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Sent by email only - [REDACTED]

30th January 2024

[REDACTED]
[REDACTED]
Planning Policy Team
Greater Cambridge Shared Planning
PO Box 700
Cambridge
CB1 0JH

Dear [REDACTED],

Re: Draft Greater Cambridge Local Plan Consultation – Representations on Behalf of Landsec in respect of Draft Policy S/C/CJ: Cambridge Junction and Cambridge Leisure, Hills Road.

Introduction

I write on behalf of my client, Landsec, and further to our exchanges of emails earlier in the week. Following a meeting with Landsec to discuss the draft plan, I now have the pleasure in making the following representations on its behalf.

The representations are in connection with **draft Policy S/C/CJ: Cambridge Junction and Cambridge Leisure, Hills Road**. They have been formulated further to our engagement with you and your colleagues in 2023-25, when Landsec and its consultancy team (including NTR Planning and Haworth Tompkins (architects)) were in the early stages of exploring conceptual masterplan options for the potential redevelopment of the Cambridge leisure site, the boundary of which is illustrated edged red in Figure 37 of the draft policy alongside the adjacent site allocation to the north, which is considered under separate draft Policy S/C/CLT: Clifton Road Area.

The Latest Position

Landsec is continuing to explore development options for the Cambridge Leisure site, both in respect of its existing property assets and also the possibilities for the site, either as a stand-alone regeneration project (allowing future integration with neighbouring sites for regeneration purposes) or as part of a broader regeneration scheme on the eastern side of Cambridge Station. The emerging planning policy within the Draft Greater Cambridge Local Plan must flexibly and proactively facilitate these objectives in the interests of good plan-making.



Representations

Landsec is generally content with the broad intent and direction of travel that the draft policy adopts, but some areas remain where alteration to the policy wording are requested. In particular, it is suggested that there needs to be more flexibility in certain areas of the policy wording to be more adaptable to the rapid nature of change in market and economic conditions, particularly in respect of historical main town centre uses. This will assist with any future scheme of development, and will also benefit the existing operators on site, to ensure that they are not hindered under the plan-led system. Such an approach is aligned with paragraph 85 of the NPPF (December 2024):

‘Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. 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. [...]’

I provide the representations below in sequence and in the order in which the draft policy is presented. In doing so, I set out the requested changes to the policy text and seek to provide Landsec’s rationale in doing so.

Existing Text

‘Cambridge Junction and Cambridge Leisure will develop as a vibrant, reimagined, part of the city that includes new homes, workspaces, leisure, entertainment and culture. Cambridge Junction is a locally and regionally important venue and, alongside a significant new public space, will form the centre of this neighbourhood. Supported with a mix of complementary uses, this area will be a place where people can live, work and play throughout the day and evening.’

Proposed Text

‘Under a future masterplan, Cambridge Junction and Cambridge Leisure will develop as a vibrant part of the city with consideration to the potential provision of new homes, workspaces, leisure, entertainment, culture and other main town centre uses. As a locally and regionally important venue, Cambridge Junction will form an integral component of the masterplan scheme. The provision of high-quality public space will sit at the heart of any future neighbourhood, promoting strong placemaking credentials and providing a shared sense of identity. The area is identified as an appropriate location for people to live, work and visit throughout the day.’

Rationale

The suggested text continues to recognise the site’s range of future development potential under a masterplan scheme but allows for the necessary flexibility in design development to enable the optimal version of the masterplan to evolve. The suggest text leaves the opportunity for a reconsideration of land use mix and the potential masterplan evolution open to further consideration, but in a less prescriptive manner than currently drafted. In this regard, Landsec



is grateful that there is recognition that further land uses would be acceptable, including residential (subject to compatibility with other land uses) and Class E(g) uses. It is sought that this part of the policy also considers other main town centre uses, as defined in the in Annex 2 of the NPPF (Glossary). I discuss this further below.

Existing Text

‘Capacity for approximately 100 homes, concert and performance spaces (Sui generis), commercial leisure (including food and drink and the reprovision of the bowling alley and cinema), commercial uses including Office (E(g)i), Research and Development facilities (E(g)ii), light industrial (E(g)iii) and complimentary Hotel (C1) and Storage or Distribution (Class B8).’

Proposed Text

‘Capacity under a future masterplan for a range of uses, with the potential to include approximately 100 homes, concert and performance spaces (sui generis), commercial leisure and other main town centre uses, Office (E(g)i), Research and Development facilities (E(g)ii), light industrial (E(g)iii) and complimentary Hotel (C1) and Storage or Distribution (Class B8).’

Rationale

The suggested text incorporates a flexible range of potential uses but allows for some flexibility in the eventual land use mix, which will be influenced by economic and market forces and local circumstances at any given time. Whilst the potential for residential use is welcomed, this should not be included if it then fetters the ability to re-provide Cambridge Junction or any other appropriate commercial uses. For example, the provision of a new cultural venue may lead to potential conflict with sensitive neighbouring land uses such as residential use through noise disturbance. It is for this reason, amongst others, that over prescription in the range of land uses under any future masterplan scheme is to be avoided through planning policy to enable robust testing through the process of scheme evolution and design development.

Also, within the revised policy wording I reference the suitability of the site for other main town centre uses, without specific reference to particular facilities by ‘type’. The site is considered to be in a highly sustainable location directly adjacent to the Hills Road/Cherry Hinton Road Local Centre and in very close proximity to Cambridge Station, so there is no reason to suggest that the allocation cannot accommodate other main town uses beyond those specifically prescribed in the draft text.

The reference to specific main town centre uses, namely the reprovision of the bowling alley and cinema, is considered to be overly prescriptive and does not account for market changes, the effects of the provision of competing facilities in the future (and the impact that would have on viability) and changing customer habits. Whilst a future masterplan scheme may include a cinema and/or bowling alley, planning policy must allow for sufficient flexibility for the case to be made either way as part of any future application scheme. My view here is aligned with that in the current consultant draft of the replacement NPPF (December 2025), paragraph E.1 sub-section 2, which states:

'Given changing commercial property requirements, development plans should not be overly prescriptive about the types of uses that would be acceptable on particular sites (other than where there is a clear and justified rationale for being specific about acceptable uses at the plan-making stage) [...]'

(my underlined text)

In terms of my suggestion that the policy embraces non-specified main town centre uses, you will of course be aware of the Government's introduction of the broader Class E. This had the effect of introducing the new Class E, thus enabling of D2 (assembly and leisure) to fall within the same Use Class as, for example, shops. Such a change could already occur on site. It is important to recognise the Government's published reasons for its introduction. The Government's Guidance¹ (published September 2020) to The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 identified that:

'Before now, property holders would generally need to seek full planning permission or make use of permitted development rights to change the use of their premises, e.g. from a shop into a restaurant, or a restaurant into an office. We are simplifying this into a streamlined system, so that:

- *Buildings can convert between commercial, business and service uses – shops, restaurants, services (like banks), gyms, offices, research facilities – and into a mix of such uses – without needing planning permission [...]'*

In the section answering the question Why are you making these changes? the guidance answered this by highlighting that:

'As we protect and grow our economy post Covid, we must think flexibly about how best to support our high streets and town centres. These changes will give high streets the ability to adapt quickly to new uses where they might be greater value, or to change into housing in due course. This gives the high streets and our town centres the best chance of adapting and thriving, but we are protecting uses which bring unique benefits, like local pubs – and local authorities will still be able to control use changes that might bring nuisance to the community – like betting shops.'

¹www.gov.uk/government/publications/permitted-development-rights-and-changes-to-the-use-classesorder/flexible-use-on-the-high-street-key-facts-brief



It is considered that the proposed flexibility in the policy wording sought is in the full spirit of the changes introduced at the national level and the reasons cited for them.

Existing Text

‘1. proposals must demonstrate how they will meet the following requirements in order to create a vibrant mixed use neighbourhood:

- a. ‘A masterplan led approach to the comprehensive redevelopment of the site, ensuring that it aligns with adjacent development proposals within the Clifton Road Industrial Estate (Policy S/C/CLT) and positively responds to any possible future eastern entrance to Cambridge Station;’

Proposed Text

‘1. Any significant future site wide masterplan proposals must demonstrate how they will meet the following requirements in order to create a vibrant mixed use neighbourhood:

- a. ‘A masterplan led approach to the comprehensive redevelopment of the site, ensuring, where possible, that it aligns with adjacent development proposals within the Clifton Road Industrial Estate (Policy S/C/CLT) and positively responds to any possible future eastern entrance to Cambridge Station;’

Rationale

Minor amendments are sought to this particular policy wording to allow flexibility to respond to any circumstances affecting the delivery of the masterplan, either for the Cambridge Leisure site in isolation or as part of a broader development scheme.

Existing Text

- b. ‘The re-provision and enhancement of Cambridge Junction as a live performance and community venue. Through engagement with local stakeholders and relevant bodies, redevelopment proposals should deliver a range of flexible spaces that can accommodate live shows, community workshops and a dedicated nightclub. If required, temporary venue provision should be provided during the construction phases of the redevelopment to minimise any short term disruption to this important local and regional venue;’

Proposed Text

- b. ‘As part of any comprehensive masterplan scheme, explore opportunities for the enhancement/re-provision of Cambridge Junction as a live performance and community venue. Through engagement with local stakeholders and relevant bodies, any redevelopment proposals should deliver a range of flexible spaces that can accommodate live shows, community workshops and a dedicated nightclub. If required, temporary venue provision should be provided during the construction



phases of the redevelopment to minimise any short-term disruption to this important local and regional venue;’

Rationale

No substantive changes to this policy wording are proposed. The suggested minor changes reinforce that the enhancement to the cultural offer on site will be triggered via site-wide regeneration. The rest of the policy wording remains unchanged.

Existing Text

- c. ‘Redevelopment of the existing commercial leisure units (including cinema, bowling alley and food and beverage outlets) must ensure that these uses are re provided within the development proposals;’

Proposed Text

Delete text altogether.

Rationale

See rationale set out above.

Existing Text

- d. ‘The provision of residential uses provided that noise mitigation is addressed at the masterplanning stages of development to ensure there is no adverse impact on residential amenity from surrounding uses;’

Proposed Text

- d. ‘Subject to not undermining the effective and unfettered operation of the commercial and cultural uses proposed as part of any masterplan scheme (by introducing a sensitive land use), opportunities for residential use can be explored;’

Rationale

The proposed policy re-wording reaffirms the priority placed upon this site in meeting cultural and commercial land use objectives. Whilst the introduction of a potential residential use could add diversity in the land use mix and greater vibrancy in the nature of activity generated on site, the mix of land uses must remain compatible and complementary in operational and general planning terms.

Existing Text

- e. ‘The provision of a range of commercial uses, in particular for start-up companies, grow on spaces, workshops and maker spaces;’

Proposed Text



- e. 'Explore opportunities under any masterplan proposals for the provision of commercial uses, including consideration of the potential for start-up companies, grow on spaces, workshops and maker spaces;'

Rationale

Greater flexibility is proposed within this policy wording to avoid overprescription and detail in policy wording prior to detailed interrogation of any masterplan scheme.

Existing Text

- f. 'The loss or reduction in Storage or Distribution (Class B8) and/or Hotel provision (Class C1) would need to be justified in accordance with the relevant policies;'

Proposed Text

No change is deemed necessary as the policy implies that this would be considered through the decision-making process in the event of a planning application coming forward.

Existing Text

- g. 'A significant and flexible public space that is the focus of the new development which provides a range of functions, including opportunities for people to dwell, temporary events like pop up markets and spill out and performance space to support Cambridge Junction and adjacent commercial/retail uses;
- h. Opportunities to open up the site from Hills Road should be taken to increase the permeability of the site;
- i. The provision of a dedicated cycle park which forms part of a travel hub that is well connected with any future phases of the Chisholm Trail and wider cycle infrastructure on Hills Road and Cherry Hinton Road;
- j. The re-provision of a multi-storey car park;
- k. A new energy centre to support decentralised energy generation for the site;'

Proposed Text

- g. 'In the event of a masterplan scheme coming forward, explore the provision of a flexible public space that is the focus of the new development which provides a range of functions, including opportunities for people to dwell, temporary events like pop up markets and spill out and performance space to support Cambridge Junction and adjacent commercial/retail uses;
- h. In the event of a masterplan coming forward, opportunities to open up the site from Hills Road should be taken to increase the permeability of the site;



- i. In the event of a masterplan coming forward, opportunities for the provision of a dedicated cycle park which forms part of a travel hub that is well connected with any future phases of the Chisholm Trail and wider cycle infrastructure on Hills Road and Cherry Hinton Road should be explored;
- j. The retention or re-provision of the multi-storey car park, unless a masterplan comes forward that can justify its loss as part of a comprehensive revised site-wide transport and parking strategy;
- k. In the event of a comprehensive and significant masterplan coming forward, consider opportunities for a new energy centre to support decentralised energy generation for the site;'

Rationale

The changes to criteria g to k above, simply reinforce the consideration of these objectives as part of any comprehensive masterplan scheme.

Existing Text

I do not seek to suggest any changes to criteria l - p as these are general development control matters that would apply to any new build proposals in this location.

Figure 37

It is suggested that there is a degree of prematurity associated with the provision of the framework diagram for the reasons highlighted above and would suggest that it not be included alongside the proposed policy wording.

Other Matters

On a very minor matter, but for the sake of completeness, I note that there is a missing apostrophe at criterion n, where it should state 'site's'.

Conclusion

I trust that these representations provide a constructive basis upon which to develop the draft policy wording. Please can I request that we are notified when the Draft Greater Cambridge Local Plan progresses to the next stage.

Yours sincerely

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NTR Planning

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