

**CAPITAL PARK,
FULBOURN
GREATER CAMBRIDGE
LOCAL PLAN – FIRST
PROPOSALS
CONSULTATION 2021**

Quality Assurance

Site name: Capital Park, Fulbourn
Client name: Janus Henderson Property UK PAIF
Type of report: Regulation 18 : First Proposals Consultation 2021

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Signed


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1.0 Introduction and Background

- 1.1 These representations have been prepared by Bidwells LLP on behalf of Janus Henderson Property UK PAIF who own Capital Park, Fulbourn (“the Site”) and in response to the Greater Cambridge Local Plan Regulation 18: First Proposals 2021 consultation (“the consultation document”). Please refer to **Appendix 1** for site location plan.
- 1.2 The First Proposals consultation document sets out the Councils preferred approach to the level of growth that should be planned for, and where it should be planned over the plan period to 2041. It also describes the planning policies proposed to shape development and guide planning decisions. The First Proposals consultation is particularly seeking views on the emerging development strategy, the direction of travel for policies and issues the Councils should be considering as policies are prepared.
- 1.3 These representations respond to the draft policies of the First Proposals consultation document with particular reference to Capital Park, Fulbourn. Janus Henderson are still at an early stage in considering potential development concepts for the site but currently consider that commercial redevelopment could be appropriate given the existing uses on the site. Land at Capital Park is considered to be a sustainable location for growth and should also therefore be released from the Green Belt.

The Site

- 1.4 Capital Park, Fulbourn comprises land immediately to the east of the Fulbourn and Ida Darwin Hospital site. It comprises four large three storey office buildings, the old hospital building (Victoria House), a daycare nursery and cafe. The main access to the site is from the south via Cambridge Road.
- 1.5 The southern section of Capital Park, to the south of the Campus perimeter road, is not included within these representations. A separate representation has been made to the Local Plan in respect of this part of the Park.
- 1.6 The site is well served by existing transport links, is ideally located to utilise the existing connectivity within and around the high quality business park and is close to the existing Tesco superstore. The site is situated within close access to ‘Citi 1’, ‘Citi 3’ and ‘16A’ bus services which are within a reasonable walking distance of the site. There are also a number of strategic schemes coming forward which will improve mobility in the area, including the Fulbourn ‘Greenway’ which is expected to be routed approximately 100m to the north.
- 1.7 The southern section of the site is within the Fulbourn Hospital Conservation Area and Victoria House is identified as a non-designated heritage asset.
- 1.8 The Site is currently washed over by the Green Belt.
- 1.9 The site is immediately adjoining the Fulbourn and Ida Darwin Hospital allocation under the existing adopted South Cambridgeshire District Council Local Plan (Policy H/3: Fulbourn and Ida Darwin Hospitals).

2.0 Economic Context

National Planning Policy

- 2.1 National Planning Policy (NPPF, Paragraph 8a) identifies the economic objective of the planning system:

“...to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure...”

- 2.2 NPPF Paragraph 81 builds upon this:

“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. 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.” (emphasis added).

- 2.3 NPPF Paragraph 82 states that planning policies should:

“a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;

b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;

c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and

d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.”

- 2.4 NPPF Paragraph 83 then states that;

“planning policies and decisions should 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”

Sub-Regional Context

- 2.5 The Cambridgeshire and Peterborough Combined Authority (CPCA) set a target of doubling the regional economic growth (GVA) over a 25 year period as part of the Devolution Deal in 2017. This requires the area going beyond what it has achieved in the past (to double an economy over twenty-five years requires an average annual growth rate of 2.81%; historically, since 1998, the local economy has only grown at around 2.5%). Achieving this requires employment growth and more importantly productivity growth, as we are already at comparatively high levels of employment.

Cambridgeshire and Peterborough Independent Economic Review (CPIER) (2018)

- 2.6 The Cambridgeshire and Peterborough Independent Economic Review (CPIER) (2018) has outlined ambitious plans for growth over the next 20 years. Growth relies on increases in employment and productivity and the CPIER emphasises the need for productivity growth in this region as employment rates are so high. Economic growth is therefore essential for the next Local Plan.
- 2.7 The CPIER notes a missed opportunity to supply AI, science and technology and bio-medical clusters from within the region: 10.8% of supplies come from within the company's local area (30mile radius) while 27.8% came from overseas. Growing these local supply chains, particularly the high value ones would help disperse the economic benefits and provide a wide range of different jobs. Availability of suitable sites and premises in excellent locations outside of Cambridge is a key factor in spreading the economic growth.
- 2.8 The CPIER also states that locations with high levels of public transport access should be identified for businesses with high employment densities;

“by ensuring good quality public transport is in place before development, the number of those new residents who will use the transport is maximised. This is also likely to be the best way to stretch some of the high-value businesses based within and around Cambridge out into wider Cambridgeshire and Peterborough. These companies will not want to be distant from the city, but these clusters could ‘grow’ out along the transportation links, providing connection to other market towns.”

- 2.9 CPIER acknowledges that knowledge-based clusters are key to Greater Cambridge's role as the engine for economic growth. An opportunity exists therefore for Greater Cambridge to encourage the forces of agglomeration through promotion of sites around existing groups of same-sector companies.

Cambridgeshire and Peterborough Local Industrial Strategy (2019)

- 2.10 The Cambridgeshire and Peterborough Local Industrial Strategy sets out an industrial blueprint to deliver Cambridgeshire and Peterborough's vision of being a leading place in the world to live, learn, work, and do business. The actions in the strategy will help deliver the aims of the national Industrial Strategy and the recommendations of CPIER.
- 2.11 In terms of Life Sciences, the Strategy sets out a priority of expanding and building upon the clusters and networks that have enabled Cambridge to become a global leader in innovative

growth and improving the long-term capacity for growth in Greater Cambridge by supporting the foundations of productivity.

2.12 The Strategy states, at page 9, that;

“Greater Cambridge is a global centre of life sciences that will increasingly grow across Huntingdonshire and be connected to a wider cluster operating across the Arc. As part of the Life Sciences Sector Deal, local partners in Cambridgeshire and Peterborough will continue to deepen the connectivity between research and industry, with a specific focus on addressing the Ageing Society Grand Challenge.”

Life Science Strategy for the Cambridgeshire and Peterborough Combined Authority (2021)

2.13 This Life Science Strategy for the Cambridgeshire and Peterborough Combined Authority highlights just how fundamental the sector is to the local economy. On page 41 it states that;

“Between these nine science parks, the Combined Authority is home to the most mature property infrastructure for life sciences firms in Europe. However, vacancy rates are running at just a few percent and we heard repeatedly during our interviews that there is an acute shortage of space for start-up and scale-up firms.”

Greater Cambridge Employment Land and Economic Development Evidence Study (November 2020)

2.14 The Greater Cambridge Employment Land and Economic Development Evidence Study explores the characteristics of each key economic cluster including the challenges and opportunities that they face. The Study confirms that there is a need for additional floorspace in Life Science, ICT and Professional Services and Advanced Manufacturing sectors.

2.15 The Study confirms demand is particularly high for wet labs, as space is highly specific, and companies seek flexible high quality floorspace. There is currently a reported lack of flexibility in floorspace arrangements as most existing buildings are purpose-built fitouts. South Cambridgeshire is reported as having a notional supply of R&D floorspace of just 1 year, with Prime Central and the Rest of Cambridge City areas having very little or no advertised R&D floorspace.

2.16 In terms of future employment needs, the Study considered that the most likely future level of jobs growth, is for 58,500 jobs between 2020 and 2041 (referred to as the ‘central’ scenario). However, the Study also identified a ‘higher’ scenario, placing greater weight on fast growth in the recent past, particularly in key sectors. The Study subsequently recommends that the ‘higher’ scenario is planned for particularly in relation to office and lab needs. This ensures a flexible supply, encouraging business growth and inwards investment, and aligns with market feedback and past completions trends.

3.0 The Opportunity

- 3.1 The R&D and Business Services sectors are growing and such knowledge intensive industries tend to cluster together, pulled by the forces of agglomeration (easy access to knowledge, workforce, supply chains, markets).
- 3.2 This clustering has significant benefits to Cambridge and the wider UK economy but to grow this cluster requires office and lab development in close proximity to the existing occupants. However, future business development in the area is constrained by the lack of high-quality office and lab space.
- 3.3 For the R&D and Business Services sectors, the location decisional drivers are access and ability to recruit the right skill sets. Cambridge provides this, but the lack of available space and lack of development pipeline puts that resilience at risk and could undermine the growth of the R&D sector.
- 3.4 In terms of the impact of COVID-19, this remains difficult to predict within a range of sectors. However, there has continued to be an encouraging level of consistent demand, particularly within the laboratory and office sectors. Indeed, office and laboratory demand has moved to its highest level since 2015. Data collected by Bidwells LLP confirms that overall demand in Cambridge stood at 1.7m sq ft at the end of H1 2021, an increase of 30% since the end of 2020 and 45% ahead of levels in mid 2020. The demand for office space of sufficient quality and specification to enable opportunities for collaboration spaces and creative practices whilst also providing the highest sustainability standards is also likely to remain high.
- 3.5 Capital Park, Fulbourn represents a significant opportunity to provide additional capacity to support the growing R&D and Business Services sector in Greater Cambridge.
- 3.6 Fulbourn is a Minor Rural Centre in the settlement hierarchy within the adopted 2018 Local Plan. Minor Rural Centres are the second most sustainable settlement type within the hierarchy.
- 3.7 The Site is within single ownership and capable of delivering additional commercial development whilst also being able to respect its historic context and landscape setting. Various development scenarios could be considered for the site which would include for the retention of Victoria House. Existing boundary vegetation can be retained and enhanced in order to provide a defensible boundary to the Green Belt edge and to contribute towards achieving Biodiversity Net Gain.

4.0 The Green Belt

- 4.1 In considering the impact of potential development proposals on the Green Belt it is important to consider the nature and extent of the harm to Green Belt purposes. The Greater Cambridge Green Belt Study (2021) has been prepared in support of the First Proposals consultation document. Capital Park is identified as falling within Parcel CH15 (see below).



Figure 2 : Extract from *The Greater Cambridge Green Belt Study (2021) – Parcel CH15*

- 4.2 The Greater Cambridge Green Belt Study (2021) identifies that the harm resulting from the release of parcel CH15, as an expansion of Cherry Hinton, would be 'Moderate-High'. This is despite acknowledging that the parcel contains 'significant urbanising elements including Fulbourn Hospital, Capital Park and a Tesco Superstore'.
- 4.3 As a previously developed site, Capital Park clearly contains significant urbanising elements and the release of the developed part of the Campus from the Green Belt is therefore considered to cause less than the 'Moderate-High' harm referred to in the Greater Cambridge Green Belt Study. Furthermore, the site is well enclosed by existing vegetation to the east, the Campus perimeter road to the south, Capital Park road to the west and Fulbourn Old Drift road to the north.
- 4.4 Furthermore, the existing vegetation around and within the Site provides substantial visual screening, such that the effects of an increased urban character are likely to be successfully mitigated if the tree cover is preserved. Therefore, any loss of visual openness would be experienced locally (i.e. views within Capital Park) but not widely. Coincidentally, the overall

qualities of the Cambridge Green Belt, which are strongly associated with the rural landscape character, would be preserved.

Demonstrating Exceptional Circumstances

- 4.5 Paragraph 140 of the NPPF states that, once established, Green Belt boundaries should only be altered where “*exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans*”.
- 4.6 There is no formal definition of what constitutes exceptional circumstances or a standard set of criteria; it is for the local planning authority to determine whether it considers exceptional circumstances exist to justify removing land from the Green Belt and to make that recommendation to the Planning Inspectorate.
- 4.7 The site specific exceptional circumstances related to Capital Park are set out below;
- **Level of unmet need and supporting the needs of existing businesses in the R&D and Business Services Sectors** - The Greater Cambridge Employment Land and Economic Development Evidence Study (2020) confirms additional need for office and lab space;
 - **The nature and extent of the harm to the Green Belt** – as referred to above, whilst the Greater Cambridge Green Belt Study (2021) identifies that the harm resulting from the release of Parcel CH15 would be ‘Moderate-High’, the site itself comprises previously developed land which is well screened by existing vegetation. The nature and extent of the harm to the Green Belt is therefore less than substantial;
 - **Extent to which Green Belt harm can be mitigated** - harm could potentially be reduced by the enhancement of existing landscaping that forms the boundaries of the site. This would also help ensure that development enhances existing landscape features and is in keeping with the wider rural character, in accordance with landscape guidelines set out in the Greater Cambridge Landscape Character Assessment (December 2020).

5.0 Historic Environment

- 5.1 The southern section of the site falls within the Fulbourn Hospital Conservation Area. The southern section of the site also contains Victoria House, a former male shelter and a former female shelter which are all identified as non-designated heritage assets.
- 5.2 Retaining Victoria House and the shelter buildings and delivering their repair, restoration and viable re-use will represent a benefit to their heritage values. It may also be possible that new built form could be accommodated on the Site. However, to enable impacts on built heritage assets to be minimised where possible, specialist heritage input would be required to advise the design team through the development of an initial concept proposal. The result of this iterative and informed design approach will be that the aspects of heritage impact will be fully addressed through the design process, with the intention to ensure that the provisions of the relevant legislation are satisfied, and that National and Local Policies are adhered to.
- 5.3 It is possible that development on certain areas of the site may result in harm to the significance of heritage assets as a result of impact on the character and appearance of the Conservation Area and as a result of impacts on the settings of non-designated heritage assets. At this early stage of the process, there is potential that impacts would be at the level of “less than substantial” harm in terms of the policies of the NPPF – although it is not possible to define any more precisely the levels of impact at this stage until more detail is available.
- 5.4 Ultimately, any impacts arising would need to be clearly outweighed by public benefits arising from the proposals.
- 5.5 The significant public benefits that could be delivered for the site include;
- The opportunity to deliver commercial development to help meet the needs of existing and future businesses in the R&D and Business Services Sectors;
 - Delivering development in a sustainable location well located for access to key facilities and services;
 - A significant opportunity to spearhead solutions around sustainability, social inclusion and wellbeing in the context of move to a net zero-carbon society. A number of climate change mitigation and adaptation measures could also be incorporated in to redevelopment proposals for the Site;
 - A landowner who wishes to work with the community in order to shape a proposal which meets the needs of and can provide wider benefits to Cambridge, as was achieved in the Fulbourn Care Home scheme adjacent to the site; and
 - Redevelopment of brownfield land, in accordance with the councils’ sustainability agenda.

6.0 Response to Policy S/DS : Development Strategy

- 6.1 Policy S/DS sets out the proposed strategy for the pattern, scale and design quality of places created in Greater Cambridge, not only for the plan period but beyond to 2050.
- 6.2 The proposed development strategy for Greater Cambridge is to direct development to where it has the least climate impact, 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, whilst ensuring all necessary utilities can be provided in a sustainable way.
- 6.3 The development strategy is broadly **supported** .

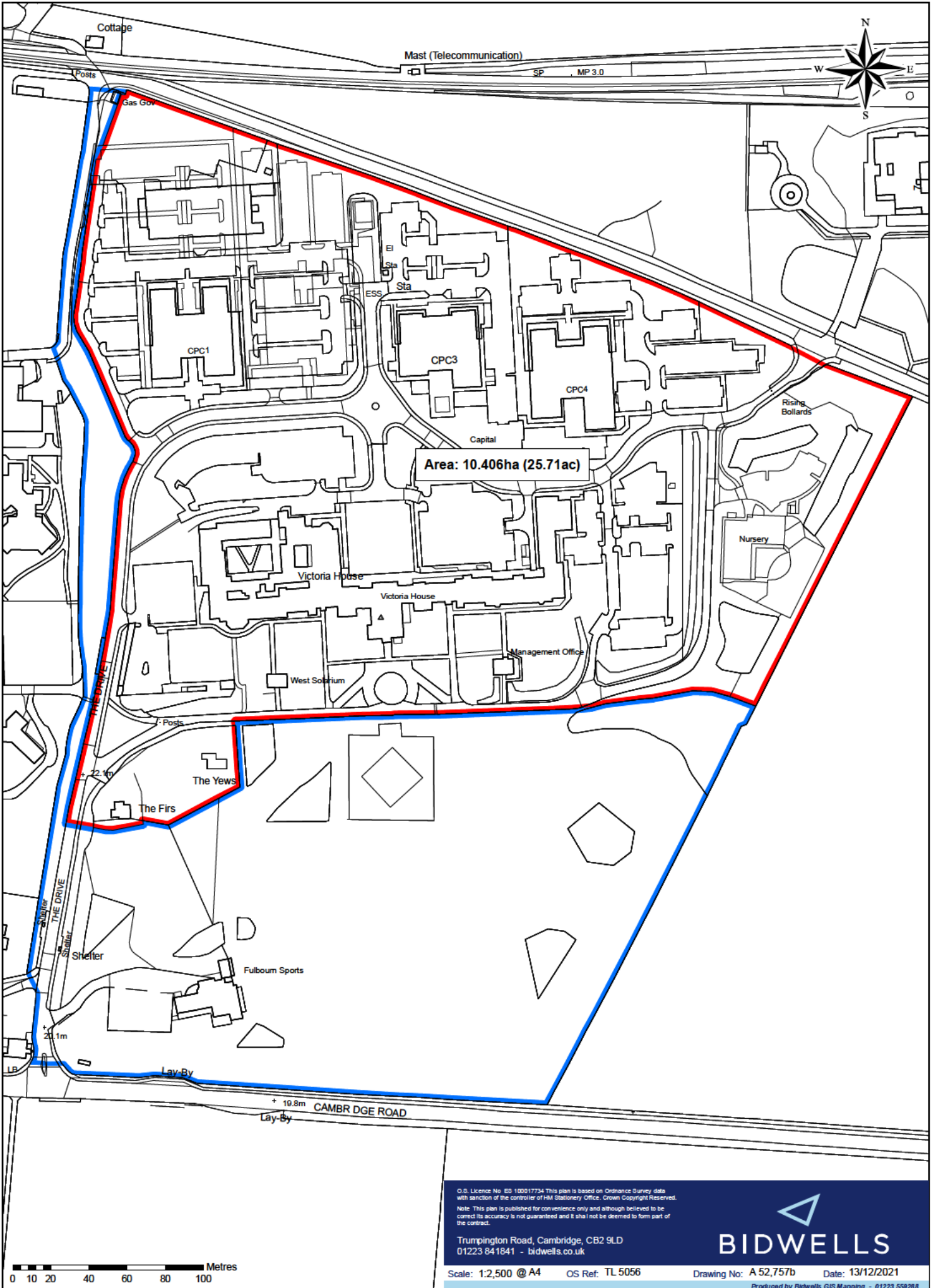
7.0 Response to Policy S/RRA : Site allocations in rest of the rural area

- 7.1 Policy S/RRA allocates sites for homes or employment that support the overall development strategy within the rural area, excluding the rural southern cluster.
- 7.2 The Fulbourn and Ida Darwin Hospital allocation from the South Cambridgeshire Local Plan is proposed to be carried forward into the new Greater Cambridge Local Plan as a Mixed Use Allocation, under site reference S/RRA/H/3 : Fulbourn and Ida Darwin Hospitals. However, Capital Park is not included as an allocation in the rest of the rural area
- 7.3 Janus Henderson supports the principle of policy S/RRA in allocating sites for employment in the rural area. However, the First Proposals document makes very few additional allocations in the rural area and Janus Henderson **objects** to this approach. This approach threatens the vitality of villages within the rural area and on the edge of Cambridge and stifles opportunities for further growth and supporting local services. As such, the Development Strategy should include for further allocations in the rural area to ensure that a sound spatial strategy is developed and delivered.
- 7.4 To fully support the rural area and develop a sound spatial strategy with a mixture of deliverable and suitable rural allocations, Capital Park, Fulbourn should be identified as an allocation for commercial development and released from the Green Belt.
- 7.5 The Science and Technology sector is the engine of the Cambridge Phenomenon that has driven the economy and it will remain an important part of the local economy and job market. Alongside, it is important to have all types of commercial space to provide for a wide range of job opportunities and to serve Greater Cambridge at close quarters to not overly rely on long-distance travel to service the area with goods and services. Further prime office floorspace in high quality developments is also needed.
- 7.6 Growth relies on increases in employment and productivity and the Cambridge and Peterborough Independent Economic Review (CPIER) emphasises the need for productivity growth in this region as employment rates are so high. Economic growth is therefore essential for the next Local Plan. As part of the devolution contract to Cambridgeshire and Peterborough is a commitment to doubling the economic output of the area (Gross Value Added) over 25 years. This is a challenging target and needs to factor at the heart of the Plan.
- 7.7 Allocating Capital Park for employment development in its location would help to meet the target of doubling GVA in Cambridgeshire and Peterborough.
- 7.8 Capital Park is a suitable location for additional employment floorspace given the site's transport connections and location near to other key employment sites including ARM and other key research and laboratory space in the area. Clustering of like-minded companies is proven to be beneficial to those companies and their enhanced contribution to the local economy. Development at Capital Park could contribute further to the East Cambridge area.
- 7.9 The site is also well served by public transport and there are no technical constraints to delivery of a sensitive, landscape-led redevelopment of the campus.

- 7.10 With the right design, including a suitable layout and design concept, further development on the site could be accommodated without having a significant impact on the surrounding heritage context of the site. The consented care home that is due to be constructed to the south of the site was found acceptable in heritage and design terms.
- 7.11 The site offers various transport connections and opportunities for sustainable travel which would help to reduce the need to access the site via polluting vehicles. In terms of transport connections, there are four bus stops located adjacent to the site offering regular services to the city centre and Arbury, approximately every half an hour. Fulbourn Greenway is also proposed to be delivered that would better connect the site to surrounding cycle networks and is expected to be routed approximately 100m to the north.
- 7.12 In conclusion, it is requested that Site Reference S/RRA/H/3 : Fulbourn and Ida Darwin Hospitals be extended to include Capital Park as it is considered a suitable and sustainable location for additional development. In order to achieve the identified development aspirations it is also appropriate to release the developed area of Capital Park from the Green Belt.

APPENDIX 1
SITE LOCATION PLAN

Capital Park



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