25 September 2026

Greater Cambridge Shared Planning Policy Team
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Dear Sir/Madam,

REPRESENTATION ON BEHALF OF TLC GROUP IN RELATION TO GREATER CAMBRIDGE'S PROPOSED SUBMISSION CONSULTATION (REGULATION 19 PUBLICATION)

We are instructed by TLC Group to submit representations to the Regulation 19 'Proposed Submission Greater Cambridge Local Plan,' which is subject to consultation until 5pm on 25 September 2026. TLC Group are providing comments on the plan based on interests in the City, which principally relate to site allocation: Parcel COM4 Orchard Park.

This representation seeks to solely make comments in respect to Policy S/C/OPK: Parcel Com4, Orchard Park.

Representations

Policy L1 (Planning for an effective use of land) of the NPPF (2026) sets out that to support the effective use of land, developments plans should allocate sites of all sizes which have the potential for redevelopment to secure a more effective use. The policy goes on to state that the extent to which development plans are making as much use as possible of previously developed land and using minimum densities to accommodate their identified development need will be tested robustly when plans are examined.

TLC Group strongly support the continued allocation of Parcel COM4 Orchard Park under Policy S/C/OPK and are committed to delivering development on the site. The site forms the final undeveloped plot in Orchard Park and represents an available and deliverable site for development. The site presents an opportunity to make effective use of a sustainably located site within the settlement boundary of Cambridge, in close proximity to existing public transport infrastructure, local employment opportunities and local services and facilities. Development on the site would be consistent with the adopted local plan, national planning policy as well as the broader development strategy identified under Policy S/DS of the Regulation 19 local plan.

The site benefits from a planning permission which was granted on 12 July 2024 (ref: 22/01632/FUL) for the following description of Development (as varied under ref: 22/01632/NMA1):

"*Erection of a mixed-use building (Use Class C1 and Class E) with associated car parking, landscaping and associated works*"

The application consisted of the following elements within a six-storey building with roof top plant and a basement level:

- An 80 room apart-hotel (use class C1).
- An 137 room hotel with associated restaurant, bar and café (use class C1).
- A gym including exercise equipment and swimming pool (use class E(d), 1,145 sq.m).
- Co-working office space (use class E(g), 604 sq.m).

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- Vehicular access, with 178 car parking spaces (16 wheelchair accessible) and 124 visitor cycle parking spaces and 30 secure spaces.
- Two conference rooms and individual meeting rooms for hire.
- Comprehensive landscaping improvements to the south of the proposed building, providing a key east to west pedestrian link with substantial tree planting.

Policy S/C/OPK allocates the site to deliver approximately the same quantum of development as approved under ref: 22/01632/FUL identifying: "*Capacity for approximately 80 aparthotel rooms (C1) and 140 hotel rooms (C1), 1,100 square metres of gym (E(d)) uses and 600 square metres gross internal area of co-working office space (E(g)).*"

The explanatory text accompanying the allocation sets out the site is allocated for hotel and business-related uses appropriate for a site adjoining the residential area of Orchard Park. The explanatory text also notes that a current permission for student rooms is being implemented and there is an extant permission for hotel related uses, and this is considered appropriate although other business or residential related uses may also be acceptable subject to their impact on neighbouring residential areas. It is noted that a permission for student rooms does not exist on the site and is not being implemented. It is assumed that this has been included in error.

Following the grant of permission, TLC Group has appointed a design team to review the approved development with a view to optimise the scheme to ensure it is efficient, viable and deliverable, whilst meeting the needs of the market and future users. This includes the omission of the 'short stay' hotel operation and replacement with solely an aparthotel operation on upper floors (maintaining a C1 use – no change in Use Class), while retaining Class E floorspace on the ground floor and part of the first floor. As part of the design review, other minor changes are proposed to the scheme, including omission of the basement and rationalisation of the internal layout. A Section 96a non-material amendment application was approved on 10 July 2026 (ref: 22/01632/NMA1) to change the description of development and a Section 73 amendment application is being prepared to obtain permission for minor design changes, including those described above.

To ensure that Policy S/C/OPK supports TLC Group's intended development for the site and that the allocation is precise and accurate as well as flxible, it is requested that the following minor changes (identified in red text) are made to the policy wording:

Current Wording	**Proposed Wording**
Policy S/C/OPK: Parcek Com4, Orchard Park ▪ Site area of 1.01 hectares. ▪ Capacity for approximately 80 aparthotel rooms (C1) and 140 hotel rooms (C1), 1,100 square metres of gym (E(d)) uses and 600 square metres gross internal area of co-working office space (E(g)). 1. Development proposals must demonstrate how they will meet the following requirements: a. Proposals must include an assessment and the implementation of necessary mitigation measures in relation to noise and air pollution generated by traffic on the A14, including an appropriate layout of land uses and open space; b. Development must retain an attractive urban edge to Cambridge through the use of high standards of design and landscaping;	Policy S/C/OPK: Parcek Com4, Orchard Park ▪ Site area of 1.01 hectares. ▪ Capacity for approximately 235 aparthotel rooms (C1) and 2,000 square metres of flexible Class E uses including co-working office space, gym and conference facilities 2. Development proposals must demonstrate how they will meet the following requirements: d. Proposals must include an assessment and the implementation of necessary mitigation measures in relation to noise and air pollution generated by traffic on the A14, including an appropriate layout of land uses and open space; e. Development must retain an attractive urban edge to Cambridge through the use of high standards of design and landscaping;

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c. Scaling and massing details should be appropriate for Orchard Park. The primary central blocks should be restricted to six residential storeys with the two end blocks a residential storey lower. Supporting information This 1.01 hectare site is allocated for hotel and business-related uses appropriate for a site adjoining the residential area of Orchard Park. The site is the last remaining undeveloped parcel of land within Orchard Park. The current permission for student rooms is being implemented and there is an extant permission for hotel related uses, and this is considered appropriate although other business or residential related uses may also be acceptable subject to their impact on neighbouring residential areas. Further guidance on the development of this site is set out in the Orchard Park Design Guide SPD, which remains a material consideration.	f. Scaling and massing details should be appropriate for Orchard Park. The primary central blocks should be restricted to six residential storeys with the two end blocks a residential storey lower. Supporting information This 1.01 hectare site is allocated for hotel/aparthotel and business-related uses appropriate for a site adjoining the residential area of Orchard Park. The site is the last remaining undeveloped parcel of land within Orchard Park. ~~The current permission for student rooms is being implemented and~~ There is an extant permission for hotel related uses, and this is considered appropriate although other business, community or residential related uses may also be acceptable subject to their impact on neighbouring residential areas. Further guidance on the development of this site is set out in the Orchard Park Design Guide SPD, which remains a material consideration.

Separate to the requested amends set out above, it is noted that the allocation of Parcel COM4 Orchard Park has been subject to consultation under previous versions of the draft local plan. Under previous versions of the local plan, two representations have been submitted in respect to the site – one from Historic England confirming there are no designated heritage assets on the site and another from Sports England who objected to the allocation. Sports England's objected for the following reason:

"*Sport England objects to the part loss of playing field at the site. The Orchard Park SPD (2011) identified the playing field to remain as public open space. With that said, the planning permission referenced 22/01632/FUL resulted in the loss of the playing field. Sport England cannot find a cord of being consulted on that planning application despite being a statutory consultee for development affecting playing fields. Furthermore, having reviewed the Officer's Report, there is no consideration afforded to paragraph 104 of the NPPF. If a future planning application were submitted, the Local Planning Authority should accord with the statutory requirement to consult Sports England.*"

The playing field referred to in Sport England's representation forms part of Topper Play Park, also known as POS5 in The Orchard Park SPD (2011).

Firstly, it is noted that the objection principally concerns the part loss of a playing field subject to approved development under 22/01632/FUL, rather than the suitability of the site to be identified for allocation within the local plan. It should also be noted that the planning permission will be implemented in due course and given the passage of time since the permission was granted, the comment from Sport England raises no issues in respect of the site continuing to be allocated. Regardless of Sport England's comments, it is considered that the site remains suitable and available for development and should continue to be allocated within the new local plan, particularly as it has planning permission for development, enabling delivery in the early part of the local plan period.

In respect to the approved development, it is acknowledged that it will result in the partial loss of a playing field, however a playing field is retained but located on a smaller portion of land. This partial loss is a result of the

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provision of high-quality public realm and open space which have been designed to provide an enhanced east west connection through the site and integration of an active frontage. The approved design has been subject to extensive consultation with the Local Planning Authority and has been agreed with Orchard Park Community Council, who own the southern portion of the site, including the playing field, ensuring that the proposals align with the needs of the local community and the Community Council.

It is not strictly correct that The Orchard Park SPD (2011) identifies the playing field to remain as public open space. The SPD makes no specific reference to the playing field within POS5. The SPD provides guidance to guide development within Orchard Park. The SPD identifies that development of COM4 should create a strong frontage to define and enclose POS5, further developing the built fabric surrounding this site, to create an attractive and secure public amenity. The SPD also identifies an opportunity for a public realm connection between Chieftain Way and POS5.

The approved development creates an attractive and high-quality public realm to improve the setting and quality of POS5, while re-providing facilities including the playing field in an alternate arrangement. The approved development provides a strong and active frontage and passive surveillance to create an attractive and secure amenity space, in accordance with the key principles identified in the SPD. In addition, the integration of public realm enables the provision of an east-west pedestrian connection to Neal Drive and Chieftain Way, in conjunction with neighbouring development to the west which once again accords with a key principle identified in the SPD.

While Sport England identify that Paragraph 104 of the NPPF (2021) (now Policy HC7: Development affecting existing recreational land and facilities under the NPPF (2026)) is not referenced in the Officer's Report, this does not necessarily result in the playing field not being considered and assessed under the application.

Policy HC7 of the NPPF (2026) sets out that development proposals should not result in the loss of existing open space, sports and recreational buildings and land, including playing fields, other formal and informal play space and allotments, unless in certain circumstances. Certain circumstances include where development is for alternative open space, sports and recreational buildings and land where the benefits clearly outweigh the loss of the current or former use.

While the approved development does result in the partial loss of a playing field, the playing field will be reprovided on a smaller site area to enable delivery of enhanced public realm and open space, which is a key benefit of the development. This is alongside other benefits including the creation of local employment opportunities from construction and operation of the aparthotel, recreation and conference facilities and social benefits from financial contributions towards local infrastructure and the provision of recreational facilities for the general public. The S.106 dated 9 July 2026 secures an Outdoor Sports Contribution of £23,310.64 towards improvements to the Orchard Park sports facilities including the pavilion, football pitches, astro turf pitch and tennis courts. Therefore, it is our opinion that the approved development appropriately considered the impacts of the development on outdoor sport and the partial loss of the playing field is clearly outweighed by the benefits and appropriately mitigated through financial contributions.

For the reasons set out above, it is considered that Sport England's representation does not justify the need to alter or amend the site's allocation. The site benefits from planning permission, which is to be implemented shortly, and remains suitable, available and deliverable to meet identified local needs and deliver significant public benefits, while also providing suitable outdoor sports facilities.

Conclusion

We are delighted to participate in the public consultation on the Regulation 19 Proposed Submission Greater Cambridge Local Plan and to submit these representations on behalf of TLC Group. In our view, Parcel COM4 Orchard Park continues to present an opportunity to develop an under-utilised site and to bring forward a site that has the potential to provide significant development in a highly sustainable location. The allocation of the Site would be consistent with the adopted local plan as well as the Spatial Strategy identified in this Regulation

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19 consultation. Therefore, we request the Council continues to allocate Parcel COM4 Orchard PARK as a site allocation within the emerging Local Plan, subject to the minor revisions identified within this representation.

Please would you acknowledge receipt of this representation. We reserve the right to supplement this representation.

Please contact either myself or Mark Thomson (mark.thomson@savills.com) should you have any queries.

Yours faithfully

[redacted]

Ben Tattersall MRTPI
Associate

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