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**Greater
Cambridge
Planning
Obligations
SPD
Consultation**

University of
Cambridge

JANUARY 2025

Q240813

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1 Introduction

- 1.1 This document provides Representations prepared on behalf of the University of Cambridge (“UoC”) to Greater Cambridge Shared Planning (“GCSP”) on the ‘Greater Cambridge Planning Obligations Supplementary Planning Document’ (“SPD”), released for consultation in Winter 2024.
- 1.2 By way of background, UoC is currently preparing an outline planning application for its site at North West Cambridge (known as Eddington). Eddington is the University’s response to the need to provide affordable housing for its staff so it can attract and retain top talent to maintain its global competitiveness. By housing staff in a purpose-built, high quality neighbourhood, the University also reduces the demand on the wider housing market in the city. By providing 50% of housing for staff and the remainder contributing to increasing the overall supply of housing in the city, the Eddington development supports the highly successful Cambridge eco-system which provides long-term growth and prosperity for the local, regional and national economy.
- 1.3 Outline Planning Permission for Eddington was originally granted in 2013 and so far 1,100 homes have been delivered with a further 700 under construction alongside a new local centre, community centre, primary school, hotel and student accommodation. The ability to bring forward further residential dwellings under the Outline Planning Permission (through Reserved Matters Applications) expired in 2023. As a result, the University needs to bring forward a new outline planning application for the ‘Future Phases’.
- 1.4 Representations have been prepared on the following sections that could be relevant to the emerging scheme:
 - Chapter 2 – Approach to Planning Obligations
 - Chapter 7 – Community Facilities
 - Chapter 9 – Libraries
 - Chapter 10 – Transport and Highway
 - Chapter 11 – Education
 - Chapter 14 – Open Space
 - Chapter 17 – Waste and Recycling
 - Chapter 18 – Emergency Services
 - Chapter 19 – Employment and Training
 - Chapter 20 – Affordable Workspace
 - Chapter 22 – Health

Overview

- 1.5 Overall, the use of “per bedroom” obligations is unhelpful. There is a significant difference between the population yield per bedroom for different tenures and types of housing; and even more so for specific specialist housing that could be associated with the University, its students and workers. There is some acknowledgement of this in the draft but a clear statement should be included to this effect.
- 1.6 In general, it is more appropriate to have a per population estimate of demand – which can be adapted to the specific circumstances of a development.
- 1.7 Additionally, there is no source provided for many of the costs set out in the document and it would be helpful and transparent for this to be provided. The costs listed need to be explicit about what they include or exclude, for example fixtures, fittings and furniture, so that additional costs are not levied in addition if not required. This appears in some cases but not all.

2 Detailed Comments

Chapter 2 – Approach to Planning Obligations

- 2.1 Paragraph 2.50 states that viability appraisals should follow a recognised UK professional standard, such as the RICS Red Book. The SPG should instead signpost to Planning Practice Guidance on Viability, as they are specifically designed to address the unique context of planning decisions. The RICS Red Book should not be used for this purpose, as it is focused on valuation for broader purposes, such as financial reporting or lending.
- 2.2 Paragraph 2.54 makes clear the expectation that viability discussions must be concluded to the satisfaction of the LPA before any meaningful negotiations between the applicant and the LPA can commence, and similar expectations are set out in paragraph 4.32. The need for early engagement during the pre-application stage is acknowledged and encouraged, to allow for matters on housing and viability to be progressed as far as is reasonably practical. However, recognising that there may be matters unresolved / subject to change, this should not prevent an application from being submitted. This would also not be conducive to an efficient and timely application and determination process, which is a clear priority for central government in order to boost housing and economic growth.

Chapter 7 – Community Facilities

- 2.3 Paragraph 7.22 states that funding for Community Workers could be required. While we understand that for very large developments a community co-ordination role can be valuable as part of the stewardship strategy in early phases; the paragraph then goes on to suggest this role could include youth workers or health workers.
- 2.4 While a community co-ordinator may indirectly have some role to play in supporting young people or the health of the community, the specific role of a youth worker or health worker is specialist and quite different from a general community development role – and is not a planning matter. This is raised again in paragraph 8.13 – the funding of mental health, domestic violence prevention etc are not planning matters and it is not practical or appropriate for those services to be delivered by or funded by an individual development/developer.
- 2.5 These references should therefore be removed from the SPD.

Chapter 9 – Libraries

- 2.6 Paragraph 9.8 should acknowledge the role of the Council in running library facilities. While it may be appropriate in some contexts for a developer to provide a library building, it should not be incumbent on that developer, or the volunteer time of the new community, to be made to run that facility. A library space or service should only be required as a planning obligation where there is demonstrable need and where there are strategies in place to maintain it, that do not require a long term commitment from the developer to do so.

Chapter 10 – Transport and Highways

- 2.7 In relation to paragraph 10.20 (Vehicular Trip Budget) and the reference to “a financial penalty”, more clarity is needed on how these penalties are calculated and applied to provide certainty for those bringing developments forward.

Chapter 11 – Education

- 2.8 Paragraph 11.9 states that child yield will be assessed against catchment capacities not school rolls – we are unclear on the distinction in this context. Further clarification is needed on the intended methodology.
- 2.9 To be in line with Government Guidance (Department for Education, June 2014. Building Bulletin 103: area guidelines for mainstream schools, pages 3 and 36), paragraph 11.14 should confirm that schools which divert from the standard site sizes may be considered on constrained sites or where other planning considerations need to be taken into account.

Chapter 14 – Open Space

- 2.10 Whilst paragraph 14.41 is helpful in establishing the principle that some types of home have different child yields/population profiles, we consider the text should go further to include a general principle that provision for children in particular can be adjusted if the specialist nature of the housing indicates a significantly lower child yield per bedroom is likely.

Chapter 17 – Waste and Recycling

- 2.11 The figures within paragraphs 17.15 and 17.16 need to be double checked. The difference between £114 and £80 is £64, not the £112 quoted. Also, it should be confirmed if this is a one-off payment. Finally, clarity should also be provided as to how this applies where an underground bin system is in place.
- 2.12 The contributions set out in paragraph 17.21 in relation to Household Recycling Centres requires further definition as to the basis for any financial contributions and what these amounts could be.

Chapter 18 – Emergency Services

- 2.13 The chapter is too vague with respect to the nature and scale of potential contributions. For very large scale development physical provision of infrastructure, such as ambulance or fire stations may meet the Community Infrastructure Levy Regulations 2010 (as amended) Regulation 122 tests (where a costed project plan is provided) but the general funding of emergency services (requests for revenue funding of any type, or, for example, police cars/uniforms) are not acceptable uses of planning obligations. This text needs to be revisited.

Chapter 19 – Employment and training

- 2.14 Paragraph 19.10 refers to having Skills and Employment Plans approved 3 months prior to the implementation/commencement of development. This is a very early trigger and if everything

else was in place for development to begin (i.e. the discharge of relevant planning conditions/obligations), we see no reason why a development should be delayed by a further 3 months. This will harm the delivery of schemes. The trigger for approval should relate to the commencement of development or any other suitable trigger as agreed on a case by case basis through planning application discussions. The text should be amended to reflect this.

- 2.15 Within paragraph 19.16, the requirement for 1 apprenticeship per 1,000 sqm of employment space could be appropriate for a higher employment density uses such as office or retail, but is not likely to be achievable for lower density uses such as logistics, datacentres, manufacturing etc. A variation for lower density uses should be reflected in the text.

Chapter 20 – Affordable Workspace

- 2.16 Paragraph 20.4 notes that the adopted Local Plans do not include policies requiring affordable workspace, although the potential requirement is being explored through the emerging Greater Cambridge Local Plan. We do not consider that affordable workspace requirements, which will have financial implications for schemes (in some cases significant), can be introduced through an SPD. This is introducing a new policy which SPDs cannot do as set out in National Planning Practice Guidance (Paragraph: 008 Reference ID: 61-008-20190315):

“What is the role of supplementary planning documents?”

*Supplementary planning documents (SPDs) should build upon and provide more detailed advice or guidance on policies in an adopted local plan. As they do not form part of the development plan, they cannot introduce new planning policies into the development plan. They are however a material consideration in decision-making. **They should not add unnecessarily to the financial burdens on development.**” [our emphasis]*

- 2.17 On a large scale employment development, 10% of space could equate to millions of pounds worth of opportunity cost, with significant impacts on development deliverability.
- 2.18 This section of the SPD should be removed and if an affordable workspace policy is pursued, it should be done so through the emerging Greater Cambridge Local Plan where its impact on development viability can be evidenced and examined – as per the affordable workspace policies set out in the London Plan and London Borough Local Plans.

Chapter 22 – Health

- 2.19 While we acknowledge the challenges faced by the NHS and the ageing estate, it is very important for the SPD to recognise that new development cannot be required to make good existing deficits in provision. Paragraph 22.15 states that there are issues related to the general background population growth, the ageing population and an estate that is no longer fit for purpose. While these pressures are all valid, resolving them is not the responsibility of land owners or developers and the obligations on them must be kept proportionate to the relocation of demand to an area and the short term pressures that this creates on capital expenditure.
- 2.20 Paragraph 22.19 states that strategic-scale proposals may be required to contribute to acute, mental health or community health provision. These are strategic level services, funded at a National Level by the NHS. They do not meet the Regulation 122 tests of necessity and there

is caselaw which supports this position. Reference to these services should therefore be removed.

- 2.21 The typical approach to calculation of GP need is with respect to number of GPs rather than sqm. We acknowledge that the changes in service delivery methods may mean that sqm is a more useful metric in some cases. If demand is to be based on sqm, then the Integrated Care System should publish up to date data on the size of the existing estate so that the developer is able to undertake this assessment and so the overall approach is evidenced and transparent.
- 2.22 Whilst the average household size of 2.4 people set out in paragraph 22.29 is a useful starting point, there should be flexibility in the formula to consider bespoke population calculations for specialist housing or different housing typologies.
- 2.23 Paragraph 22.37 requires flexibility with respect to the potential mitigation strategy. We accept that some degree of flexibility is required but an obligation that does not have any restriction on where and how funds will be spent to ensure that they are directly related to the development does not meet the Regulation 122 tests.
- 2.24 Paragraph 22.40 confirms that the suggested sqm benchmark includes the full capital cost of construction. It should however also state whether this includes site levelling and servicing, which is often done by the developer ahead of land transfer and should be discounted from any further capital contribution.
- 2.25 Paragraph 22.43 states that the service needs to be viable, and this could affect lease terms. If a building is to be let to the NHS, then this space should pay a rent in accordance with the district valuation. This should be made clear in the paragraph.

Appendix A: Children and Occupancy Yields

- 2.26 The average household size, and in particular the number of children per household, tends to differ significantly between houses and flats. There are situations where good design and setting can make flats relatively more attractive to families with children but on average the trend applies across the UK. As such a distinction should be made between houses and flats and this should be incorporated into the Appendix.