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CB23 6EA30<sup>th</sup> January 2026

Dear Sir,

**DRAFT GREATER CAMBRIDGE LOCAL PLAN (2024 – 2045) REGULATION 18 CONSULTATION  
REPRESENTATIONS ON BEHALF OF UNIVERSITIES SUPERANNUATION SCHEME (USS)**

On behalf of Universities Superannuation Scheme ('USS'), we submit these written representations to the Draft Greater Cambridge Local Plan Regulation 18 Consultation ('the Draft Local Plan'). The representations relate to the land at Clifton Road Industrial Estate and 60-62 Clifton Road, Cambridge, CB1 7ED ('the Site') as shown on **Figure 1.0** below and specifically to draft Allocation 'S/C/CLT: Clifton Road Area'.



**Figure 1.0: Aerial View of the Site with Indicative Red Line Site Boundary (Source: Google Maps)**

The Site, which totals some 5 ha and currently comprises the central piece of a wider draft Allocation 'S/C/CLT' totalling circa 7.3 ha, potentially represents the most strategically important urban regeneration prospect in the combined Greater Cambridge area.

This submission is part of our client's ongoing engagement with the Councils on the emerging vision for the Site dating back to 2023, including most recently, meetings in Summer / Autumn 2025 with Terry De Sousa (Planning Policy and Strategy Team Leader) and Stephen Kelly (Joint Director of Planning and Economic Development).

Our client is also engaging with East West Rail (EWR) in relation to their proposals for the improvements to Cambridge Station, including the potential for and scope of an eastern station entrance. In addition, our client is in dialogue with Land sec, the owners of Cambridge Leisure, who also have proposals for redevelopment, and Royal Mail with regards to the prospects of their relocation from their existing adjacent depot.

Our client supports the Councils' aspiration for the regeneration of the Site for a mix of uses over the Plan period (up to 2041) and welcomes the opportunity to continue a collaborative dialogue as the Draft Local Plan process progresses. At this stage, our client's key considerations are:

- The need for flexibility, given the anticipated development programme, to react to market conditions and occupier needs. It is anticipated that development of the Site would not start before 2030 and would likely have a 10-15 year time horizon.
- The relationship between existing, to be retained and proposed uses within the Site and wider area. It should be noted that the Council's aspiration for the reprovision of existing industrial floorspace introduces material challenges from a physical, amenity and viability perspective. And in relation to the overall vision for the Site.
- The high likelihood of the Royal Mail depot remaining fully operational in its current location, which reduces the developable area of the Site and maintains physical, amenity and viability challenges for the remainder of the draft allocation.
- The uncertainty surrounding the scope, form and programme for the delivery of an eastern entrance to Cambridge Station and the implications of this for the Site. Our client supports the principle of an upgraded Cambridge Station, including an entrance from the east. However, its function, form and scale will have an impact on the developable area of the Site, access and routing strategies and potentially the siting of buildings and uses. A Development Consenting Order is expected to be submitted January 2027 with a determination within this Parliamentary term (i.e. by 2029). This timetable and detail of the improvements to Cambridge Station would need to be understood.
- The potential development density for the Site having regard to the Council's multi-layered requirements for, inter alia, retention of existing industrial uses, introduction of residential, open space, active travel accessibility, etc and townscape/historic setting considerations need to be fully explored.

## **SITE CONTEXT**

The Site comprises Clifton Road Industrial Estate (USS Leasehold Ownership) and 60-62 Clifton Road (USS Freehold Ownership), located south-east of Cambridge City Centre, adjacent to Cambridge Train Station. The freeholders of the Clifton Road Industrial Estate are Cambridge City Council.

The Site consists of a range of employment buildings totalling circa 16,030 sqm (172,545 sq ft) of Class E (including light industrial, office and leisure uses e.g. Cambridge Science Centre, Clip 'n Climb Cambridge and a martial arts training space), B2 (general industrial) and B8 (storage and distribution) uses. Occupiers include traditional industrial and logistics operations, through to dark kitchens, wholesalers, trade counters and automotive repairs. In addition, there are a number of sui generis uses, including a fitness and training centre and a hot food takeaway.

Currently, the Estate is circa 95% occupied. The occupational profile of the Site means that it will become available for phased redevelopment from 2030 onwards. **Appendix 1.0** includes a summary tenancy schedule which identifies:

- The occupier of each unit; and
- The existing use, including Use Class classification.

The Site comprises low density development (especially within an urban context). The industrial / warehouse buildings are of no design merit and for the most part equivalent to circa 2 storeys in height. 60-62 Clifton Road, to the northern end of Site, comprising 3 storeys of office space. The Site includes areas of hardstanding and car parking, with limited landscaping along the boundaries and within the car parks / hardstanding. There is a total of 340 car parking spaces within Clifton Road Industrial Estate and 60-62 Clifton Road. The existing Site infrastructure falls well below current standards for active travel modes, including walking, wheeling and cycling.

The Site is strategically located within the City Centre, with excellent accessibility by public transport including Clifton Road Bus Stop located immediately to the south of the Site along Cherry Hinton Road, serving bus routes 3 and 16A. Cambridge Train Station is situated to the west of the Site serving direct trains to Birmingham New Street, Cambridge North, Ipswich, London, Norwich, Ely and Stansted Airport.

The Site is located within Flood Zone 1 which indicates a low probability of flooding. This means in any year land has a less than 0.1% chance of flooding from rivers or the sea.

The Site does not sit within a conservation area but lies to the east of New Town and Gillson Road Common Conservation Area and in close proximity to the south of Mill Road Conservation Area. Furthermore, the Site does not contain any listed buildings, however the Railway Station, situated on the western side of the railway tracks, is Grade II listed.

### ***Planning History***

The base permissions for Clifton Road Industrial Estate are as follows:

- Phase 1 granted on 11 November 1981 comprising the '*erection of 4200 sqm light industrial and 4389 sqm warehouse units with 725 sqm ancillary office space*' (ref. C/81/0782) relating to Units 4-48;
- Phase 2 granted on 21 February 1984 for '*erection of 7 warehouse/ industrial units*' (ref. C/83/1044) relating to Units 49-56.

60-62 Clifton Road was granted outline planning permission in February 1984 for '*The erection of research and development accommodation (vehicular access from extension to Clifton Rd.)*' (ref. 83/0999) with reserved matters approved in 1984 (ref. 84/0493).

Planning permission was granted in 1986 for the lawful change of use of the building from research and development to office (ref. C/86/0145) and part of the ground floor to book handling, stock control and servicing of retail outlets and schoolbook service (ref. 86/1151).

It should be noted that none of the above permissions included any restrictions on operating hours, delivery and servicing or noise limits.

Since the grant of the base permissions, there have been several applications for change of use, minor works and advertisement consents. Notwithstanding, we are aware of only one unit which has a restriction on hours of operation (28 Clifton Road).

## PLANNING POLICY CONTEXT

The Site has long been recognised as part of an “Area of Change” where redevelopment will be encouraged to maximise its potential.

Within the adopted Cambridge Local Plan (2018), the Site is located within the Station Areas West and Clifton Road Area of Major Change (Clifton Road Area – Site M2). It should be noted that Site M2 includes a wider area comprising Network Rail Land to the north and land at Cherry Hinton Road to the south. An extract of the adopted Local Plan Policies Map is included below with an indicative red line boundary outlining the Site.



*Figure 2.0: Extract of Local Plan Policy Map with indicative Site Red Line Boundary*

**Policy 21** states that ‘Development at the Station Areas West and Clifton Road Area of Major Change will support the continued and complete regeneration of vibrant, mixed-use areas of the City, centred around and accessible to a high quality and improved transport interchange.

The principal land uses within Clifton Road Area (Site M2) should include:

- a mix of Class B1(a) and B1(b) employment uses (2 hectares);
- leisure-related uses;
- residential use, with a maximum capacity of 550 dwellings; and
- open spaces, both hard surfaced and green.

The policy goes on to state that proposals within the wider Station Areas West and the Clifton Road Area should:

- be designed to the highest quality to support the successful redevelopment of this area;
- allow the potential for future improvements to the access for pedestrians and cyclists between Station Areas West and Clifton Road Area, including investigation of a possible foot and cycle eastern entrance to the railway station; and
- provide surface water drainage improvements.

## **DRAFT GREATER CAMBRIDGE LOCAL PLAN - REPRESENTATIONS**

The Draft Greater Cambridge Local Plan (Regulation 18) ('the draft Local Plan') sets out the out the Development Strategy and vision for Greater Cambridge over the next 20 years. This builds on the 'Greater Cambridge Local Plan – First Proposals' (Reg 18) which was published for consultation in November 2021.

The draft Local Plan is supported by evidence-based documents and topic papers, including:

- Draft Greater Cambridge Employment and Housing Needs Evidence Update (2025);
- Draft Greater Cambridge Housing Delivery Study Addendum (2025);
- Draft Greater Cambridge Local Plan: Site Allocations Topic Paper (2025); and
- Greater Cambridge Skyline and Tall Buildings Strategy (2025).

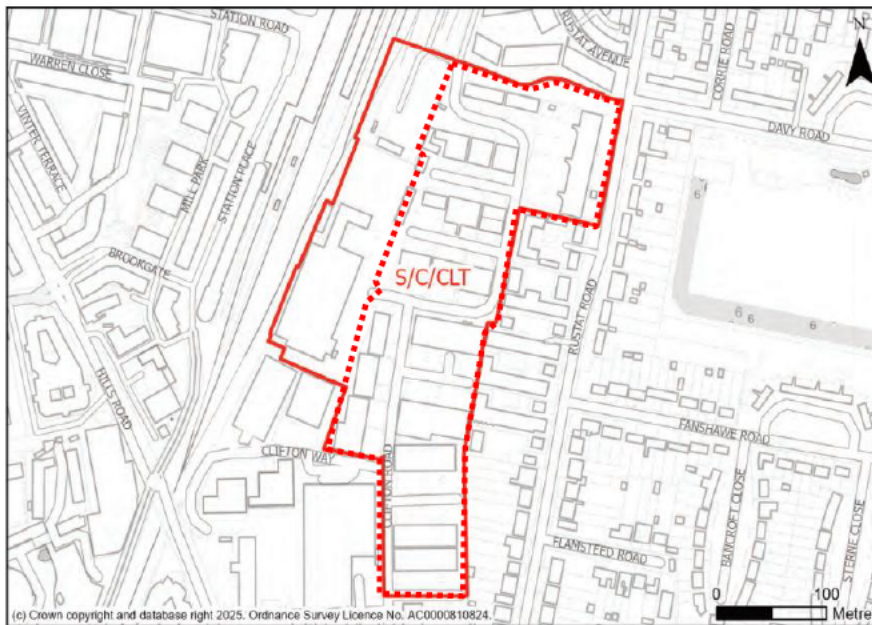
We have undertaken a review of the above documents and note the recommendations of the Skyline and Tall Buildings Strategy, which confirms that generally development heights should remain below the tall building threshold of 19m, however, in the central part of the Allocation, individual, finely grained development with a height of up to 25.5 metres may be permissible, provided that comprehensive testing demonstrates no detrimental impact on views towards the historic core skyline and that the character of the skyline in these views is retained.

Furthermore, the Strategy document notes that the cumulative height scape of development should be comprehensively planned and tested through a master planning process and fixed through parameter plans in local planning frameworks or by outline planning permission.

### Site Allocations

Draft **Allocation S/C/CLT** relates to the Clifton Road Area and comprises an area of 7.26 hectares. **Figure 3.0** below provides the extent of the allocation.

It should be noted that draft allocation S/C/CLT includes the Royal Mail depot site and land to the north, which falls outside of our client's ownership (shown in a dotted red line on **Figure 3.0**). We would estimate that the Royal Mail depot comprises circa 1.5 ha.



**Figure 3.0: Site Plan of S/C/CLT: Clifton Road Area with indicative ownership boundary shown in a red dotted line**

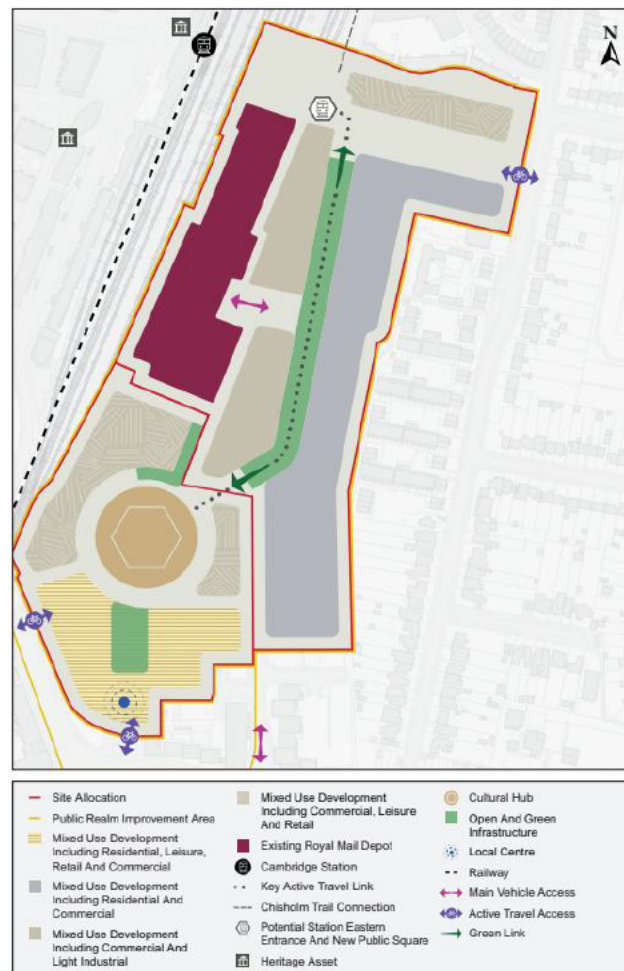
The draft allocation states:

- 'Site area of 7.26 hectares.
  - Clifton Road Area will develop as an integrated part of Cambridge to become a great place to live, work and visit. It will contain new homes, space for business and industry and will benefit from its location as the link between Cambridge Junction and Cambridge Leisure and any possible future new eastern entrance to Cambridge Station.
  - Capacity for approximately 200 homes, employment uses and other complementary uses including hotel and retail.
1. Development proposals must demonstrate how they will meet the following requirements to deliver a vibrant mixed use neighbourhood:
    - a. A masterplan led approach to the comprehensive redevelopment of the site, ensuring that it:
      - i. aligns with adjacent development proposals within Cambridge Junction and Cambridge Leisure, Hills Road (Policy S/C/CJ);
      - ii. makes provision for any possible future eastern entrance to Cambridge Station;
      - iii. incorporates any future phases of the Chisholm Trail into the design of the masterplan, ensuring that people, cyclist and vehicular conflicts are designed out;
      - iv. Is fully integrated with its surrounding area and is well structured to increase legibility;
    - b. Provides a significant and multi-functional open space and public realm offer, ensuring that those living, working, visiting and passing through the area have sufficient opportunities to dwell and play;
    - c. The reprovision of the existing floorspace for General Industry (B2), Storage and Distribution (B8), Light Industry (E(g)iii), mid-tech and any sui generis floorspace that share a significant number of characteristics with these uses, through an intensification of built form;
    - d. The provision of a range of commercial uses, in particular for start up companies, grow on spaces, workshops and maker spaces as well as office (E(g)i) and Research and Development facilities (E(g)ii);

- e. Includes complementary uses that make best use of this centrally located site, including hotel, retail and food and beverage facilities;
- f. The provision of residential uses provided that noise mitigation and outlook is addressed at the masterplanning stages of development to ensure there is no adverse impact on residential amenity from surrounding uses;
- g. A positive, context-led approach should be taken in relation to the massing, style, and materials of new buildings to limit any negative impacts on the setting of the Grade II Listed Railway Station, the New Town and Glisson Road Conservation Area, and other designated and non-designated heritage assets that are in the vicinity of the site;
- h. Opportunities to open up the site from Cherry Hinton Road and Rustat Road should be taken to increase the permeability of the site;
- i. Adequate access and servicing arrangements for the range of uses for the site and the adjacent Royal Mail Depot should be incorporated into any proposal. Where possible and practical, access for servicing and deliveries for new development within the site should be managed on-street.'

The supporting text to the policy is provided at **Appendix 02**.

An extract of the draft Spatial Framework for Clifton Road Allocation in addition to the adjacent allocation of Cambridge Junction and Cambridge Leisure (draft allocation S/C/CJ) is provided at **Figure 4.0** below.



**Figure 4.0: Extract of Draft Local Plan Spatial Framework for S/C/CJ: Cambridge Junction and Cambridge Leisure, Hills Road and S/C/CLT: Clifton Road Area**

## **REPRESENTATIONS & PLANNING ASSESSMENT**

In principle, our client supports a site allocation which identifies the future redevelopment of the Clifton Road Site to create a new commercial-led mixed-use quarter at the heart of the City. Notwithstanding, our client suggests modifications to the draft allocation to ensure it reflects a deliverable, commercially robust proposition.

In 2023, USS appointed a project team (Montagu Evans (Planning and Heritage), JLL (Development Advisory) Allies and Morrison (Master Planning and Design), and SLR Consulting (Transport)) to comprehensively review the potential of the Site and develop a vision for a high-quality mixed-use scheme, reflecting the general principles set out in the adopted and emerging Local Plans.

This review took into account, inter alia:

- the physical condition of the existing accommodation;
- the continued operation of the Royal Mail depot, including maintaining HGV access to it;
- the relationship of the Site with existing residential to the north and east;
- heritage issues, including short and longer distance views/townscape considerations, and the relationship with the listed Cambridge Station;
- Existing and emerging commercial market factors;
- The initial proposals (as far as they are known) for the redevelopment of Cambridge Leisure Park; and
- aspirations for a new link into Cambridge Station from the east.

The exercise established a vision led opportunity for a commercial-led mixed-use scheme focused around a new urban park, including a new entrance to the eastern side of the Station.

### **Extent of Site Allocation**

We are advised that Royal Mail has a requirement to remain in situ and continue to operate as existing (i.e. 24/7). Therefore, the potential of this portion of the site allocation being available for development is limited. In the event it was to cease to be required by Royal Mail, or relocated to alternative premises, this is unlikely until at least the very end of the Plan period (i.e. towards 2041).

We recommend that the Royal Mail depot site is excluded from Draft Allocation S/C/CLT or is identified as a sub-phase for longer term development. Assuming the Royal Mail site is excluded, we propose that Draft Allocation S/C/CLT is amended to reflect the reduced development area and the relationship between the operations and the new development on the rest of the Site. If the Royal Mail site continues to be included within the site allocation but as a later phase, given its position immediately adjacent the railway line its preferred use be identified as employment and/or commercial uses subject to ensuring the required amenity issues are met.

### **Residential Development & Complementary Uses**

The Regulation 18 Local Plan draft allocation S/C/CLT indicates the potential for approximately 200 homes and other uses, including inter alia, hotel use. We would reiterate that we have excluded the Royal Mail depot site on the advice that it is more likely than not to stay in operational use. This means that the developable area reduces by circa 1.5 ha and an additional consideration to the development potential of the wider site remains (i.e. the relationship of a 24/7 operation with other uses, including residential).

The initial Site review indicates the opportunity to deliver approximately 150 Build to Rent (BTR) residential homes. These are shown located along the Site's eastern boundary to provide a buffer to and present complementary uses to the existing residential developments located along Rustat Road, in both use and scale. This also allows for intervening uses and open space to protect the new residential uses from the existing Royal Mail Depot, whether or not it remains with the Draft Site Allocation.

Our client has stress-tested the potential for 200 homes alongside the other site objectives as envisaged by Draft Allocation S/C/CLT. Assuming the retention of the Royal Mail depot, the exercise demonstrated that to meet the 200-home objective would require increased height and or density across the Site. Subject to further detailed review, and notwithstanding the supporting evidence base for the Local Plan for the potential for increased height on the Site, this was considered to be incompatible with the Site's townscape and heritage setting, the daylight / sunlight standards for existing residential units located along Rustat Road and aspirations for a landscape-led design approach.

Further, on the basis of the Royal Mail Site remaining and subsequently the developable area reducing by circa 1.5 ha, flexibility should be built into the allocation for the delivery of complementary uses on the Clifton Road Site, including hotel use.

In light of the above, our client requests the following amendments to the draft wording of the Allocation:

*'Capacity for approximately 150 homes, employment uses and other complimentary uses potentially including hotel and retail'.*

### **Cambridge Station Eastern Entrance**

Draft Allocation S/C/CLT Part 1a, requires provision to be made *"for any possible future eastern entrance to Cambridge Station"*.

Our client remains in dialogue with East West Rail and Network Rail regarding the potential eastern entrance to Cambridge Station. The latest proposals were presented to our client on 20<sup>th</sup> January 2026.

At this time, it is understood that the minimum viable option for the new eastern station entrance will be based on active travel principles (including accessibility primarily for pedestrians and cyclists) with, a small area for pick-up and drop-off and access for emergency vehicles only. As far as we understand, no passenger car parking is proposed. Our clients support the principle of an active travel-based approach to the new station entrance.

EWR have presented an alternative option which includes, inter alia, a non-paying pedestrian and cycle link from the draft allocation site to the western side of the railway. This includes a high density (up to 13 storey) residential (BTR) scheme with commercial uses at ground. USS acknowledges that a direct pedestrian/cycle link to the City Centre would improve the accessibility of the Site.

We acknowledge the need to ensure that development of the Site does not prejudice the delivery of a new eastern station entrance. However, we consider that the broad parameters for a station entrance should be established at the Site Allocation stage so as not to place unnecessary constraints on the development of the wider site. This should include location, footprint and access requirements. USS suggest that the role of the eastern station entrance should be considered in the context of the station as a whole. For example, our clients ask whether the existing western entrance should continue to be the primary location for vehicular pick up and drop off, the eastern entrance should be limited to walking and cycling?

Our client's emerging option for the Site has been designed around the creation of a new mixed-use neighbourhood for the City, which focuses on urban greening (through the provision of a new green park for the City) and active travel (including walking, wheeling and cycling) to make the best use of the Site's sustainable City Centre location. Were the eastern station entrance to introduce material vehicular traffic movements to and through the Site it could conflict with these emerging masterplan principles. Therefore, the role of the eastern station entrance and the routing of movements to it should be principal issues to address at the site allocation stage.

In light of the above, our client seeks modifications to the draft wording of the Allocation as follows:

- 'a. *A masterplan led approach to the comprehensive redevelopment of the site, ensuring that it:*  
.....  
*ii. makes provision for a possible future eastern entrance to Cambridge Station in the location shown on Figure 39 of the Local plan, meeting active travel principles.*

### **Chisholm Trail Future Phases**

The Chisholm Trail is a walking and cycling route which aims to provide a predominately traffic-free route between Cambridge North and Cambridge stations. Phase One of the Trail opened in December 2021, connecting Cambridge North to Coldham's Lane. Phase Two is proposed between Coldham's Common and Clifton Road. Phase Two is expected to be completed over a period of 3-5 years (date of commencement currently unknown).

Our client is supportive of the future phases of the Trail which seeks to facilitate greater walking and cycling connectivity across the City. Further, they are committed to the principles of active travel, including walking, wheeling and cycling routes as part of the redevelopment of the Site. However, we are concerned that the requirement in draft Allocation S/C/CLT Part 1a that the future masterplan must '*incorporate any future phases of the Chisholm Trail into the design, ensuring that pedestrian, cyclist and vehicular conflicts are designed out*' is unreasonable given the uncertainty regarding the timing, funding and alignment of Phase Two of the Trail.

Accordingly, our client requests the following amendments to the draft wording of the Allocation:

- 'a. *A masterplan led approach to the comprehensive redevelopment of the site, ensuring that it:*  
.....  
*iii. seeks to reasonably incorporate future phases of the Chisholm Trail into the design of the masterplan, ensuring that people, cyclist and vehicular conflicts are designed out*'.

### **Employment Uses**

Our client welcomes the support for a range of employment uses on the Site and the need for a flexible approach to allow for market change and occupier requirements over the Plan period. The range of supported uses includes light industrial, research and development, life sciences, workspace, retail and food and beverage.

The draft Allocation also states that '*Development proposals must demonstrate*' the re-provision of existing employment floorspace:

- j. The re-provision of the existing floorspace for General Industry (B2), Storage and Distribution (B8), Light Industry (E(g)iii), mid-tech and any sui generis floorspace that share a significant number of characteristics with these uses, through an intensification of built form;*

The drafting could be interpreted as the re-provision of 'all' existing floorspace and range of employment uses (our emphasis). Our clients consider this to be an unreasonable and unrealistic proposition for commercial and design reasons.

The Site comprises a range of employment and other commercial operators which benefit from flexible planning consents to allow for the day-to-day commercial operations of individual business. **Appendix 01** includes schedule of all existing accommodation including uses.

It should be noted that the uses range from Class E to Class B2, B8 and Sui Generis uses. The existing accommodation is flexible and is supported by dedicated service yards, and a total of 340 parking spaces for staff and customers. This range of use is typical of an "industrial estate" which has evolved over many years, including one with the broader locational characteristics (e.g. relationship with railway line and adjacent Royal Mail depot). Whilst such uses are appropriate now, many will not be as part of a high-quality mixed-use scheme as envisaged by draft Allocation S/C/CLT which acknowledges the potential impact on residential amenity.

By definition, some of the uses can be compatible with residential development. For example, the definition of Class E(g) is '*Uses which can be carried out in a residential area without detriment to its amenity*', which includes Use Class E(g)(iii) Industrial processes. Likewise, there are quasi retail/ trade uses which typically would not give rise to amenity issues (e.g. Use Classes E(a) Retail, E(g) light industrial and Sui Generis).

However, by definition, Class B2 uses are not compatible and Class B8 activities may require operational controls in an effort to be compatible (e.g. hours of use, noise limits, etc). Such limits would impact on commercial viability.

Whilst our client shares the aspiration to re-provide a proportion of the existing employment floorspace on the Site, it is not considered appropriate or commercially feasible to require the re-provision of all existing employment floorspace and specifically not the B2 and B8 elements. This is particularly the case given the inclusion of residential development as a key component of the masterplan and the inherent conflict between some general industrial uses and residential.

Furthermore, it is noted that Part 1i. of the draft Allocation requires '*where possible and practical, access for servicing and deliveries for new development within the site should be managed on-street*'. This requirement does not align with the operational needs of existing occupiers of the Industrial Estate, all of whom currently benefit from unrestricted off-street parking and servicing provision. The proposed approach would therefore constrain the ability of occupiers to operate effectively and undermines the deliverability of full re-provision of industrial floorspace on the Site. This, alongside the requirement for on-street servicing of the new development including re-provided employment space, would conflict with the pedestrian-friendly, mixed-use environment envisaged for the future masterplan.

In addition, it is understood that a number of existing occupiers (circa 18 existing tenants) operate from more than one location within Cambridge. In this context, the existing employment uses on the Site are not locationally dependent. The potential relocation of such uses should be considered having regard to the need to optimise the Site for more appropriate uses in this highly sustainable location adjacent to the railway station.

With consideration to the above, our client seeks amendments to the draft wording of the allocation to future-proof the Site from market changes, whilst providing compatible uses with residential development. Accordingly, Part 1c. of the draft Allocation is proposed to be amended as follows:

'The reprovision of some existing light industrial and employment floorspace, where viable and compatible with residential uses.'

## PROPOSED MODIFICATIONS TO DRAFT ALLOCATION S/C/CLT

In accordance with the above representations, the following modifications are proposed to draft Allocation S/C/CLT. It should be noted that the below suggested amendments are proposed on the basis of the Royal Mail depot being excluded from the allocation.

### **'S/C/CLT: Clifton Road Area**

- Site area of ~~7.26 hectares~~ 5.8 hectares.
  - Clifton Road Area will develop as an integrated part of Cambridge to become a great place to live, work and visit. It will contain new homes, space for business and industry and will benefit from its location as the link between Cambridge Junction and Cambridge Leisure and ~~any a~~ a possible future new eastern entrance to Cambridge Station.
  - Capacity for approximately ~~200~~ 150 homes, employment uses and other complementary uses potentially including hotel and retail.
1. Development proposals ~~must~~ should demonstrate how they will meet the following requirements to deliver a vibrant mixed-use neighbourhood:
    - a. A masterplan led approach to the comprehensive redevelopment of the site, ensuring that it:
      - i. ~~aligns with~~ has consideration to adjacent development proposals within Cambridge Junction and Cambridge Leisure, Hills Road (Policy S/C/CJ);
      - ii. makes provision for ~~any a~~ a possible future eastern entrance to Cambridge Station in the location shown on Figure 39 of the Local plan, meeting active travel principles.
      - iii. ~~incorporates any~~ seeks to reasonably incorporate future phases of the Chisholm Trail into the design of the masterplan, ensuring that people, cyclist and vehicular conflicts are designed out;
      - iv. Is fully integrated with its surrounding area and is well structured to increase legibility;
    - b. Provides a significant and multi-functional open space and public realm offer, ensuring that those living, working, visiting and passing through the area have sufficient opportunities to dwell and play;
    - c. The reprovision of ~~the existing floorspace for General Industry (B2), Storage and Distribution (B8), Light Industry (E(g)iii), mid tech and any sui generis floorspace that share a significant number of characteristics with these uses, through an intensification of built form~~ some existing light industrial and employment floorspace, where viable and compatible with residential uses
    - d. The provision of a range of commercial uses, ~~in particular~~ including for start up companies, grow on spaces, workshops and maker spaces as well as flexible office (E(g)i) and Research and Development facilities (E(g)ii);
    - e. Includes complementary uses that make best use of this centrally located site, potentially including hotel, retail and food and beverage facilities;
    - f. The provision of residential uses provided that noise mitigation and outlook is addressed at the masterplanning stages of development to ensure there is no adverse impact on residential amenity from surrounding uses;
    - g. A positive, context-led approach should be taken in relation to the massing, style, and materials of new buildings to limit any negative impacts on the setting of the Grade II Listed

- Railway Station, the New Town and Glisson Road Conservation Area, and other designated and non-designated heritage assets that are in the vicinity of the site;*
- h. Opportunities to open up the site from Cherry Hinton Road and Rustat Road should be taken to increase the permeability of the site;*
  - i. Adequate access and servicing arrangements for the range of uses for the site and the adjacent Royal Mail Depot should be incorporated into any proposal. Where possible and practical, access for servicing and deliveries for new development within the site should be managed on-street.'*

We trust the contents of these representations are clear and we welcome the opportunity to engage further with Officers on the emerging Allocation for Clifton Road.

## **CLOSING**

These representations to the Regulation 18 Consultation version of the Draft Greater Cambridge Local Plan (Regulation 18) are submitted on behalf of USS. They seek to confirm in principle support for the allocation of Clifton Road for redevelopment to create a new commercial-led mixed-use quarter in Cambridge City Centre. Notwithstanding, modifications are proposed to the draft allocation to maximise the potential for any future scheme to be commercially viable and deliverable.

USS confirms its willingness to continue in collaborative dialogue with the Council's as the next version of the Local Plan is prepared.

Should you have any queries or require any further information, please do not hesitate to contact Craig Blatchford [REDACTED] or Rachel McGall [REDACTED] at this office.

Yours faithfully,

[REDACTED]  
**Montagu Evans LLP**

Encs.

**APPENDIX 01: CLIFTON ROAD INDUSTRIAL ESTATE TENANCY SCHEDULE**

UNIT	OCCUPIER	OPERATIONS OF TENANT	USE CLASS
4	C Brewer & Sons Limited	Trade	E(g)iii
5	Sally Salon Services Limited	Trade	E(g)iii
6	Vacant	Industrial	-
7	Wolseley UK Limited	Trade	E(g)iii
8	Abbey Cross Trading Limited	Trade	E(g)iii
9	Eurocell Building Plastics Limited	Trade	E(g)iii
10	Voi Technology UK Limited	Fix Scooters	B2
11	Williams Trade Supplies Limited	Trade	E(g)iii
12	TLC (Southern) Limited	Trade	E(g)iii
13	HFD Limited	Trade	E(g)iii
14	UK Plumbing Supplies Limited	Trade	E(g)iii
15	Howden Joinery Properties Limited	Trade	E(g)iii
16	Vindis Trade Parts Limited	Trade	E(g)iii
17	Edmundson Electrical Limited	Trade	E(g)iii
18	Dean & Wood Limited	Air conditioning specialist	E(g)iii
19	Halfords Autocentres Ltd	Trade - car repair	B2
20	Toolstation Limited - HO	Trade	E(g)iii
21	Beggs & Partners	Trade	E(g)iii
22	Hire Station Limited	Trade	E(g)iii
23/24	Screwfix Direct Limited	Trade	E(g)iii
25	Sevenday Window Centres limited	Trade - windows	E(g)iii
26	Cambridge Aerospace Ltd	Drone manufacturer	B2
27	T Patton Limited	Trade - plumbing	E(g)iii
28	Hertz (UK) Limited	Car Hire	sui generis
29	Deliveroo Hop Ltd	Dark kitchen	sui generis
30	The Tyre Store Ltd	Trade - tyres	E(g)iii
31	By Design (Cambridge) Limited	Trade - kitchens	E(g)iii
31	By Design (Cambridge) Limited	Trade - kitchens	E(g)iii
32/39/40	JD.com International UK Limited	Cash & Carry	B2
33	Giocoguado Ltd	Manufacturing	E(d)
34	Walthew Leisure Limited	Indoor leisure/rock climbing	E(g)iii
35	Fix My Tyre Limited	Trade - tyres	B8
36	Jag Express Limited	Logistics & courier	sui generis
37	Aromi Caffè Ltd	Dark kitchen	sui generis
38	Aromi Caffè Ltd	Dark kitchen	E(g)iii

41	AK Hair/Barker (Cambridge) Ltd	Trade	sui generis
42	Retour UK Limited	Chinese supermarket	sui generis
43	Namaste Cambridge Ltd	Dark kitchen	Office
44	Cambridge Science Centre	Interactive games	E(g)iii
45	CircuitHub Limited	Trade - electronics	B8
46	Pinnacle FM Limited	FM business - storage	B2
47	Trifords limited	Car windscreen	E(d)
48	Rainbow Rocket Limited	Indoor leisure/rock climbing	E(d)
49/52	Rainbow Rocket Limited	Indoor leisure/rock climbing	B2
50	German Tech Cars Cambridge Limited	Car repair	E(g)iii
51	Vodafone Limited	Switch centre	B2
53	Micheldever Tyre Services Limited	Tyres	B2
54	Peach Innovations	Industrial	E(g)iii
55	Footprint Signs and Graphics Limited	Printing	-
56	vacant	Industrial	Office
60/61/62	diverse	Offices	E(g)iii

## APPENDIX 02: SUPPORTING TEXT OF DRAFT ALLOCATION S/C/CLT: CLIFTON ROAD AREA

- 3.1.93 *Clifton Road Industrial Estate plays a critical role in the functioning of the city, providing a range of light industrial and trade counter units. However, these types of uses have historically been built at low densities, creating large spaces between buildings that are designed around the needs of vehicles. The estate is within a highly sustainable location, close to Cambridge railway station and bus interchange as well as Hills Road and Cambridge Leisure, which offer a wide range of services and facilities.*
- 3.1.94 *Through a comprehensive masterplan led approach, there is significant potential to transform the current industrial estate into a mixed use neighbourhood that is fully integrated with the surrounding area. A masterplan would need to align with and compliment development proposals at Cambridge Junction and Cambridge Leisure as well as existing and future active travel plans and projects, including future phases of the Chisholm Trail. Engagement with local transport bodies and stakeholders will be important to ensure some of the positives and challenges from the CB1 development around pedestrian, cyclist and vehicular conflicts can be designed out.*
- 3.1.95 *The Cambridge Development Plan (Holford Wright, 1950) outlined the merits of a new eastern entrance to Cambridge Station. This long held ambition still remains and would be a significant factor in unlocking this site as well as bringing benefits to those using the railway station, particularly those at Hills Road Sixth Form College and people visiting Cambridge Junction and Cambridge Leisure. It could also relieve congestion for those using the existing station entrance. The masterplan for this site therefore needs to be flexible to ensure that it does not prejudice any potential station entrance and can positively respond to it through the design of streets, public realm, building orientation and land use.*
- 3.1.96 *Given the importance and success of the light industrial and trade related services, this must be retained as part of the redevelopment of the site, through a fine grain and intensified approach. Opportunities should be taken to stack complimentary uses, providing a rich and varied neighbourhood, whilst the introduction of some office and laboratory space could further diversify the employment offer. Residential development will need to be carefully located to create activity within the site but also protect residential amenity and outlook from existing and proposed uses, including the Royal Mail Depot which is currently proposing to remain within the area.*
- 3.1.97 *Given the mix of uses and the potential number of people living within, visiting or passing through the site, the public realm will be a key component for the future success of this neighbourhood. It must be multi-functional and provide a range of spaces for people to dwell and play all year round. Through a mix of land uses, high quality public realm and better integration with the surrounding area, there is an opportunity to create a vibrant, mixed use resident and working community in a highly sustainable location, and one that would rebalance development either side of Cambridge Station, following the near completion of the CB1 development on the western side. The proposed mitigation measures within the policy will also ensure no unacceptable impacts on the local and wider skyline, townscape character and listed assets and their setting through appropriate building height, massing and style and materials.'*