

Greater Cambridge Shared Planning
Planning Policy Team
Cambridge City Council
PO Box 700
Cambridge
CB1 0JH



BY EMAIL

13 December 2021

Dear Sir / Madam,

**Representations to Greater Cambridge Local Plan Regulation 18 First Proposals
On behalf of Trinity College Cambridge and Cambridge Science Park North**

These representations are made by DP9 and Sphere25 on behalf of [REDACTED] Cambridge [REDACTED]) as the principal owner and custodian of Cambridge Science Park (CSP) and promoter of Cambridge Science Park North (CSPN / the site).

These representations set out why we believe the emerging JLP is currently flawed, and how allocation of CSPN can address these issues:

- The emerging JLP is inconsistent with National Planning Policy and fails to recognise and plan positively for one of the largest employment sites in Greater Cambridge – Cambridge Science Park.
- The evidence base fails to recognise, identify and plan for mid-tech needs in Greater Cambridge.
- There are fundamental concerns raised with regard to the deliverability of Policy S/NEC:
 - Procedurally, the evidence base for Policy S/NEC was published on the 22nd November, only allowing 3 weeks for responses.
 - Deliverability of Policy NEC AAP and the impact on adopted Policy E/1.
 - Concerns regarding the jobs growth proposed, and evidence base.
 - Deliverability of S/NEC without a strategic intervention to address unresolved transport concerns.
 - The open space deficit, and deliverability of S/NEC without the strategic scale public formal and informal open space proposed at CSPN.
 - Out of date and / or inaccurate evidence base in support of the policy.
- CSPN scores similarly to other Green Belt employment sites allocated within the emerging JLP.
- CSPN by virtue of adjacency to North East Cambridge is located in ‘one of the most sustainable locations in Greater Cambridge’.
- Allocation of CSPN addresses an identified need and delivers important socio-economic benefits in a sustainable location, where the impact can be greatest to nearby communities; in addition, the transport and green infrastructure proposed will enable development within the wider NECAAP and benefit neighbouring Histon and Impington residents whilst relieving pressure on Milton Country Park.
- We therefore maintain that exceptional circumstances are demonstrable and Greater Cambridge reconsider CSPN.

Cambridge Science Park

The City of Cambridge is an economic powerhouse with a world-leading reputation for research and innovation. The high-value economic activity taking place across the city delivers productivity and prosperity locally, regionally and across the UK.

Integral to this reputation is the Cambridge Science Park. Founded in 1970 by ██████████ Cambridge as the first science park in the UK, Cambridge Science Park comprises 150 acres, 1.9million ft² of predominantly research and development lab space, supporting employment for approximately 7,500 people across over 130 companies including AstraZeneca, Napp Pharmaceuticals and Toshiba.

On behalf of TCC separate representations have been made outlining how the emerging JLP fails to recognise one of Greater Cambridge's largest employment sites.

In summary these are that:

- The plan is not positively prepared, ignoring one of Greater Cambridges largest employment sites.
- The emerging JLP is not in accordance with National Policy which seeks (as a minimum) to support economic growth.
- The JLP conflates the delivery of new homes reliant on the DCO with the ongoing growth of employment associated with the existing Cambridge Science Park cluster.
- Transport capacity is a key constraint to the delivery of the NECAAP and to date this issue remains unresolved.

It is difficult to comprehend how an emerging JLP that does not recognise one of Greater Cambridges largest employment sites has been positively prepared.

Mid-tech needs in Greater Cambridge

The JLP suggests that Cambridge is forecast to grow by an additional 58,500 jobs between 2020 and 2041 and demand from businesses to access science parks, with the opportunities presented by research and industrial knowledge, is placing significant pressure on available floorspace.

TCC and CSP maintain that there is a demonstrable need to provide space for mid-tech employment space, as set out within our evidence¹, Volterra forecast that there could be demand for a further 17,000 jobs in mid-tech between 2019 and 2031 across Greater Cambridge. **This need is not met within the emerging JLP.**

The decision on whether to allocate land for CSPN relied heavily on projections for floorspace requirement in the ELEDES.

Overall, we believe there is a significant chance that the forecast within the ELEDES underestimates the demand for commercial floorspace across Greater Cambridge, and particularly demand for the mid-tech floorspace supported at CSPN.

¹ Volterra Report, 2019

Since the publication of the ELEDES, there is strong evidence of high demand for floorspace. A recent market report by Bidwell's notes a significant upturn in the demand for larger types of offices and labs in Cambridgeshire in 2021, compared to pre-COVID levels, with demand for larger footprints in particular increasing substantially.

If this trend continues there will be a need to deliver additional floorspace beyond that identified to address market need. If the floorspace is not delivered economic growth will be lost from Greater Cambridge. Given the global nature of the market within which Oxford and Cambridge operate, it is possible that this growth would be lost not just from Cambridgeshire but from the UK altogether.

However, these requirements are not recognised or addressed in the draft Greater Cambridge Local Plan.

Policy S/NEC:

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TCC wholly endorse the JLP's aspirations for the North East Cambridge area in creating an inclusive, walkable, low-carbon new district with a mix of homes, employment space, services and social spaces.

However, it is difficult to see how the North East Cambridge Area Action Plan can be delivered without the benefits CSPN offers to the wider area. Indeed, key facets of the emerging AAP will struggle to be realised without the interventions provided through the delivery of CSPN including:

- Significant mobility improvements
- Servicing and delivery strategy
- Public Open Space
- Biodiversity net gain

As set out within the accompanying Mobility Note whilst CSPN provides significant mobility improvements identified within the evidence base, it is difficult to see how the wider AAP can come forward without CSPN as part of the package of measures needed. The Proposed Submission NECAAP states that:

'the Milton Interchange (A14 and A10 roundabout) and Milton Road leading into the city are at maximum capacity, resulting in frequent congestion and delays to journeys. Whilst the A14 improvement works may help to alleviate some of congestion on the A14 and A10, long term

improvements can only be achieved through significant investment in sustainable alternatives and careful management of future development in North East Cambridge'

CSPN provides a mobility solution at scale, delivering capacity to enable future growth within the wider AAP area. Without this strategic scale mobility solution identified as part of the package of measures within the Transport Strategy further development within the AAP area will be undeliverable. The area is at maximum capacity with additional committed development recently granted planning permission not included within the evidence base.

CSPN Site Assessments

It is disappointing to note, that whilst assessed in the Greater Cambridge Housing and Economic Land Availability Assessment² (HELAA) and scoring comparably with other sites, the JLP does not currently include a site allocation for Cambridge Science Park North.

Greater Cambridge have justified this decision stating that there is “*not sufficient need for the scale of development supported by CSPN*”, as determined with reference to the Employment Land and Economic Development Evidence Study (ELEDES). However, we believe that the evidence base does not justify this decision as set out within our supporting documents³. We have sought to engage with Planning Policy Officers on the employment evidence and submit again our unanswered questions relating to the employment evidence base.

The Sustainability Appraisal prepared to support the emerging JLP includes policy interventions in the scoring of other employment designations somewhat skewing the results, an evaluation of this is included within our representations⁴.

We submit a number of questions relating to the Green Belt Assessment, and note the document clarifies that where changes to the Green Belt are needed through the Development Plan process, the changes should include ‘*demonstration of exceptional circumstances, including consideration of the need to promote sustainable patterns of development, i.e. planning for economic growth, housing need, health and wellbeing, accessibility and biodiversity, cultural heritage and climate change resilience*’ (para 5.2). The common interpretation of the approach being that development should be in the most sustainable locations for growth.

A Sustainable Location for Growth

CSPN is located within closer proximity to a higher volume of the key housing growth areas illustrated within the JLP than any other strategic employment site identified within the emerging JLP.

Page 38 of the JLP suggests that the JLP strategy has been strongly influenced by

'reducing climate impacts through compact development located to connect homes and jobs where active and sustainable travel can be maximised.

² Site 40096, Greater Cambridge Housing and Economic Land Availability Assessment, September 2021.

³ See Volterra Report

⁴ See Sphere25 Report

Page 39 goes on to state that

'We also have evidence that locating homes close to existing and proposed jobs at the cluster of research parks to the south of Cambridge would help reduce commuting and associated carbon emissions and congestion.'

It therefore logically follows that providing additional jobs close to existing and proposed homes in the north of Cambridge utilising the existing and planned sustainable transport measures would be equivalent.

Allocation of CSPN addresses an identified need and delivers important socio-economic benefits in a sustainable location, where the impact can be greatest to nearby communities; in addition, the transport and green infrastructure proposed will enable development within the wider NECAAP and benefit neighbouring Histon and Impington residents whilst relieving pressure on Milton Country Park.

Exceptional circumstances

The supporting documents set out in detail the exceptional circumstances for CSPN, which include:

1.5m ft² to support future mid-tech demand

3,500 jobs across a range of high, medium and low skills, adding diversity to the local economy

460 extra apprenticeships creating a new generation of skilled employees

Up to **£290million** annual GVA paying for management, programmes and supporting a carbon positive development

+£75million annual tax revenues to contribute to local infrastructure

Net positive environmental impact with net positive biodiversity, air quality, operational carbon and water, and a circular economy with a zero waste and carbon life-cycle

A sustainable mobility strategy to achieve: **60% cycle or scoot to work / 15% walk to work / 25% bus to work**

An opportunity to **diversify employment opportunities** in a location with the greatest need.

Strong links to local educational institutions, including providing workspace for **Cambridge Regional College** which would sit at the heart of the new CSP / CSPN campus.

A ground-breaking, global first, **Net Positive** campus, incorporating Sustainable Natural Systems, Green Infrastructure and Open Space (circa 50% of the site).

A **Strategic Scale Mobility** Solution serving the wider NECAAP area, including a consolidated location for parking linked to a mobility hub providing pedestrian, cycle, PLEV, shuttle and sustainable mass transit facilities for onward travel. Re-routing the Park & Ride shuttle service off the A10 onto a congestion free, dedicated transit route.

These ambitions would be delivered through sustainable growth, investing up-front in the right infrastructure including the mobility hub, bike lane, guided busway and early completion of the country park to create the right environment for Cambridge Science Park North and ensure the proposals only contribute positively to the local area.

Summary

To summarise, the emerging JLP does not provide sufficient employment land for mid-tech needs and the proximity to Cambridge Science Park and the cluster benefits of locating mid-tech at CSPN are not recognised.

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Creating a ground-breaking global first Net Positive campus on inaccessible low-grade agricultural land, provides for the identified needs. The proposals demonstrate the exceptional circumstances to allow for part of the site to be removed from the Green Belt whilst retaining and enhancing the remainder of the site for improved access is entirely in line with the JLP Green Infrastructure proposals.

CSPN is located in one of the most sustainable locations in Greater Cambridge and there are key strategic reasons why the Site needs to be in this location to meet the specific needs and requirements of the proposed mid-tech uses. There is a strong economic case and justification that benefits Cambridge and the exceptional circumstances that demonstrate the need to release land from the Green Belt in this location.

Where exceptional circumstances are proven and release of land from Green Belt is determined to be necessary, the Greater Cambridge Green Belt Study identifies that mitigation measures can be applied to mitigate the harm to the Green Belt. Mitigation is outlined within the accompanying reports.

We therefore submit additional information at this stage and would ask the Greater Cambridge team to review the evidence and take this opportunity to provide for a sustainable mid-tech future for Cambridge and a diversification of opportunities for residents.

We trust this submission provides sufficient information however should you require any further detail or clarification, please do not hesitate to contact me. We are keen to remain involved in the emerging JLP process and wish to be consulted on future development plan documents.

Yours sincerely,



Emma Woods

Director



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Local Plan First Approach Economic Response – Volterra (December 2021)

Landscape and Green Belt Study – The Landscape Partnership (Updated December 2021)

Cambridge Science Park North Prospectus – Perkins&Will (December 2021)

Mobility Note – Vectos (December 2021)

CSPN Local Plan Representations: Policy S/NEC: Northeast Cambridge – Vectos (December 2021)

The Case for CSPN - Sphere25 (December 2021)

Cc: Dick Wise, Bidwells

Hugh Morgan, DP9

Josh Coldicott, Sphere25