location to support the needs of the Greater Cambridge economy*. This suggests that there is no latent demand from existing occupiers or a particular need arising in this location for specific forms of employment space. As is confirmed below through a planning history review, existing provision on site includes predominantly general office space rather than research and technology companies which tend to gravitate to specialist clusters on the edge of Cambridge such as that at PTP. Policy S/NS sets out the direction for the three new settlements of Northstowe, the new town north of Waterbeach, and Bourn Airfield new village, which are proposed to continue to grow during the period of the new Local Plan and beyond, including elements of employment development.
- 5.33 Neither policy is clear on the amount or type of employment development that is to be allocated or supported in these new settlements. Historically, Cambourne and Northstowe have been delivering housing at relatively strong rates and are better associated with residential orientated development. A review of the relevant evidence⁷ and recent planning applications relating to potential employment development at the new towns indicates the following:
- 1 Waterbeach** – Arguably the strongest potential new settlement for employment development due to the proximity of the existing Cambridge Innovation Park and Cambridge Research Park, which lie adjacent to the new town. Waterbeach is likely to build on the ICT/professional services and biotech sectors located at the existing parks and the site is coming forward through two large applications under two land ownerships.

Planning applications comprise: an outline application for 6,500 homes and 15,000m² of business (B1) floorspace, including small to medium sized offices, light industrial workshops, studios and maker spaces (reference S/0559/17/OL, approved 2019); an outline application for 5,500 homes and up to 22,400m² B1a office and 2,400m² B1c/B8 light

industrial, storage and distribution space (reference S/2075/18/OL, awaiting decision); and a further application for the expansion of the Innovation Park, including new office buildings and floorspace (reference 20/05253/FUL, awaiting decision).

- 2 Cambourne** – The extension of Cambourne (Cambourne West) is located immediately adjacent to the existing Cambourne Business Park, which contains larger scale office accommodation occupied by a mix of businesses in professional services, IT, telecommunications and research and development. The employment evidence confirms that the Business Park itself *‘has taken some time to work towards being an established employment location’*, raising questions on the potential for the extension to deliver further employment space.

Outline planning permission was granted in 2017 for the Cambourne West extension (reference S/2903/14/OL), which included land for the provision of up to c.6ha of B1 employment space, anticipated to be small offices, R&D and clean technology businesses – however to date there does not appear to be further activity on this provision. Significantly, the land directly south of the Business Park is being promoted for residential development only; a screening opinion was recently submitted for 300 new homes (21/03771/SCRE).

- 3 Bourn Airfield** – Located to the east of Cambourne, planning applications at Bourn Airfield suggest that the site is expected to deliver a mixed-use village comprising of 3,500 dwellings and supporting uses including 1,500m² of employment floorspace comprising offices, R&D and light industry (Class B1a, b and c uses) (reference S/3440/18/OL, awaiting decision). A further application, granted in January 2021, includes provision for an additional 24,620m² of employment space consisting of a mix of B1b (research and development), B1c (light industrial) and B8 (storage and distribution) (reference 20/02568/FUL).

- 4 Northstowe** – The employment evidence makes clear that *‘Northstowe has a challenge in bringing forward employment under the current strategy’*. The new town will eventually include up to 10,000 new homes and a range of other uses. Planning applications to date suggest that there will be a series of employment area parcels across the phases of development in association with the town centre and local centres, primarily for mixed B1 uses, however no employment floorspace has yet been completed within the new settlement which is in early phases of development. There are a number of other identified employment locations that are either established or seeking market position – including Cambourne and Waterbeach.

5-34

While this review provides an insight into potential employment development in the new town designated areas, it is not clear how much, and what type, of employment space is already permitted against that still being proposed in the emerging GCLP. As noted previously, the Reg 18 consultation does not set this out in a transparent way, and it is difficult to ascertain whether or not the importance (and delivery) of employment growth that is being proposed at these new towns is likely to materialise or be successful. If Cambridge wants to fully capitalise on its economic success then it must maximise the development potential of employment sites located close to established employment clusters which attract the best businesses and workers; this is an opportunity available to Greater Cambridge at Land South of Cambridge.

6.0 Theme 6 – Housing

Summary of our representation:

Although a theme in itself, housing underpins every aspect of sustainable development and every one of the themes in the GCLP. Housing represents an option for the site under Options 3, 4 and 5 and will build upon the site’s locational advantages near to Cambridge City and existing employment clusters, delivering a range of housing across different types, tenures and sizes to ensure all needs can be catered for.

South East Cambridge can play a key role in meeting the overall needs of Greater Cambridge, potentially delivering up to c.1,500 homes (or 2,200 if the County Council’s site to the south is included) through a comprehensively planned mixed-use development which incorporates a range of employment, community and open space alongside housing. This would deliver a truly sustainable, inclusive and strong neighbourhood which supports Greater Cambridge’s wider economic potential.

Context

- 6.1 Housing underpins every objective of sustainable development in the NPPF; economic (building a strong economy and ensuring sufficient land of the right types is available in the right place), social (supporting strong communities by ensuring a sufficient number and range of homes can be provided and by fostering well-designed, safe places) and environmental (making effective use of land, improving biodiversity and moving to a low carbon economy). The NPPF goes on to set out that (para 61):

“To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.”

- 6.2 Housing also underpins the themes of the emerging GCLP, for example:
- 1 Climate Change – it is a recurring theme in the GCLP that one of the biggest contributors to climate change is in commuting to Cambridge. This is exacerbated by the current lack of affordable housing relative to quantum of jobs in Cambridge. Building enough new homes just to keep pace with job growth may simply maintain the current situation but planning for more jobs without the corresponding homes would exacerbate the issue further.
 - 2 Biodiversity – new housing development can provide access to new formal and informal open spaces, taking pressures of existing habitats, whilst also delivering biodiversity net gain.
 - 3 Jobs – at its most simple level job growth must be supported by housing growth to ensure a sufficient labour force is available. It is also key that these homes are in the right places, because businesses rely upon (and gain a competitive advantage from) having a workforce which can move readily to new employment opportunities. Jobs also need to be supported by a range of housing types and tenures to ensure that workers on all incomes can access employment, and the provision of new housing allows for delivery of affordable housing as well as specific types, such as key worker accommodation.
 - 4 Infrastructure – development of housing is key to ensuring existing infrastructure can be retained (for example, ensuring public transport networks remain viable) and is also key to unlocking new infrastructure.

- 6.3 The intersection of housing with other themes is also noted within the GCLP itself, stating that:
“Delivering new net zero carbon homes, across a variety of tenures, with sufficient indoor and outdoor space, designed to be adaptable throughout the lifetime of their occupants, and located close to jobs will provide many varied benefits for people and the planet. This theme therefore connects with most of the other themes. For example: net zero carbon homes (Climate Change) will help control energy costs making living costs more affordable, the creation of healthy new high quality developments with green spaces and other appropriate infrastructure (Biodiversity and Green Spaces, Wellbeing and Social Inclusion, Great Places, and Infrastructure) will improve the health and wellbeing of residents, and providing new homes will help businesses to meet their staffing needs (Jobs).” (GCLP First Proposals p.259)
- 6.4 The GCLP proposes a number of policies including for affordable housing, housing mix, density, specialist housing, self-build homes, build-to-rent homes, student accommodation and community-led housing.

Housing in the GCLP

- 6.5 On the basis of Section 5.0 (which set out that the GCLP should be more ambitious in its planned level of employment growth) we consider that commensurate increases would also be needed in housing growth to support this. As with employment, we consider that the housing requirement in the GCLP should be expressed as a minimum to ensure that there is flexibility to allow for higher housing growth in order to ensure Greater Cambridge’s potential is maximised.
- 6.6 In addition, we also make some observations below about identified housing delivery in the GCLP.

Build-out rates

- 6.7 As per para 10.19 of the October 2021 Housing Delivery Study¹³ (HDS), Waterbeach is assumed to deliver at 250dpa, but Bourn Airfield and Cambourne West are set to only deliver at 150dpa with the odd year of delivery rising to 200dpa. The clear evidence to justify this disparity in sites of a similar scale is unclear.
- 6.8 Northstowe is consistently assumed to deliver 250 dpa but within the next 4 years is to deliver in excess of 300dpa. This approach would not appear to have been taken with regard to Table 18 of the HDS, which sets out that average build out rate of urban extensions delivering 2,000+ homes are 225-275. We would consider that setting out an expected delivery of over 300dpa for multiple years is highly optimistic and it is not clear from the evidence base how this is justified, to ensure no optimism bias this should be lowered to a more realistic average build out rate of 250dpa, which fits within the identified range above, with a peak of 300dpa in 1 or 2 years if it can be evidenced.

Windfalls

- 6.9 We further note the high windfall figure of 450 dwellings per annum that is expected to be delivered across Greater Cambridge, see HDS (October 2021). It is noted that the historic windfall allowance has traditionally been 350dpa, however a recent review of the data suggests that c.500dpa has been delivered across the area over the longer term. The 450dpa is made up of the top end of the range for 240-255 for South Cambridgeshire and 185-195 for Cambridge City.

¹³ AECOM: Housing Delivery Study for Greater Cambridge October 2021 available [here](#)

- 6.10 However, the evidence appears to show that the windfall figures are elevated between the years of 2013 to 2018, i.e. the years in which the adopted Cambridge Local Plan was at Examination in Public. It is not surprising that windfalls would be higher in this period as non-allocated sites came forward without the benefit of an up to date adopted local plan, in effect the majority of housing supply would have been a windfall. Comparing this data with windfalls delivered in the period either side is less. Furthermore, the windfall ranges concluded on for Cambridge and South Cambridgeshire above seem to align very closely with the historic windfall figures for sites ‘including gardens’. This would run contrary to the NPPF paragraph 71 which states that plans should consider the case for setting out policies to resist inappropriate development of residential gardens, including these in a long-term windfall allowance could perpetuate this trend.

Housing requirement buffer

- 6.11 The HDS confirms that it is a recommendation that ‘at least a 10%’ buffer is applied to ensure an ‘over-allocation’ of land against the eventual housing requirement. However, as we have demonstrated above in the case of South East Cambridge and as we detail regarding Greater Cambridge as a whole in respect to Theme 5 – Jobs, the economy in this location is particularly robust and has seen strong levels of growth, despite the downward pressures placed on economic growth due to Covid 19. It is therefore a realistic expectation that job growth could be considerably higher than projected by the currently adopted scenario, which is demonstrated clearly by the spatial strategy suggested within the Cambridgeshire and Peterborough Independent Economic Review (CPIER) have referred to within their report¹⁴ that employment growth rates are far higher than have been indicated by official figures and that growth can be expected to keep increasing. Noting the overall thread of sustainability running through the Local Plan, it would seem appropriate to provide a higher buffer of dwelling to facilitate houses close to local sources of employment which have seen higher growth rates over the past few years, notably biomedical and technology industries which are prevalent in South East Cambridge.

How does the site contribute to this theme?

- 6.12 Options 3, 4 and 5 set out in the OfSG anticipate c.500, 800 and 1,500-2,200 homes respectively at South East Cambridge, alongside employment space, local centres and open space. This would include much-needed affordable housing across a range of sizes and types, and homes would provide a range of private amenity space, be built to accessibility standards and to zero carbon standards.
- 6.13 As well as contributing to the overall amount of housing which is needed across Greater Cambridge (which is likely to under-estimated in the current GCLP), by delivering a range of homes in this specific location the scheme contributes all of the themes underpinning the GCLP and in particular the three themes explored earlier in our representations (Section 3 – Theme 1 Climate Change, Section 4 – Theme 2 Biodiversity and Green Spaces and Section 5 – Theme 5 Jobs):
- 1 Climate Change – Delivering homes in this location will contribute to sustainable transport methods, both to nearby employment sites and into Cambridge City itself which is approximately 2-3 miles away (train station and city centre respectively). This in turn will reduce congestion and pollution. It is demonstrated that most travel in the local area takes already place via sustainable methods and the site represents a unique opportunity to build upon this.

¹⁴ CPIER Final Report September 2018 available [here](#)

- 2** Biodiversity – New housing development can enable access to new formal and informal open spaces which carries multiple benefits, including taking pressures of existing habitats whilst also delivering biodiversity net gain through the direct creation of new habitats. At the time of writing discussions with the Wildlife Trust have focused on commercial development extensions to the PTP and housing development extensions to the GB1 site only as set out in Section 4.
- 3** Jobs – It is well established that Cambridge City and the edge of Cambridge is the preferred employment location for many businesses seeking to take advantage of Cambridge’s clusters, and it is vital that a sufficient amount of homes are provided so that business do not continue to rely on significant levels of in-commuting. Indeed if commuting becomes unsustainable it could see lower paid workers forced out and the loss of lower paid and key worker jobs would undermine Cambridge’s overall economic success. The site could provide a wide range of housing types and tenures to ensure that workers on all incomes can access employment, and the provision of new housing allows for delivery of affordable housing as well as specific types, such as key worker accommodation.

7.0 Conclusions

7.1 These representations seek to illustrate the inherent suitability and overall sustainability of land to the South East of Cambridge, and the significant opportunity that this site provides to accommodate employment and housing development in a manner in line with the emerging GCLP themes.

7.2 The site was submitted through the Call for Sites process in Spring 2019 with a number of different options for development of various scales and forms, including modest extensions as well as a sustainable mixed-use development across the entire site. However, the Greater Cambridge HELAA published in September 2021 only assesses the development potential of the entire site (reference 40058). Through ongoing dialogue with the Wildlife Trust BCN, these proposals have also evolved to propose two incremental and proportionate extensions to Worts' Causeway and PTP to enable a new large strategic accessible natural green space.

Theme 1 – Climate Change

7.3 Development at South East Cambridge will support the emerging GCLP aims with regards to the theme of climate change, most notably through its location. It is a highly accessible site that can encourage low-carbon transportation use, building on existing sustainable travel patterns in this location and enhancing local cycling and walking networks. Delivering housing and employment space close to where people live will also reduce the need to travel in the first instance.

Theme 2 – Biodiversity and Green Space

7.4 In terms of green spaces and biodiversity, the site would help to achieve this consultation theme. Not only is this a site whereby a net biodiversity gain is easily attainable through (but not exclusive to) significant planting and the creation of new habitats and green corridors, it also offers an opportunity to relieve pressure on other local nature reserves close to the site, through the provision of new greenspaces as well as increased public access to nearby nature sites and country parks.

7.5 Our proposals seek to deliver new homes and jobs in this location to facilitate the delivery of strategic green infrastructure and priority habitats. Although discussions are ongoing, the Wildlife Trust consider Options 1 and 2 to be the most acceptable at this stage from a nature conservation perspective. These two options are considered by the Trust to have the potential to make the most significant contribution to the Cambridge Nature Network aims. Our proposals for extensions to GB1 and Peterhouse Technology Park would provide a range of potential measures to encourage biodiversity all whilst enhancing landscape value and linking existing development with the Beechwoods Nature Reserve, Gog Magog and Wandlebury Country Park and the Cherry Hinton Chalk pits. CEG have engaged with the Wildlife Trust and are committed to continuing discussions about how best to support the Cambridge Nature Network.

Theme 5 - Jobs

7.6 The economic success of Cambridge is recognised as being of both global and national importance, and it is essential that this is supported by planning for further employment growth. Forecasts suggest that Cambridge's world-renowned clusters and strong performance of knowledge intensive sectors has the potential to drive growth beyond the jobs figure proposed in the emerging GCLP. The NPPF at paras 81-83 and the PPG specifically require Plans to look beyond a 'predict and provide' approach and seek out positive approaches to achieve opportunities that might arise from high growth scenarios. We are not confident that the emerging plan fully embraces this national policy imperative.

- 7.7 The expansion of Peterhouse Technology Park therefore provides a unique opportunity to increase employment options in this part of the city. It is clear that allocated employment areas in locations outside of the city have been less desirable, and the drive and demand for employment space in and on the edge of the city of Cambridge is strong. The site provides an opportunity to address this issue, provide opportunities for local people to work nearby to their home and support Cambridge's leading presence in specialist sectors.

Theme 6 – Housing

- 7.8 Housing underpins every one of the themes in the GCLP and South East Cambridge can play a key role in meeting the overall needs of Greater Cambridge, potentially delivering up to c.1,500 homes (or 2,200 if the County Council's site to the south is included) through a comprehensively planned mixed-use development which incorporates a range of employment, community and open space alongside housing. The site's location, close to a significant amount of existing employment, new employment and the city centre itself, means that new housing in this location can contribute to sustainable development from an economic, social and environmental perspective.

Conclusions

- 7.9 The site would support the sustainable expansion of a successful high technology research and development cluster, building on the principles already established through allocations which demonstrate the inherent suitability of this location in contributing to meeting development needs. South East Cambridge can facilitate employment growth despite its current location within the Green Belt, and the site can be delivered to accommodate employment space of a scale complementary to the GCLP current direction of travel. Furthermore, the delivery of more employment space must be supported by the delivery of additional housing to ensure unsustainable commuting patterns are not perpetuated. Delivery of additional housing east of GB1 provides this opportunity.

Appendix 1 Illustrative Landscape Framework

1. Land managed as chalk grassland, including restored and enhanced hedgerows. Area provides a swathe of grassland connecting Cherry Hinton Chalk Pits and the Gog Magog Golf Course / Wandlebury. Opportunities to limit public access across the area through provision of footpaths alongside restored hedgerows and Wort's Causeway.

2. Blocks of native woodland and tree belts to extend the stepping-stone of woodland habitats and provide landscape structure and screening of development. Woodland to follow existing field margins and contours, reflecting the pattern and form of the landscape, with the wooded skyline and backdrop in wider views. Includes belts of trees within areas of Green Infrastructure through development parcels to break up development and retain wooded skyline as experienced from Fulbourn Road / Wort's Causeway to the east.

3. Opportunities for areas of Strategic Accessible Natural Green Space set within the woodland framework. May also include areas of grassland, scrub and ecotones, providing a variety of complementary and habitats. These areas are accessible along nature trails, connecting with the circular routes and existing rights of way network

4. Ridgeline and Missleton Hill to remain as open landform to retain setting as a distinctive skyline and backdrop, as well as facilitating views across the historic core and skyline of Cambridge from the high ground. Opportunities exist to provide a viewpoint and destination on the hill to allow for appreciation of these views, tying-in with the circular access route and connections with the city and wider countryside.

5. Potential location for visitor centre connecting with commercial area, overlooking and providing access to area of Strategic Accessible Natural Green Space, circular walks and viewing areas.

6. Opportunities to provide activity area with views south across the chalk grassland, ridge and woodland at Beechwood and Wandlebury. New paths provide connections to the Cherry Hinton Chalk Pits and access to Semi Natural Greenspace, viewing areas, Beechwood Nature Reserve and the wider rights of way network.



Legend

- Site Location
- Developable area
- Native woodland and tree belts
- Retained and enhanced native hedgerows
- Areas of scrub and ecotones to woodland edges
- Chalk Grassland
- Existing Public Rights of Way/ Accessible Spaces
- New paths providing links and circular access
- Multifunctional Green Infrastructure through developable parcels
- 55 Ridgeline and Missleton Hill retained as open landform
- ↖ Views across Cambridge skyline from high ground retained
- Potential location for Visitor Centre and associated activities
- Potential viewing area/destination on high ground
- ↗ Potential links to Limekiln Hill and viewpoint

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Illustrative Landscape Framework

Plan Number	Incola 1009 P01
Revision	a
Date	19/11/2021

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South Cambridge
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