

**CC4/CCC**



Examination into the Soundness of the Cambridge  
Local Plan

**Matter CC4 – Supporting the Cambridge  
Economy**

Matter Statement by Cambridge City Council

May 2016



## Matter CC4 – Supporting the Cambridge Economy

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## **Introduction**

1. This statement sets out the Council's response in relation to the Inspectors' Matter CC4 in relation to employment land and University development.
2. The documents referred to in this statement are listed in Appendix 1. Examination document reference numbers are used throughout for convenience.

## **Matter CC4A: Supporting the Cambridge Economy**

### **4A.1 Policy 40 – Development and Expansion of Business Space**

#### **Overview**

3. Cambridge has a successful economy centred on high tech companies located in and around Cambridge. Over time, the Cambridge Cluster has emerged as a strong, dynamic local economy and a world leader in education and research. This economic growth has been predicated on the benefits of co-location: the close links that have built up between businesses locating near similar businesses and close to the University of Cambridge. The sharing of ideas, staff, equipment and data, and the collaborative working that has taken place has contributed to the dynamism, prosperity and further expansion of the local economy.
4. Cambridge also has a thriving low technology and services economy. This includes offices in the City Centre associated with the high technology economy and serving the local population. There is also a legacy of industrial uses alongside the railway and on industrial estates in Cambridge.
5. The Local Plan seeks to support and enhance all aspects of the Cambridge economy, the internationally successful Cambridge Cluster and the more local, service-driven economy.
6. The Framework requires local planning authorities to plan proactively to meet the development needs of business and support an economy fit for the 21<sup>st</sup> century<sup>1</sup>. According to paragraph 21 of the Framework, there is a need to set out a clear economic vision and strategy and plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries<sup>2</sup>.
7. The Local Plan meets these policy requirements through policies 2, 40 and 41 and a suite of other policies and allocations<sup>3</sup> in the Plan.
8. The evidence base for Cambridge City Council and South Cambridgeshire District Council indicates that the number of jobs to be planned for is 22,100 in the Cambridge

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<sup>1</sup> RD/NP/10, paragraph 20

<sup>2</sup> RD/NP/10, paragraph 21

<sup>3</sup> RD/Sub/C/010, Appendix B

Local Plan and 22,000 in the South Cambridgeshire Local Plan or 44,100 in the Greater Cambridge area. This jobs requirement for Cambridge is set out in Policy 2 of the Local Plan. This fully meets the objectively assessed need for jobs. The two Local Plans identify the need for employment land as being 7.4 hectares for Cambridge<sup>4</sup> and around 143,000 sq m of additional floorspace or 43 hectares for South Cambridgeshire<sup>5</sup>.

9. Cambridge City Council and South Cambridgeshire District Council are planning to ensure that the land is available to accommodate these jobs in order to continue to support the successful Greater Cambridge economy.
10. The joint Matter M4 hearing session examined issues relating to employment in November 2014. This hearing session looked at the following questions:
  - Matter M4a: Is the forecast growth of net additional jobs (22,100 for Cambridge City and 22,000 for South Cambridgeshire District) based on a clear understanding of business need and a robust evidence base?
  - Matter M4b: Does the evidence base supporting employment and retail policies meet the requirements of Planning Practice Guidance?
  - Matter M4c: Will the proposed amounts of land for economic development uses meet the needs for all foreseeable types of economic development?
11. The Councils' position has not changed since the Matter M4 hearing session and this statement does not seek to repeat evidence given to that hearing session.
12. Appendix 5 to the Councils' joint Matter 4 statement M4<sup>6</sup> sets out the supply situation for employment land.
13. Policy 40 sets out the Council's approach to dealing with planning applications for employment uses. It encourages new employment development at a number of key employment locations in Cambridge (in the City Centre; Eastern Gateway, around the two stations; at Addenbrooke's and West Cambridge). Employment development elsewhere will be considered on its merits.
14. Policy 41 sets out the Council's approach to development proposals on sites in existing employment use. This policy seeks to test the loss of any development that results in the loss of employment floorspace (use class B or sui generis research institute), to try and ensure that a good supply of employment land is maintained.
15. Appendix B: Proposals Schedule sets out the sites that are being allocated for development in the Local Plan, including those allocated for employment uses.

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<sup>4</sup> RD/Sub/C/010, Paragraph 5.6 and Table 5.1

<sup>5</sup> RD/Sub/SC/010, paragraph 2.36

<sup>6</sup> M4/CCC & SCDC

**i. Should the source of the figures in Table 5.2 in respect of West Cambridge be clarified?**

16. The Council considers that the source of the figures could be clarified. Accordingly, the Council has put forward minor modifications PM/5/002 and PM/5/003 which propose adding the source for these figures and stating that the capacity is indicative<sup>7</sup>.
17. Further to the above minor modifications, changes have been proposed to the paragraphs following Table 5.2 to explain the source of the figures in the table and to provide a short update relating to the pre-application discussions with the University of Cambridge in relation to West Cambridge and work on Cambridge Northern Fringe East. A Statement of Common Ground has been agreed with the University of Cambridge relating to Policy 40 and West Cambridge<sup>8</sup>. It is also proposed that the figures in Table 5.2 are updated to the latest position before the Plan is adopted. The figures currently show commitments as of March 2012.

**ii. Should the proposed Green Belt site allocations GB3 and GB4 provide the option for mixed use development including some residential accommodation and a local centre?**

18. Proposed allocations GB3 and GB4 are currently located in the Green Belt, and consequently the Council needs to demonstrate exceptional circumstances in order to justify their release from the Green Belt and allocation for development<sup>9</sup>. The exceptional circumstances that the Council is relying upon for the allocation of these sites are based on the need for employment uses and the release of these sites will not cause significant harm to the purposes of the Green Belt<sup>10</sup>. Furthermore, the Council has approved a planning application for employment development on covering half of the sites' area<sup>11</sup>.
19. The Framework requires the Council to positively seek opportunities to meet the city's objectively assessed development needs, with sufficient flexibility to adapt to rapid change, unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits. In developing the Local Plan, the Council has assessed all available land within the city's boundary in order to meet the housing and employment needs set out in Section Two of the Local Plan.
20. The Council has also assessed the inner Green Belt around Cambridge and by assessing this land, it has been established that a significant proportion of it remains vitally important to the particular purposes of the Cambridge Green Belt. This work did, however, identify that there was very limited scope for a small amount of land to be

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<sup>7</sup> RD/Sub/C/050, page 19

<sup>8</sup> RD/SCG/440

<sup>9</sup> RD/NP/010, paragraph 83

<sup>10</sup> See the Council's Matter M6 statement, M6/CCC & SCDC, in particular the answers to questions 6A i, 6B2, 6B 2i and 6B 2ii

<sup>11</sup> See <https://idox.cambridge.gov.uk/online-applications/search.do?action=simple&searchType=Application> 15/0893/FUL

released from the Cambridge Green Belt on the city's south-eastern edge, without having a significant impact on the purposes of the Cambridge Green Belt. Development of these four small sites within Cambridge will need to include considerable landscape enhancement in order to ensure that a strong and defensible Green Belt boundary is created as set out in Policy 26 of the Local Plan.

21. Sites GB3 and GB4 (Fulbourn Road West 1 and 2) are currently in the Green Belt and located on land adjoining Peterhouse Technology Park. The allocations propose extending the urban area of Cambridge so that the new southern boundary would align with Peterhouse Technology Park's southern boundary. The spatial relationship between the sites and Peterhouse Technology Park are a further justification for allocating the site for employment uses.
22. The Council has considered a mixed use scheme on this site. At Issues and Options 2, consultation, the Council consulted on employment uses on GB4, and either residential uses or employment uses on GB3<sup>12</sup>. The Council rejected taking forward the residential element of the allocation in favour of an entirely employment one, in order to meet Cambridge's employment needs, provide employment floorspace in a sustainable location on the edge of Cambridge and to meet the needs of an internationally important local employer.
23. Sites GB3 and GB4 have been allocated for Green Belt release in order to help meet the Council's objectively assessed need for employment in sustainable locations on the edge of Cambridge, and can specifically meet the needs of ARM, who are seeking to grow. The sites have a combined capacity of approximately 25,000 sq m research and development floorspace. Policy 26 of the Local Plan guides the development of GB3 and GB4, setting out specific policy requirements in direct response to site specific issues identified as part of the process of assessing sites for allocation.
24. The majority of Peterhouse Technology Park's buildings are currently occupied by ARM, which currently employs around 1,000 people on the Cambridge campus. ARM has growth plans that require supporting up to 2,500 employees at Peterhouse Technology Park. ARM's plans are well-advanced, and they have submitted a planning application for GB4 and part of GB3, which the Council has approved<sup>13</sup>. They plan to begin construction as soon as possible, and are aiming to do so in Summer 2016. The planning application for this development includes access arrangements for the remaining parcel of land in GB3 and ensures that further employment development on this site is not prejudiced by this application. Paragraphs 13.1 to 13.9 in Appendix 13 of the Council's Matter M6 statement<sup>14</sup> set out the particular exceptional circumstances justifying the release of sites GB3 and GB4 from the Cambridge Green Belt.
25. The Council has identified enough sites for residential development to meet its objectively assessed need for residential development with an appropriate buffer. The Council therefore does not need to identify further sites for residential development.

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<sup>12</sup> RD/LP/150, pages 59-60.

<sup>13</sup> see <https://idox.cambridge.gov.uk/online-applications/search.do?action=simple&searchType=Application> 15/0893/FUL

<sup>14</sup> M6/CCC & SCDC



The exceptional circumstances the Council is relying upon is that there is need for the development for employment purposes and release will not cause significant harm to the Green Belt. Amending these allocations to include residential development would undermine, and would not be consistent with, the exceptional circumstances justifying their release from the Green Belt.

26. There is no need to provide a new Local Centre within this allocation. The Cherry Hinton High Street Local Centre is located just over 100 metres to the north, and a new Local Centre located so close to this existing centre would not be likely to be viable.
- iii. **Would the policy as currently worded enable the adequate provision of floor space for knowledge based, high tech businesses seeking to be located within or close to the city centre?**
27. Cambridge has a successful economy centred on high tech companies located in and around Cambridge. Over time, the Cambridge Cluster has emerged as a strong, dynamic local economy and a world leader in education and research. This economic growth has been predicated on the close links that have built up between businesses locating near similar businesses and close to the University of Cambridge. The sharing of ideas, staff, equipment and data, and the collaborative working that has taken place has contributed to the dynamism, prosperity and further expansion of the local economy.
28. The Cambridge and South Cambridgeshire Local Plans set out the approach to the provision of land for employment uses across Greater Cambridge and identify a range of strategic sites that will make a significant contribution to future employment provision, in addition to the significant land supply with planning permission. These are listed below. Further information can be found in the Councils' Joint Employment Topic Paper<sup>15</sup>:

### **Cambridge**

- Station Area West and Clifton Road;
- West Cambridge;
- Cambridge Biomedical Campus (including Addenbrooke's Hospital); and
- Land adjoining Peterhouse Technology Park.

### **Joint sites**

- North West Cambridge; and
- Cambridge Northern Fringe East.

### **South Cambridgeshire**

- Northstowe;
- Cambridge Science Park;
- Land adjoining Peterhouse Technology Park;
- Waterbeach New Town;

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<sup>15</sup> RD/Top/020

- Bourn Airfield New Village; and
  - Cambourne West.
29. Most of these strategic sites include provision for knowledge based high tech businesses and include a number of sites within and on the edge of Cambridge providing capacity for knowledge based, high tech businesses.
30. The Council recognises the desire for businesses to locate in and close to the City Centre. However, the Cambridge Cluster Study identifies that the City Centre does not have the capacity to allow significantly more employment space without harming the historic nature of the city<sup>16</sup>. The Council acknowledges the importance of the City Centre, but in addition to the historic nature of the City Centre constraining capacity, there are a number of competing uses that desire a City Centre location (e.g. employment, retail, tourism etc.). Land within and close to the City Centre is a finite resource and the Council is seeking to manage this resource through the Local Plan.
31. The Council has allocated land within and close to Cambridge City Centre to meet the need for knowledge based, high tech businesses. For the purposes of meeting the needs of B use business, the City Centre extends beyond the City Centre boundary defined in the Local Plan. Indeed, the prime office locations are south of the City Centre stretching down Hills Road to the railway station<sup>17</sup>. For example, redevelopment around the station will increase the amount of office space there (by some 25,000 sq m<sup>18</sup>). Redevelopment at Clifton Road is seeking to increase the amount of office space there (by approximately 9,000 sq m<sup>19</sup>). Furthermore, when Cambridge Assessment relocate into their new offices, this will free up their old office locations in the City Centre (including at allocation E5). Policy 40 is supportive of new office development in the City Centre as opportunities arise. The Council is seeking to enable a range of sites to provide adequate floorspace for knowledge based, high tech businesses to be located within or close to the City Centre. By supporting employment growth in specific locations, the Council is supporting the benefits of co-location, a key part of the Cambridge Cluster. While some of these sites are allocated for office uses, rather than research and development, it is worth noting that research and development businesses are often able to locate in traditional offices<sup>20</sup>, e.g. Microsoft moved into offices near the station back in 2012.
32. It is also worth noting that the policy is supportive of new employment development within the City Centre (criterion a), in the areas around the two stations (criterion b) and proposals elsewhere will be considered on their merits (second paragraph). The provision for alternative employment sites to come forward on their merits provides flexibility to the policy and means that ad-hoc opportunities will be deliverable.
33. The Council is creating a range of opportunities for new employment development across the Cambridge area, support by new infrastructure, including City Deal transport

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<sup>16</sup> RD/E/060, page 28, paragraph 4.6

<sup>17</sup> RD/E/020, page 17, map

<sup>18</sup> M4/CCC & SCDC, Appendix 5

<sup>19</sup> M4/CCC & SCDC, Appendix 5

<sup>20</sup> RD/E/020, page 33, fourth bullet

improvements. There are a number of City Deal transport projects<sup>21</sup> being considered that will seek to improve the movement of traffic around Cambridge. These improvements will enhance the attractiveness of employment sites further from the City Centre to business. There are now, a number of successful employment sites on the edge of Cambridge (e.g. the Science Park, Addenbrooke's etc.), as well as sites which are planned for further development (e.g. West Cambridge, Cambridge Northern Fringe East etc.). The Council considers that the policy as currently worded enables the adequate provision of floor space for knowledge based, high tech businesses across Cambridge, including those seeking to be located within or close to the city centre.

**iv. Should the wording of the policy be amended to provide greater clarity in terms of the cross referencing with the proposed site allocations in Appendix B?**

34. The Council considers that Policy 40 could be made clearer by including a reference to Appendix B: Proposals Schedule. This will ensure that applicants are reminded that any development should take into account the allocations contained in Appendix B.

35. As a result, a minor modification is proposed to the supporting text at paragraph 5.6. This minor modification is set out in Appendix 2 of this statement.

**v. Have the proposed employment allocations in Appendix B been tested in relation to their availability, suitability and deliverability in order to ensure that the overall quantum of land earmarked for employment uses would be sufficient?**

36. Paragraph 161 of the Framework requires the Council to assess the needs for land or floorspace for economic development, as well as the existing and future supply of land available for economic development. The Councils' Employment Land Review sets out the level of floorspace and jobs that the Councils must plan for to meet the needs of business<sup>22</sup> as well as reviewing the supply of employment land across Cambridge and South Cambridgeshire<sup>23</sup>.

37. The Plan allocates a number of sites for employment use<sup>24</sup> in order to meet the needs identified in the Employment Land Review. All employment allocations have been through a thorough process. This process is summarised below:

- All employment sites were assessed prior to consultation in the Issues and Options 2 Part 1: Technical Document<sup>25</sup> and Issues and Options 2 part 2: Technical Document<sup>26</sup>;
- Sites were consulted upon at Issues and Options 2 consultation<sup>27</sup>;

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<sup>21</sup> <http://www.gccitydeal.co.uk/citydeal/info/2/transport/9/transport/2>

<sup>22</sup> RD/E/030

<sup>23</sup> RD/E/020, pages i-ii, paragraphs 3-4

<sup>24</sup> RD/Sub/C/010, Appendix B

<sup>25</sup> RD/LP/170

<sup>26</sup> RD/LP/260

<sup>27</sup> RD/LP/150 & RD/LP/270

- Following consultation, new sites were assessed for their availability, suitability and deliverability and assessments of existing sites were amended in the Technical Background Document – Part 2 Supplement 2013<sup>28</sup>.
38. The testing of the employment allocations is set out in the three technical documents mentioned above<sup>29</sup>. These documents assess sites against over 60 criteria, to ensure that they are available for development, suitable for development and deliverable within the Plan period.
  39. The Cambridge and South Cambridgeshire Local Plans identify the need for employment land as being 7.4 hectares for Cambridge<sup>30</sup> and around 143,000 sq m of additional floorspace or 43 hectares for South Cambridgeshire<sup>31</sup>.
  40. Cambridge City Council alongside South Cambridgeshire District Council has made provision to meet the full land and floorspace needs, in order that conditions in Greater Cambridge are conducive to businesses. Appendix 5 to the Councils' statement to Matter M4<sup>32</sup>, sets out the supply situation for employment land. This shows that, within Cambridge, there was a supply of 291,794 sq m of employment floorspace (net) on 24.54 hectares of land (net) over the plan period (as of 2013).
  41. For further information, the Council will provide a supplement to this statement outlining the position on the employment allocations provided in Appendix B: Proposals Schedule.
- vi. Does the absence of larger scale site allocations for employment uses render the Plan unsound?**
42. The emerging Local Plan does allocate a number of larger scale allocations. A number of these allocations were also identified in the current Local Plan<sup>33</sup> (Addenbrooke's, West Cambridge and North West Cambridge), one of which is allocated for further intensification over the plan period (West Cambridge). Policy 40 and Table 5.2 both refer to a number of the larger scale allocations in the plan. In pre-application discussions about the substantial intensification of the West Cambridge Site, the University of Cambridge are proposing over 383,300 sq m of academic and commercial space, of which up to 170,000 is for commercial research. At North West Cambridge, the University of Cambridge are building 100,000 sq m of academic and commercial space, with up to 40,000 sq m of commercial research (this site is within Cambridge and South Cambridgeshire). By supporting employment growth in these large scale allocations, the Council is supporting the benefits of co-location, a key part of the Cambridge Cluster.

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<sup>28</sup> RD/LP/310

<sup>29</sup> RD/LP/170, RD/LP/260 and RD/LP/310

<sup>30</sup> RD/Sub/C/010, Paragraph 5.6 and Table 5.1

<sup>31</sup> RD/Sub/SC/010, paragraph 2.36

<sup>32</sup> M4/CCC & SCDC

<sup>33</sup> RD/AD/300

43. The overview at paragraphs 3-8 sets out the context within which Policy 40 will operate. In Cambridge there is a supply of 291,794 sq m of employment floorspace on 24.54 hectares of land<sup>34</sup>, which is measured against a need of 70,200 sq m on 7.4 ha<sup>35</sup>. The land supply position shows Cambridge has a more than sufficient and flexible supply of employment land available to meet needs during the plan period, in a number of strategic locations. There is a range of sites, some under construction, some with planning permission, and others which are allocated, which have the potential to deliver across the plan period. The Plans will be subject to review (scheduled to start by 2019 as a joint Local Plan), allowing the Councils to ensure there remains a good supply for the remainder of the plan period and beyond. If circumstances change before 2019, the Councils would consider bringing this review forward in order to respond to changing demand or engaging further with developers, agents and other landowners, as identified in their respective policies or appendix on monitoring plan delivery.
44. In addition to these major sites, Cambridge Northern Fringe East is identified for the production of an Area Action Plan. The development potential of this area is being significantly enhanced by the opening of the new Cambridge Science Park Station. This will link up with the wider transport network, including the Cambridge to Huntingdon Busway. This highly accessible urban location will be able to support high development densities (the first round of consultation suggested figures of between 162,000 and 328,000 sq m of B1 floorspace).
45. Furthermore, there are a number of smaller scale allocations within and on the edge of Cambridge that help to meet the needs of the city (e.g. GB3 and GB4), as well as planning applications on unallocated sites (e.g. Cambridge Assessment, who are developing a new office of over 40,000 sq m<sup>36</sup>).
46. The supply of employment land in Cambridge is sufficient and flexible, larger allocations at Cambridge Northern Fringe East, West Cambridge, Addenbrooke's and North West Cambridge help contribute to this supply and the plan is sound in this respect.
- vii. Does the Plan allocate sufficient space for B1(b) Research and Development uses on the edge of Cambridge?**
47. The Council considers that the plan allocates sufficient space for B1(b) Research and Development uses on the edge of Cambridge, along with wider supply in Cambridge and South Cambridgeshire. This forms part of a flexible supply of employment land able to support the jobs growth envisaged by the two Local Plans.
48. The Joint Matter M4 hearing session considered employment growth and employment land supply. Overall, the employment land supply across Cambridge and South

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<sup>34</sup> M4/CCC & SCDC, appendix 5

<sup>35</sup> RD/E/130, table 3 and table 4

<sup>36</sup> <https://idox.cambridge.gov.uk/online-applications/search.do?action=simple&searchType=Application> 14/2093/REM

Cambridgeshire shows a supply of 456,617 sq m of B1(b) land<sup>37</sup>, this compares to a need identified in the Councils' Employment Land Reviews of 32,700 in Cambridge<sup>38</sup> and 50,000 sq m in South Cambridgeshire<sup>39</sup>. Of this, there is a significant supply on the edge of Cambridge:

<b>Sites on the edge of Cambridge (in Cambridge and South Cambridgeshire) and policy references</b>	<b>B1(b) capacity (as at 2013, source M4/CCC &amp; SCDC, appendix 5)</b>	<b>Site description</b>	<b>Update May 2016</b>
North West Cambridge (RD/AD/290)	44,652	New mixed use urban extension incorporating residential, academic and commercial research uses.	Development of the Local Centre is underway.
Cambridge Biomedical Campus / Addenbrooke's (RD/Sub/C/010, policy 16)	151,000	Existing employment site incorporating hospital and research campus.	The site is being developed to accommodate firms and job growth that is anticipated by the plan.
West Cambridge (RD/Sub/C/010, policy 15)	19,996 (and 44,000 estimated from densification)	Existing employment site incorporating academic and commercial research uses.	In initial discussions the University is planning to intensify the floorspace on this site applying for 383,000 sq m of academic and commercial space, with up to 170,000 being for commercial research.
GB3 and GB4 (RD/Sub/C/010, policy 26 and Appendix B)	25,193	Extension to existing Peterhouse Technology Park, incorporating commercial research uses.	Planning application approved on GB4 and part of GB3 <sup>40</sup>  Development planned to begin in Summer 2016
Cambridge Science Park (RD/Sub/SC/010, policy E/1)	30,000	Existing science park incorporating commercial research uses.	The Submission South Cambridgeshire Local Plan includes Policy E/1 which supports the intensification of employment uses on the Science Park. Intensification on a number of sites already has planning permission.  The SQW Cambridge Northern Fringe East:

<sup>37</sup> M4/CCC & SCDC, page 30

<sup>38</sup> RD/E/030, page 4

<sup>39</sup> RD/E/020, page 9

<sup>40</sup> <https://idox.cambridge.gov.uk/online-applications/search.do?action=simple&searchType=Application> 15/0893/FUL

			Employment Options Study – Sector Profile <sup>41</sup> estimates potential for an increase in floorspace over the next 15 to 20 years of 30,000 to 40,000 sq m, but this would depend on a range of factors, such as buildings becoming available for redevelopment.
Cambridge Northern Fringe East (RD/Sub/C/010, policy 14; RD/Sub/SC/010, policy SS/4; RD/LP/320)	No figures are currently included in the land supply calculations whilst the AAP is being prepared.	New mixed use, employment focussed allocation, centred on the new station.	Site was considered at Matter M9.  Issues and Options consultation suggested figures of between 162,000 and 328,000 sq m of new office space. Many Research and Development firms are capable of locating into “normal” office space

49. It should also be noted that South Cambridgeshire District Council are considering allocating a further 8.9 hectares south of Addenbrooke’s for an extension to the Cambridge Biomedical Campus. Whilst there is no overall shortage of employment land within South Cambridgeshire for high-tech and research and development companies, the findings of the new Green Belt Study provide an opportunity to allocate land for an extension to the Cambridge Biomedical Campus to provide high quality biomedical development on the edge of Cambridge with its locational benefits, without causing significant harm to the purposes of the Cambridge Green Belt. The Councils consider that the need for jobs can comprise exceptional circumstances justifying a review of the Green Belt boundaries in so far as this would not cause significant harm to Green Belt purposes. The decision was deferred pending further evidence following consultation through the Proposed Modifications consultation.
50. There are no exceptional circumstances to make further allocations on the edge of Cambridge, as the latest Green Belt Study<sup>42</sup>, makes it clear that any further changes to the Green Belt boundary would result in significant harm to the purposes of the Cambridge Green Belt.
51. It is important not to view the edge of Cambridge in isolation, there are numerous business parks and science parks in South Cambridgeshire, that have met the needs of B1(b) businesses in the past, and will continue to do so in the future. For example, Granta Park, Babraham Research Park, Cambridge Research Park, Hinxtton Genome Campus etc. The cluster does not rely on all firms being in one location, high tech Research and Development firms locate in many locations across the Cambridge area. The biotech and pharmaceutical cluster stretches from Cambridge to south into South

<sup>41</sup> RD/LP/325

<sup>42</sup> RD/MC/030 and RD/MC/031

Cambridgeshire and Uttlesford<sup>43</sup> and further to Stevenage and London. The Cambridge Cluster is a Research and Development cluster with a global scale and reach, with successful businesses across a wide geographical area.

52. Some of the firms relocating to Addenbrooke's are moving from within the Sub-Region. For example, Abcam are moving from Cambridge Science Park, some of AstraZeneca's employees are moving from Granta Park, and Papworth Hospital is moving from Papworth. All of these moves will help free up employment space elsewhere in the two authorities' areas.
53. City Deal transport improvements will also help make employment sites across the two districts more attractive to business by improving transport links. There are a number of City Deal transport projects<sup>44</sup> being considered that will seek to improve the movement of traffic around Cambridge. These improvements will enhance the attractiveness of employment sites further from the City Centre to business.
54. It is also worth noting that many Research and Development businesses do not necessarily need lab space and many use "normal" office buildings, and can be located in higher density areas. This allows them to more flexibly meet their needs. For example, ARM operate out of "normal" offices down on Peterhouse Technology Park, and Microsoft operate out of a "normal" office on Station Road.
55. The Councils have identified significant employment land supply through land taken out of the Green Belt in previous plans, using previously developed land opportunities, and removing land from the Green Belt and allocating land for employment where it would not cause significant harm to the purposes of the Green Belt.

#### **4A.2 Policy 41 – Protection of Business Space**

- i. **Is the wording of the policy sufficiently flexible to accommodate needs not anticipated in the Plan and to allow a rapid response to changes in economic circumstances in accordance with paragraph 21 of the National Planning Policy Framework?**
56. Policy 41 sets out the Council's approach to development proposals on sites in existing employment use. This policy seeks to test the loss of any development that results in the loss of employment floorspace (use class B or sui generis research institute), to try and ensure that a good supply of employment land is maintained. Protecting employment land that can viably be retained to meet employment needs is an important aspect of ensuring that there is sufficient land available for businesses.
57. Within protected industrial sites, developments should aim to maintain the same level of industrial floorspace, outside protected industrial sites, developments should aim to

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<sup>43</sup> RD/E/020, page D-14

<sup>44</sup> <http://www.gccitydeal.co.uk/citydeal/info/2/transport/9/transport/2>



maintain the same level of employment floorspace. Where the applicant can demonstrate that the same has been marketed unsuccessfully for a period of at least 12 months, the floorspace can be lost.

58. The first sentence of paragraph 21 of the Framework states: *“Investment in business should not be over-burdened by the combined requirements of planning policy expectations.”* The aim of Policy 41 is to ensure that the market is tested prior to allowing the loss of employment uses in the city, so as to ensure that there is sufficient supply of employment land to meet the needs of business. The Council considers that this policy (by itself or in combination with other policy requirements) does not represent an excessive burden on business. Where a site operator knows that a tenant is leaving the site, they have the opportunity to market the site while the tenant is still onsite. Where a tenant leaves unexpectedly, this will create more problems for the site operator, as there is more likely to be a period of unavoidable vacancy while the marketing requirements of the policy are met. However, a shorter marketing period would not allow the market to be properly tested, and hence would not meet the policy objective of ensuring that the market is tested prior to allowing the loss of employment uses in the city.
59. Paragraph 157 of the Framework makes it clear that Local Plans should *“plan positively to meet the development and infrastructure required in the area to meet the objectives, principles and policies in this Framework”* and *“identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation”*. Policy 41 seeks to protect employment uses to ensure that Cambridge is able to meet its development needs. The Employment Land Review 2012 noted a need to reduce the loss of employment land to other uses and ensure there is sufficient land for manufacturing in the area<sup>45</sup>. Maintaining a good supply of employment land is essential for Cambridge’s economy and hence its quality of life and place. This includes the high tech research and development businesses and the professional services and industry that make up Cambridge’s diverse economy.
60. There is flexibility built into the policy, in that any site that is no longer viable to continue in employment use (demonstrated through marketing of the site) is capable of being developed for another use.
61. The Council takes seriously the requirement to support economic growth and consider that this policy helps to do that by helping to provide a balanced supply of employment land that can be relied upon throughout the plan. Furthermore, the Councils consider that the policy is compliant with the Framework.

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<sup>45</sup> RD/E/020, page iv, second and third bullets

**ii. Should the policy enable appropriate temporary changes of use from employment uses especially to appropriate sui generis uses which could also support economic growth?**

62. The aim of Policy 41 is to ensure that the market is tested prior to allowing the loss of employment uses in the city. Sui generis uses that provide employment opportunities help to support the economy and can provide an important source of jobs.
63. A temporary change of use to sui generis uses that generate employment while the site is marketed would be appropriate. This would increase the flexibility for landowners and make more efficient use of land by minimising the time and land and buildings are left vacant.
64. The following minor modification to the policy is proposed to help increase the flexibility of the policy and support business needs in the interim, by adding an additional sentence after the final paragraph: *“Temporary changes of use to sui generis uses that generate employment opportunities will be appropriate while marketing of the site takes place (e.g. taxi businesses, vehicle hire).”* This minor modification is set out in Appendix 2.

**iii. Is the imposition of a blanket 12 month marketing period overly restrictive? Could the provisions in criterion (b) of Paragraph K8 in Appendix K be considered pertinent in this regard?**

65. The Council considers that the policy, as a whole, provides sufficient flexibility and the requirement for a 12 month marketing campaign is not overly restrictive. The Council considers that the guidance provided in Appendix K provides assistance on how the Council expects this marketing to be undertaken. A minor modification is proposed to make reference to Appendix K in the supporting text of Policy 41. This is set out in Appendix 2 of this statement.
66. Appendix K, paragraph K.8, criterion b allows for a more focussed marketing strategy and this could take account of the restricted nature of some business units. The duration of the focussed marketing exercise can also be reduced from 12 to 6 months. The intention of the marketing campaign is to ensure that alternative providers of the current/last use are encouraged to respond to the marketing exercise.
67. The intention of criterion c of paragraph K.8 is to ensure the marketing campaign attracts alternative providers of the current/last use to respond to the marketing exercise. If the facility is marketed for a wide range of options, this may only encourage bids of the highest value use to come forward. Potential, lower value uses will be deterred from coming forward because of the time and expense incurred to produce a bid which is of less value than the higher value uses advertised. These valuation differences will influence how the marketing exercise should be completed.

**iv. In respect of flexibility, does wording of the policy appropriately reflect the recent government initiatives to boost the supply of housing e.g. the introduction of permitted development rights to enable changes of use from office to residential?**

68. In May 2013, the Government changed permitted development rights to temporarily allow the change of use from offices to residential, for a period of 3 years. This change was introduced to reduce “red tape” and help boost the supply of housing.

69. In October 2015, the Government announced that these permitted development rights will now be made permanent. In addition those who already have permission will have 3 years in which to complete the change of use – ending potential uncertainty for developers and enabling the development of much needed homes. To further support the delivery of new homes, the rights will in future allow the demolition of office buildings and new building for residential use. In addition, new permitted development rights will enable the change of use of light industrial buildings and launderettes to new homes<sup>46</sup>.

70. As of April 2016, this change to from a temporary permitted development right to a permanent permitted development right has not yet been put into effect. Given there is still some lack of clarity over how the Government will implement the permanent change to permitted development rights allowing changes of use from B1a to C3, the Council is not proposing any change to this policy at this time, other than that already submitted. PM/CC/5/A<sup>47</sup>, proposes the following sentence to be added to the end of paragraph 5.18: *“This policy only seeks to protect employment uses from change of use where a planning application (including variation of condition) is required.”* This is to make clear that the policy only applies where planning permission is needed.

**v. Should the wording of the policy be amended in order to confirm that a proposed allocation of a site in the Plan for residential development which is currently in employment use, e.g. site R17, Mount Pleasant House, negates the need to comply with the criteria in the policy?**

71. The Council does not consider that Policy 41 would apply to sites allocated for development for other uses. The decision to allocate them in the Local Plan means that the principle of the loss of the existing use has already been accepted by the Council. The Council considers that it would be helpful to clarify this.

72. A minor modification to Policy 41 is proposed in Appendix 2 for clarity.

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<sup>46</sup> See: <https://www.gov.uk/government/news/thousands-more-homes-to-be-developed-in-planning-shake-up>

<sup>47</sup> See RD/MC/010, page 47

#### 4A.3 Appendix B) Proposals Schedule

**i. Site M1 [379-381 Milton Road]: Has part of the site already been granted planning permission for employment use? Does the residential allocation relate to the rest of the site?**

73. Site M1 is located on Milton Road in the North of Cambridge. It is adjacent to residential properties to the south west and employment uses to the north east and south east, across the Guided Busway and Milton Road, respectively. The Plan allocates the site for mixed uses: 95 dwellings of residential and just over half a hectare of employment uses.
74. The site's existing lawful use for a number of car showrooms. There have been no planning applications of significant scale on the site in recent years.
75. In 2013, representation 26624 to the Proposed Submission consultation, submitted by WFM Motors, expressed the intention to develop the site for 100% residential uses within the plan period and confirmed that the lease for the current tenant expires on 24 December 2019 and can be terminated on 25 December 2015. This representation also states that the Plan does not need to allocate part of the site for employment uses as this is the lawful use authorised by the planning consent<sup>48</sup>.
76. The intention of the allocation is to allow for the development of the rest of the site for residential uses while not precluding the site's current use continuing on the Milton Road Frontage. This is consistent with the information provided to the Council by the site owners when producing the SHLAA<sup>49</sup>.

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<sup>48</sup> Representation number 26624

<sup>49</sup> RD/Strat/140, page 52, Table 5, Row ID 5.04

## **Matter CC4B: Higher Education**

### **4B.1 Policy 43 – University Faculty Development**

#### **Overview**

77. Cambridge is a centre for education with an international reputation. During term-time, over 25,000 students come to Cambridge to study at the two universities<sup>50</sup>.
78. The University of Cambridge is one of the oldest educational establishments in the world, and is consistently ranked in the top three universities in the world. Their success, and knowledge transfer from the University to business, has contributed to the dynamism, prosperity and further expansion of the local economy. Anglia Ruskin University has been in existence, in one form or another, for over 150 years, and draws students from all over the UK and internationally.
79. Both universities in Cambridge have growth ambitions, and the Council supports their plans, and the continued growth of the higher education cluster in the city.
80. The existing Local Plan (2006) supports the expansion of both universities and this positive approach has been taken forward in the emerging Local Plan. Policy 43 seeks to provide the framework for the growth of university development in Cambridge. This seeks to focus new faculty, and other associated development in key locations both within and outside the City Centre. This will assist the universities in achieving their growth plans, as well as sustainably locating complementary uses close to each other.
- i. Should the policy also make reference to the preparation of the proposed master plan for the New Museums Site; and include any other existing sites with faculty development potential in the city centre?**
81. The New Museums site is located centrally within Cambridge. There are a number of University of Cambridge departments located on the site, primarily used for teaching and research. The site is formed of one urban block, with roads on all four sides. The site does not engage with the surrounding streets, and does not connect well with the wider City Centre.
82. The New Museums site is allocated in the Local Plan 2006<sup>51</sup> for redevelopment for predominantly university uses and some mixed uses to enhance the public realm<sup>52</sup>. This University-related, mixed use allocation is carried forward in the emerging Local Plan, in Policy 43 and Appendix B<sup>53</sup>.

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<sup>50</sup> RD/Sub/C/080, pages 400-401, paragraphs 54 and 56

<sup>51</sup> RD/AD/300

<sup>52</sup> RD/AD/300, Appendix F, 7.08

<sup>53</sup> Site reference U2

83. Planning for, and development of, the New Museums Site has moved on apace since the submission of the Local Plan to the Secretary of State on 28 March 2014.
84. The Council and the University have worked collaboratively to produce a development framework<sup>54</sup> for the site that will be adopted as a supplementary planning document (SPD) alongside the Local Plan. The development framework sets out the aspirations of the Council and the University of Cambridge for the site. These aspirations include enhancement of the conservation area; integration of the site into the wider City Centre; improvement of external spaces and public realm within the site; improved permeability; improved university facilities; and reduced car parking. The framework will help to co-ordinate and guide future redevelopment of the site in line with the Local Plan, in particular Policy 43: University Development and site allocation U2.
85. The University's Masterplan proposals helped to inform the parameters set out in the development framework, and the Masterplan provides an illustration of how those parameters could be implemented. The development framework<sup>55</sup> outlines that, whilst the Masterplan will not be formally adopted alongside the development framework, the Masterplan proposals will be submitted with applications for each phase of development. As such, it is not considered appropriate to mention the Masterplan in the policy text.
86. The Masterplan will be updated by the University, when necessary. This may include updates after completion of each phase of development.
87. Given the work undertaken, the Council considers it is appropriate for the supporting text to refer to the SPD for the New Museums Site (and, similarly, for the Old Press/Mill Lane Site), rather than to the Masterplan. A minor modification is proposed in Appendix 2.
88. The University of Cambridge has other operational sites in the City Centre that may also be subject to change during the Local Plan period. The Council considers that the policy as currently worded allows for the development of these sites and it would be appropriate to provide reference to them within the supporting text. A minor modification to paragraph 5.23 is proposed in Appendix 2.
89. In respect of the University's sites across the city, the Council and the University of Cambridge have completed a Statement of Common Ground which relates to Policy 43 and its supporting text<sup>56</sup>.

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<sup>54</sup> RD/CR/610

<sup>55</sup> RD/CR/610, paragraph 2.2.3

<sup>56</sup> RD/SCG/450

**ii. Is the reference to site U2 in Appendix B in relation to the retention and improvement of listed buildings sufficient or should the need to protect the heritage assets within the New Museums Site be reinforced in the policy?**

90. There are significant heritage assets on the New Museums site, which site U2 in Appendix B: Proposals Schedule of the Local Plan (and the development framework) recognise. The development framework<sup>57</sup> analyses the historic assets on the site and makes a note of each building's heritage significance. It then goes on to denote areas where buildings are likely to be removed (where there is limited heritage significance) in order to create new areas of open space and public realm (plan no. 15: proposed open space and public realm<sup>58</sup>). In addition, plan no.16 shows a future built form for the site<sup>59</sup>.

91. The Local Plan should be read as a whole, and this includes consideration of Policy 61: Conservation and enhancement of Cambridge's historic environment; Policy 62: Local heritage assets; and Site U2 in Appendix B: Proposals Schedule. Taken together, these policies along with the approach in the development framework provide for protection of heritage assets within the New Museums Site. There is no need to reinforce that protection through modifications to Policy 43.

92. Since the submission consultation in 2013, the Council has agreed a Statement of Common Ground with Historic England<sup>60</sup>. In the paragraphs relating to Policy 43, within this statement, Historic England notes that given their involvement in the work that has been undertaken on the development framework, they have withdrawn their objection to this policy and Site U2 in Appendix B: Proposals Schedule<sup>61</sup>.

**iii. Should the policy also make reference to the continued development of the Sidgwick site outside the city centre?**

93. The Council recognises that there are other sites outside the City Centre that have potential for redevelopment for university uses (e.g. the Sidgwick site), but does not consider it necessary to add reference to this site in the policy. The Council considers that the policy as currently worded allows for the development of this site and it would be appropriate to provide reference to them within the supporting text. A minor modification is proposed to paragraph 5.23 in Appendix 2 to address this.

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<sup>57</sup> RD/CR/610, pages 16-27

<sup>58</sup> RD/CR/610, page 48

<sup>59</sup> RD/CR/610, page 51

<sup>60</sup> RD/SCG/410

<sup>61</sup> RD/SCG/410, page 9, paragraph 3.41

**iv. Should the wording of criterion (b) make clear that reductions in car parking provision should not prejudice “Blue Badge” holders’ parking requirements?**

94. The Council considers that the guidance given on parking standards in Policy 82 and Appendix L of the Plan is sufficient for informing the future development of the site. Furthermore, the development framework that has been prepared gives some further indication as to where disabled parking should be located on the site<sup>62</sup>. The Council considers that it is unnecessary to add anything further to this policy.

**v. Would the further expansion of Anglia Ruskin University on the East Road site represent sustainable development particularly in terms of the housing mix in that part of the Petersfield area?**

95. The Framework requires local planning authorities to plan proactively to meet the development needs of business and support an economy fit for the 21<sup>st</sup> century<sup>63</sup>, by setting out a clear economic vision and strategy and planning positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries<sup>64</sup>.

96. The research and higher education cluster in Cambridge, of which Anglia Ruskin University forms a part, is an important element of the Cambridge economy.

97. The Framework says that planning policies should aim for a balance of land uses so as to minimise journey lengths for education and other activities<sup>65</sup>.

98. The main Cambridge campus of Anglia Ruskin University is located on East Road. This campus has seen significant development in recent years following the development of a masterplan for the site in 2008/9<sup>66</sup>. Policy 43 seeks to encourage further university related development in close proximity to this site so as to support the growth of Anglia Ruskin University and encourage sustainable modes of travel.

99. Policy 43 promotes new university faculty development close to Anglia Ruskin University’s existing main campus. It is not promoting new student accommodation in the Petersfield area. The provision of student accommodation is covered by Policy 46 in the Plan. A number of students at Anglia Ruskin University live in the Petersfield area currently, due to the proximity of the main campus. However, Policy 46 does not promote new student accommodation in the area of the city above any other area of the city.

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<sup>62</sup> RD/CR/610, page 44, paragraph 5.1.16

<sup>63</sup> RD/NP/010, paragraph 20

<sup>64</sup> RD/NP/010, paragraph 21

<sup>65</sup> RD/NP/010, paragraph 37

<sup>66</sup> RD/E/180



**vi. Should the development of the university sites in the Eastern Gateway and East Road be primarily focussed on faculty development?**

100. The main Cambridge campus for Anglia Ruskin University is located on East Road. There are also other sites accommodating uses for Anglia Ruskin University nearby (e.g. on Young Street). Focussing further university related development for Anglia Ruskin University in this area will promote sustainable patterns of development and encourage sustainable modes of travel.
101. The Council does not consider that this university related development should be restricted to faculty development. The policy clearly refers to “faculty, research and administrative” uses, and any of these university related uses would be appropriately focussed on the Eastern Gateway and East Road, so as to support the growth of Anglia Ruskin University.
102. The Council has already proposed minor modifications to this policy to amend the references to faculty development to university development<sup>67</sup>. These modifications were for clarity and because the policy does not simply address faculty development. The Council considers that these modifications should similarly apply to the paragraph in the policy that mentions the Eastern Gateway and East Road. Appendix 2 sets out these minor modifications to Policy 43.

#### **4B.2 Policy 44 – Specialist Colleges and Language Schools**

##### **Overview**

103. There is a concentration of language schools and other specialist colleges within Cambridge. They contribute to the local economy by creating jobs as well as bringing people to Cambridge who spend their money locally. They can also add to the pressures on the housing market and add to the sense of overcrowding in the City Centre (particularly in the Summer)<sup>68</sup>.
104. Policies 7/10 and 7/11 in the existing Local Plan<sup>69</sup> set out the current policy position on the provision of speculative student accommodation and the growth of language schools. Policy 7/10 requires any new speculative student accommodation to be tied to Anglia Ruskin University or the University of Cambridge. This is to ensure that, particularly Anglia Ruskin University, could better meet its student housing needs, in the context of a limited land supply in Cambridge and competition with other land uses.
105. Policy 7/11 prevented any new language schools from being developed and only allowed existing language schools to expand by up to 10% of their teaching space. This is to ensure that language schools do not add to the housing pressures in Cambridge unacceptably.

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<sup>67</sup> RD/Sub/C/050, page 19, PM/5/004 and PM/5/005

<sup>68</sup> RD/E/060, pages 95, paragraph B3.67

<sup>69</sup> RD/AD/300, page 82

106. The Framework requires local authorities to support the knowledge industries and the development of a strong and competitive economy<sup>70</sup>. The Cambridge Cluster Study recognised the increasing contribution language schools make to the local economy and has suggested a review in the policy approach<sup>71</sup> as the schools between them contribute £78 million per annum to the local economy<sup>72</sup>.
107. Many schools have been housing their teenage students with host families during the summer months, which also provide another source of income for local families and does not unduly cause pressures on the local housing market. Others are starting to take on more mature and business students, along with pre-University entrance students wishing to improve their English. Most make use of independently provided student accommodation to house their more mature students.
108. This can put pressure on the local housing market in Cambridge, if students are not accommodated in purpose built accommodation or in lodgings with host families.
- i. **Would the policy unfairly discriminate against specialist schools as there is no imperative in the Plan for other educational establishments to demonstrate adequate provision of residential accommodation for students as a precursor to development? In this regard, Policy 46 of the Plan: *Development of Student Housing* appears to be less prescriptive in terms of the provision of student residential accommodation.**
- ii. **Is the policy too restrictive in that it does not adequately take account of the evolving market for the provision of student accommodation?**
- iii. **For the avoidance of doubt, should the policy specifically state that the use of family dwelling houses to accommodate students only will not be permitted?**
109. The Council is undertaking a study to look at the provision of and need for student accommodation within Cambridge. The scope of this study includes specialist colleges and language schools. Following completion of this study, the Council will be able to provide detailed responses to questions i – iii.

### **4B.3 Appendix B: Proposals Schedule**

#### **Overview**

110. Site U3 Grange Farm is situated off Wilberforce Road and is allocated for student accommodation (120 student units) in the Local Plan. The site was originally a Cambridge Local Plan 2006<sup>73</sup> allocation (Site 7.09) for development as a student hostel or affordable/key worker housing for the colleges.

<sup>70</sup> RD/NP/010, page 6-7, paragraph 21

<sup>71</sup> RD/E/060, page 33, Agenda for Action

<sup>72</sup> RD/E/060, page 90, paragraph B3.37

<sup>73</sup> RD/AD/300

111. The allocation site 7.09 at Grange Farm, off Wilberforce Road, was not carried forward in the Issues and Options 2 consultation in 2013, due to access and flood risk issues. It was consulted upon as one of the rejected sites in Appendix 1 of Issues and Options 2: Part 2 - Sites within Cambridge<sup>74</sup>. During Issues and Options 2<sup>75</sup> consultation in 2013, the landowner, St John's College, provided information which indicated that it is may be possible to mitigate the access and flood risk issues. Accordingly, Site U3: Grange Farm, off Wilberforce Road was included within the Proposals Schedule of the Local Plan (Appendix B) and on the Policies Map<sup>76</sup>.
112. St John's College made representation 27974 to the Proposed Submission consultation, which objected to the restriction of the use of the site to student accommodation only. St John's College withdrew this representation on 3 September 2014, confirming that they supported the allocation for student accommodation and that the College was considering the submission of an application for this use. No application has been submitted by the time of writing this statement.
- i. **Site U3 [Grange Farm]: Should the provisional issues identified also include biodiversity in respect of wildlife habitats?**
113. Site U3: Grange Farm contains a mosaic of woodland, hedgerow, scrub and grassland habitats adjacent to mature gardens and open farmland. In addition, the habitats and surrounding area are likely to support protected species including bat species which would require surveys and potentially mitigation should a planning application be submitted. The arable farmland supports nationally declining species of breeding farmland birds, that are also likely to benefit from the nesting, roosting and foraging opportunities provided by the relatively undisturbed habitats on Site U3: Grange Farm.
114. Although not currently designated as a local wildlife site, all, or part of, the site has the potential to meet City Wildlife Site criteria if surveyed. The criteria for assessment are provided in the Annexes to the Cambridge City Wildlife Site Register<sup>77</sup>. The following criteria are the most likely to be met:

**Woodland**

2.5 *All recent woodlands between 0.5-1.0ha in area with five or more woodland plants and which comprise 10% or more mature woodland.*

**Scrub**

2.6 *All blocks over 0.5ha in area with four or more woody species*

**Hedgerows**

2.9 *Hedgerows at least 100m in length and comprised of shrubs greater than 2m in width at the widest point, with four or more woody species, and with at least part of the hedge allowed to flower and fruit.*

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<sup>74</sup> RD/LP/270

<sup>75</sup> RD/LP/270

<sup>76</sup> RD/Sub/C/020

<sup>77</sup> RD/NE/100

115. If the criteria were met, it would require consideration under Policy 69 of the Local Plan.
116. The Council considers that biodiversity should be considered as a provisional issue. As such, the Council proposes that the provisional issues identified for Site U3 should be modified. This minor modification is set out in Appendix 2 of this statement.

## **Appendix 1: List of Reference Documents**

### **National Policy:**

- National Planning Policy Framework (NPPF) (RD/NP/010)
- National Planning Practice Guidance (NPPG)(RD/NP/020)

### **Topic Papers**

- Joint Employment Topic Paper (RD/Top/020)

### **Committee Reports**

- The New Museums Site SPD (RD/CR/610)

### **Earlier stages of plan making**

- Cambridge City Council and South Cambridgeshire District Council – Issues and Options 2, Part 1 – Joint Consultation on Development Strategy and Site Options on the Edge of Cambridge (RD/LP/150)
- Cambridge Local Plan Towards 2031, South Cambridgeshire Local Plan – Issues and Options 2: Part 1 – Joint Consultation on Development Strategy & Site Options on the Edge of Cambridge – Technical Background Document Part 1 (RD/LP/170)
- Cambridge Local Plan – Towards 2031 Technical Background Document – Part 2 (RD/LP/260)
- Cambridge City Council Issues and Options Part 2: Site Options within Cambridge (RD/LP/270)
- Cambridge Local Plan – Towards 2031 Technical Background Document – Part 2 Supplement 2031, Cambridge City Council (RD/LP/310)
- SQW Cambridge Northern Fringe East Employment Options Study – Sector Profile (RD/LP/325)

### **Cambridge City Council submission documents:**

- Cambridge Local Plan 2014: Proposed Submission (RD/Sub/C/010)
- Cambridge City Council Policies Map (RD/Sub/C/020)
- Addendum to the Cambridge Local Plan 2014: Proposed Submission document (July 2013) Schedule of Proposed Changes following Proposed Submission Consultation (RD/Sub/C/050);
- Cambridge City Council Statement of Consultation and Audit Trails (RD/Sub/C/080)

### **Adopted development plan documents:**

- Cambridge East Area Action Plan (RD/AD/280);
- North West Cambridge Area Action Plan (RD/AD/290);
- Cambridge Local Plan 2006 (RD/AD/300)

### **Statements of Common Ground:**

- Statement of Common Ground between Cambridge City Council and the University of Cambridge (West Cambridge Update and Policy 40) (RD/SCG/440)
- Statement of Common Ground between Cambridge City Council and the University of Cambridge (Policy 43) (RD/SCG/450)

- Statement of Common Ground with Historic England (RD/SCG/410)

#### **Protecting and enhancing the natural and historic environment**

- Cambridge City Wildlife Sites Register 2005 (RD/NE/100)

#### **Economy and Tourism**

- South Cambridgeshire and Cambridge City Employment Land Review 2012 (RD/E/020)
- South Cambridgeshire and Cambridge City Employment Land Review Update – Addendum 2013 (RD/E/030)
- Cambridge Cluster at 50 (RD/E/060)
- Cambridge Retail and Leisure Study Update 2013 (RD/E/310)
- Cambridge Campus Redevelopment Masterplan Revision B, Anglia Ruskin University (RD/E/180)

#### **Modifications Consultation**

- Cambridge and South Cambridgeshire Modifications Consultation Report November 2015 (RD/MC/010)
- Cambridge Inner Green Belt Boundary Study (November 2015) (RD/MC/030)
- Cambridge Inner Green Belt Boundary Study (November 2015) Supplement – March 2016 (RD/MC/031)

#### **Other Matter Statements**

- Joint Matter 4 – Employment and Retail (M4/CCC & SCDC)
- Joint Matter 6 – Green Belt (M6/CCC & SCDC)

## Appendix 2: Proposed Modifications

The modifications set out below relate to a number of policies and their supporting text in the Cambridge Local Plan 2014: Proposed Submission. The changes are expressed either in the conventional form of strikethrough for deletions and underlining for additions of text, or by specifying the modification in words in *italics*.

The page numbers and paragraph numbering below refer to the Cambridge Local Plan, and do not take account of the deletion or addition of text.

Page	Policy/Paragraph	Modification	Justification
134	Policy 40	c. research and research and development facilities will be supported in the Cambridge Biomedical Campus <del>and Addenbrooke's</del> <u>(including Addenbrooke's Hospital)</u> , and at the West Cambridge site, provided they satisfy relevant policies in Section Three of the plan.	This minor modification was proposed in the Schedule of Proposed Changes following Proposed Submission Consultation (March 2014) as PM/5/001.
134	Paragraph 5.6	Add a new sentence at the end of paragraph 5.6 to read: <u>"Proposals for the development of employment uses will be considered alongside the policies in Section Three of the plan and the allocations in Appendix B."</u>	This minor modification is proposed to increase clarity and reminded applicants that any development should take into account the allocations contained in Appendix B.
135	Table 5.1	Add <u>"Source: Employment Land Review Update 2013"</u>	This minor modification is proposed to increase clarity. This modification supersedes modification PM/5/002 insofar as it relates to Table 5.1.
136	Tables 5.2 and 5.3	Add <u>"Source: Cambridge Business Commitments and Completions 2012, Cambridgeshire County Council."</u>	This minor modification was proposed in the Schedule of Proposed Changes following Proposed Submission Consultation (March 2014) as PM/5/002.
136	Table 5.2 and	<i>Amend Table 5.2 and paragraph 5.9 by splitting paragraph 5.9 into 5.9</i>	These minor modifications are

Page	Policy/Paragraph	Modification	Justification																												
	following paragraphs 5.9	<p data-bbox="622 236 1375 268"><i>and 5.9a, and, inserting an additional new paragraph 5.9b</i></p> <p data-bbox="622 316 1574 384"><b>Table 5.2 Key employment sites in Cambridge <u>with planning permission at 31 March 2012</u></b></p> <table border="1" data-bbox="622 427 1574 1377"> <thead> <tr> <th data-bbox="622 427 949 592">Site</th> <th data-bbox="949 427 1167 592">Employment use</th> <th data-bbox="1167 427 1368 592">Net floorspace remaining (sq m)</th> <th data-bbox="1368 427 1574 592">Net land (hectares)</th> </tr> </thead> <tbody> <tr> <td data-bbox="622 592 949 639">Station Areas West</td> <td data-bbox="949 592 1167 639">Offices</td> <td data-bbox="1167 592 1368 639">34,096</td> <td data-bbox="1368 592 1574 639">5.97</td> </tr> <tr> <td data-bbox="622 639 949 879">West Cambridge* (NB: increased land and floorspace to be determined through development management)</td> <td data-bbox="949 639 1167 879">Research and development</td> <td data-bbox="1167 639 1368 879">19,896*</td> <td data-bbox="1368 639 1574 879">3.03</td> </tr> <tr> <td data-bbox="622 879 949 1007">Cambridge Biomedical Campus and Addenbrooke's</td> <td data-bbox="949 879 1167 1007">Offices and research and development</td> <td data-bbox="1167 879 1368 1007">151,333</td> <td data-bbox="1368 879 1574 1007">16.43</td> </tr> <tr> <td data-bbox="622 1007 949 1094">North West Cambridge</td> <td data-bbox="949 1007 1167 1094">Research and development</td> <td data-bbox="1167 1007 1368 1094">6,883</td> <td data-bbox="1368 1007 1574 1094">0.87</td> </tr> <tr> <td data-bbox="622 1094 949 1222">Fulbourn Road (GB3 and GB4)**</td> <td data-bbox="949 1094 1167 1222">Offices and research and development</td> <td data-bbox="1167 1094 1368 1222">25,193**</td> <td data-bbox="1368 1094 1574 1222">3.7</td> </tr> <tr> <td data-bbox="622 1222 949 1377">Cambridge Northern Fringe East</td> <td data-bbox="949 1222 1167 1377">Offices and research and development</td> <td data-bbox="1167 1222 1368 1377">To be determined through an area action</td> <td data-bbox="1368 1222 1574 1377">To be determined through an area action</td> </tr> </tbody> </table>	Site	Employment use	Net floorspace remaining (sq m)	Net land (hectares)	Station Areas West	Offices	34,096	5.97	West Cambridge* (NB: increased land and floorspace to be determined through development management)	Research and development	19,896*	3.03	Cambridge Biomedical Campus and Addenbrooke's	Offices and research and development	151,333	16.43	North West Cambridge	Research and development	6,883	0.87	Fulbourn Road (GB3 and GB4)**	Offices and research and development	25,193**	3.7	Cambridge Northern Fringe East	Offices and research and development	To be determined through an area action	To be determined through an area action	<p data-bbox="1597 236 2047 403">proposed in order to provide clarification as to the source of information in 5.2 and to provide an update for sites where progress has been made.</p> <p data-bbox="1597 443 2047 707">Note: it is also proposed that before the plan is adopted net floorspace and net land figures are updated to reflect the latest position at that point. The figures currently show commitments as of March 2012.</p> <p data-bbox="1597 754 2047 978">Please note that the figures for West Cambridge and North West Cambridge are not correct in the table, nevertheless these will be updated prior to the adoption of the Plan.</p> <p data-bbox="1597 1026 2047 1098">This modification supersedes modification PM/5/003</p>
Site	Employment use	Net floorspace remaining (sq m)	Net land (hectares)																												
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		plan	plan				

Page	Policy/Paragraph	Modification	Justification
		<p><u>5.9b Table 5.2 sets out the committed level of employment floorspace and the amount of land for the key employment sites that had planning permission at 31 March 2012. The level of employment development at West Cambridge is being reviewed in line with the aspirations in Policy 18 of the Plan. The site could provide approximately 468,300 sq m of academic and commercial space in total, of which around 210,400 sq m would be for B1(b) commercial uses. The precise amount of floorspace to come forward will be agreed as part of the development management process, subject to design, transport and other considerations. In terms of Cambridge Northern Fringe East, the Council has commenced work on an Area Action Plan for the area with South Cambridgeshire District Council. The development potential of this area will be significantly enhanced by the opening of the new Cambridge North Station in May 2017. This will link up with the wider transport network, including the Cambridge to Huntingdon Busway. The precise amount of employment floorspace to be provided in this highly accessible and sustainable urban location at Northern Fringe East will be determined through the Area Action Plan.</u></p>	
138	Policy 41: Protection of business space	Add an additional sentence after the final paragraph of the Policy: <u>“Temporary changes of use to sui generis uses that generate employment opportunities will be appropriate while marketing of the site takes place (e.g. taxi businesses, vehicle hire).”</u>	This minor modification is proposed to increase the flexibility for landowners and make more efficient use of land by minimising the time and land and buildings are left vacant.
138	Policy 41: Protection of business space	Add two new final sentences to the policy: <u>“This policy does not apply to sites in employment use that are allocated for another use and being developed for the use they are allocated for. The principle of the loss</u>	This minor modification is proposed to make clear that the decision to allocate them in the

Page	Policy/Paragraph	Modification	Justification
		<u>from employment use was accepted when the site was allocated.</u>	Plan means that the principle of the loss of the existing use has already been accepted by the Council. As long as the site is being developed for the use it is allocated for. This change clarifies that principle.
139	Paragraph 5.18	Insert at the end of paragraph 5.18: <u>“This policy only seeks to protect employment uses from change of use where a planning application (including variation of condition) is required.”</u>	This minor modification was proposed in the Schedule of Proposed Changes following Proposed Submission Consultation (March 2014) as PM/CC/5/A.
140	Paragraph 5.19	Add a final sentence to this paragraph to read: <u>“Appendix K of the Plan provides some guidance as to how any marketing campaign is expected to be carried out, and under what circumstances a shorter time period would be considered”</u>	This minor modification is proposed to provide clarity to applicants on what is expected of them regarding any marketing campaign that is carried out.
141	Policy 43: University faculty development	Policy 43: University <del>Faculty</del> Development	This minor modification was proposed in the Schedule of Proposed Changes following Proposed Submission Consultation (March 2014) as PM/5/004.
141	Policy 43: University faculty development	Amend sub-titles to read: <del>Faculty</del> University development in the City Centre <del>Faculty</del> University development outside the City Centre	This minor modification was proposed in the Schedule of Proposed Changes following Proposed Submission Consultation (March 2014) as PM/5/005.
141	Policy 43: University faculty development	Amend to read: a. <del>optimise the</del> <u>make effective use</u> of land, including a mix of uses on larger sites to meet the needs of the relevant institution, and	This minor modification was proposed in the Schedule of Proposed Changes following

Page	Policy/Paragraph	Modification	Justification
			Proposed Submission Consultation (March 2014) as PM/5/006.
141	Policy 43: University faculty development	In addition, development of sites in the Eastern Gateway or near East Road should consider including a significant element of <del>faculty</del> <u>university</u> development.	This minor modification is proposed in response to a representation and for clarity as it does not simply address faculty development.
141	Policy 43: University faculty development	e. the development of medical teaching <u>and</u> research facilities and related university research institutes at Cambridge Biomedical Campus (see Policy 16); and	This minor modification was proposed in the Schedule of Proposed Changes following Proposed Submission Consultation (March 2014) as PM/5/007.
142	Paragraph 5.23	The University of Cambridge has an overall estate comprising around 650,000 sq m on 247 hectares, distributed across a number of key locations in the City Centre and West Cambridge. West and North West Cambridge have been the focus of the University of Cambridge's growth and relocations in the past 14 years. Remaining development there will focus on further academic development and commercial research and development. Cambridge Biomedical Campus now has outline consent. <del>The only o</del> <u>Other</u> key locations where significant change is still planned are the Old Press/Mill Lane area and the New Museums site. <u>An SPD has been prepared for Old Press/Mill Lane and a Development Framework SPD has been prepared for New Museums. In addition to these sites, other sites where there is the potential for change to occur during the Plan period, include the Sidgwick Site, the Old Addenbrooke's Site, the Downing Site, the former Scroope House Site (Department of Engineering), and the Department of Chemistry (Lensfield Road).</u>	This minor modification is proposed to indicate other University sites that may be subject to change over the plan period.
143	Policy 44: Specialist colleges and language schools	The development of existing and new specialist schools will not be permitted unless they provide residential accommodation, social and amenity facilities for all non-local students (students arriving to study from outside Cambridge and the Cambridge sub-region), with controls in place to ensure that the provision of accommodation is in step with the	This minor modification is proposed to strengthen the wording already included in the supporting text, that it will not be appropriate to use family dwelling

Page	Policy/Paragraph	Modification	Justification
		expansion of student places. <u>The use of family dwelling houses to accommodate students only is not appropriate.</u>	houses to accommodate students (only).
144	Paragraph 5.32	Language schools can place additional burdens on the housing market. This policy seeks to ensure that when specialist schools seek to grow, those burdens are mitigated. The applicant will need to demonstrate how many additional students will be generated by the proposal. This will allow the Council to judge the residential, social and amenity impact generated. The Council will <del>be flexible in considering any</del> <u>require a robust method of calculating the additional number of students arising from any proposal, and will consider a range of mechanisms to agree an upper limit to the number of additional students. The range of mechanisms considered may include, but not be limited to, controlling the hours of operation, the number of desk spaces and the number of students. This will ensure that a proposal will generate a specific level of growth that can be measured and mitigated. Student accommodation is dealt with under Policy 46 in Section Six.</u>	This minor modification was proposed in the Schedule of Proposed Changes following Proposed Submission Consultation (March 2014) as PM/5/008.
252	Appendix B: Proposals Schedule, Site U3; Grange Farm off Wilberforce Road	<i>Amend provisional issues identified to read:</i> <ul style="list-style-type: none"> <li>○ Surface water flood risk would require careful mitigation;</li> <li>○ Access arrangements would require careful mitigation-;</li> <li>○ <u>Site contains features of biodiversity importance. Development will only be permitted where it can be adequately demonstrated that proposals will not have an adverse impact on biodiversity</u></li> </ul>	This minor modification is proposed to address concerns in relation to the impact of development upon biodiversity.