

24 February 2020



Cambridge City Council
Planning Policy Team
PO Box 700
Cambridge
CB1 0JH

Dear Sir/Madam,

Greater Cambridge Local Plan – Issues and Options 2020 Consultation

Deloitte Real Estate is instructed by Universities Superannuation Scheme (USS) to advise on planning matters in respect of Clifton Road Industrial Estate ('the Site'). USS therefore has an active interest in the formulation of planning policy at Cambridge City Council ('the Council') and welcomes the opportunity to respond to the Greater Cambridge Local Plan Issues and Options Consultation (Regulation 18 Consultation under the Town and Country Planning (Local Planning) (England) Regulations 2012).

This emerging Local Plan is being prepared as a joint Local Plan for the combined districts of Cambridge City Council and South Cambridgeshire District Council as Greater Cambridge.

The Site

The Site comprises a total area of approximately 4ha and is located within the urban area of Cambridge, approximately 1 mile southeast of the city centre. It lies to the east of Hills Road and railway line. The estate is north of Cherry Hinton Road and west of Rustat Road, taking its access from Cherry Hinton Road. It comprises a spine road with some units facing the road itself and some in small courtyards served by spurs off the main road.

The site is currently a well-used industrial estate, with a variety of light industry (use class B1c), general industry (use class B2) and storage and distribution uses (use class B8). The industrial estate (consisting of units in varying two storey sizes) accommodates a mix of business uses including the present occupiers including climbing centre (Clip 'n' Climb), Cambridge Science Centre, kitchen furniture shop (Howdens), building supplier merchants (Toolstation) and beauty supply store (Salon Services) to name a few.

The site is well located close to the Cambridge outer ring road, providing access to the M11 and A14. The site lies directly opposite Cambridge Railway Station, which is a 10 – 15 minute walk away, with access over a railway footbridge to the west of the site.

Current Policy Position

The Cambridge Local Plan was adopted on 18 October 2018 and sets out the planning framework to guide development within the city up to 2031. Policy 21 'Station Areas West and Clifton Road Area of Major Change' states that development at the Station Areas West and Clifton Road Area of Major Change will

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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.

Clifton Road Industrial Estate forms the core part of this site allocation and also includes land within Royal Mail and National Rail ownerships, which are outside of the ownership of USS. The Policy states the following:

Clifton Road Area – Site M2

- *A mix of Class B1(a) and B1(b) employment and employment uses (2 hectares);*
- *Leisure-related uses;*
- *Residential use, with a maximum capacity of 550 dwellings; and*
- *Open spaces, both hard surfaced green.*

The Clifton Road area will be subject to the preparation and adoption of a Supplementary Planning Document (including detailed traffic assessment) to guide the future development of the area, before any major planning application is submitted. The SPD will set out the vision for the area as a distinctive new mixed-use neighbourhood, well integrated with and responsive to the established context, including the residential areas adjacent to the site. This highly accessible and sustainable location will need to be linked to the station by new cycle and pedestrian infrastructure, and future vehicle movements will be expected to be no greater than current levels. Proposals within 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 improvement 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.*

Emerging Policy Position

South Cambridgeshire completely surrounds the City Council area and both local authorities have a history of joint working. This joint working has led to preparing a joint Local Plan for the Greater Cambridge area. To date both authorities planning teams have joined together to form an integrated shared planning service.

The first stage of the emerging joint Local Plan was the 'Call for Sites' consultation which ran from 11 February to 26 March 2019. The 'Issues and Options Local Plan' consultation is open until 24 February 2020 and provides four big themes that will influence how homes, jobs and infrastructure are planned, and draw on the feedback the Council have received from Councilors, communities and businesses while preparing this document. The four themes are as follows:

- Climate Change;
- Biodiversity and Green Spaces;
- Wellbeing and Social Inclusion; and,
- Great places.

Whilst the site is allocated in the current Local Plan, it is possible that its redevelopment will span the adoption of the new Local Plan. On this basis, USS wish to respond to the production of the new Local Plan.

The consultation document provides 50 questions under these headings. We consider the following as being relevant to our site and this includes our representations to the given questions:

Consultation Question	Response
<p>1. How do you think we should involve our communities and stakeholders in developing the Plan?</p>	<p>USS supports the innovative and extensive approach Greater Cambridge Partnership (GCP) has taken to the Local Plan consultation and use of alternative tools and methods for gathering responses and engaging local stakeholders.</p> <p>USS has a successful record of working with authorities and local employers</p>
<p>2. Please submit any sites for employment and housing you wish to suggest for allocation in the Local Plan. Provide as much information and supporting evidence as possible.</p>	<p>The Site is currently allocated in the Cambridge Local Plan (2018) under Policy 21 (Site M2) for mixed-use development including employment uses, leisure-related uses, residential use (with a maximum capacity of 550 dwellings) and open spaces. USS is preparing a strategy for the delivery of this site but in the meantime would encourage the emerging Greater Cambridge Local Plan to continue to allocate the Site for development.</p>
<p>6. Do you agree with the potential big themes for the Local Plan?</p>	<p>It is clear that the themes arise from local needs, the Councils' priorities set out in the Cambridge City and South Cambridgeshire District corporate plans, and by taking into account national and local planning priorities and requirements.</p> <p>The Sustainability Appraisal (SA) sets out 15 objectives. The SA objectives have been developed to ensure all Strategic Environmental Assessment (SEA) topics are covered. This reflects the fact that an integrated approach is being taken to the Local Plan. The four big themes encompass all the SA objectives.</p> <p>USS support the Council in achieving the big themes of the emerging Plan. Future development at the Site can address all four themes whilst contributing to housing need and supporting homes for employees locally.</p>
<p>7. How do you think we should prioritise these big themes? Rank the options below 1-4 (1 – Most preferred 4 – Least preferred)</p>	<p>The four themes are all equally important in the context of changing infrastructure and economic growth in the area, effect on housing need and other aspects of spatial and transport planning and how this translates in to a coherent strategic framework for the next 15-20 years.</p>
<p>14. How do we achieve biodiversity net gain through new developments?</p>	<p>New development can achieve biodiversity net gain through a range of methods/tools including the materials and features used i.e. green roofs; landscape design; and providing resilient habitats for animals to support wildlife in a changing climate.</p> <p>USS support the Council's aim of achieving biodiversity net gain through new development. However, USS encourage the Council to not be restrictive on the amount of biodiversity net gain to be achieved through new development and instead assess the quality of the method/tools implemented to protect and enhance biodiversity.</p>

Consultation Question	Response
<p>17. How do you think our plan could help enable communities to shape new development proposals?</p>	<p>USS support the Council’s approach to engaging with stakeholders and the local community to shape development proposals.</p> <p>USS has demonstrated its commitment to engaging with the local community and key stakeholders throughout the preparation of the adopted Cambridge City Local Plan (2018) and will continue to do so.</p>
<p>18. How do you think we can make sure that we achieve safe and inclusive communities when planning new development?</p>	<p>The Cambridge Local Plan (2018) sets out that the overall development strategy is to focus the majority of new development in and around the area of Cambridge, creating strong, sustainable, cohesive and inclusive mixed-use communities, making the most of previously developed land and enabling the maximum number of people to access services and facilities locally. Therefore, new development should seek to provide for a range of demographics, age groups and the vulnerable to ensure it is offering a range of community initiatives to all local residents.</p>
<p>19. How do you think new developments should support healthy lifestyles?</p>	<p>The site is located in a highly sustainable location being adjacent Cambridge Train Station and being connected into the Cambridge City Cycle network. The site is also a 20mins walk from the City Centre. USS promotes and supports new developments, which are well located in relation to sustainable transport nodes, which in turn help to support healthy lifestyles.</p>
<p>23. How do you think we could ensure that new development is as well-designed as possible?</p>	<p>The Living with Beauty (January 2020) report published by the Building Better, Building Beautiful Commission, sets out the requirements to promote health, well-being and sustainable growth through design. The report proposes three aims for the planning system to achieve beautiful buildings including ‘Ask for Beauty’ as beauty includes everything that promotes health and happy life and can turn a collection of buildings into a place; ‘Refuse Ugliness’ as ugly buildings can destroy the sense of place; and ‘Promote Stewardship’ which includes protecting and enhancing the built and natural environment for long-term communities.</p> <p>USS supports the Council’s desire to ensure that new development is as well designed as possible and this will need to be achieved through incorporating this requirement into planning policy. Development proposals should then be assessed against the relevant policies, but also against relevant guidance at a local and national level.</p>
<p>24. How important do you think continuing economic growth is for the next Local Plan?</p>	<p>The Cambridge and Peterborough Independent Economic Review (CPIER) notes that the wider Cambridge region is committed to doubling its economic output over the next 25 years. On this basis, continuing economic growth should be captured and addressed in the next Plan. However, this economic growth needs to be captured in an appropriate spatial strategy which balances employment growth with housing development.</p> <p>It is essential that employment use is supported by housing development, ideally within close proximity. Additionally, the location of employment use and housing</p>

Consultation Question	Response
	<p>development should be considered in the context of their relationship to sustainable transport links.</p> <p>The Site presents the opportunity to deliver residential use adjacent to employment use and within close proximity to public transport i.e. Cambridge Train Station.</p>
<p>26. Do you think we should be protecting existing business and industrial space?</p>	<p>USS supports the protection of existing business and industrial space but it also considers that the protection of such space should be assessed on a site by site basis. This is in respect of the changing market conditions for this type of space. This approach was taken by CCC within the existing site allocation for a mixed use development at this location.</p>
<p>29. How flexible should we be about the uses we allow in our city, town, district, local and village centres?</p>	<p>A mix of uses should be offered, which is appropriate to the context of its local community and scale of centre. This should be combined with the opportunity to reduce the need for travel where possible.</p>
<p>31. How should the Local Plan help to meet our needs for the amount and types of new homes?</p>	<p>It is vital that the right number of homes are delivered in the right locations. Housing in Cambridge has an important role to play in supporting both the local and national economy, as well as being critical in promoting well-being and achieving positive health outcomes. Cambridge is at the centre of significant housing growth however there is shortage of all types of tenure and in particular a lack of affordable housing. This growth is needed to support the strong and growing economy at the eastern end of the Oxford Cambridge Arc.</p> <p>The provision of a mix housing tenures in a central, well-connected location can help to ensure residents access services, as well as encourage people to travel by more sustainable means, i.e. walking and cycling.</p> <p>The currently challenges facing the housing market in Cambridge can lead to employers facing issues with the recruitment and retention on staff due to the city's high house prices and high levels of housing need. Therefore, the co-ordination and the provision of residential and employment use within a site can alleviate some of these concerns by resulting in people living more locally. This reduces commuting which leads to a reduction in the impact on the environment from the air pollution associated with daily commuting.</p>
<p>32. Do you think we should plan for a higher number of homes than the minimum required by government, to provide flexibility to support the growing economy?</p>	<p>Previously, the Housing Delivery Test (HDT) measurement result published in February 2019 for Cambridge City Council is 388% therefore there were no required consequences. The HDT measurement result for South Cambridgeshire was much lower, scoring 78% with a consequence of a buffer. However, this had no consequences as MHCLG is recommending for housing trajectories for Cambridge and South Cambridgeshire to be considered jointly, including future calculations for the 5 year housing land supply. MHCLG acknowledges that the sequences for development involves more development in Cambridge initially in the plan period and</p>

Consultation Question	Response
	<p>more development later in the plan period in South Cambridgeshire.</p> <p>Altogether, it has been estimated that there are more than 30,000 extra homes above those already in the pipeline that could be built in the Greater Cambridge area by 2040. These new homes need to be supported by sites, which provide jobs and leisure facilities.</p> <p>The Clifton Road Area site allocation could positively contribute towards these goals.</p>
<p>33. What kind of housing do you think we should provide?</p>	<p>Cambridge’s objectively assessed housing need identifies the type, scale, mix and range of housing required in the area. Providing a mix of different tenures and products will contribute to catering for the needs of all in Cambridge.</p>
<p>35. How should we ensure a high standard of housing is built in our area?</p>	<p>USS supports the Council’s ambition to deliver high quality homes, which are safe, secure and long-lasting. USS encourage the Council to adopt a design-led approach to the acceptability of development proposals, particularly on high density development.</p> <p>The national spaces standards ensure homes are fit for purpose and USS consider these remain appropriate. However, USS does encourage the Council to explore having specific standards for energy efficiency, accessibility and adaptability to respond to local needs and the impact this has on affordability.</p>
<p>36. How should the Local Plan ensure the right infrastructure is provided in line with development?</p>	<p>Transport infrastructure, which includes the infrastructure to encourage more sustainable modes of travel i.e. walking and cycling, can have positive impacts on people’s health and wellbeing. This can also reduce transport related emissions on the environment. Therefore, this will result in healthier communities, which will have a positive effect on air quality, all contributing towards sustainability objectives of the emerging Local Plan.</p> <p>The Clifton Road Area site allocation is within close proximity to public transport links and is within walking/cycling of the city centre and science parks to the south of the city.</p>
<p>37. How should we encourage a shift away from car use and towards more sustainable modes of transport such as public transport, cycling and walking?</p>	<p>More sustainable forms of transport should be encouraged i.e. walking and cycling, to reduce the impacts of climate change. New developments should aim to reduce the dependency on car parking especially when the development is close to excellent public transport links.</p>
<p>43. What do you think about densification?</p>	<p>NPPF paragraphs 122 and 123 state that sites should make optimal use of its land in order to meet identified need for housing as much as possible. Therefore, the NPPF supports high density development, especially in highly accessible locations subject to good quality design.</p> <p>Increased residential densities should be supported in highly sustainable locations (e.g. by the Cambridge Train Station) such as the Clifton Road Area of Major Change. The increase in housing densities will be essential to</p>

Consultation Question	Response
<p>49. Do you have any views on any specific policies in the two adopted 2018 Local Plans? If so, what are they?</p>	<p>enable the Council to achieve the level of housing growth predicted under this emerging Local Plan.</p> <p>Policy 21 of the Cambridge Local Plan (2018) allocated the USS site (Site M2) as part of a wider site allocation for mixed-use development, including residential, employment, leisure and open space. USS fully support this policy and site allocation, and encourage the emerging Local Plan to continue to allocate the Site for development.</p>

Conclusion

USS is pleased to have the opportunity to comment on the emerging Greater Cambridge Local Plan Issues and Options Consultation and requests to be informed on the progress of the Plan.

We would be most grateful if the Council could provide updates on the progress of the Local Plan. In the interim, if you have any queries, please contact Tim Cakebread on [REDACTED] or at [REDACTED]

Yours faithfully

[REDACTED]

Caroline McDade
Deloitte LLP