PD14624/CB/RM

Greater Cambridge Shared Planning Service
South Cambridgeshire Hall
Cambourne Business Park
Cambourne
Cambridge
CB23 6EA

24 September 2026

Dear Sir/ Madam,

PROPOSED SUBMISSION GREATER CAMBRIDGE LOCAL PLAN (2024 – 2045) REGULATION 19 CONSULTATION (AUGUST – SEPTEMBER 2026)
REPRESENTATIONS ON BEHALF OF UNIVERSITIES SUPERANNUATION SCHEME (USS)

On behalf Universities Superannuation Scheme (*'USS'* / *'our Client'*), we submit these representations to the Proposed Submission Greater Cambridge Local Plan Regulation 19 Consultation (*'the Proposed Submission Local Plan'/ 'the draft Local Plan''*).

The representations relate to draft Policy *'S/C/LCR: Land at Clifton Road (including Cambridge Junction and Cambridge Leisure)'*, of which our Client owns land at Clifton Road Industrial Estate and 60-62 Clifton Road, Cambridge, CB1 7ED (*'the Site'*) as shown on **Figure 1.0** below. Other landowners within the Allocation include, inter alia, Cambridge City Council, Network Rail, Royal Mail and Land Securities.

The Site totals some 5 ha and comprises the central piece of the wider draft Policy S/C/LCR Allocation totalling circa 10.65 ha. Potentially, it represents the most strategically important urban regeneration prospect in the combined Greater Cambridge area.

This submission forms part of our Client's ongoing engagement with the Councils regarding the emerging vision for the Site dating back to 2023. These representations follow our earlier representations to the Draft Greater Cambridge Local Plan Regulation 18 Consultation in January 2026 (*'Reg 18 representations'*), in addition to meetings in Summer 2026 with Terry De Sousa (Planning Policy and Strategy Team Leader) and Stephen Kelly (Joint Director of Planning and Economic Development).

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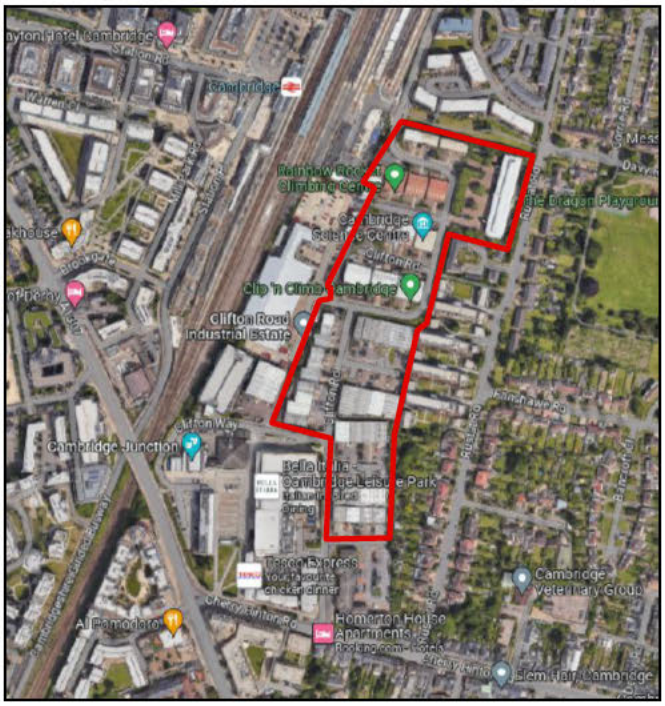


Figure 1.0: Aerial View of 'the Site' with Indicative Red Line Site Boundary (Source: Google Maps)

In our Regulation 18 representations, USS supported in principle, the allocation of the Clifton Road area (ref. S/C/CLT) for redevelopment as a commercial-led mixed-use quarter, subject to modifications to ensure that the policy established a flexible, commercially robust and deliverable framework. In particular, our Client's Regulation 18 representations identified the importance of:

- Accommodating phased development over an extended delivery period;
- Recognising the fragmented ownership and operational circumstances of the wider allocation;
- Allowing development to respond to changing market conditions and occupier requirements;
- Avoiding an inflexible requirement to re-provide all existing industrial and storage floorspace;
- Appropriately addressing the continued operation of the Royal Mail Depot;
- Providing greater certainty regarding a possible eastern entrance to Cambridge Railway Station; and
- Ensuring that individual development parcels are not prevented from coming forward by infrastructure or land requirements that are not necessary to make those parcels acceptable in planning terms.

PROPOSED SUBMISSION GREATER CAMBRIDGE LOCAL PLAN- REPRESENTATIONS

The Proposed Submission Greater Cambridge Local Plan (Regulation 19) sets out the development strategy and vision for Greater Cambridge over the period of 2024-2045.

The draft Local Plan is supported by the following evidence-base and topic papers, including:

- Housing and Economic Land Availability Assessment Update (2026);
- Greater Cambridge Housing Delivery Study Addendum Update (2026);

- Draft Interim Greater Cambridge Transport Strategy for committee (Cambridgeshire and Peterborough Combined Authority (June 2026);
- Greater Cambridge Retail and Leisure Study (2026); and
- Greater Cambridge Skyline and Tall Buildings Baseline, Strategy and Guidance (June 2026).

Site Allocations - Draft Policy S/C/LCR

Draft Policy S/C/LCR relates to Land at Clifton Road (including Cambridge Junction and Cambridge Leisure) and combines the previous Regulation 18 allocations (S/C/CJ: Cambridge Junction and Cambridge Leisure, Hills Road and S/C/CLT: Clifton Road Area) into one allocation. We provide a summary of draft Policy S/C/LCR below, with the full policy wording included at **Appendix 01** to these representations.

Draft Policy S/C/LCR allocates Land at Clifton Road (including Cambridge Junction and Cambridge Leisure) for mixed-use development comprising approximately 300 homes, employment floorspace, leisure, hotel and cultural uses. The policy seeks to enhance Cambridge Junction as a regionally significant cultural destination, facilitate a future eastern entrance to Cambridge Railway Station, deliver residential development, retain and intensify employment floorspace, and provide significant public realm, transport and green infrastructure improvements through a coordinated site-wide master planning process.

A new requirement of the draft policy is for a site-wide masterplan to be prepared by the landowners/promoters in consultation with the Council, local community and key stakeholders, including East West Rail. The masterplan should be broadly aligned with the Indicative Spatial Framework Diagram for Policy S/C/LCR (see **Figure 2.0** below) and must be agreed by the Council before any planning permission is granted at the site. It is envisaged that the masterplan should establish the distribution of land uses, infrastructure and development phasing. Development proposals, including phased schemes, must contribute positively to the wider redevelopment objectives and must not prejudice the future redevelopment of adjoining land.

The draft Allocation is identified for a broad mixed-use redevelopment comprising:

- Concert and performance spaces to enhance the cultural offer of Cambridge;
- Commercial leisure uses, including re-provision of the cinema and bowling alley;
- Approximately 300 dwellings, with a mix of housing types and tenures;
- Employment development, including offices, research and development, light industrial, industrial and storage/distribution uses;
- A public open green space; and
- Hotel accommodation.

With regards to employment development, the draft Policy S/C/LCR requires proposals to provide a wide range of commercial accommodation, including offices, research and development facilities, industrial premises, storage and distribution uses, trade counters, starter units, grow-on space for SMEs and flexible maker spaces. Notably, the draft Policy states that redevelopment must re-provide the existing quantum of industrial and storage floorspace through higher-density forms of development and the strategic co-location of uses.

Cambridge Junction is identified as a cultural asset of local and regional significance whose long-term enhancement and expansion is a central objective of the allocation. Development proposals must support its

continued operation and future growth, while Cambridge Leisure is expected to retain its function as a leisure destination and Local Centre. Existing leisure facilities, including the cinema and bowling alley, must be re-provided within replacement facilities of equal or better quality, ensuring no net loss of cultural or leisure value.

Emphasis is placed on ensuring that development does not constrain the operation of the Royal Mail depot, including conflicts for vehicles that need to travel to and from the depot, and that appropriate mitigation measures are incorporated where necessary to ensure that proposed uses are compatible with the depot.

Development must safeguard sufficient land to facilitate the delivery of a future eastern Cambridge Station entrance and ensure its seamless integration with the wider masterplan. The draft policy also requires proposals to avoid prejudicing the preferred East West Rail route alignment and associated rail infrastructure, including any eastern entrance to Cambridge railway station.

The draft policy promotes a low-car, sustainable movement framework in which walking, wheeling, cycling and public transport become the preferred modes of travel. Development must integrate future phases of the Chisholm Trail, deliver high-quality cycle infrastructure, provide mobility hub facilities and support the wider station area's role as a regional transport interchange. Comprehensive transport assessment and mitigation will be required to demonstrate that transport impacts can be appropriately managed.

With regards to built form, development proposals must carefully consider scale, massing, building heights, townscape impacts and the relationship with nearby heritage assets. Proposals greater than three commercial storeys within Clifton Road Industrial Estate or more than six residential storeys within the Cambridge Leisure part of the site, must create a positive contribution to the wider Cambridge skyline, justified through accurate 3D modelling and comprehensive landscape and visual impact assessment.

Finally, in relation to delivery, infrastructure and planning obligations, the policy anticipates significant infrastructure investment and requires a coordinated approach to delivery and phasing. Developers must prepare a strategic transport mitigation plan setting out infrastructure requirements, delivery timescales, costs, monitoring mechanisms and potential funding sources, including Section 106 contributions, CIL and other delivery mechanisms. The overarching objective is to ensure that redevelopment is supported by the infrastructure necessary to create a successful and sustainable mixed-use neighbourhood.

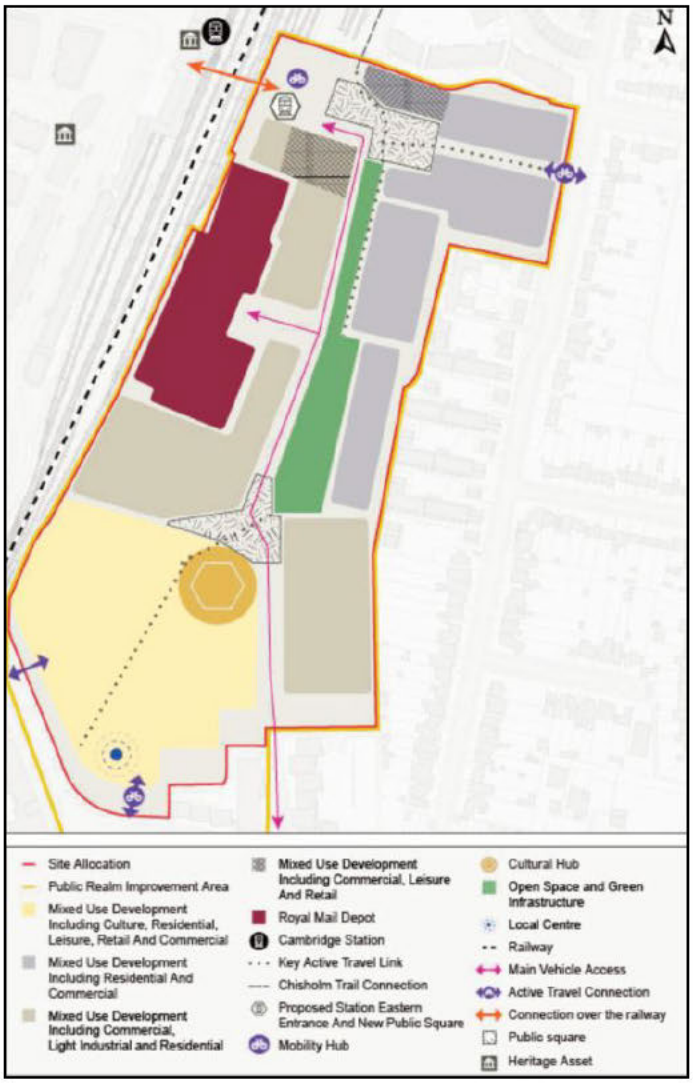


Figure 2.0: Extract of Indicative Spatial Framework Diagram for Policy S/C/LCR: Land at Clifton Road (including Cambridge Junction and Cambridge Leisure)

REPRESENTATIONS & PLANNING ASSESSMENT - POLICY S/C/LCR

Overall, our Client continues to support the Councils' aspiration for the regeneration of the Site for a mix of uses over the Plan period (up to 2045). However, Policy S/C/LCR has changed materially since the Regulation 18 consultation, and in our Client's opinion, now places significant and unnecessary hurdles to deliver the regeneration of the Site. Therefore, our Client requests modifications to provide a positive policy context to ensure future redevelopment proposals are deliverable and commercially viable.

Draft Policy S/C/LCR combines the Cambridge Junction and Cambridge Leisure sites with the Clifton Road site Allocation to create a comprehensive, strategic allocation for the area. Whilst our Client does not object to the principle of a combined allocation, the policy must be flexible to enable redevelopment to be delivered by different landowners at different times within an overall policy framework.

The policy does not adequately recognise the separate landownerships, varied development objectives or different delivery programmes across the Allocation. Further, the draft policy now proposes a significantly more detailed and prescriptive set of masterplanning, transport, infrastructure, employment and design requirements

which are either unrealistic, unviable or will frustrate the delivery of the Site's contribution it can make to the City as a whole. Our Client is concerned that the current draft policy wording will delay development, constrain the ability of individual land interests to come forward and imposes disproportionate obligations on early phases of development. Without modifications to, inter alia, introduce greater flexibility, expressly support phased delivery and ensure that infrastructure and mitigation requirements are fairly and proportionately apportioned, the draft policy is unsound given it has not been positively prepared, it is not justified, effective or consistent with National Policy.

Masterplan-Led Development

Our Client supports the principle of coordinated redevelopment and agrees that proposals should positively contribute to the wider objectives of the Allocation. A framework which establishes broad design, movement and infrastructure principles is appropriate for a site of this scale and strategic importance. However, our Client objects to the requirement in Criterion 3 of draft Policy S/C/LCR that:

> *"The masterplan should be agreed by the Council prior to the approval of any planning applications."*

The Regulation 18 policy sought a masterplan-led approach which ensured coordination with adjoining development. The Regulation 19 policy goes materially further by requiring a site-wide masterplan covering the wider Allocation and requiring that masterplan to be agreed by the Council before any planning application is approved.

The Allocation includes several distinct landownerships and established operational uses. There is no certainty that all landowners will agree a detailed masterplan and delivery arrangements, let alone at the same time, or more importantly, prior to an application being determined by the Local Planning Authority. As such, the draft policy has the potential to make the delivery of one parcel dependent upon the agreement of third-party landowners, which could delay investment and regeneration of the site.

With regards to the future eastern station entrance, these proposals will be submitted as a Development Consent Order and assessed by the Planning Inspectorate. Whilst the Council will play an important role in the DCO as a host authority, it will not be in control of timescales or the decision-making process. As currently drafted, there is a genuine risk that development on individual parcels could therefore become contingent upon matters outside the control of our Client and the Council, resulting in delay, increased cost and uncertainty.

Furthermore, the requirement to agree a masterplan with the Council and other landowners prior to approval of any planning application reduces the ability of longer-term proposals to respond to changing commercial, occupational and infrastructure circumstances. It should be noted that Land Securities are currently in the process of selling the Cambridge Leisure site, which to the best of our knowledge, has received interest from investors seeking to retain the Leisure Park in its current form. Given this portion of the allocation is unlikely to come forward until the longer-term, fixing the masterplan at this stage will create an in-flexible policy framework for future development.

In light of the above, instead of a mandatory site-wide masterplan, we suggest individual proposals should demonstrate compliance with an agreed set of strategic design and development principles. These development principles would address matters such as land-use relationships, movement corridors, public realm, infrastructure interfaces and the avoidance of prejudice to adjoining land. This would secure appropriate coordination without requiring detailed agreement across landownerships that may progress at different times.

The policy should also expressly recognise that development may be delivered in phases and that an individual parcel may come forward independently where the proposal:

- complies with the strategic principles for the wider Allocation;
- provides an appropriate relationship with existing and future adjoining development;
- delivers or contributes proportionately towards the infrastructure necessary for that phase;
- does not prejudice the reasonable future development of adjoining land; and
- demonstrates that the proposal is acceptable on its own planning merits.

With consideration to the above, our Client seeks amendments to Criterion 3 of draft Policy S/C/LCR to ensure that the absence of an agreed detailed masterplan for the whole Allocation does not prevent the approval of an otherwise acceptable planning application. Accordingly, Criterion 3 is proposed to be amended on as follows:

> *"A set of site-wide strategic design and development principles should be prepared by the landowners/ promoters in conjunction with the Council and following proportionate engagement with relevant stakeholders. The principles should have regard to the indicative Spatial Framework shown at Figure 13 and will need to identify the broad distribution of land uses, infrastructure delivery and anticipated phasing.*
>
> *Development may come forward on a phased or parcel-by-parcel basis. Planning applications should demonstrate how the proposed development responds positively to the strategic principles and wider objectives of the Allocation and does not unreasonably prejudice the future development of adjoining land."*

Phasing of Development

Our Client welcomes Criterion 5 of draft Policy S/C/LCR which recognises that development proposals may be delivered on a phased approach. However, this is not carried consistently through the remainder of the policy, which implies that the Allocation will be planned, funded and delivered as a single comprehensive project.

The Policy should recognise that different land parcels will be subject to different issues, viability considerations, lease and vacant possession timings and delivery timescales. It is counterintuitive to bring forward a large site in multiple ownership on a basis that requires an individual landowner to resolve every site-wide matter before bringing forward a planning application on its own. Nor should a planning application be delayed solely because neighbouring land is not being actively promoted nor an agreement reached with every adjoining owner.

Accordingly, our Client requests the following amendments to criterion 5 of draft Policy S/C/LCR:

> *"Development proposals, including those being delivered as individual parcels or using a phased approach, must positively contribute to the wider development objectives for Land at Clifton Road in line with the principles identified in the indicative Spatial Framework diagram (Figure 13), and they must not prejudice the potential future redevelopment of adjacent sites. The absence of redevelopment proposals or agreement from other landowners within the Allocation should not, in itself, prevent an otherwise acceptable development from coming forward."*

Apportionment of Infrastructure

The Regulation 19 draft Policy S/C/LCR introduces a substantial range of infrastructure, mitigation, safeguarding and financial requirements. These include measures relating to the safeguarding of the eastern station entrance, the Chisholm Trail, cycle parking, mobility hubs, public realm, transport mitigation, pick-up and drop-off facilities, servicing, monitoring and wider station-area infrastructure. Whilst our Client recognises that development should make appropriate contributions towards infrastructure, the policy must ensure that obligations are fairly and reasonably related to the scale, nature and effects of the development proposed and apportioned to elements of the overall allocation-not a first past the post approach.

The current policy is not clear regarding which land should be safeguarded for the identified 'physical transport measures', the evidence supporting the extent of that safeguarding, the mechanisms through which infrastructure costs will be apportioned between development parcels, or how the policy will avoid an early development parcel carrying a disproportionate share of site-wide costs.

No development parcel should be required to provide or fund infrastructure purely because it is the first part of the Allocation to come forward. In particular, a parcel should not be required to deliver strategic infrastructure that is not necessary to make that development acceptable in planning terms, or which principally serves other land, the wider station area or later phases. Infrastructure requirements should be supported by robust evidence and should be proportionate to the impacts generated by each development.

In light of the above, our Client requests the following additional wording to draft Policy S/C/LCR relating to the apportionment of infrastructure:

> *"Infrastructure, mitigation measures and financial contributions will be apportioned fairly and proportionately between development parcels, having regard to the scale, nature and impacts of the development proposed and the degree to which each parcel benefits from the relevant infrastructure. An individual proposal will not be required to deliver or fund infrastructure which is not necessary to make that proposal acceptable in planning terms."*

Employment and Industrial Floorspace

Our Client continues to support the inclusion of a range of employment uses within the Allocation. A flexible commercial offer will be important to securing a viable mixed-use quarter that can respond to market demand and occupier requirements over the Plan period. However, our Client continues to object to Criterion 9 of Policy S/C/LCR, which requires redevelopment to:

> *"re-provide the existing quantum of floorspace for industrial and storage uses through the use of an intensified built form and the strategic co-location of complementary planning uses".*

The existing Industrial Estate accommodates a broad range of light industrial, general industrial, storage, distribution, trade counter, leisure and sui generis uses. Many of these businesses rely on dedicated servicing areas, vehicle access, parking, operational flexibility and, in some cases, activities which may not be compatible with residential development or a high-density mixed-use environment. A requirement to re-provide the existing quantum of industrial and storage floorspace is onerous and gives no meaningful consideration to the operational requirements of B2 and B8 uses, market demand and whether particular uses are compatible with new residential, leisure or cultural uses and the ability to deliver the wider objectives of the Allocation.

The proposed mix of homes, cultural facilities, leisure, employment floorspace, public realm and strategic transport infrastructure creates competing demands for a finite amount of land. Requiring the full existing industrial and storage quantum to be replicated would prevent the balanced, mixed-use redevelopment sought by the policy. The policy should instead support the retention or reprovision of employment floorspace where this is viable, deliverable and compatible with the overall development strategy. It should allow the appropriate employment mix and quantum to be established through up-to-date market, viability, design and amenity evidence at planning application stage.

Furthermore, it should be noted that a number of existing occupiers at Clifton Road Industrial Estate (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 loss 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.

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. As such, Criterion 9 of draft Policy S/C/LCR is proposed to be amended as follows:

> *"Redevelopment of the site should provide an appropriate range and quantum of employment floorspace, including light industrial, storage and other commercial uses, where demonstrated to be viable, deliverable and compatible with the proposed mixed-use development."*

Royal Mail Depot & Access Arrangements

Our Client recognises the need for redevelopment to take account of the operation of the Royal Mail depot, and redevelopment should not create unacceptable restrictions on the lawful operation of the depot. However, there is a clear distinction between safeguarding Royal Mail's operational requirements and requiring those requirements to be accommodated at the expense of delivering a comprehensive and well-designed redevelopment.

The current Spatial Framework identifies a servicing route for the Royal Mail depot through the centre of the Allocation. This approach raises significant concerns as it effectively embeds an existing industrial servicing function within the heart of a proposed mixed-use neighbourhood. The route would introduce regular HGV movements into areas intended for mixed-use residential and employment development, active travel connections, public realm and green infrastructure, creating an inherent conflict between industrial servicing operations and the creation of a safe, attractive and pedestrian-focused environment.

Furthermore, given the nature of Royal Mail operations, including early morning, late evening and potentially 24-hour servicing activity, the routing of depot traffic through the centre of the development has the potential to create ongoing conflicts between HGV movements and the operation of new public spaces, pedestrian routes and active frontages. Such an arrangement risks prejudicing the delivery of the high-quality, connected and people-focused urban environment that the Allocation seeks to achieve.

The policy should therefore avoid prescribing a fixed alignment for Royal Mail servicing access. Instead, it should require that any access solution is informed by robust transport, operational and masterplanning evidence and follows the principle of minimising impacts on the development potential, design quality and placemaking objectives of the Allocation. Where practicable and operationally feasible, servicing arrangements

should be redirected to the periphery of the redevelopment rather than routed through the central parts of the mixed-use development.

Eastern Station Entrance

Our Client supports the principle of an appropriate eastern entrance to Cambridge Railway Station and remains committed to ensuring that redevelopment of the Site does not prejudice its delivery. However, it is noted that the Regulation 19 Policies Map (extract included at **Figure 3.0** below) identifies safeguarded land for East West Rail improvements and the eastern station entrance, which extends across a substantial part of the Clifton Road Site without justification.

Our Client is concerned that the draft Policy could lead to excessive safeguarding of developable land without sufficient clarity on the final location and footprint of the eastern entrance and its access requirements. Furthermore, limited details are known of the delivery programme of the eastern entrance including its planning process which will run independently to the Local Plan process in addition to the nature and scale of pick-up/ drop-off facilities.

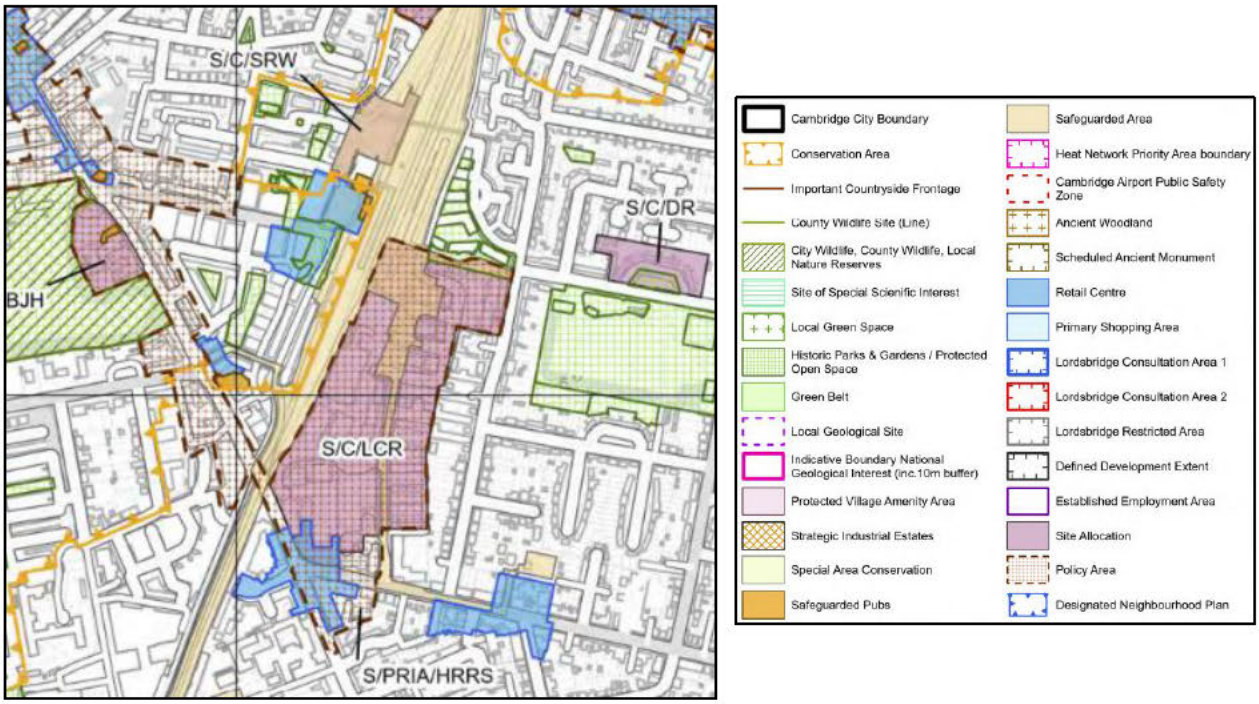


Figure 3.0: Extract of Greater Cambridge Local Plan Policy Map (Regulation 19)

Safeguarding should be based on robust and up-to-date evidence of the land genuinely required. It should not prevent reasonable interim or phased development where that development would not prejudice the evidenced delivery of the station entrance.

Accordingly, our Client requests the following amendments to the draft wording of Criterions 17 and 26(a) of Policy S/C/LCR:

> *"17. Development proposals must <u>have regard to the evidenced land requirements</u> of the preferred East West Rail route alignment and associated rail infrastructure, including <u>a possible future eastern</u>*

entrance to Cambridge railway station including access requirements which meet active travel principles. Safeguarding must be limited to land demonstrated to be necessary through robust and up-to-date evidence and should not prevent reasonable interim or phased development which would not prejudice delivery of the confirmed infrastructure."

"26. Safeguarding land for and directly delivering the following physical transport measures within the site, demonstrated through robust and up-to-date evidence:

a. *A possible eastern entrance to Cambridge railway station and associated essential infrastructure which meet active travel principles- this should include evidence of the possibility and feasibility of providing an unpaid pedestrian link over the railway as part of the station design. Interim and phased development should be supported where it would not prejudice delivery of the confirmed station proposals."*

Movement and Transport

Our Client supports the objective of promoting walking, wheeling, cycling and public transport. The Site's highly accessible location provides an opportunity to deliver a low-car development with significant improvements to active travel connections.

However, it is noted that draft Policy S/C/LCR contains an extensive range of transport requirements, with Criterion 28 introducing the need for a Strategic and Local Transport Mitigation Plan. Notwithstanding, the draft policy fails to identify who is responsible for preparing the Mitigation Plan and how the costs of identified measures will be apportioned.

The Transport Mitigation Plan must not become another mandatory site-wide approval stage which prevents individual parcels from progressing. It should be capable of being prepared, supplemented or updated in support of individual planning applications and phases. Where a planning application demonstrates an acceptable transport strategy, provides proportionate mitigation for its effects and does not prejudice the future development of the Allocation, the absence of a completed site-wide mitigation plan should not prevent permission being granted.

In light of the above, our Client suggests Criterion 28 of draft Policy S/C/LCR is amended as follows:

"A proportionate transport strategy or mitigation plan should support development proposals. The scope of the strategy or plan should reflect the scale, nature and effects of the development proposed and may be prepared or updated on a phased or planning application basis.

The strategy should demonstrate how the proposal contributes to the wider movement objectives for the Allocation, provides the mitigation necessary to address its effects and does not materially prejudice the future development of adjoining land. The absence of a completed site-wide Strategic and Local Transport Mitigation Plan should not prevent an otherwise acceptable planning application from coming forward."

Building Heights

Our Client supports a context-led design approach and agrees that building height, scale and massing should respond appropriately to the Site's townscape and heritage context. Specifically, our Client welcomes supporting paragraph 3.1.5 which notes the significant potential to capitalise on the site's highly sustainable

location close to Cambridge railway station and bus interchange and rebalance development either side of Cambridge railway station.

The Cambridge Tall Buildings Baseline, Strategy and Guidance (June 2026) indicates that development within the Clifton Road Allocation should generally remain below the 19-metre tall building threshold, while individual, finely grained development up to 25.5 metres may be permissible in the central part of the area where testing demonstrates no detrimental effect on views towards the historic core skyline. The guidance does not recommend development significantly above 25.5 metres because of potential effects on historic skyline views and cumulative urbanising effects.

Notwithstanding, Criterion 20 of draft Policy S/C/LCR requires proposals greater than three commercial storeys within Clifton Road Industrial Estate, or taller than six residential storeys within the Cambridge Leisure part of the Allocation, to provide additional justification through accurate 3D modelling and a comprehensive landscape and visual impact assessment. Given the CB1 development on the western side of the railway spans up to seven commercial storeys, the effect of this wording applies additional townscape and design scrutiny at an unreasonably low threshold.

The policy should positively recognise that a significant degree of intensification will be necessary if the Allocation is to fulfil its regeneration objectives and make the most effective use of this highly sustainable brownfield site adjacent to the Station. The Site represents one of the most accessible locations in Greater Cambridge and is precisely the type of location where national policy seeks to direct growth. The Government has recently strengthened national policy support for development around railway stations, recognising such locations as critical opportunities to accommodate growth in the most sustainable manner. The clear direction of travel within national policy is towards greater density and more intensive development around public transport nodes, rather than the imposition of arbitrary constraints on building height and capacity.

Notably, Part 1) of NPPF (2026) Policy L3: Achieving appropriate densities, states '*Development proposals should make efficient use of land, taking into account the identified need for different types of housing and other development, local market conditions, the availability of infrastructure (including that supporting sustainable transport modes) and its scope for improvement, a site's connectivity and the importance of securing well-designed, attractive and healthy places.*'

In addition, Part 2 C) of NPPF Policy L3 requires minimum development densities for residential or mixed-use schemes which are within reasonable walking distance of a well-connected station. Part 3 confirms minimum densities should be exceeded where possible, especially in areas of high connectivity, to optimise the efficient use of land. Finally, Part 4 stipulates that "*Development proposals that do not make efficient use of land in accordance with paragraph 2 of this policy should be refused*".

Against this national policy context, criterion 20 of draft Policy S/C/LCR fails to promote the optimisation of a highly accessible brownfield site and is therefore inconsistent with the NPPF's objective of making effective use of land. Furthermore, such an approach is contrary to the policy's simultaneous expectations for the re-provision of employment floorspace, the delivery of new homes, significant public realm improvements, green infrastructure, and the safeguarding of land for station-related infrastructure. The cumulative effect is to require substantial development outcomes whilst artificially limiting the scale of development capable of delivering them. As such, our Client considers that the threshold for enhanced assessment should be increased to more than five commercial storeys and more than seven residential storeys. Development exceeding those thresholds should not be discouraged in principle provided it is supported by robust design, townscape and heritage evidence and can be demonstrated to respond appropriately to its context. Rather, the policy should

positively support well-designed intensification, where it responds appropriately to surrounding townscape and heritage sensitivities, in a location where National Policy clearly supports higher-density development.

With regards to the above, our Client seeks modifications to Criterion 20 of draft Policy S/C/LCR as follows:

> *"Proposals should make efficient use of this highly accessible previously developed site through an appropriate intensification of built form. Proposals greater than five commercial storeys or taller than seven residential storeys should demonstrate a positive contribution to the Cambridge skyline, justified through accurate 3D modelling and comprehensive landscape and visual impact assessment. Taller development may be acceptable where justified by high-quality design and where it responds appropriately to surrounding townscape and heritage sensitivities, having regard to the Council's Tall Buildings Guidance."*

Site-Wide Energy and Heat Networks

Our Client supports the principle of low-carbon energy generation and the investigation of opportunities to connect development to wider heat networks. However, Criterion 29 of the draft Policy should recognise that the separate parcels within the Allocation may come forward at different times, and therefore a site-wide decentralised energy solution may not be technically, commercially or operationally available when an individual development parcel is ready to proceed.

The absence of a site-wide solution should not prevent an individual parcel from being delivered where that proposal demonstrates an appropriate standalone low-carbon energy strategy and does not prejudice a reasonable future connection.

Accordingly, our Client seeks modifications to the wording of Criterion 29 of draft Policy S/C/LCR as follows:

> *"Development proposals should assess opportunities for decentralised energy generation and storage and, where feasible and viable, connections to wider heat networks. A site-wide approach should be encouraged where it is technically and commercially deliverable. The absence of a site-wide energy solution should not prevent the delivery of an individual development parcel where an appropriate standalone low-carbon energy strategy is demonstrated, and the proposal does not unreasonably prejudice future connections."*

CLOSING

Our Client supports the continued allocation of Land at Clifton Road and remains committed to working proactively and collaboratively with the Council, adjoining landowners, East West Rail and other key stakeholders to secure the comprehensive regeneration of this strategically important site. The allocation presents a significant opportunity to deliver a high-quality mixed-use quarter in one of the most sustainable and well-connected locations in Greater Cambridge.

Notwithstanding, draft Policy S/C/LCR of the Regulation 19 Local Plan, is materially more prescriptive than the Regulation 18 draft and, in several respects, departs from the flexibility necessary to facilitate the successful delivery of a complex, long-term redevelopment project. The policy introduces a mandatory site-wide masterplanning requirement, additional transport and infrastructure obligations, extensive safeguarding provisions and an inflexible requirement to re-provide the existing quantum of industrial and storage floorspace. These requirements risk placing disproportionate constraints on development and creating unnecessary barriers to implementation.

In particular, the draft policy fails to adequately reflect the fragmented ownerships, diverse operational requirements and ranging delivery timescales that characterise the Allocation. It also does not reflect the planning process of the East West Rail project which, as a Nationally Significant Infrastructure Project (NSIP) will be submitted as a Development Consent Order application (DCO) and assessed by the Planning Inspectorate. Whilst the Council will play an important role in the DCO as a host authority, it will not be in control of the decision-making process or timescales. As currently drafted, there is a genuine risk that development on individual parcels could become contingent upon matters outside the control of our Client, resulting in delay, increased cost and uncertainty. This risks undermining both the viability of redevelopment proposals and the timely delivery of the homes, employment space, infrastructure and wider regeneration benefits that the Allocation is intended to secure. Accordingly, our Client considers that draft Policy S/C/LCR has not been positively prepared, is not justified, effective or consistent with National Policy, and therefore is unsound.

We trust that these representations will be given full consideration and we reserve the position to present a case as part of the Local Plan examination.

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

Montagu Evans LLP

Encs.

APPENDIX 01:

POLICY S/C/LCR - LAND AT CLIFTON ROAD (INCLUDING CAMBRIDGE JUNCTION AND CAMBRIDGE LEISURE)

Land at Clifton Road (including Cambridge Junction and Cambridge Leisure)

Policy S/C/LCR: Land at Clifton Road (including Cambridge Junction and Cambridge Leisure)

Objectives and place identity

1. Land at Clifton Road will be comprehensively redeveloped through a masterplan-led approach, delivering a high-quality, mixed-use quarter within Cambridge that reinforces the role of the area as a cultural and leisure destination for the region. Development will be contextually responsive, creating a coherent and distinctive sense of place. It will secure the long-term enhancement and expansion of arts, music and performance facilities associated with Cambridge Junction to maintaining its role as a regionally significant cultural venue.
2. A mix of uses, including leisure, cultural and social uses alongside workspace and residential development will support activity throughout the day and evening and strengthen the vitality of Cambridge Leisure Park. The layout and design of development will integrate positively with surrounding neighbourhoods and will safeguard and facilitate the delivery of a future eastern entrance to Cambridge railway station, creating a welcoming and well-connected arrival point that reflects Cambridge as a creative, inclusive and evolving city.
3. A site wide masterplan will be prepared by the landowners / promoters in conjunction with the Council and in consultation with the local community and other stakeholders including the East-West Rail Company. The masterplan should be broadly aligned with the indicative Spatial Framework Plan shown at Figure 13 and will need to identify the broad distribution of land uses, infrastructure delivery and phasing and will be used as a basis for the consideration of subsequent planning applications. The masterplan should be agreed by the Council prior to the approval of any planning applications (and may be subsequently updated by the landowners / promoters and agreed by the Council).
4. The masterplan must demonstrate that it:
    a. Is fully integrated with its surrounding context;
    b. Responds positively to nearby existing land uses and that, in line with the indicative Spatial Framework, proposed uses and high-quality public open spaces are arranged to ensure a coherent sense of place;

c. Uses a well-structured layout and built form to create a safe environment, and improve the area's legibility and permeability;

d. Makes provision for and positively responds to the proposed future eastern entrance to Cambridge railway station, providing seamless connections between active travel infrastructure and public transport serves both within and beyond the site;

e. Ensures that conflicts between pedestrians and wheelers, micromobility users, and motor vehicles are mitigated as far as possible;

f. Does not undermine Cambridge Junction as a venue of local and regional significance. Opportunities should be explored to maintain its ability to operate whilst redevelopment occurs;

g. Has been informed by key stakeholders, including the police, to ensure that necessary security measures have been built into the design and a safe environment can be delivered through development; and

h. Provides a complementary and sensitive mix of new homes, cultural and recreational facilities, and employment floorspace.

5. Development proposals, including those being delivered using a phased approach, must positively contribute to the wider development objectives for Land at Clifton Road in line with the principles identified in the indicative Spatial Framework diagram (Figure 13), and they must not prejudice the potential future redevelopment of adjacent sites.

Uses

6. Land at Clifton Road (including Cambridge Junction and Cambridge Leisure) is allocated for mixed-use development comprising the following:

   a. Concert and performance spaces (Sui generis), developing further the cultural offer for the city and wider sub-region;

   b. Commercial leisure, including food and drink outlets and the reprovision of the bowling alley and cinema;

   c. Approximately 300 residential homes (Use Class C3), providing for a mix of types and tenures;

   d. Employment uses, including Offices (Use Class E(g)i), Research and Development facilities (Use Class E(g)ii), light industrial space (Use Class E(g)iii), General Industrial space (Use Class B2), and Storage or Distribution facilities (Use Class B8); and

   e. Hotel (Use Class C1).

7. Residential development will be supported provided that it is sensitively integrated with neighbouring planning uses, and that the mitigation of noise, vibration, light, odour, dust, and any land quality issues are addressed at the early design stages of development to limit adverse impacts on residential amenity or other sensitive receptors.

8. Development must be designed to support a range of commercial uses and include units for light industrial floorspace and trade counters, grow-on spaces for SMEs, spaces for start-up companies, and flexible maker spaces, as well as office (Use Class E(g)(i)) and Research and Development facilities (Use Class E(g)(ii)).

9. Redevelopment of the site must re-provide the existing quantum of floorspace for industrial and storage uses through the use of an intensified built form and the strategic co-location of complementary planning uses.

Context

10. Redevelopment of the site must support the enhancement of the Cambridge Junction as a live performance and cultural venue, positioning it as a landmark building in masterplans for the site.

11. Development proposals must support the ability for Cambridge Leisure to function as a designated Local Centre, making provisions for the colocation of flexible spaces for retail, recreation, community workshops and a vibrant nightlife. Engagement with local stakeholders and relevant bodies will be required to ensure that proposals deliver appropriate facilities.

12. Proposals involving the redevelopment of the existing cinema and/or bowling alley in Cambridge Leisure must ensure that such uses are re-provided in an equal or better facility as part of the development.

13. Redevelopment of other commercial leisure uses within the site must ensure that either:

    a. Such uses are re-provided as part of the development proposals; or

    b. Quantitative and qualitative evidence is submitted that demonstrates a better range and quality of facilities will be provided as part of the development.

14. Where appropriate, temporary venue spaces and meanwhile uses should be provided during the construction phases of the site's redevelopment to minimise any short-term disruption to on-site community and recreational facilities.

15. To ensure the Royal Mail Depot is appropriately integrated whilst it is operational, development proposals must be designed in such a way that:

    a. Do not create constraints for the operation of the existing Royal Mail Depot, including conflicts for vehicles that need to travel to and from the depot; and

    b. Incorporate mitigation measures to ensure that proposed uses are compatible with the Royal Mail Depot.

16. Archaeological investigation and mitigation will be required to identify the presence and significance of as yet unknown archaeological remains across the site.

17. Development proposals must not prejudice the delivery of the preferred East West Rail route alignment and associated rail infrastructure, including any eastern entrance to Cambridge railway station.

Built form

18. Development proposals must take a positive, context-led approach to design that achieves an appropriate style, scale and massing, including effective transitions between proposals and established residential areas, in order to limit 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.

19. Given the site's potential to be experienced from a number of strategic viewpoints and the sensitivity of nearby residential uses to overlooking, proposals must ensure that building heights are thoroughly tested and that careful design mitigation and building orientation is used to provide a well-articulated roofscape and skyline.

20. Proposals that include buildings with multiple storeys must have regard to the design, distribution and vertical layering of ground and lower floor uses, securing active frontages and vertical integration, particularly on lower storeys, to create a vibrant, safe and inclusive public realm. Proposals greater than three commercial storeys within Clifton Road Industrial Estate or taller than six residential storeys within the Cambridge Leisure part of the site, must create a positive contribution to the wider Cambridge skyline, justified through accurate 3D modelling and comprehensive landscape and visual impact assessment.

21. Given the changes in ground levels across the site, proposals should be designed to improve the site's visual and physical permeability, including its visual relationship with Hills Road.

Public space

22. Significant and flexible areas of public realm and open space must be provided to respond to the likely intensity of use and should be located to form focal parts of the site's overall development providing a range of functions throughout the day, including recreational green infrastructure, pop-up street markets, places to dwell, and outdoor "spill-out" spaces to expand the cultural and leisure offering into the open spaces and compliment the indoor offering.

23. In line with the indicative Spatial Framework diagram, a high-quality green infrastructure corridor, anchored by public squares at the eastern entrance to Cambridge railway station and Cambridge Junction, should be used to frame the site-wide layout, and improve the site's legibility and spatial identity.

Nature

24. Proposals must protect and enhance biodiversity and mitigate the impacts of climate change by:

    a. Embedding nature across all development typologies through the use of green roofs, trees, habitat corridors, and other appropriate urban greening measures; and

b. Introducing SuDS as part of high-quality, multifunctional green and blue infrastructure.

Movement

25. Development must deliver an exemplary approach to movement and transport within and through the site and promote a low-car-dependency approach to living where walking, wheeling and cycling are the first choice for most residents, workers and visitors, by:

    a. Ensuring the design of the site:

        i. Responds positively to the area's high level of accessibility by public transport and active travel modes, providing a comprehensive approach to transport that complements existing transport facilities on the western side of the railway;

        ii. Incorporates effective wayfinding measures to create a place that is easy to navigate and safe throughout the daytime and evening;

        iii. Creates a safe relationship between on-site transport infrastructure and other on-site uses; and

        iv. Uses innovative approaches to car storage, including off-plot car barns and shared parking solutions.

26. Safeguarding land for and directly delivering the following physical transport measures within the site:

    a. A new eastern entrance to Cambridge railway station, including space for essential infrastructure and security features required to deliver the new station entrance – this should include evidence of the possibility and feasibility of providing an unpaid pedestrian link over the railway as part of the station design;

    b. Future phases of the Chisholm Trail that will cross the site and safe connections between the Chisholm Trail and active travel infrastructure that surrounds the site;

    c. A dedicated, secure cycle park that is well connected to the new eastern entrance to Cambridge railway station and the Chisholm Trail;

    d. On-site mobility hub provisions that complement the existing mobility hub facilities on the western side of the railway to enhance the wider station area's function as a regional transport interchange;

    e. The retention or re-provision of the multi-storey car park as part of on-site mobility hub proposals that seek to consolidate and rationalise car parking across the site, unless alternative parking solutions can be justified as part of a comprehensive strategic and local transport mitigation plan for the site's development; and

f. Making financial contributions towards and, as appropriate, enabling any other transport measures necessary to make the development of the site acceptable in transport terms, as evidenced at planning application stage.

27. The agreed masterplan for the site must demonstrate how the distribution and mix of development achieves optimal transport outcomes, including high active and public transport mode shares.

28. To support the delivery of an agreed masterplan, a strategic and local transport mitigation plan must be prepared in consultation with key transport stakeholders, the Local Highways Authority and the Local Planning Authorities. This must:

    a. Explore the suitability of a range of transport options for the site's redevelopment, including facilities to serve bus routes;

    b. Demonstrate how on-site mobility hub provisions will complement facilities on the western side of Cambridge railway station to enhance the wider station area's function as a regional transport interchange;

    c. Demonstrate how comprehensive transport provision across the wider station area has informed appropriately scaled pick-up and drop-off facilities at the new eastern entrance to Cambridge railway station and measures to address other needs generated by the site's development;

    d. Effectively address potential car parking demand generated by development proposals and the new eastern entrance to Cambridge railway station, including measures to manage overspill parking into surrounding residential areas;

    e. Demonstrate how appropriate access and servicing arrangements for the range of uses proposed or to be retained will be achieved, including details of how these arrangements will be managed when operational;

    f. Demonstrate how development can cumulatively and effectively undertake a "monitor-and-manage" approach to resolve any potential transport impacts caused by redevelopment;

    g. Provide details of infrastructure costing and delivery phasing, demonstrating how the necessary transport measures will be delivered at a time that enables optimal transport outcomes; and

    h. Provide details of mechanisms for delivery, monitoring and review, including potential delivery through Section 106 obligations, CIL, or other appropriate funding mechanisms.

Resources

29. Development proposals should assess and incorporate opportunities to take a site-wide approach to decentralised energy generation and storage, including exploring connections to wider heat networks.

30. Development should not preclude operation and maintenance of sewer pumping stations located within or adjacent to the site.

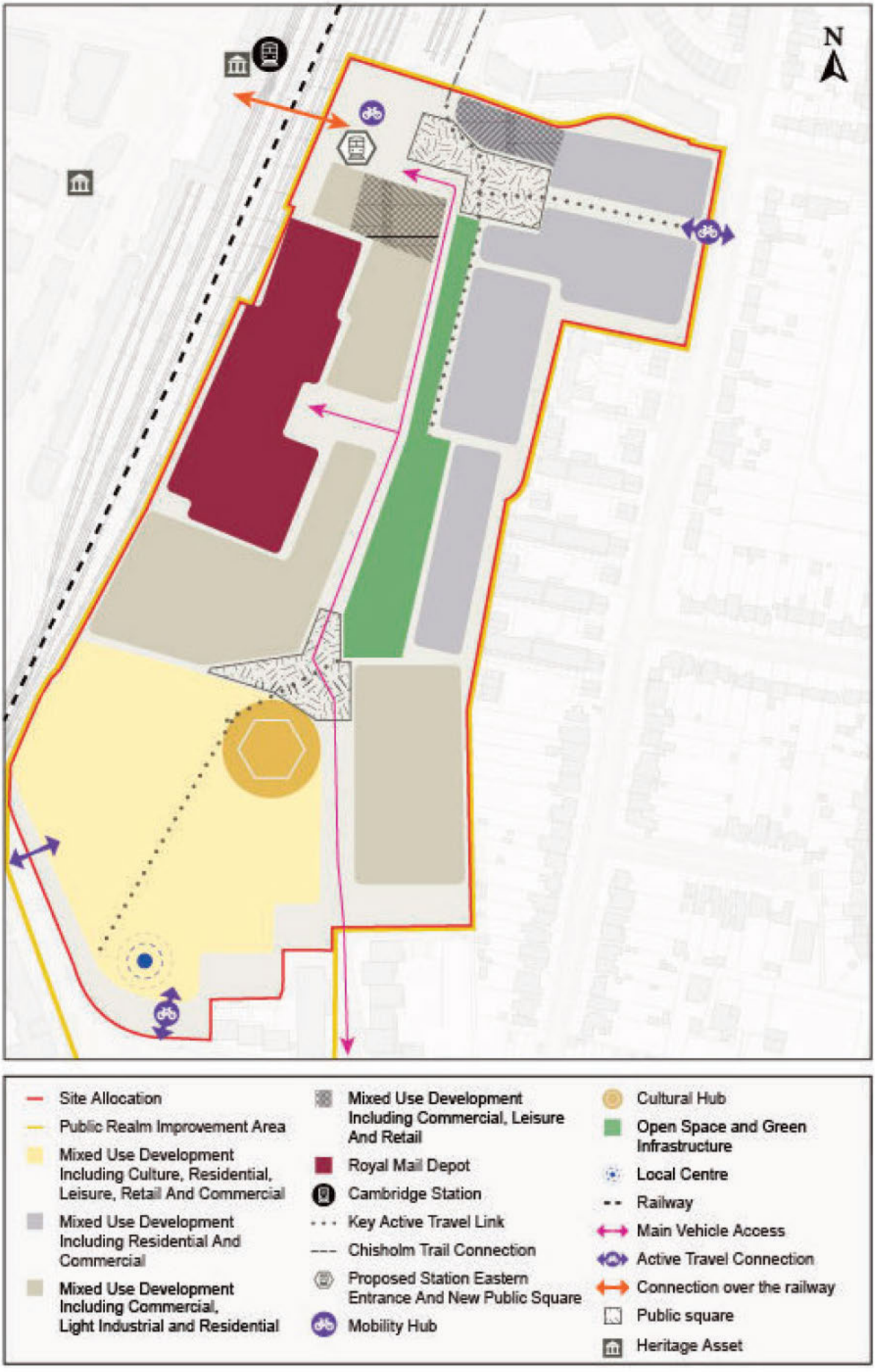


Figure 13: Indicative Spatial Framework Diagram for Policy S/C/LCR: Land at Clifton Road (including Cambridge Junction and Cambridge Leisure)

Supporting information

3.1.4 Land at Clifton Road is an accessible, dynamic space that offers a range of critical functions and a cultural and leisure quarter for both Greater Cambridge and the wider region. The area makes substantial contributions to the city's wider cultural and recreational offer: Cambridge Junction is a music and performance venue of regional importance, and Cambridge Leisure hosts a range of community and recreational spaces, including a cinema, bowling alley, and a range of food and beverage outlets. Together, Cambridge Junction and its neighbouring facilities contribute to the vitality of the designated Hills Road Local Centre and create a key cultural and leisure district for Greater Cambridge and beyond. Clifton Road Industrial Estate also provides a range of light industrial and trade counter units that are an important working space for local tradespeople. Given the current fragmentation of land ownership within the allocation, development proposals will need to positively contribute to site-wide development objectives (as illustrated on the indicative Spatial Framework in Figure 13) in order to deliver a vibrant and successful destination.

3.1.5 Based on landowner discussions, there are aspirations for a comprehensive redevelopment of Land at Clifton Road to create a vibrant and attractive gateway to the city. Notwithstanding the important functions already hosted on the site, many of the existing buildings have historically been built at low densities, creating large spaces between buildings that are designed around the needs of vehicles. There is significant potential to transform the current Clifton Road area into a vibrant mixed-use neighbourhood that expands on the estate's existing successes and capitalises on the site's highly sustainable location close to Cambridge railway station and bus interchange. Ultimately, this would rebalance development either side of Cambridge railway station given the near completion of the CB1 development on the western side of the railway.

3.1.6 Key to achieving vibrancy at Land at Clifton Road is the sensitive arrangement of a mix of new homes, cultural and recreational facilities, and employment opportunities, all of which must be fully integrated with the infrastructure and development context that surround the site. Opportunities should be taken to stack complimentary uses to improve the efficiency of land use and enrich the site's day-to-day functionality. A blended mix of commercial spaces, ranging from grow-on spaces for start-up businesses to some larger scale office and laboratory units, will generate activity throughout the day, whilst residential uses alongside the cultural, leisure, hotel and entertainment facilities will generate interest and activity into the evening and at weekends. Given the importance and success of the area's industrial and storage businesses and trade counters, spaces that can accommodate services of this nature must also be consolidated or re-provided as part of the redevelopment of the site, which should be achieved through a fine-grained and intensified built form that uses a well-considered colocation of planning uses.

3.1.7 Residential development will need to be carefully located to protect residential amenity and outlook from existing and proposed uses, including railway operations and the Royal Mail Depot, which will remain operational within the site for the foreseeable future.

Masterplan-led approaches that seek to deliver more than 300 residential units through the site's redevelopment may be supported, provided that development would result in a balanced mix of housing and commercial and leisure floorspace, and that new residential development does not present significant obstacles for the operation of cultural, leisure and other employment uses across the site. Layout opportunities, such as well-designed residential-led development blocks on the eastern extents of the site, will likely help to facilitate sensitive transitions between existing residential development adjacent to Land at Clifton Road and the commercial and leisure landscapes at the heart of the site.

3.1.8 Given the social and cultural importance of the site, development should contribute the achievement of objectives set out within Cambridge City Council's Cultural Strategy (2024 – 2029) (or successor documents) and the Greater Cambridge Cultural Infrastructure Strategy (2025). At the heart of a comprehensive masterplan would be an upgraded music and performing arts venue (Cambridge Junction), providing a mix of performance space, workshop studios and a dedicated nightclub.

3.1.9 As well as the new railway station entrance, the redevelopment of this important venue should act as the catalyst for regeneration of the wider site, and it should position the venue as a landmark within the Clifton Road area both in terms of architectural interest and cultural offering. The final design of a redeveloped cultural and events venue and the wider cultural and leisure district will need to be initially informed by Cambridge's Cultural Infrastructure Strategies and engagement with Create Cambridge. Through the comprehensive redevelopment of the Clifton Road area, there is an opportunity to enhance this area as a key cultural hub. In addition, this should be supplemented with meaningful engagement with local residents and key stakeholders to ensure that proposals reflect local aspirations and incorporate best-practice design principles.

3.1.10 A comprehensive masterplan for the site would also need to complement existing and future active travel plans for the area to ensure that site-wide access and servicing solutions are holistic and adaptable. As such, on-site mobility hub facilities and transport-related infrastructure to be delivered on Land at Clifton Road should be considered in the context of existing facilities on the western side of Cambridge railway station to ensure that development enhances the wider station area's functionality as a regional transport interchange.

3.1.11 A new eastern station entrance has been presented as part of the wider East West Rail (EWR) development plans; a new eastern station entrance would be a significant factor in unlocking the full potential of Land at Clifton Road and would bring benefits to existing users of the railway station such as staff and students at Hills Road Sixth Form College. Development at Land at Clifton Road presents a significant opportunity to enhance the regional transport interchange capabilities around Cambridge railway station through the delivery of additional mobility hub facilities that complement existing facilities on the western side of the railway.

3.1.12 Transport planning and assessment work, based on a holistic parking and transport strategy for the area, will be necessary to understand how any residual effects on the wider network, such as increased traffic flows to the site and public transport interchange activity, can be managed sustainably. Meanwhile, ensuring that future

phases of the Chisholm Trail are integrated into the masterplan will be key to facilitating safe active travel throughout the site, and managing conflicts between pedestrians, micromobility users (e.g. cyclists and e-scooter users), and road vehicles. Secure facilities and safe streetscapes will be needed to support walking, wheeling and cycling as the primary transport modes, whilst appropriate car parking will need to be considered in the context of the area's needs and high levels of public transport accessibility. Engagement with transport bodies and local stakeholders will be important to ensure that lessons learned from the CB1 development around pedestrian, cyclist and vehicular conflicts can be applied to the redevelopment of Land at Clifton Road.

3.1.13 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. Public realm improvements and open space provision must be multi-functional and provide a range of spaces for people to dwell and play all year round, including temporary spaces for public events, live performances and pop-up street markets. Proposals should also explore how public realm improvements can help to satisfy other site-wide needs, such as space for urban greening, sensitive buffers between planning uses, or SuDS to manage the site's surface-water drainage risks. Opportunities should also be taken to introduce innovative methods of managing on-site energy and resource consumption such as connecting buildings to sustainable heat networks.

3.1.14 Given the site's central location in the city and its function as an interregional gateway, development must use place-responsive design, massing, street furniture and landscaping to create a cohesive built environment. In line with the indicative Spatial Framework diagram, a linear green infrastructure corridor anchored by public squares at the eastern entrance to Cambridge railway station and the Cambridge Junction offers an opportunity to establish Land at Clifton Road's dual spatial identity as a key destination in the city and as a gateway to and from Cambridge's interregional public transport interchange.

3.1.15 The site has the potential to be experienced from a number of strategic viewpoints and in the context of landmark buildings beyond the site's immediate surroundings, owing to long views along Hills Road. Changes in ground levels, particularly around Hills Road Bridge, also present considerations for how the site is experienced as part of a number of local views, as well as the site's relationship with a number of nearby designated and non-designated heritage assets. Effective vertical integration and thoroughly tested building heights, including the testing of any proposals for over-station development, will ensure that land can be used efficiently and in ways that limit any negative impacts on neighbouring planning uses or protected assets. The proposed mitigation measures within the policy will limit the negative impacts on the local and wider skyline, townscape character and listed assets and their setting through appropriate building height, massing and style and materials.