



Cambridge City and South Cambridgeshire Local Plan Examinations

Our ref 13577/MS/MS
Prepared By Nathaniel Lichfield & Partners on behalf of CEG
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Subject MATTER SC7: BUILDING A STRONG AND COMPETITIVE ECONOMY

1.0 **SC7B Policy E/2: Fulbourn Road East - Proposed Modification PM/SC/8/C**

Background

- 1.1 The Council's proposed modification wrongly seeks to reduce the size of the allocation E/2 from 6.9ha to 4.3ha. The proposed allocation east of the existing Peterhouse Technology Park (PTP) complements allocations GB3 and GB4 in the Cambridge City Council Local Plan which extend the Park to the west. Those sites currently being developed by CEG to provide 20,677sqm of new headquarters accommodation for ARM Holdings PLC ("ARM") pursuant to a planning application (15/0893/FUL) that successfully demonstrated 'very special circumstances' and was granted permission on 11 Dec 2015. The development currently underway (buildings ARM A & B) will occupy all of GB4 and some of GB3, and provide 1,100 net additional jobs. A second phase (of circa 6,650 sqm) will occupy the remainder of GB3 and it is anticipated that this will all be taken up ARM in the short term, in the context of its current stated commitment to "double" its UK headcount over the next five years to create 1,500 jobs¹.
- 1.2 In light of the above, Site E/2 is the only remaining area of land on which future expansion of PTP beyond ARM's five-year plans can be accommodated. The significance of ARM as an anchor – not just at PTP – but for the whole Cambridge economy – should not be under-estimated, and it helps explain why the original allocation was sound and the proposed modification is dangerously misconceived.
- 1.3 The NPPF requires that, inter alia, the planning system should:
- "*positively seek opportunities to meet... development needs*" (paragraph 14),
 - "*take account of market signals*" (para 17);

¹ Based on ARM press releases in July 2016 at the time of the acquisition by Softbank of ARM Holdings PLC.

- “do everything it can to support sustainable economic growth” (para 19); and
- Plan “proactively to meet the development needs of business and support an economy fit for the 21st century” and “positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries” (para 21).

1.4 CEG’s concern is that, having regard to the Development Strategy Update (RD/MC/060) and the SA Addendum² (RD/MC/010), the Council’s decision to reduce the size of the allocation is based on nothing beyond the conclusions of the Inner Green Belt Review 2015. CEG believes the methodology and conclusions of this Review are flawed - (see our responses to ii. below) - but, in any event, in making its decision on the Green Belt review alone, the Council has failed to justify its approach. It has failed to give proper consideration to whether its revised proposals will be consistent with employment land needs, either in terms of the requirement to:

- 1 “positively seek opportunities to meet... development needs” (NPPF para 14) across the District and Cambridge area as a whole in light of latest evidence on performance of the economy;
- 2 “proactively to meet the development needs of business and support an economy fit for the 21st century” (NPPF para 21) given the respective roles of different locations (including PTP) in catering for different sectors;
- 3 “take account of market signals” (NPPF para 17) and the potential for future growth of ARM within and beyond the plan period; or
- 4 Planning “positively for ... clusters or networks of knowledge driven, creative or high technology industries” (NPPF para 21) in terms of PTP around ARM.

1.5 As a result of this, it has also thus failed to consider whether the reduced scale of allocation of E/2 (and its associated Green Belt boundary) would be consistent with paragraph 85 of the NPPF which requires local planning authorities to, inter alia:

- ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development
- where necessary, ‘safeguarded land’ to meet longer-term development needs stretching well beyond the plan period;
- satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period.

² Page 149 states the reduction of E/2 was “In response to the findings in the LDA Cambridge Inner Green Belt Boundary Study 2015 (See Sector 13), which recommended allocating a smaller site to minimise impact on the Green Belt”. Appendix 4 of RD/MC/060 indicates similarly.

1.6 By failing to consider employment land considerations, the ‘balancing’ exercise required by the NPPF has thus not been properly carried out, rendering the Modified Policy E/2 allocation ‘unsound’ against paragraph 182 of the Framework.

i. Is the area of land allocated, as proposed to be modified (PM/SC/8/C – 4.3 ha), consistent with the need for employment uses in this location having regard to paragraph 2.36 in the supporting text to Policy S/5?

1.7 No. There is a need for both a quantitative and qualitative approach to assessing employment land needs, and the Council has failed to address both dimensions in its proposals to modify Site E/2.

1.8 The Council’s employment land need assessment (described in the RD/Top/020 uses econometric modelling to identify a need for 42.4-43.3 ha of employment land in South Cambridgeshire (plus 7.4 ha in Cambridge City) which is split by use classes. The Council’s most recent Annual Monitoring Report³ has identified a 24.69ha of land, and identifies further allocations, which it claims will meet needs.

1.9 However, this is not the end of the story. The PPG (2a-031) requires needs to be assessed with “*by market segment and by sub-areas, where there are distinct property market areas within authorities*”. It goes on to state that: “*Analysing supply and demand will allow plan makers to identify whether there is a mismatch between quantitative and qualitative supply of and demand for employment sites. This will enable an understanding of which market segments are over-supplied to be derived and those which are undersupplied.*”

1.10 The PPG (ID: 2a-033) emphasises the need to consider a range of factors in identifying land supply requirements, including: “*Market segments, ... analyses based on ... future property market requirements [and], consultation with relevant organisations [and] studies of business trends*” It also refers (ID: 2a-033) to “*increasing diversity of employment generating uses ... which requires different policy responses and an appropriate variety of employment sites*”. to the need to consider

1.11 The Councils’ employment land review (RD/E/020) did explore some of these issues, noting the pressure for office space linked to the hi-tech cluster and how, in the face of a crowded city centre market, “*the only way around this is to intensify the use of existing sites; ... allocating more land in peripheral locations⁴ will not help ... (as the market for peripheral sites is quite different*” (para 1.40).

³ For period 1st April 2014 to 31st March 2015, published January 2016. Not currently an Examination Document in the library.

⁴ ‘Peripheral’ in this context refers to land remote from Cambridge, and does not mean ‘edge of Cambridge’ sites

- 1.12 This perhaps explains why Paragraph 2.36 contains a number of components:
- A qualitative dimension: the policies of the plan are intended to “delivering the types of employment appropriate to both support the Cambridge cluster and to provide a diverse range of local jobs” (our emphasis).
 - A reference that the Plan’s supply of land is intended to provide “for the predicted 22,000 additional jobs and includes sufficient surplus so that ... if the economy performs better than expected, the plan will not constrain economic potential”; and
 - Responds to “demand in Cambridge ... by identifying opportunities ... next to the Peterhouse Technology Park”.
- 1.13 Unfortunately, the Council’s alleged justification does not demonstrate that the reduced scale of allocation at E/2 is supported by evidence on the performance of the Cambridge cluster, the ability to provide a diverse range of local jobs, to cater for any faster performance of the local economy (e.g. of ARM) or market signals in Cambridge that would drive demand for space at PTP. There is no new analysis of the property market in Cambridge to justify the approach taken. It is not consistent with para 2.36 of the Plan.
- 1.14 This reflects the fact that the Council’s evidence base on employment land – including the joint update in 2012 (RD/E/20) or the City Council’s addendum in 2013 (RD/E/030) is now at least three years old and does not support the spatial or qualitative dimension in terms of the split of provision proposed by the Councils, particularly in terms of the specific role of PTP in the wider market, or the amount of reliance placed on peripheral (new settlement) locations. It has not taken into account that ARM has committed to expanding on to GB3 and GB4. The Council has failed to demonstrate that the size of E/2 (either as originally proposed or as now reduced) is now sufficient to meet business needs or cater for demand.
- 1.15 CEG has undertaken an analysis that looks at the development strategy for the site in light of both a smaller allocation and as originally proposed⁵, and the current rate of employment growth in the area. It has also commissioned a Market Report from Juniper Real Estate (a Cambridge-based property advisory firm), which is attached at **Annex A**.
- 1.16 This analysis shows:
- 1 Cambridge is undergoing an unprecedented era of growth, something that is firmly supported by central government as it recognises the value of UK knowledge based industries.

⁵ The plans are included in the Tyler Grange work at Annex C

- 2 Astra Zeneca's decision to move its research HQ which will bring over 2,000 jobs to Cambridge has underpinned the city's appeal. Of the 44,000 jobs identified in the Plans for the 20 year period to 2031, some 17,500 have already been created after just five years (see **Annex B**). Approximately 75% (or 13,000 jobs) were in Cambridge (59% of the City's target job growth for twenty years has been achieved in just five years), with much of this in knowledge-based sectors and associated with office space.
- 3 The current market is very strong: concerns surrounding Brexit appear to have had limited effect⁶. Stock levels of existing office and lab buildings are at an all time low. Current levels of consented land could provide for just four or five years of average level take up
- 4 The market in Cambridge is very specific in terms of:
 - City centre vs fringe vs remote (or peripheral locations: Occupiers favour fringe city locations as the centre becomes more unaffordable/congested, and remote business parks are seen as unsustainable for cyclists/public transport users, which in the context of Cambridge's unique 'bicycle economy', is a critical factor for knowledge-based businesses in retaining key staff.
 - North vs south of the City: The south side of the city has attracted traditional office users but now existing space has run out. Nearly all allocated land on the south side is for specialist medical research users. The only option for office space is PTP.
 - A market demand focused around PTP itself, in terms of meeting ARM's medium/long term future and support clustering of similar companies and those in its supply chain.
- 5 In light of the above, and the fact that the reduced scale of allocation proposed would accommodate half the floorspace (just 26,500 sqm approx), there is no basis to conclude that it is consistent with para 2.36 of the Plan, notably in failing to support the Cambridge Cluster, not supporting a diverse range of jobs, not providing a sufficient surplus of land if job growth exceeds 22,000 jobs across the district, not constraining economic potential, and failing to cater for demand associated with PTP itself.
- 6 As a consequence, there is every prospect that the boundaries of the Green Belt would need to be reviewed again by (or in advance of) the end of the Plan period to address future business needs associated with PTP. In this regard, the proposal clearly fails to satisfy paragraph 85 of the Framework.

⁶ Anecdotal evidence indicates one company may have withdrawn from a 60,000 sqft pre-let

7 None of these factors have been considered by the Council in making its decision on the scale of the E/2 allocation.

ii. Is the proposed reduction in the size of the allocation (PM/SC/8/C) justified by the findings of the Inner Green Belt Boundary Study 2015?

1.17 No, the proposed reduction in the size of allocation (PM/SC/8/C) is not justified by the findings of the Inner Green Belt Boundary Study (the 2015 Study).

1.18 The 2015 study is based on a flawed methodology using criteria that are not specific and do not relate clearly to the Green Belt purposes. These flaws are set-out within the CEG Representations to the Proposed Modifications⁷ and Hearing Statement for Matter PM2.1⁸. LDA's assessment relies upon subjective measures and narrative that do not clearly identify areas that are suitable for release from the Green Belt.

1.19 Tyler Grange has prepared a short report that considers the methodology and approach taken by the 2015 Cambridge Inner Green Belt Boundary Study when defining the parameters that LDA have defined for the release of Green Belt in this location. The report is contained at **Annex C** to this Statement and includes plans and photographs to illustrate the points being made.

Parameters and Eastern Extent of Release

1.20 LDAs parameters for limiting the eastern extent of the release of Green Belt land in this location are not justifiable. Proposed Modification (PM/SC/8/C) is defined by a line across an open area of land that does not relate to any features on the ground and lies within the extents of the built edge. It is not clear as to why the eastern area is more sensitive or makes a greater contribution to the purposes and function of the Green Belt than the land to the west of the roundabout.

1.21 When providing justification for the parameters in relation to the extent of development, the 2015 Study states that:

“The new Green Belt boundary would not significantly increase the extent of the city from the historic core, aligning with the existing boundaries around Peterhouse Technology Park and Cherry Hinton. A permanent, well-designed edge to the city would be created. Thus, the increase in urban sprawl would be permanently limited and would not affect perceptions of the compact nature of the city.”⁹

⁷ Representation Refs: 65992-66019 and 66020-66021 esp. 65995, 65996, 65998, 66000, 66003, 66004, 66007, 60014, 60015, 60016, 60020, 60021

⁸ Cambridge City and South Cambridgeshire Local Plan Examination Matter PM2 – Green Belt Review Methodology: Issue PM2.1 11 May 2016(report: 1665/12c)

⁹ Cambridge Inner Green Belt Boundary Study, November 2015, LDA (RD/MC/030): page 148 (paginated page 157), third bullet point

- 1.22 This description highlights the inadequacies of LDAs methodology when identifying and defining land for release but could be more appropriately applied to the original E/2, where existing established features, specifically an existing field boundary and access track, would provide a clearly defined boundary. Conversely, LDA's parameters place the eastern extent of the proposed release within an open field where there is no existing boundary or recognisable feature on the ground.
- 1.23 Limiting the release of Green Belt based on the LDA analysis and assessment would not reflect the requirements of NPPF paragraph 85 to, inter alia:
*“Not include land which it is unnecessary to keep permanently open; and
Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.”*

Impact on the setting and Key Views of Cambridge

- 1.24 In addition to the parameters concerning the eastern extent of Green Belt release to the east of PTP (Sector 13.1), the 2015 Study also considers the setting of Cambridge. The 2015 Study identifies a view elevated view from Shelford Road to the southeast (as shown on Figure 10 of the 2015 Study).¹⁰
- 1.25 The whole of the E/2 Allocation lies within the extent of the built edge and is bounded by an existing defensible boundary at the gateway to Cambridge. The development of the E/2 Allocation would preserve the setting of Cambridge in key views from Shelford Road, without an appreciable difference in the composition of the view or elements in it between either E/2 or the Proposed Modification.
- 1.26 The drawing **Key View from Shelford Road: Extent of Existing Development and Allocation Sites (drawing 1665/P138)** included at Appendix 5 in **Annex C** demonstrates how development of up to three storeys of a scale and density that reflects that at PTP would not introduce prominent or uncharacteristic development into the view, preserving the setting to the city. There would be a limited difference between development of the E/2 Allocation or the Proposed Modification sites, with additional development representing the more sustainable option in this location consistent with NPPF para 84 and the Councils' own Sustainable Development Sequence (SCLP Policy S/6 refers).
- 1.27 There is scope for development of the E/2 Allocation site to incorporate a range of similar scale development to that at Peterhouse Technology Park, whilst allowing opportunities for the sensitive and appropriate treatment of

¹⁰ Cambridge Inner Green Belt Boundary Study, November 2015, LDA (RD/MC/030): Figure 9: Visual Assessment (dwg no. 4732_009)

boundaries to provide both robust Green Belt boundaries and a soft green edge to the City. This would reflect the existing boundaries to Peterhouse Technology Park and the southern boundary of the under-construction extension of the Park to the west of ARM1 (CCC planning permission 15/0893/FUL).

1.28 Each of the options for E/2 can be developed to fit within the following parameters that correctly reflect the existing gateway, extent of the urban edge and existing defensible Green Belt boundaries on the ground:

- 1 Containment within the existing gateway and extent of the urban edge on the approach to Cambridge on Fulbourn Road as marked by the recent re-development of the Alms Houses fronting Fulbourn Road and entrance to Fulbourn Hospital;
- 2 Containment within the wider extents of the urban form to the east of Cambridge;
- 3 Preserving the landform of the rising land to the south;
- 4 Maintaining the setting of the City, including in key views from Shelford Road;
- 5 Maintaining separation with Fulbourn and contain urban sprawl; and
- 6 Providing a well vegetated, permanent and robust edge to the city in this location.

1.29 Tyler Grange's assessment, including the consideration of establishing a new boundary and the comparative analysis of impacts in views, clearly demonstrates that there is no justification for the limiting of the eastern extent of the E/2 Allocation in respect of the setting and key views of Cambridge as defined by the 2015 Study. If the reduced area proposed as a result of the LDA parameters is acceptable in this regard, then the original full allocation including the land to the east must also be acceptable.

Conclusions

1.30 The available evidence and analysis clearly establishes sustained economic growth in Cambridge and South Cambridgeshire - 40% of the jobs growth anticipated across both Plans for twenty years has been achieved in just five years (59% of the figure for Cambridge) - and a need for additional future employment floorspace.

1.31 Market evidence - including the investment for an existing occupier currently being demonstrated by the construction of the ARM extension - and a proper consideration of locational and sectoral differences supports the need for additional growth at PTP to positively support a key economic cluster

1.32 Careful consideration of the Green Belt Boundary Study 2015 and assessment of relevant Green Belt considerations can only lead to the conclusion that the

allocation of site E/2 as originally proposed by the Council is the minimum scale of allocation acceptable; reducing this release as proposed in the modification would unjustifiably constrain sustainable economic development in this location contrary to local and national planning policy.

2.0 **SC7I Policy E/9: Promotion of Clusters**

i. Should paragraph 8.44 of the supporting text clarify that the reference to the 'NPPF' is taken directly from the 4th bullet point of paragraph 21 of the document?

2.1 Yes

ii. Should the policy refer to other factors which contribute to the success of employment clusters?

2.2 No. The factors which contribute to the success of clusters vary by sector, location and over time. Consequently the policy should be positively worded to support clusters but not be overly prescriptive. In any event, the local plan evidence base does not provide the necessary information to robustly and comprehensively identify these factors.

iii. Could the Council clarify the reference to Policy E/4 in paragraph 8.47?

2.3 N/A

iv. Paragraph 8.46 recognises that greater flexibility is needed to support the diversification of Cambridge's high technology cluster. However, paragraph 8.48 appears to introduce some uncertainty as to the ongoing support for the development of employment clusters? Is there a conflict in this regard?

2.4 Paragraph 8.48 should be deleted and paragraph 8.46 reworded to address and support the emerging policy, including clear support for the development of office and high tech clusters.

v. In addition to Northstowe, is there a case for the creation of other clusters beyond the immediate environs of Cambridge e.g. in Cambourne?

2.5 No. There is no evidential basis for such an approach, and indeed, the market evidence is that clusters should be focused on the expansion of existing locations.

Annex A: Market Report and Appendices

PETERHOUSE TECHNOLOGY PARK

SC7B Policy E/2: Fulbourn Road East - Proposed Modification PM/SC/8/C

The Cambridge Commercial Property Market.

Prepared By Juniper Real Estate (Ref: JG)

18th November 2016

1.0 INTRODUCTION

- 1.1 Juniper Real Estate (JRE) has been appointed by Commercial Estates Group (CEG) to provide supplementary advice to representations made to South Cambs DC upon Policy E2: Fulbourn Road East – Proposed Modification PM/SC/8/C. The modification proposes a reduction in the Employment Land allocation E/2 from 6.9 hectares to 4.3 hectares following the recent Green Belt Boundary Study.

2.0 JUNIPER REAL ESTATE

- 2.1 Juniper Real Estate is a Cambridge based commercial agency practice whose principals Jamie Green MRICS and Mike Ayton MRICS have over 50 years combined market experience in the office and laboratory sector. The company acts upon both disposal of buildings and acquisition of space for companies seeking to move. This agency work provides an excellent understanding of commercial occupier needs within Cambridge and the immediate environs.

3.0 CAMBRIDGE GROWTH

- 3.1 Although the Site E/2 is part of South Cambridgeshire District, it is contiguous with the City Council area, and – being an extension of Peterhouse Technology Park – is clearly part of the functional market area of the City.
- 3.2 The recent agreement of the Greater Cambridge City Deal aims to enable a new wave of innovation-led growth by investing in the infrastructure and housing for skills that will facilitate the continued growth of the 'Cambridge Phenomenon' — the cluster of technology firms around Cambridge.
- 3.3 Within the City Deal is a plan to create 45,000 new jobs.
- 3.4 Over the next 5 years the Government will provide £100m. A further £400m can be drawn down over the following 15 years. The scale of the investment by Government is testimony to how important Cambridge is to the UK economy. The National Infrastructure Commission's Interim Report on the Oxford-Milton Keynes-Cambridge corridor found in respect of the corridor that:

“With the exception of London, no other part of the country hosts such powerful a combination of: World leading universities and research institutes, ... globally competitive business clusters, ... and highly-skilled workers.... The corridor competes with locations across the globe to attract talent and investment. In considering where to base their operations, businesses with global reach may consider this corridor alongside areas such as Boston MA or the San Francisco Bay Area. If the UK is to succeed in the global economy, it must invest in the continued success of this corridor, sustain its competitiveness and develop its role at the heart of the UK knowledge economy. In addition - workers in the cities are highly productive, workers in Milton Keynes and Oxford are 23% and 14% more productive than the UK average respectively”.

National Infrastructure Commission interim report | Cambridge – Milton Keynes – Oxford corridor. Paragraphs 1.1-1.23.5

- 3.5 The recent decision on Brexit has, so far, had minimal effect upon the market. We are only aware of one company (Xaar) that has postponed a planned expansion into a new building.
- 3.6 Over the last 10 years there has been an increase in overseas companies establishing a presence in the city. This includes Huawei, Hewlett Packard, Apple, Spotify and Amazon. We do not see this abating.

4.0 THE OFFICE & LABORATORY MARKET

- 4.1 It is crucial in market terms to recognise the differentiation in types and quality of space, and in particular, between office and laboratory markets.

Current supply of built stock

- 4.2 Cambridge has an office stock of approx. 5.6 million sq ft and a fitted laboratory stock of approx. 2 million sq ft. If 45,000 new jobs were created, over 4 million sq ft of new space would be needed.
- 4.3 **Appendix 1** shows the current supply of available labs and offices over 10,000 sq ft. It highlights an acute shortage, with Grade A space being below 4% and much of this on remote parks like Cambourne and Cambridge Research Park.
- 4.4 The only speculative development taking place is at Cambridge Science Park where Trinity College have begun regeneration of the early phase 1 area and are erecting approx. 150,000 sq ft in 3 office buildings. 60,000 sq ft is already under offer.

The loss of office stock to alternative uses

- 4.5 Supply of built office stock has diminished through buildings being converted to student accommodation, teaching facilities and hotel use. In the last 4 years over 200,000 sq ft has been lost through the following schemes:

Elizabeth House	35,000 sq ft	Student rooms (CATS College)
Castle Court	80,000 sq ft	Student rooms (Study Inn)
Compass House	35,000 sq ft	Teaching space (Anglia Ruskin)
Intercell House	25,000 sq ft	Premier Inn hotel
Mount Pleasant House	40,000 sq ft	Student rooms (planning submitted)

This depletion of central stock is contributing to occupiers needing to look to fringe locations for offices.

Pipeline of development land

- 4.5 **Appendix 2** lists the office and laboratory parks within Cambridge and a 10mile radius and details the supply of land for B1 a/b office/research development.
- 4.6 At present, land for approximately 2.15m sq ft of B1a/b uses is consented.
- 4.7 However, within this figure it is worth noting that:
 - i. 1m sq ft is on parks with a specific bias to life science (lab based) occupiers.
 - ii. 500k sq ft at Cambourne Business Park is expected to be changed to residential consent.
 - iii. The next phase at Cambridge Research Park is to be built as light industrial – 80,000 sq ft
 - iv. There is no significant consented land on the south side of the city for pure office (non-lab) users.

If the total figure is rationalised to take account of these specifics, then there is approx. 570,000 sq ft of traditional B1a/b **office** focussed consent, less than 2 years supply on current **office** take up levels.

Demand

- 4.8 Bidwells latest Databook research lists 1.1m sq ft of office and 472k sq ft of lab demand.
- 4.9 A number of sectors are witnessing growth particularly in specialist areas such as personalised medicine research (Horizon Discovery), computer gaming (Frontier) and cyber security (Dark Trace)
- 4.10 A number of new companies have also set up in Cambridge over the last 5 years, notably Huawei, Amazon and Apple, often arriving via acquisition of a local firm.

Take Up

- 4.11 Total office and lab take up over the last 10 years is listed as follows and gives an annualised average of 658,200 sq ft.

Office & Lab Take Up (sq ft)	
2015:	1,209,500
2014:	932,000
2013:	780,200
2012:	416,900
2011:	626,800
2010:	404,800
2009:	577,100
2008:	599,100
2007:	624,500
2006:	591,800
2005:	477,500

- 4.12 As a result of these factors, there is a widely acknowledged shortage of office space, and this is having an impact on rents. The National Infrastructure Commission found that

“Office property demand has grown faster than supply, leading to increasing prices: In Oxford and Cambridge there have been sharp increases in asking rents for office space (of 13% and 18% over the last two and a half years respectively.) Similarly, there has been a sharp drop in the proportion of total stock available for rent.”

National Infrastructure Commission interim report | Cambridge – Milton Keynes – Oxford corridor. Paragraph 2.28

Absorption of development land

- 4.13 Since the UK emerged from the economic crisis, development levels in Cambridge have been increased to meet renewed demand. In the last 5 years we have seen significant amounts of allocated land taken up, including:

CB1 Station Rd	Over 150,000 sq ft in 22 Station Rd and One The Square. Work is about to begin on 150,000 sq ft in the next building.
Cambridge Science Park	Trinity has started speculative development of 150,000 sq ft (60,000 sq ft is already under offer).
Cambridge Biomed Campus	Over 1m sq ft under construction for AZ and Papworth Hospital.
Cambridge Research Park	75,000 sq ft speculative building by Rockspring. Work to start on 80,000 sq ft light industrial.
Capital Park	Completion of the final building CPC2 - 40,000 sq ft
Granta Park	155,000 sq ft under construction for Illumina.
Babraham Research Park	Over 100,000 sq ft of new laboratory space.

- 4.13 The only locations with extensive land supply are Cambourne Business Park and Cambridge Research Park which, due to their more remote locations, are perceived as less sustainable and/or attractive to Cambridge occupiers and at the Cambridge Biomedical Campus and Granta Park, where the bias is to attract specialist life science occupiers.
- 4.14 The absorption of land from the schemes listed above, has now made it more pertinent for the City and South Cambs Councils to be looking at the next phase of allocations that will secure land availability over the life of the plan period and beyond, and to cater for demand in the event the local economy grows more quickly than the Plans currently envisage.
- 4.15 Whilst consented land can be balanced against the predicted job creations over a local plan period, the occasional large and unpredictable company arrival can skew figures – for example Astra Zenica as stated and Northwest Biopharma who plan to create a new campus in Sawston. As it stands, the economy and job growth in Cambridge City has grown at a more rapid pace over the first five years of the plan period, which if it continued, would see a crisis of supply well before 2031.

5.0 LOCATIONAL AND SECTOR SPECIFICS

- 5.1 It is our concern that the Council has not undertaken sufficient locational and sector specific analysis in taking its decision to propose the reduction of allocation E2. By simply matching predicted job numbers over the plan period with allocated and proposed sites, the Council is not truly understanding where companies wish to locate and why, as specialist biotech parks become established, the need for traditional office space should not be overlooked.

The move to the city fringe

- 5.2 As Cambridge grows, the city centre is becoming less attractive to certain types of company, many of whom are now looking to the urban edges to locate their business. Perceptions over traffic congestion, prime rents reaching £35 per sq ft/pa and reduced parking provision on new schemes have fuelled a drift away from the core.
- 5.3 Examples of companies who have moved include, Ernst and Young (to Cambridge Business Park) and Display Link (Cambridge Science Park). Others such as PWC are considering following suit. The difference in rents on the edge of the city compared to the city centre can be between £5-10 per sq ft/pa, making a relocation all the more compelling.

North / South divide

- 5.4 Whilst the north side of the city (Cambridge Science Park, St John's, Cambridge Business Park) has traditionally attracted tech sector businesses, the south side has emerged as a biotech cluster as life science companies chose to locate near the research institutes at Babraham, Addenbrookes Hospital and the Wellcome Genome campus. Accordingly there has been sustained lab development at Babraham Research campus, Granta Park and the Cambridge Biomedical Campus.
- 5.5 Despite this trend, the south still appeals to office based tech and traditional occupiers, drawn by the road access to M11/A11 and in turn quicker links to Stansted Airport and London.
- 5.6 The only true office parks on the southern fringe are Peterhouse Technology Park and Capital Park. The former is almost exclusively occupied by ARM and their 150,000 sq ft extension is now under construction. Capital Park comprises 4 office buildings and is now totally built out with no further development land. There is only 6,000 sq ft available.
- 5.7 The upshot is that any office (non-lab) occupier looking for built accommodation above 10,000 sq ft on the southern edge of the city currently has **no immediate** options.
- 5.8 The release of more land at the Cambridge Biomedical Campus will only provide space for medical research companies. There has to be a balance of allocations on the south side of the city and therefore the larger E2 proposal is key to satisfying anticipated demand from 'non-lab' occupiers.

Why more remote business parks struggle

- 5.9 The Councils' combined approach – in both policy making and their evidence base – is to consider supply in more remote locations from Cambridge as being of equal status to land within or on the edge of Cambridge. In this regard, the 24.69ha of land the Council identifies in South Cambridgeshire in its Annual Monitoring Report 2014/15 includes a significant amount of land in locations remote to Cambridge for which there has been little demand, but which they now propose to compound with further allocations.
- 5.10 The directors at JRE have worked on buildings at Cambourne Business Park and are currently involved with three buildings at Cambridge Research Park. Both of these locations are classified as 'out of town', being 9 and 5 miles from the city centre respectively.
- 5.11 In both locations, space has been difficult to let. The principle reason has been a reluctance from companies who rely on a good proportion of staff who cycle, use a train or walk to work, not wanting to move outside the area bounded by the M11/A11 and A14. Cambridge is unique

in its cycle use and if a company has a few key employees who bike to work, they will not move further out and risk losing these valued employees. In April 2016 both these locations secured Enterprise Zone status yet there is still no evidence that this has helped drive new occupiers to the parks.

- 5.12 Occupiers see these locations as unsustainable and geared towards car users only. Public transport to and from these remote parks is time consuming and if delegates or visitors arrive at Cambridge station having taken a train from London, they face a lengthy taxi journey to reach their destination.
- 5.13 There is also emerging evidence that the 'millennial generation' are aligning their working life with their desire to be within an urban environment. Many graduates in Cambridge chose not to own cars and value the buzz and connectivity of the city in preference to a business park that may have few amenities and require a lengthy commute.
- 5.14 **Appendix 3** lists the business and life science parks within a 10 mile radius of the city and ranks their appeal to occupiers. Peterhouse Technology Park ranks in the top category, whereas remote locations – such as Cambourne – are in the third tier.

6.0 MICRO LOCATIONAL ANALYSIS

- 6.1 This section of the report considers the market attributes of Peterhouse Technology Park in the context of its location within South East Cambridge, and proximity to Capital Park. JRE worked for JP Morgan, previous owners of Capital Park and it was evident that this 'corner' of the city is viewed as an attractive and sustainable commercial location.
- 6.2 Companies like the fact that car users turned off to their office at 'the back of the queue' into the city yet the station is only a short bike/bus ride away for staff that use public transport. The Nos 1 and 3 bus services are extremely regular (20 minute intervals). Local amenities are provided in Cheery Hinton and Fulbourn and the Tesco store is within a 5 minute walk from both Capital Park and Peterhouse. There is now a child nursery and coffee bar at Capital Park.
- 6.3 The mixture of tenants at Capital Park includes IBM (software technology), Staffords (accountants), Syngenta (agricultural research), Scientia (software) and Boulton Tennant (patent lawyers). It is testament to the fact that even though – overall - the south side of Cambridge has a biotech bias, all manner of office based users are attracted to this fringe location.
- 6.4 The presence of the ARM campus gives this SE edge of the city an 'anchor tenant' which, as they continue to grow, will help fuel a mini cluster as businesses that serve them - or spin out from within - seek to co-locate. The full E/2 allocation would also help create critical mass of scale and activity at Peterhouse Technology Park and justify delivery of amenities such as a café and child nursery at Peterhouse, which will in turn drive the success of this location. The Council does not appear to have considered these factors in its decision to reduce the scale of E/2.
- 6.5 Softbank, the new Japanese owner of ARM, has stated that it will maintain the UK HQ in Cambridge and aim to double workforce over the next 5 years. This could take Cambridge based staff numbers to 3,000-3,500. If the upper end of this scale is achieved, the current expansion space (on allocations GB3 and GB4 in Cambridge City) would become fully occupied and further land would be needed if more growth followed.

- 6.6 ARM is expected to be at the forefront of chip design for the 'Internet of Things' and this will see a significant growth profile over the coming years.
- 6.7 If sufficient space was not provided this could undermine the basis for its ongoing expansion in Cambridge – ARM already has a global network of operations, and with its new overseas owners, it could become more footloose and mobile in its decision making on where it focuses its growth. The inability to grow a cluster of like-minded businesses around it at Peterhouse Technology Park would also be a factor in its deliberations. There is local concern that the new owners could even change their minds and relocate the company, perhaps nearer to Heathrow or even overseas. This fuels the reasons not to let ARM become constrained by land supply, and hence ensure that the full allocation of E/2 gives it confidence of an ability to expand locally in the long term.
- 6.8 The full allocation of E/2 (as originally proposed) would allow for development of up to 560,000 sq ft (gross) within 5 or 6 buildings to accommodate circa 4,500 jobs. This level of space could provide for any ARM growth beyond current projections and allow more office occupiers to co-locate/cluster around this influential campus. By contrast, a smaller allocation – as proposed by the Council in its Modifications – would allow only 285,000 sq ft (gross) and be able to accommodate just 2,300 jobs.

7.0 SUMMARY AND CONCLUSIONS

- 7.1 Cambridge is undergoing an unprecedented era of growth, something that is firmly supported by central government as it recognises the value of UK knowledge-based industries.
- 7.2 Astra Zeneca's decision to move its research HQ bringing over 2,000 jobs to Cambridge has reinforced the city's appeal. The property market has seen significant demand reflecting the rapid pace of job growth in and on the edge of the City.
- 7.3 The prospect of Brexit appears to have had limited affect upon the Cambridge market.
- 7.4 Stock levels of existing office and lab buildings are at an all-time low.
- 7.5 Current levels of consented business/science park land could only provide for 4 or 5 years of average level take up.
- 7.6 Occupiers strongly favour city fringe locations as the centre becomes more unaffordable/congested. Remote business parks are seen as unsustainable for cyclists/public transport users and are unattractive to most office occupiers, particularly in knowledge-based sectors.
- 7.7 The south side of the city has attracted traditional office users but now existing space has virtually run out.
- 7.8 Nearly all allocated land on the south side is for specialist medical research users. Extending an allocation at Cambridge Biomedical Campus will not cater for demand from traditional office based users. Further expansion at Peterhouse Technology Park is the only location available to satisfy this demand.
- 7.9 The growth of Cambridge has many constraints, but evidence of where companies prefer to locate should be a fundamentally important market signal that informs the Council's decisions upon releasing employment land. It is clear that office parks like Cambourne and Cambridge Research Park have struggled to attract companies due to their more remote locations and even after 15 -20 years of being established – and with a booming Cambridge economy - still

suffer from empty space and undeveloped land. The fact that the owners are considering alternative uses such as residential and light industrial on the next phases bears this out. The Councils' decision to compound these problems by adding further allocations in remote locations and not provide sufficient expansion in locations that demonstrably do have demand, is likely to mean occupiers not having sufficiently attractive options in and around Cambridge. They will likely either constrain their growth, or choose to explore other locations either elsewhere in the UK or overseas.

- 7.11 The original E/2 allocation of 6.9ha would provide the minimum scale of extension to Peterhouse Technology Park required to meet market demand in a sustainable and accessible location and deliver much needed office buildings to this part of the city.

CAMBRIDGE OFFICE AVAILABILITY
Existing units over 10,000 sq ft
November 2016



ADDRESS	LANDLORD	AVAILABLE SQ FT	RENT £PSF	GRADE	COMMENT
Existing Buildings					
NORTH CAMBRIDGE					
8200, Cambridge Research Park Whole	Rockspring	25,000	23.50	A	New 2 storey building Available in floors from 13,000 sq ft.
Building 3000, Cambridge Research Park Part	Kier	10,000	23.50	A	30,000sq ft office to be occupied by Kier, 10,000 sq ft surplus.
Building 5100, Cambridge Research Park Whole	Secretary of State	29,876	16.00	A	Former Fire Services Centre, bespoke building with specialist fit out.
1000 Cambridge Research Park	Threadneedle	23,165	23.50	A	Fully refurbished
216 Cambridge Science Park	L&G	23,000	tba	B	To be refurbished.
Total sq ft		111,041			
WEST CAMBRIDGE					
2 nd Floor, Building 2020, Cambourne Business Park Part	La Salle Investment Managers	18,500	22.50	A	Refurbished
Building 1020, Cambourne Business Park Part	Alpha Real	29,162	18.50	B	Subletting of part of building from tenant, Convergys.

Building 2010, Cambourne Business Park Part	Alpha Real	14,408	20.05	B	1st floor sub lease from Convergys
Total sq ft		62,070			
SOUTH CAMBRIDGE					
Total sq ft		0			
CITY CENTRE & FRINGE					
One Station Square, Station Rd, CB1	Orchard Street	41,000	35.00+ guide	A	Development by Brookgate, forward funded by Orchard Street. Completion Nov 16. U/offer to Amazon
Total sq ft		41,000			
Grand total sq ft		214,111			

Availability summary

Total office stock: **5.6m sq ft**

Sector	Total available sq ft	%	Vacancy rate	Grade A available sq ft	%	Vacancy rate	Grade A Under offer sq ft
North	111,041	52		88,041	60		
West	62,070	29		18,500	12		
South	0	0		0	0		
City centre & city fringe	41,000	19		41,000	28	,	41,000
Total	214,111	100	3.8%	147,541	100	2.6%	



Schedule of Cambridge Parks (10 mile radius)

November 2016

Property	Description	Owner/Developer	Planning/Use	Availability	Future Development
Babraham Research Campus	Specialist Life science campus	Babraham Institute (BBSRC/MRC)	R&D User Only		80,000 sq ft
Granta Park	470,000 sq ft R&D park	Biomed Realty US REIT (Blackstone)	B1(b)	45,000 sq ft Portway	2 Plots for 60,000 sq ft Phase 2 (TWI) 150,000 sq ft
Genome Campus Hinxton	300,000 sq ft research campus	Wellcome Trust	B1 (a/b)	Not available for commercial letting	
Cambridge Biomedical Campus	Hospital and biomedical research campus	Addenbrookes NHS Liberty/Countryside	R&D User Only	600,000 sq ft to pre-let	20 acres may be released from green belt
Peterhouse Technology Park	150,000 sq ft Business park	CIN c/o Lasalle	R&D User Only		150,000 sq ft to be built as extension for ARM. Further release from green belt.
Capital Park	160,000 sq ft Business park	Henderson	B1 (a/b) with local User restriction	6,500 sq ft (CPC2)	
West Cambridge	250,000 sq ft Univ campus	Cambridge University Turnstone	R&D User Only	Small suites	500,000 sq ft planning submitted University will absorb majority

Property	Description	Owner/Developer	Planning/Use	Availability	Future Development
Cambourne Business Park Phase 1	100,000 sq ft Business Park	Alpha Fund LLP	Open User B1(a)		500,000 sq ft
Cambourne Business Park Phase 2	135,000 sq ft Business Park	La Salle Investment Managers	Open User B1(a)	80,000 sq ft	Plots for 250,000 sq ft
Vision Park Histon	250,000 sq ft Business Park	Royal London, Threadneedle + others	B1(a/b) Open User	20,000 sq ft small office suites	
Cambridge Research Park	600,000 sq ft Business Park	Threadneedle (Zurich) Rockspring	Open User B1(a/b/c) but local user clause	60,000 sq ft	18 acres of serviced land (approx. 300,000 sq ft)
Cambridge Science Park	1,600,000 sq ft R&D park	Trinity College Trinity Hall College	Specific science based user clause	80,000 sq ft	150,000 sq ft within redevelopment of Phase 1. 3 plots for 120,000 sq ft Phase 6
St John's Innovation Park	150,000 sq ft R&D park	St John's College	R&D User Only		65,000 sq ft Maurice Wilkes
Cambridge Business Park	450,000 sq ft Business Park	Crown Estate	B1(a/b) Open User	11,000 sq ft	

Cambridge Business/R&D and Life Science Parks

Hierarchy based on occupier preference

Business /R&D Parks

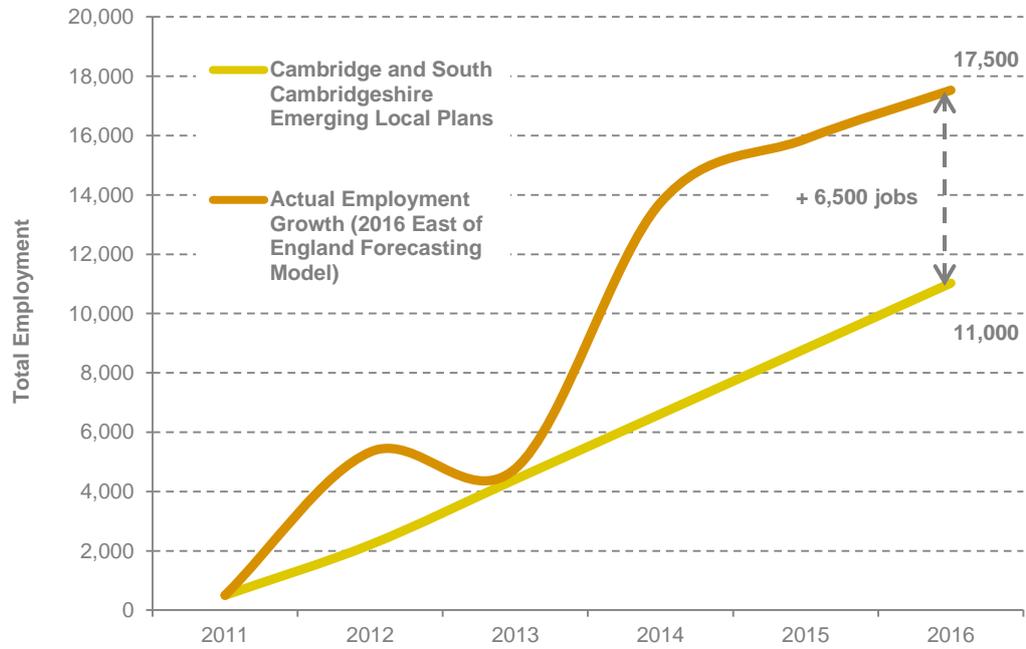
Ranking	Address	Location	Description	Attributes	Vacant space/land
A	Cambridge Science Park	Fringe	Offices 70% Lab 30%	Address still provides 'kudos'. Guided busway has helped accessibility.	150,000 sq ft under construction. Plots for 120,000 sq ft.
A	Cambridge Business Park	Fringe	Offices	Open B1 user is attractive. New CB4 train station will help.	No further land
A	St John's Innovation Park	Fringe	Offices	Part of popular 'northern fringe'. CB4 train station will help	Plot for 65,000 sq ft
A	Peterhouse Tech Park	Fringe	Offices	Avoids worst traffic. Excellent bus links. Nearby amenities	150,000 sq ft for ARM under construction. Further land allocated.
A	Capital Park	Fringe	Offices	Avoids worst traffic. Excellent bus links High quality buildings. Child nursery	6,000 sq ft on market. No further land.
A	Vision Park	Fringe	Offices	Improved by Guided Busway stop. Amenities in Histon village. Avoids traffic	Small suites on market. No further land.
B	West Cambridge Campus	Fringe	Offices/University Depts	Edge of city with good cycle/bus routes. Co-location with Uni Depts.	Application to extend by 500,000 sq ft. University will absorb majority.
C	Cambridge Research Park	Out of Town	Offices 90% Lab 10%	High quality buildings. Lower rents	60,000 sq ft available. 18 acres of land.
C	Cambourne Buisness Park	Out of Town	Offices	High quality buildings. Lower rents	80,000 sq ft available. Land for 750,000 sq ft

Life Science Parks

Ranking	Address	Location			
A	Cambridge Biomedical	Fringe	Lab	Co-location with Addenbrookes and research institutes. Excellent public transport/cycle links	Land for 600,000 sq ft Further 20 acres proposed release
A	Babraham Institute	Out of Town	Lab	Availability of incubator/'grow on' space. Secure perimeter.	Land for 80,000 sq ft
A	Granta Park	Out of Town	Lab 95% Office 10%	Cluster of life science. Private bus service. Biotech focussed landlord.	Land for 210,000 sq ft
B	Chesterford Research Pk	Out of Town	Lab 95% Office 10%	Secure perimeter. Park like setting.	80,000 sq ft Land for 250,000 sq ft.

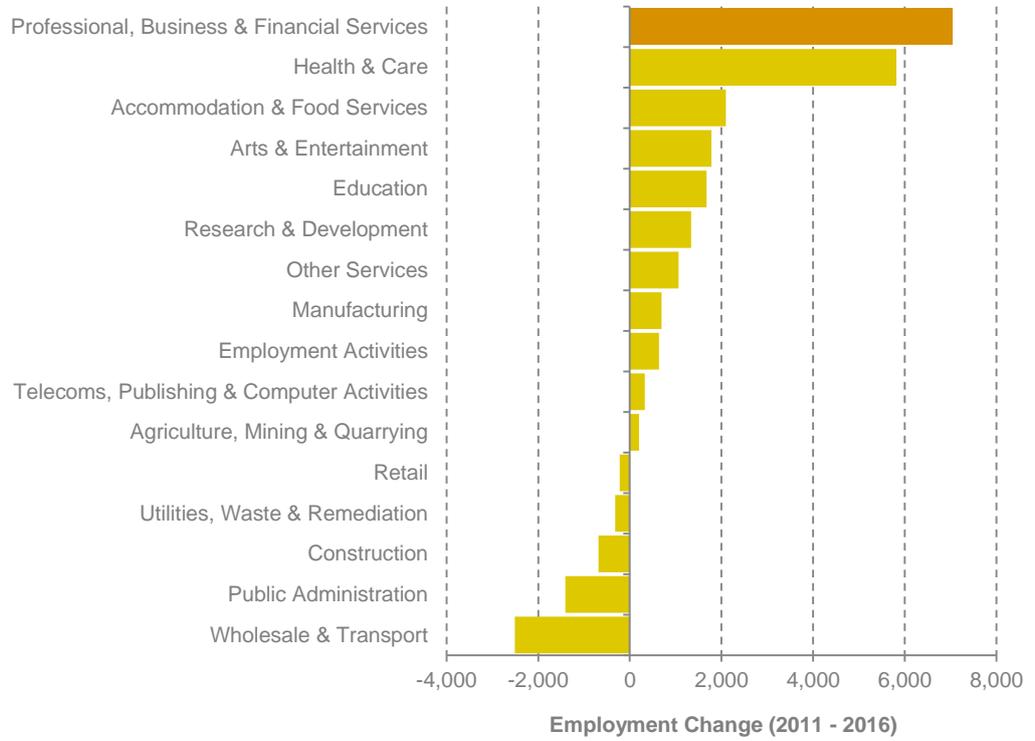
Annex B: Employment Growth 2011-16

Figure 1 Recent Employment Growth in Cambridge and South Cambridgeshire, 2011 - 2016



Source: Cambridge and South Cambridgeshire Emerging Local Plans / 2016 EEFM / NLP analysis

Figure 2 Recent Employment Change in Cambridge & South Cambridgeshire by Sector, 2011 - 2016



Source: 2016 EEFM / NLP analysis

Annex C: Tyler Grange Green Belt Review Technical Report and Appendices

**Cambridge City and South Cambridgeshire Local Plan Examination
Matters and Issues for South Cambridgeshire Local Plan specific hearing sessions:
Matter SC7 Building a Strong and Competitive Economy**

**Issue SC7B Policy E/2: Fulbourn Road East (Fulbourn) – Proposed Modification
PM/SC/8/C**

ii Is the proposed reduction in the size of the allocation (PM/SC/8/C) justified by the findings of the Inner Green Belt Boundary Study S/5?

2015 Cambridge Inner Green Belt Boundary Study Methodology

- 1.1. The proposed reduction in the size of allocation (PM/SC/8/C) is not justified by the findings of the Inner Green Belt Boundary Study S/5 (the 2015 Study).
- 1.2. As previously set-out within the CEG Representations to the Proposed Modifications¹, the methodology employed by the 2015 Cambridge Inner Green Belt Boundary Study undertaken by LDA (RD/MC/030) (the 2015 Study) has failed to provide a ‘robust, transparent and clear understanding of how the land in the Cambridge Green Belt performs against the purposes of the Cambridge Green Belt’.
- 1.3. This has been subsequently reinforced through CEG’s Hearing Statement for Matter PM2.1 – Green Belt Review Methodology².
- 1.4. As detailed at Appendix 3 to CEG’s Representations³ and within the Matter PM2.1 Hearing Statement, Tyler Grange has identified several key flaws and soundness concerns, including the following:
 - The introduction of criteria which are not relevant to the Green Belt purposes and therefore not consistent with National Policy;
 - Reliance on subjective measures and general narrative to describe performance against the criteria and definitions of the extent of potential release sites, meaning that the conclusions are open to interpretation and cannot be replicated or verified;
 - The baseline studies and analysis place an emphasis on issues relating to the character and setting of Cambridge, which has filtered down to the assessment criteria and resulted in an over-emphasis on the importance of setting in balance against the overall assessment of the Green Belt; and
 - The Study does not provide a clear explanation or justification of how land within those sectors and sub areas assessed contributes to the Green Belt and does not allow for the clear identification of areas of land that are suitable for release from the Green Belt.

¹ Representation Refs: 65992-66019 and 66020-66021 esp. 65995, 65996, 65998, 66000, 66003, 66004, 66007, 60014, 60015, 60016, 60020, 60021

² Cambridge City and South Cambridgeshire Local Plan Examination Matter PM2 – Green Belt Review Methodology: Issue PM2.1 11 May 2016(report: 1665/12c)

³ Cambridge South East: Appendix 3 – Technical Paper in support of CEG Representations regarding the Green Belt Study, 25 January 2016 (report: 1665/R11a)

- 1.5. These flaws in the methodology and application of broad criteria has led to a set of parameters that propose the release of a small parcel of land that lies within the extents of the previous E/2 (Proposed Modification PM/SC/8/C).
- 1.6. This is despite the E/2 Allocation falling within the extents of development on Cambridge Road and being bounded by an access track, hedgerow and trees that forming a recognisable feature and defensible boundary on the ground.

Parameters for Green Belt Release – Sector 13 Southeast Cambridge

- 2.1. Sub area 13.1 includes an area of land considered by the 2015 Study as suitable for release from the Green Belt. Notwithstanding the relevance of the criteria employed by the 2015 Study to Green Belt issues, the lack of clarity in defining measurable parameters and thresholds has allowed for the misinterpretation of several clear “facts on the ground” when defining the parameters for the release of land within Sub-area 13.1, east of Peterhouse Technology Park.
- 2.2. The 2015 Study falls short of providing a plan which clearly identifies a recommended area for Green Belt Release, and set-out parameters that have informed the proposed reduction of the proposed allocation⁴ These are examined further below in relation to the reduced extent of the Proposed Modification and comparison with the former E/2 allocation.
- 2.3. A copy of LDA’s assessment of Sector 13 (land to the south of Fulbourn) is included at **Appendix 1**.
- 2.4. In the case of the Proposed Modifications to allocation E/2 (PM/SC/8/C), the reduction in the Green Belt release is based upon an error by LDA in respect of the extent of the urban area and gateways on Cambridge Road.
- 2.5. As set-out in CEG’s Representations⁵, LDA’s assessment and parameters for the extent of potential release of land at Site E/2 is unjustified for the following reasons:
 - *The recent re-development of the Alms Houses to the east of the roundabout provides a distinct built edge fronting Fulbourn Road, extending the urban edge on the approach to Cambridge;*
 - *To the east of the roundabout, the entrance to Fulbourn Hospital and associated signage combine with the Alms Houses development to form an urban gateway in this location; and*
 - *North of Fulbourn Hospital, a supermarket and office buildings at Capital Park extend the developed urban edge beyond Yarrow Road to the east of Cherry Hinton.*
- 2.6. The representations recommend the reinstatement of land originally included as part of the allocation site E/2, based upon CEG’s interpretation of the parameters for Green Belt release at Sub-area 13.1. These are illustrated on Figure 3.3 extracted from the representations.⁶

⁴ Cambridge Inner Green Belt Boundary Study, November 2015, LDA (RD/MC/030): pages 143 - 148 (paginated pages 152 - 158), third bullet point

⁵ CEG Representations to Proposed Modifications to the Cambridge City and South Cambridgeshire Local Plans, January 2016: paragraph 2.29 (pages 11 – 12)

⁶ CEG Representations to Proposed Modifications to the Cambridge City and South Cambridgeshire Local Plans, January 2016: Figure 3.3 Proposed Reversion to Original E/2 allocation in Submission Draft South Cambridgeshire Local Plan

Eastern Extent of Release

- 2.7. When providing justification for the parameters in relation to the extent of development, the 2015 Study states that:

“The new Green Belt boundary would not significantly increase the extent of the city from the historic core, aligning with the existing boundaries around Peterhouse Technology Park and Cherry Hinton. A permanent, well-designed edge to the city would be created. Thus, the increase in urban sprawl would be permanently limited and would not affect perceptions of the compact nature of the city.”⁷

- 2.8. This description highlights the inadequacies of LDAs methodology when identifying and defining land for release but could be more appropriately applied to the original E/2, where existing established features, specifically an existing field boundary and access track, would provide a clearly defined boundary. Conversely, LDA’s parameters place the eastern extent of the proposed release within an open field where there is no existing boundary or recognisable feature on the ground.
- 2.9. Given the absence of any measurable criteria to establish the relative size of the city to the historic core, the gateways and approaches identified by the 2015 Study provide a guide to what the Study may assume is the extent of the existing urban edge.
- 2.10. The 2015 Study defines urban gateways as: *“The Urban Gateway is the point at which the character of the route becomes built-up and urban”⁸* These include several urban gateways around Cambridge with a variety of different built edges and characters formed by surrounding development.
- 2.11. The urban gateway on Cambridge Road is identified as being to the east of the Yarrow Road Roundabout, opposite the modern Alms Houses development and entrance to Fulbourn Hospital. This is illustrated on Figure 10 ‘Gateways and Approaches’⁹.
- 2.12. Although shown on Figure 10, the urban gateway on Cambridge Road is not identified or described within the Baseline Studies and Analysis, nor is it assessed against the Assessment Criteria for Sector 13.
- 2.13. The urban gateway on Cambridge Road, and the surrounding built context, including the consented and under-construction ARM extension at Peterhouse Technology Park is illustrated on the drawing **Cambridge Road Urban Gateway and Extent of Development (1665/P134a)** at **Appendix 2**. This includes labels to highlight the situation of the key features and parameters of relevance to the Green Belt and release of land in this location.
- 2.14. The drawing shows the locations of **Viewpoints 1 – 3**, the views from which are illustrated on the **Photosheets (1665/P135a)** that are also included **Appendix 2** which demonstrate the role that the Alms House development plays as the urban gateway and extent of the urban built edge along Cambridge Road:

- **Viewpoint 1: From adjacent to the Alms House Development on Cambridge Road, looking west:** From this location to the east of the Yarrow Road Roundabout, the Alms

⁷ Cambridge Inner Green Belt Boundary Study, November 2015, LDA (RD/MC/030): page 148, third bullet point

⁸ Cambridge Inner Green Belt Boundary Study, November 2015, LDA (RD/MC/030): page 44, paragraph 4.11.3

⁹ Cambridge Inner Green Belt Boundary Study, November 2015, LDA (RD/MC/030): Figure10: Gateways and Approaches (dwg no. 4732_010)

House development to the east of Yarrow Road forms a distinct built-up urban edge fronting the road and a gateway on the edge of Cambridge. Beyond the roundabout, properties of Coltsfoot Close are filtered by mature hedgerows and trees to gardens along the roadside, with roof tops visible above the intervening vegetation.

- **Viewpoint 2: From the Yarrow Road Roundabout, looking north:** In this view, which reflects the point that LDA defines as being the furthest extent of the urban area from the historic core, it is clear that the houses to the east extend the urban edge beyond the roundabout.
- **Viewpoint 3: From Cambridge Road at the entrance to Fulbourn Hospital, looking west.** This view demonstrates the gateway provided by the Alms Houses as a distinct boundary to the urban edge on the city approaches on Cambridge Road. The view also shows the access track to Westbourn Farm defined by trees and hedgerows that forms the clearly defined boundary of the E/2 Allocation area and matches-up with the existing built edge formed by the Alms Houses.

- 2.15. The plan and photoviews clearly demonstrate that the LDA parameters are inappropriate and inadequate when identifying the eastern extent of the land which may be suitable for release from the Green Belt. This has resulted in recommendations that limit the release of Green Belt land to the east of Yarrow Road, despite the land falling within the extent of existing development.
- 2.16. It is unclear why the land to the east of Yarrow Road is considered by LDA to be inappropriate for Green Belt release. It has not been demonstrated that this area of land makes a greater contribution to the purposes and function of the Green Belt than the land west of the roundabout junction.
- 2.17. The Alms House development east of Yarrow Road forms a clearly defined urban boundary in this location, marking the extent of the built edge of Cambridge. The access track, hedgerow and trees to the east also provide a robust defensible boundary that would serve to limit any further expansion and sprawl of the city in this direction, as well as forming a robust new Green Belt Boundary. The potential for planting up of this boundary also offers the opportunity to enhance the soft green edge to the city and integrate development at the transition to the countryside. This could also be achieved along the southern extent of the allocation, using an appropriate planted edge as employed at Peterhouse Technology Park and the recently permitted, under-construction extension of the ARM Headquarters (CCC planning application ref. 15/0893/FUL)
- 2.18. Limiting the release of Green Belt based on the LDA analysis and assessment would not reflect the requirements of the NPPF which states at paragraph 85 that, when defining boundaries, local planning authorities should:
- *“Not include land which it is unnecessary to keep permanently open; and*
 - *Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.”*

E/2 Allocation: Development Options

- 2.19. In order to demonstrate how the E/2 Allocation Site may be developed to accommodate different configurations and types of development for employment use, Scott Brownrigg have prepared Indicative Masterplan options (Option A and B at **Appendix 3**). These indicate two different configurations of business park style buildings and associated car parking, incorporating large footprint buildings suitable for technology companies, such as those

currently at Peterhouse Technology Park. There would be flexibility to also accommodate smaller footprint buildings if required to provide flexibility to meet demand.

- 2.20. The two options provide a similar footprint and scale of development within the E/2 Allocation site, whilst offering alternatives for different users and uses. In addition to this, the options also provide examples of how development on land that is suitable for release from the Green Belt can respond to the surrounding context and sensitivities of the receiving environment in different ways. For example:
- **Option A** provides development that extends along the northern edge of the E/2 Allocation site, with the car parking to the south of the site. The parking could be feathered into the slopes to minimise any landscape and visual impacts, allowing for planting within car parking spaces to further break-up and soften development; and
 - **Option B** provides car parking to the east of the site to provide an offset to development opposite residents of properties to the north of Cambridge Road.
- 2.21. Both options are contained within the extents of existing development and the Westbourn Farm access track and hedgerow to the east forming a robust boundary to the Green Belt. They also both allow for the landscape planting of the southern boundary to establish a new Green Belt boundary that provides a soft green edge to the City and a soft transition with the agricultural landscape beyond, as approved by Cambridge City Council for the permitted extension of the Peterhouse Technology Park to the west of ARM1 (CCC planning application ref. 15/0893/FUL).
- 2.22. There would also be opportunities for the design of development to consider other factors including: the frontage to Cambridge Road; options for planting to frontages and within the site; and the heights, materials and design of buildings.
- 2.23. Through collaboration with the Council and Stakeholders through the adoption of an SPD or as part of a planning application, development of the area could be designed to provide an exemplar high quality, sustainable development that responds positively to the surrounding context.

Limitations of the 2015 Cambridge Inner Green Belt Boundary Study Parameters

- 2.24. As set-out above, the 2015 Study does not include analysis to justify or demonstrate how land within Allocation E/2 east of the Yarrow Road roundabout makes a greater contribution to the Green Belt than the land within the Proposed Modification (PM/SC/8/c) site.
- 2.25. The E/2 Allocation releases land that is contained within the extents of existing development at Peterhouse Technology Park and along Cambridge Road, being defined by the access track to Westbourn Farm and associated hedgerow and trees to the east.
- 2.26. LDA's parameters for the release of Green Belt land a sub-area 13.1 are limiting and do not provide the flexibility to allow for a masterplanning approach to ensure sensitively designed development within the land defined by the access track and hedgerows (Allocation E/2).
- 2.27. This approach is at odds with that formerly taken by LDA within the 2002 Cambridge Green Belt Study (RD/Strat/180) which made recommendations for the release of land at East Cambridge under the heading 'A Vision of East Cambridge'. The approximate location of a new Green Belt boundary in this location is illustrated on the supporting plan a copy of which is

included at **Appendix 4**.¹⁰The legend to the plan shows the New Green Belt Boundary as a dashed line, with the text:

“Diagrammatically shown. Subject to further study and masterplanning work should principle of Green Belt change be accepted.”

- 2.28. This is despite the 2002 Cambridge Green Belt Study having undertaken a detailed site appraisal of East Cambridge with the brief stating that:

“A detailed assessment, following the same steps set out in the paragraph above, is made of the east side of Cambridge to identify whether there is scope for urban expansion, through Green Belt releases, without harming Green Belt purposes.”¹¹

- 2.29. This approach to the release of Green Belt has also been adopted by the Councils within the Cambridge East Area Action Plan (RD/AD/280) with **Policy CE/4 The Setting of Cambridge East** including a Green Corridor retained as Green Belt. Whilst this is defined on LDP Proposals Map within the Action Plan¹² the supporting text states that:

“The Green Belt boundary in the green corridor and west of Airport Way is not drawn with reference to clear physical boundaries. This is done in the knowledge that the precise boundaries of the green corridor will be determined on the review of the Area Action Plan when the timing of the relocation of the Airport is more certain and the masterplanning process is further advanced.”¹³

- 2.30. The 2015 Study uses essentially the same methodology as the 2002 Cambridge Green Belt Study, stating within the methodology section that:

“This study draws significantly from the Green Belt Study undertaken by LDA Design in 2002 on behalf of South Cambridgeshire District Council. The 2002 study adopted a similar approach of identifying qualities in order to understand the role played by the Green Belt around Cambridge, it did not assess specific areas of Green Belt in detail other than the land to the east of Cambridge...”¹⁴

- 2.31. Given the above factors, it is unclear as to why the 2015 Study does not provide a similar approach and provide recommendations for release of land that allow the flexibility for masterplanning to best define how land released from the Green Belt may be developed.

- 2.32. It is telling that the 2002 Cambridge Green Belt Study, when undertaking a detailed review of specific land at east Cambridge, allowed for some further interpretation as to the exact extents of land to be released based upon masterplanning, yet the 2015 Study using the same methodology seeks to define Green Belt release through defining new boundaries on land undefined by physical features on the ground. This highlights the flaws identified with the methodology and findings of the 2015 Study when seeking to determine land for release from the Green Belt.

¹⁰ Cambridge Green Belt Study – A Vision of the Future for Cambridge in its Green Belt Setting, Landscape Design Associates, September 2002 (RD/Strat/180) Detailed Study East of Cambridge – A Vision of East Cambridge (drawing 1641LP/15)

¹¹ Cambridge Green Belt Study – A Vision of the Future for Cambridge in its Green Belt Setting, Landscape Design Associates, September 2002 (RD/Strat/180) Page 1, fifth paragraph

¹² Cambridge East Area Action Plan DPD, SCDC and CCC, Adopted February 2008: Local Development Framework Proposals Map

¹³ Cambridge East Area Action Plan DPD, SCDC and CCC, Adopted February 2008: Page 21, paragraph C2.5

¹⁴ Cambridge Inner Green Belt Boundary Study, November 2015, LDA (RD/MC/030): Page 2, paragraph 0.3.1

Impact on the setting and Key Views of Cambridge

- 2.33. In addition to the parameters concerning the eastern extent of Green Belt release to the east of Peterhouse Technology Park (Sector 13.1), the 2015 Study also considers the setting of Cambridge. Parameters identify that development should not encroach onto land with a higher elevation than on the boundary with the Technology Park and to be of a similar scale and massing, in order to assimilate into the landscape.
- 2.34. The 2015 Study identifies a view elevated view from Shelford Road to the southeast (as shown on Figure 10 of the 2015 Study).¹⁵
- 2.35. The drawing: **Key View from Shelford Road: Extent of Existing Development and Allocation Sites (1665/P138) at Appendix 5** illustrates the view from this location, with distant views across the expansive, open arable fieldscape in the foreground towards the historic city skyline and landmarks on the horizon. In these views, development of the MRC building on the eastern edge of Peterhouse Technology Park is visible, set in front of a wooded backdrop at Cherry Hinton.
- 2.36. To illustrate how development of both the E/2 Allocation Site and Proposed Modification (PM/SC/8/C) may impact upon these views and the setting of Cambridge, the photoview is labelled to show the extents of Proposed Employment Allocations GB3, E.2 and the Proposed Main Modification (PM/SC/8/C). This demonstrates that the differences in scale of development between the E/2 Allocation and Proposed Main Modification would not be material in the only key view identify by LDA within which the either of the proposed allocation sites are visible. Development would preserve the setting of Cambridge in key views from Shelford Road, without an appreciable difference in the composition of the view or elements in it between either E/2 or the Proposed Modification.
- 2.37. The image shows that development of up to three storeys of a scale that reflects that at Peterhouse Technology Park would not introduce prominent or uncharacteristic development into the view, preserving the setting to the city formed by the expansive open arable fieldscape in the foreground. The development would not break the wooded intermediate skyline at Cherry Hinton and would not impinge upon views of the historic city skyline and landmarks on the horizon. Furthermore, the development would not interrupt or detract from views towards local landmarks at Fulbourn Hospital and Capital Park.
- 2.38. The labels also show that there would be a limited difference between development of the E/2 Allocation or the Proposed Modification site when seen in these expansive views. The composition of the view and distribution of features within it would remain fundamentally unaltered, with the setting and character of the city as seen from this location preserved.
- 2.39. The photoview from Shelford Road clearly demonstrates that there is no justification for the limiting of the eastern extent of the E/2 Allocation in respect of the setting and key views of Cambridge as defined by the 2015 Study. If the area proposed by the LDA parameters is acceptable in this regard, then the additional land to the east as included in the E/2 Allocation must be also.

¹⁵ Cambridge Inner Green Belt Boundary Study, November 2015, LDA (RD/MC/030): Figure 9: Visual Assessment (dwg no. 4732_009)

- 2.40. Furthermore, the photograph does not take into consideration any planting to boundaries that would strengthen the landscape structure, filter and break-up views of the development and provide a characteristic soft green edge to the city. This could include native hedgerows and trees planted to provide glimpsed views of the development and a soft transition with the adjacent land, as at the recently consented and under construction expansion of Peterhouse Technology Park (CCC planning application ref. 15/0893/FUL).

Conclusions

- 3.1. The proposed reduction in the size of allocation (PM/SC/8/C) is not justified by the findings of the 2015 Cambridge Inner Green Belt Boundary Study.
- 3.2. The 2015 Study has employed a flawed methodology using criteria that are not specific and do not relate clearly to the Green Belt purposes. Furthermore, LDA's assessment relies upon subjective measures and narrative, that does not clearly identify areas that are suitable for release from the Green Belt. This has led to incorrect assumptions being applied at the E/2 Allocation regarding the relationship of the land to the existing extents of the urban edge and defensible boundaries.
- 3.3. LDAs parameters for limiting the eastern extent of the release of Green Belt land in this location are not justifiable. Proposed Modification (PM/SC/8/C0) is defined by a line across an open area of land that does not relate to any features on the ground and lies within the extents of the built edge. It is not clear as to why the eastern area is more sensitive or makes a greater contribution to the purposes and function of the Green Belt than the land to the west of the Yarrow Road roundabout.
- 3.4. The release of the E/2 Allocation would allow for greater flexibility, with masterplanning and consultation with the Council and stakeholders to establish what may be acceptable and ensure appropriate development in this location.
- 3.5. The whole of the E/2 Allocation lies within the extent of the built edge and is bounded by an existing defensible boundary at the gateway to Cambridge. The development of the E/2 Allocation would preserve the setting of Cambridge in key views from Shelford Road, without an appreciable difference in the composition of the view or elements in it between either E/2 or the Proposed Modification.
- 3.6. There is scope for development of the E/2 Allocation site to incorporate a range of similar scale development to that at Peterhouse Technology Park, whilst allowing opportunities for the sensitive and appropriate treatment of boundaries to provide both robust Green Belt boundaries and a soft green edge at the transition with the agricultural land and approaches to the City along Cambridge Road. This would reflect the existing boundaries to Peterhouse Technology Park and the southern boundary of the consented and under-construction extension of the Park to the west of ARM1 (CCC planning application ref. 15/0893/FUL).
- 3.7. Each of the options for E/2 can be developed to fit within the following parameters that correctly reflect the existing gateway, extent of the urban edge and existing defensible Green Belt boundaries on the ground:
- Containment within the existing gateway and extent of the urban edge on the approach to Cambridge on Fulbourn Road as marked by the recent re-development of the Alms Houses fronting Fulbourn Road and entrance to Fulbourn Hospital;

- Containment within the wider extents of the urban form to the east of Cambridge formed by the supermarket and the office development at Capital Park alongside the railway line east of Cherry Hinton;
 - Preserving the landform of the rising land to the south;
 - Maintaining the setting of the City, including in key views from Shelford Road;
 - Maintaining separation with Fulbourn and contain urban sprawl; and
 - Providing a well vegetated, permanent and robust edge to the city in this location.
- 3.8. The field boundary alongside the access track to Westbourn Farm that defines the eastern edge of the E/2 Allocation site is an existing recognisable feature and would form a defensible Green Belt boundary.
- 3.9. In contrast, the parameters set by LDA and endorsed by the Councils in their proposed modifications would require a new boundary to be planted, as the eastern boundary of the reduced E2 site divides an open field with no landscape features to define it.



Appendix 1

Cambridge Inner Green Belt Study (November 2015) (RD/MC/030) Assessment of Green Belt Sectors,
Sector Number 13, South of Fulbourn

6.16. Sector Number: 13

Location: South of Fulbourn

- 6.16.1. Sector 13 extends onto the foothills of the Gog Magog Hills to the south east of the city, and exhibits undulating topography. It is one of the furthest Green Belt sectors from the historic core, which is 4.1 km away. Only the north-west corner of this sector abuts the edge of Cambridge at Cherry Hinton. This area forms the majority of the separation between Cambridge and Fulbourn, with the remainder of the separation formed by Fulbourn Hospital and Capital Park. In particular, sub area 13.2 is bounded by the village of Fulbourn to the east and Fulbourn Hospital and Capital Park to the west. Sub area 13.2 is further bounded by Fulbourn Old Drift Road to the north and Cambridge Road to the south. Sub area 13.1 is located on the south side of Cambridge Road, with the western boundary taken as the district boundary between Cambridge and South Cambridgeshire and the southern and eastern boundaries being Shelford Road.
- 6.16.2. Land use in this sector is entirely arable. The Conservation Area associated with Fulbourn Hospital is located immediately to the north west of the sector.
- 6.16.3. An elevated panoramic view of Cambridge from Shelford Road overlooks this area of Green Belt. Fulbourn Hospital and Fulbourn Windmill are key local landmarks that can be seen from this sector and are highlighted as distinctive/memorable features in the setting of Cambridge.

Sector Number: 13		
Assessment Criteria	Sub Area 13.1 - south of Cambridge Road	Sub Area 13.2 - north of Cambridge Road
1. A large historic core relative to the size of the city as a whole	Despite the presence of substantial suburban housing areas south east of the historic core, the scale of the historic core relative to the overall city still remains such that Cambridge retains its historic character. This sector is relatively remote from historic core, and equally as closely associated with the edge of Fulbourn as the edge of Cambridge, with the adjacent development being the furthest edge of the city from the historic core and having little sense of connection with the historic character of the city. The extent of development on this side of the city gives an impression of urban sprawl. This sector plays an important role in restricting further growth of the city in this direction. Significant expansion of development into this sector could start to threaten Cambridge’s identity as a city dominated by the historic core.	

Sector Number: 13		
Assessment Criteria	Sub Area 13.1 - south of Cambridge Road	Sub Area 13.2 - north of Cambridge Road
2. A city focussed on the historic core	<p>There are a number of neighbourhood hubs and areas of commercial, industrial, retail or institutional focus in the east and south east of the city. Although detailed analysis of this aspect of Cambridge has not been undertaken, it appears as though these nodes either serve local community needs without seriously competing with the city centre, or specialise in certain services that the city centre cannot cater for, and which would be out of character with the city centre (such as Capital Park and Peterhouse Technology Park). Retention of this sector of Green Belt helps to prevent the requirement for community scale centres to expand to a size that would compete with the historic core, as well as preventing the importance of Fulbourn as a centre increasing in its own right.</p>	
3. Short and/or characteristic approaches to the historic core from the edge of the city	<p>The approach along Cambridge Road from Fulbourn into Cambridge is a suburban approach into the city from the east, along the northern boundary of sub area 13.1 and the southern boundary of sub area 13.2. Given the extent of suburban development to the south east of the historic core, this approach is relatively long and does not currently contribute positively to the setting or special character of the city.</p> <p>Worts' Causeway (east) and Shelford Road provides an alternative route into Cambridge from Fulbourn, subsequently joining either Limekiln Road or Babraham Road, both of which are more characteristic green approaches into the city. Shelford Road offers elevated views over Cambridge that contribute to the special qualities of the Green Belt in their own right.</p> <p>The sector makes a significant contribution to the rural character of these approaches to the city edge but does not contribute to the approaches from the city edge to the historic core.</p>	
4. A city of human scale easily crossed by foot and by bicycle	<p>This quality has already been eroded to a certain extent to the south east of Cambridge, due to the extent of suburban development already present. Consequently the compactness of the city has been reduced and this sector is relatively far from the historic core for people to walk or cycle into the centre. However, there is a cycle route along Fulbourn Road/Cambridge Road between the two sub areas that is well used.</p>	

Sector Number: 13		
Assessment Criteria	Sub Area 13.1 - south of Cambridge Road	Sub Area 13.2 - north of Cambridge Road
5. Topography providing a framework to Cambridge	The area east of Westbourn Farm in the north west of this sector is relatively flat and forms part of the lower ground of the bowl landform in which Cambridge is located. The remainder of the sector slopes up towards the Gog Magog Hills to the south of the sector. The chalk hills of the Gog Magogs Hills are a key element of the topographic bowl in which Cambridge is located, providing physical and visual containment to the south east of the city. They provide a marked contrast to the lower lying ground on which Cambridge is located and the Fen landscape to the north and east of the city, physically manifesting the underlying geology. These are the closest areas of high ground to the edge of Cambridge, with the high point of Wandlebury located to the south west of this sector.	
6. Long distance footpaths and bridleways providing access to the countryside	There is no formal public access into or through this sector. Links from Fulbourn and Cambridge into this sector are very poor.	
7. Key views of Cambridge from the surrounding landscape	A key view has been identified from Shelford Road to the south west of Fulbourn. This key view has visibility of a number of the landmark features in the historic core are also visible when looking towards Cambridge, as well as the hangars at Cambridge Airport and Addenbrooke's Hospital. In addition, there are views of Fulbourn, including the local landmark features of Fulbourn Hospital and the windmill on Mill Hill.	
8. Significant areas of distinctive and supportive townscape and landscape	This sector is all assessed to be supportive landscape. The Gog Magog Hills are a distinctive feature of the setting of Cambridge in their own right, but they also form the backdrop to the city in views out to the surrounding landscape. They are the major component of the sense of place associated with the areas south east of Cambridge, influencing the perception of the city from this direction. In addition, the eastern end of the sector forms part of the setting to the village of Fulbourn and Fulbourn Hospital.	

Sector Number: 13		
Assessment Criteria	Sub Area 13.1 - south of Cambridge Road	Sub Area 13.2 - north of Cambridge Road
9. A soft green edge to the city	The edge of Cambridge in the vicinity of Sector 13 is mixed and generally unremarkable. It varies from abrupt, hard edges with modern housing or commercial development abutting arable fields, to more mature treed landscapes such as in the vicinity of Fulbourn Hospital. In views north west towards Cherry Hinton, the soft green edge present around some of the older parts of Cambridge, which creates a distinctive boundary between urban and rural, is not present and the urban edge would benefit from softening. Separately, the edge of Fulbourn also varies in terms of how green it appears.	
10. Good urban structure with well-designed edges to the city	The edge of the city adjacent to the north western corner of sub area 13.1 is not well designed and does not currently demonstrate a good urban structure. However, Peterhouse Technology Park is sunk into the landform such that it is hardly visible from the south and east, and has a well planted edge.	The edge of the Fulbourn adjacent to the eastern edge of sub area 13.2 is also not well designed and does not currently demonstrate a good urban structure.
11. Green corridors into the city	There are no green corridors into the city associated with this sector.	
12. The distribution, physical and visual separation of the necklace villages	This sector plays a key role in separation between Cambridge and Fulbourn.	
13. The scale, character, identity and rural setting of the necklace villages	Fulbourn is a relatively large, nucleated necklace village and has expanded from its historic core. This sector forms the immediate setting to Fulbourn to its south west and is important to prevent the sprawl of Fulbourn into the open countryside south west of the village.	
14. Designated sites and areas enriching the setting of Cambridge	Both sub areas of this sector abut the Conservation Area around Fulbourn Hospital, to the north of Cambridge Road. The windmill on Mill Hill is also a Grade II listed building.	

Sector Number: 13		
Assessment Criteria	Sub Area 13.1 - south of Cambridge Road	Sub Area 13.2 - north of Cambridge Road
15. Elements and features contributing to the character and structure of the landscape	The elevated and undulating landform of this sector is one of the features that contributes most to the character of the landscape setting of Cambridge in this vicinity. The relative absence of field boundary hedgerows is also a notable characteristic of the arable areas of this sector. However, the lack of a strong landscape structure increases the risk of urban sprawl if development is extended into the sector in the future. The windmill at Fulbourn and the distinctive buildings at Fulbourn Hospital are also positive features in and adjacent to this sector that contribute to the setting of Cambridge from the south east.	
16. A city set in a landscape which retains a strongly rural character	The landscape in this sector retains a strong rural character, despite the awareness of the edges of both Cambridge and Fulbourn immediately adjacent to the sector. The urbanising influence of the edge of Cambridge creates a sense of encroachment into the countryside and the rural setting of south east Cambridge, which could be reduced through planting and vegetation management along the urban edge.	

Importance of the sector to Green Belt Purposes

6.16.4. This sector plays a key role in the setting of the south east of Cambridge, with the foothills of the Gog Magog Hills forming the backdrop to views out from and across Cambridge in this direction. The sector also prevents the continued sprawl of Cambridge to the south east, halting expansion in this direction and ensuring that the distance between the historic core and the edge of Cambridge does not extend further than it is at present. It plays a key role in the remaining separation between Cambridge and Fulbourn, as well as the setting of the windmill on Mill Hill and the Conservation Area at Fulbourn Hospital.

Implications of Green Belt release for development

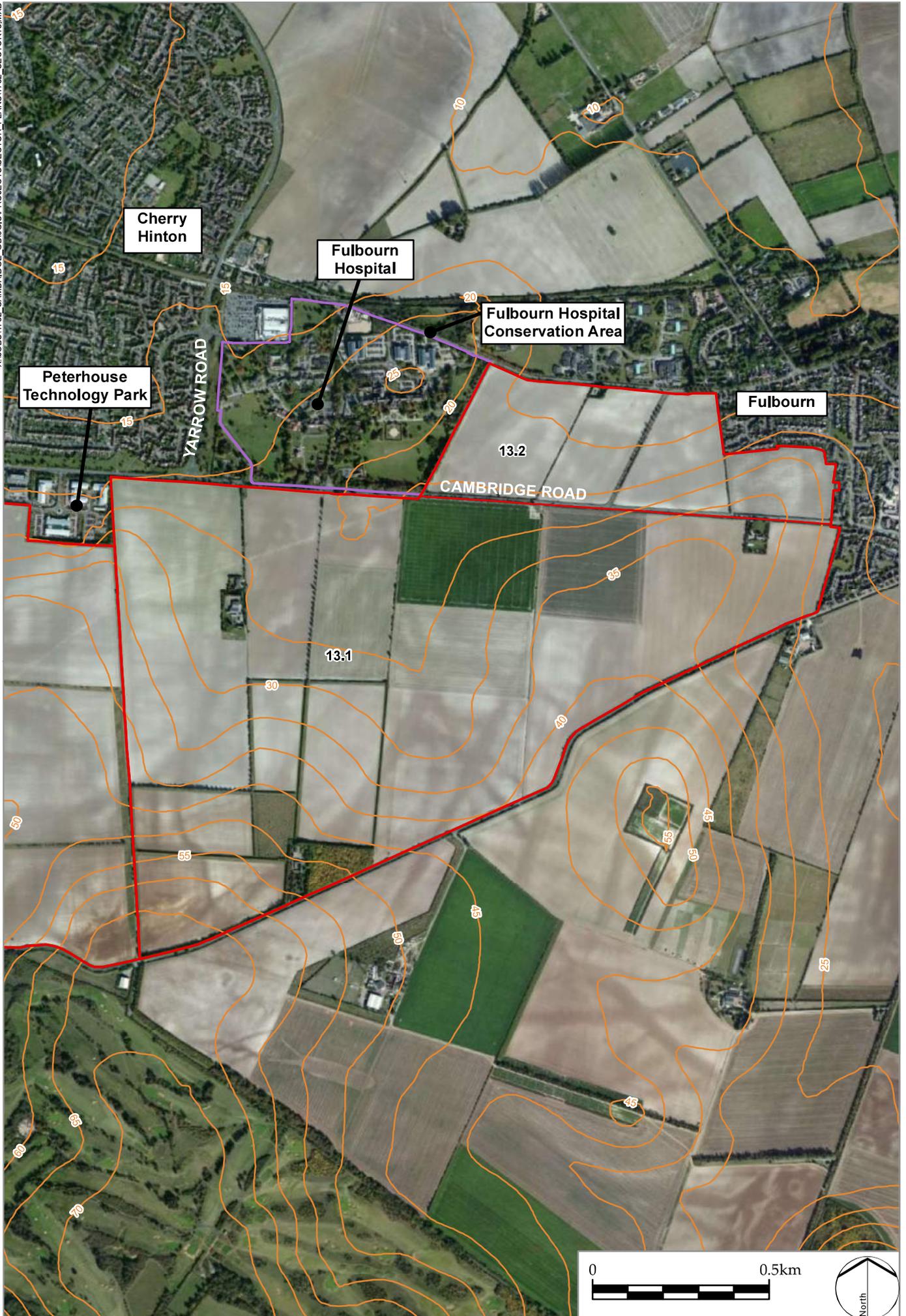
6.16.5. Any development within sub area 13.2 would compromise the separation between Fulbourn and Cambridge, and impact on the relationship with the Fulbourn Hospital Conservation Area and the limited remaining separation between Fulbourn and Cambridge. No Green Belt release should be contemplated in this sub area.

6.16.6. Any form of development extending onto the slopes of the Gog Magog Hills would substantially harm one of the key components of the setting of the city. This has already occurred to a degree at Peterhouse Technology Park and a recent planning consent for an extension west of the Technology Park will extend this. It is essential that no development should encroach any higher up the slopes of the Gog Magog Hills than has already occurred. However, given the encroachment that has already occurred, little further harm to Green Belt purposes would arise from a further release of land for development adjacent to Peterhouse Technology Park, if carefully planned and designed in accordance with the parameters set out below. These parameters would avoid significant further harm for the following reasons:

- Any new development would extend no higher up the slopes of the Gog Magog Hills than the highest point on the existing boundary of Peterhouse Technology Park.
- The rising topography of the Gog Magog Hills, higher than the existing Peterhouse Technology Park, would be kept open, retaining a key feature of the setting of the city.
- The new Green Belt boundary would not significantly increase the extent of the city from the historic core, aligning with the existing boundaries around Peterhouse Technology Park and Cherry Hinton. A permanent, well-designed edge to the city would be created. Thus, the increase in urban sprawl would be permanently limited and would not affect perceptions of the compact nature of the city.
- A well-vegetated, soft green edge to the city would minimise the urban influences on the retained Green Belt, thus minimising the perception of encroachment into the countryside.
- The separation between Fulbourn and the existing edge of Cambridge would not be any further reduced.

Parameters for Green Belt release (refer to the drawing on the following page):

- The boundary of any land released in the north western corner of sub area 13.1 should extend no further south than the existing southern edge of Peterhouse Technology Park and no further east than the Yarrow Road roundabout, which is the furthest extent of the urban area from the historic core.
- Any new development on land released from Green Belt should not encroach onto land with a higher elevation than the highest point on the existing boundary of Peterhouse Technology Park.
- The development site should be cut into the slope in a similar way to Peterhouse Technology Park.
- Development should be designed to create a robust, permanent edge to the city in this sector. The new urban edge should be planted to create a soft green edge to the city, to help integrate built form and to minimise the urbanising effects of development on the countryside.
- The scale and grain should be similar to the existing development on this edge of Cambridge. Medium-low density housing or medium scale office buildings set well into the landscape (similar to Peterhouse Technology Park) are likely to be most appropriate.

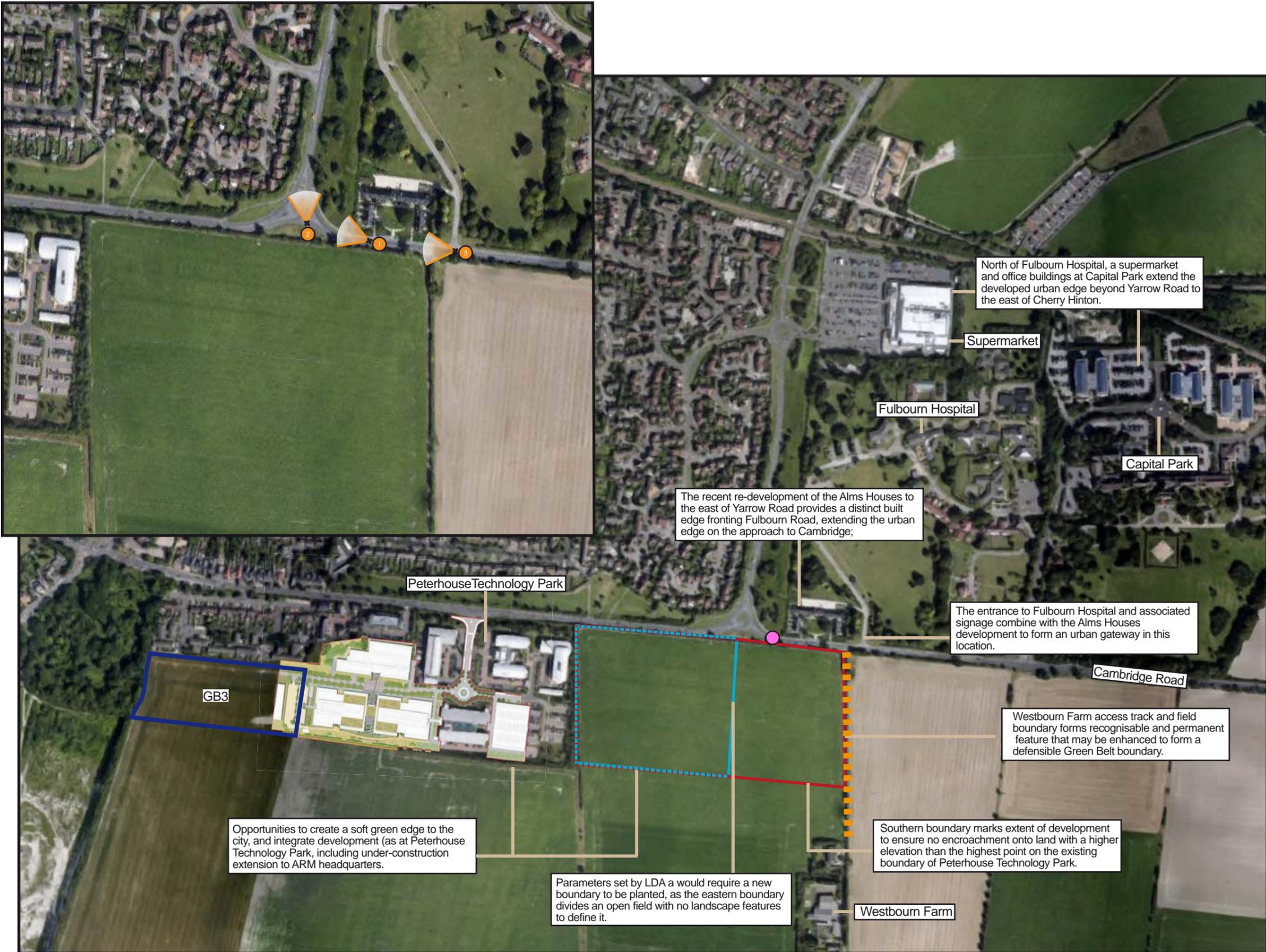




Appendix 2

Cambridge Road Urban Gateway and Extent of Development (drawing 1665/P134a)

Photosheets – Photoviewpoints 1-3 (drawing 1665/P135a)



Key:

-  Urban Gateways
(as illustrated on Figure 10: Gateways and Approaches of the LDA Design Cambridge Green Belt Study - November 2015)
-  Photo Viewpoints
-  Proposed Employment Allocation Site GB3/ GB4
-  Proposed Employment Allocation Site (Policy E/2)
-  Proposed Main Modification Allocation (PM/SC/8/C)
-  Recognisable, permanent boundary to Allocation site E/2 formed by access track to Westbourn Farm, hedgerow and trees.

Aerial Photography and photo view points taken from Imagery ©2016 Google, Infoterra Ltd & Bluesky, Map data ©2016 Google.



Project	Southeast Cambridge
Drawing Title	Cambridge Road Urban Gateway and Extent of Development
Scale	Not to scale
Drawing No.	1665/P134a
Date	November 2016
Checked	LS/RH



Lion House, Rowcroft, Stroud, Gloucestershire GL5 3BY
T: 01453 765 500 E: info@tylergrange.co.uk W: www.tylergrange.co.uk

Yarrow Road Roundabout

Rooftops of properties on
Coltsfoot Close



Photoviewpoint 1: From adjacent to the Alms House Development on Cambridge Road looking west.

Description/ From this location to the east of the Yarrow Road Roundabout, the Alms House development forms a distinct built-up urban edge fronting the road and a gateway on the edge of Cambridge. Beyond the roundabout, properties of Coltsfoot Close are filtered by
Commentary: mature hedgerows and trees to gardens along the roadside, with roof tops visible above the intervening vegetation.



Photoviewpoint 2: From the Yarrow Road Roundabout, looking north.

Description/
Commentary: In this view, which reflects the point that LDA defines as being the furthest extent of the urban area from the historic core, it is clear that the houses to the east extend the urban edge beyond the roundabout.



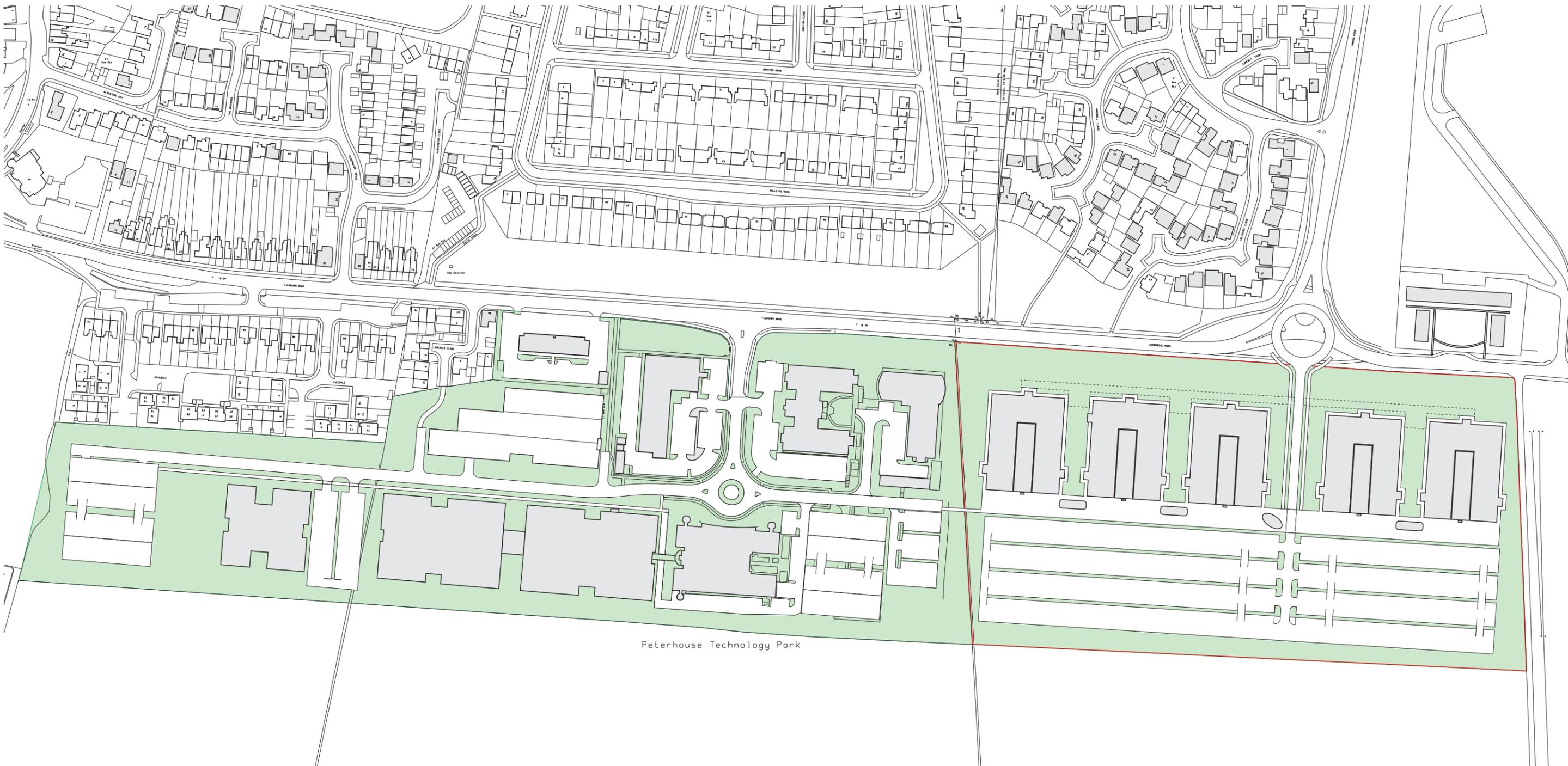
Photoviewpoint 3: From Cambridge Road at the entrance to Fulbourn Hospital, looking west

Description/ This view demonstrates the gateway provided by the Alms Houses as a distinct boundary to the urban edge on the city approaches on Cambridge Road. The view also shows the access track to Westbourn Farm defined by trees and hedgerows that forms
Commentary: the clearly defined boundary of the E/2 Allocation area and matches-up with the existing built edge formed by the Alms Houses.



Appendix 3

Indicative Masterplan Options A and B (Scott Brownrigg drawings 17151 – SK-21 & 22)



Peterhouse Technology Park

Indicative masterplan Option A E2 current land allocation

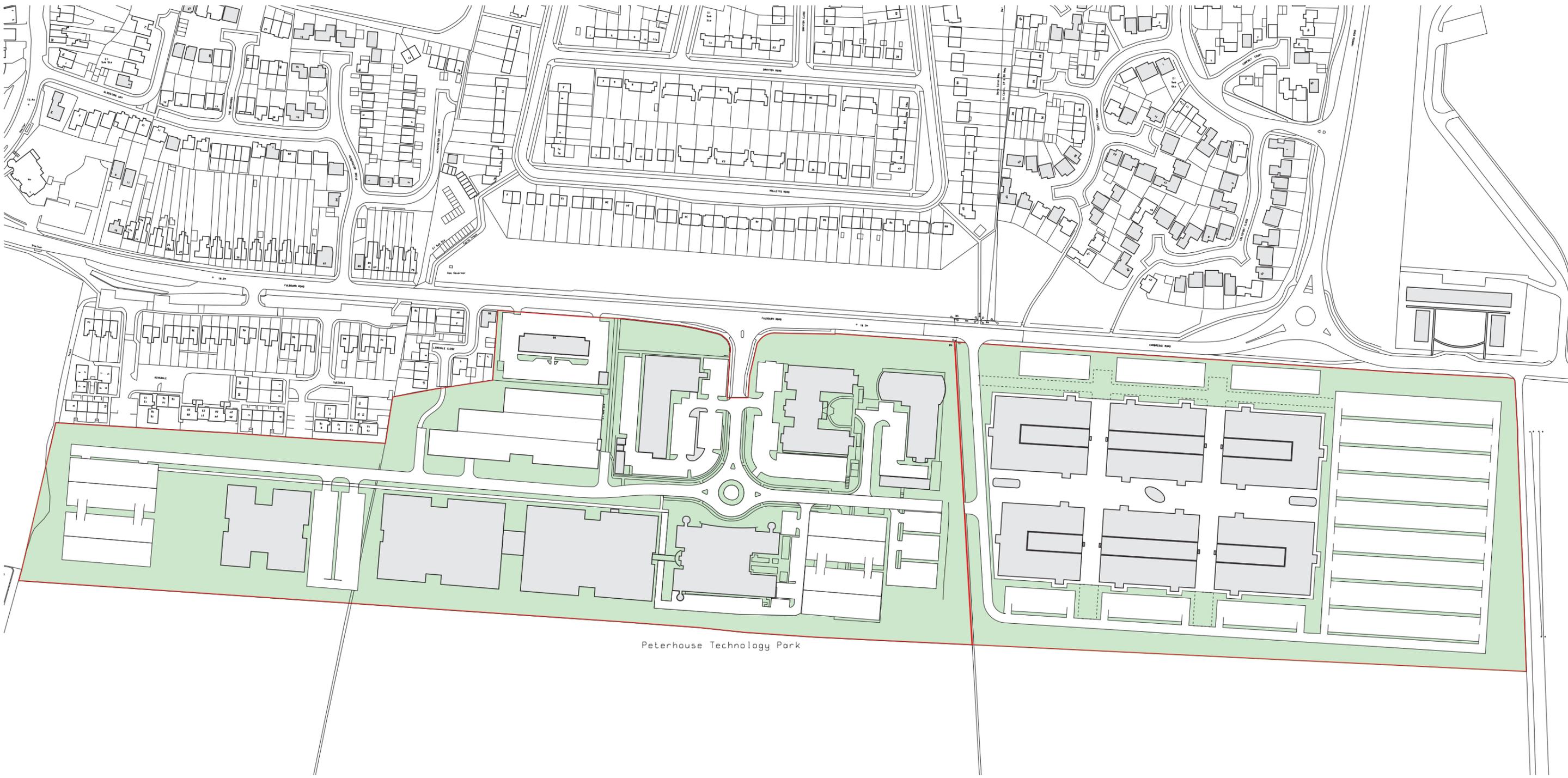
South Cambridge Local Plan allocation E2

22 November 2016 17151 • SK-21 01

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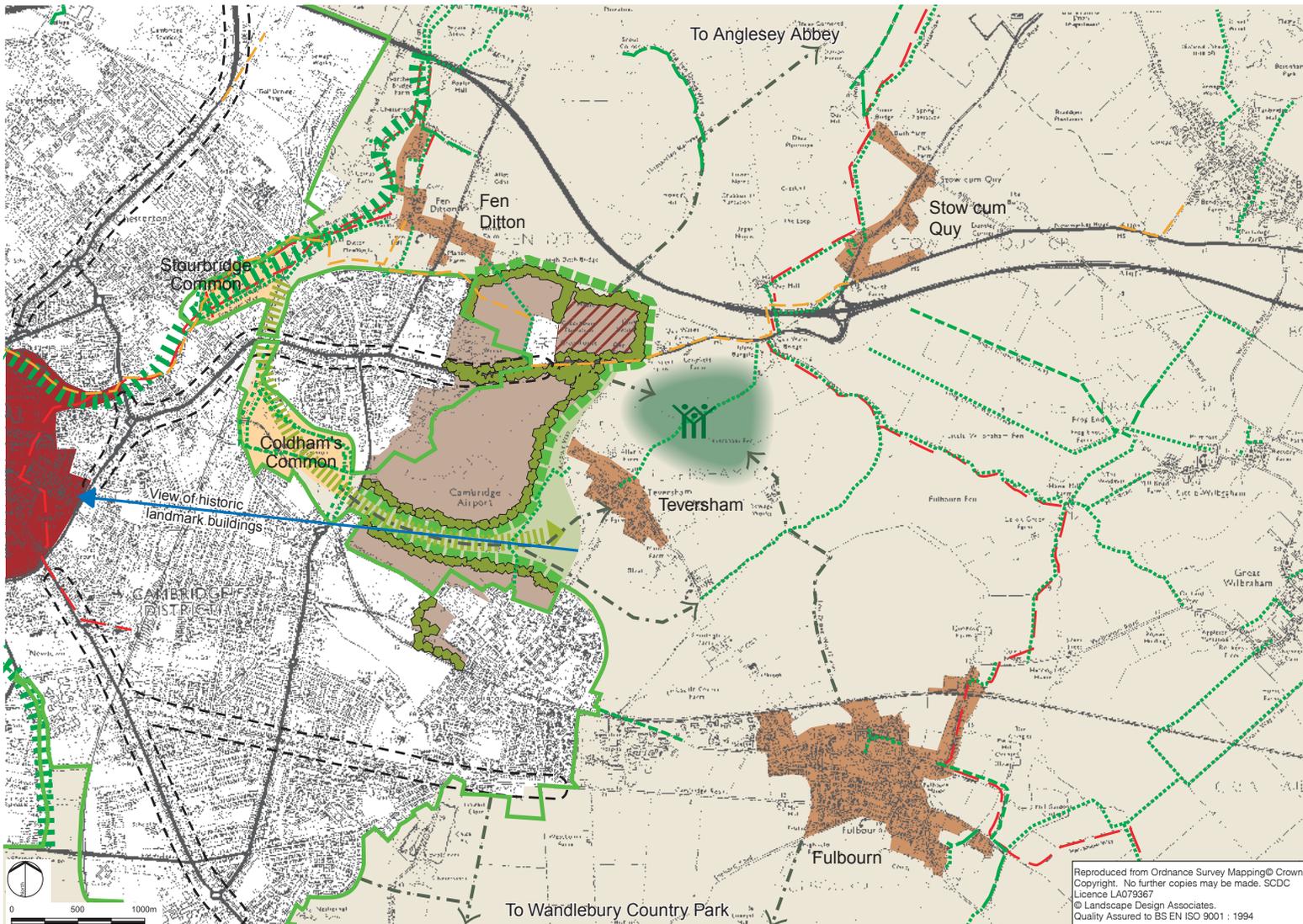
Indicative masterplan Option B E2 current land allocation





Appendix 4

Cambridge Green Belt Study – A Vision of the Future for Cambridge in its Green Belt Setting, Landscape Design Associates, September 2002 (RD/Strat/180) Detailed Study East of Cambridge – A Vision of East Cambridge (drawing 1641LP/15)



Detailed Study East of Cambridge

A Vision of East Cambridge

Existing Features

-  Inner Green Belt boundary
-  Green finger
-  Distinctive Cambridge
-  Inner necklace villages
-  Rural setting
-  Coldham's Common and Stourbridge Common (Common Land, Public Open Space and Recreation Ground in Cambridge Local Plan 1996)
-  Long Distance Footpath
-  Cycleway (Sustrans)
-  Byway
-  Bridleway
-  Footpath

The Vision

-  New Green Belt boundary (Diagrammatically shown. Subject to further study and masterplanning work should principle of Green Belt change be accepted.)
-  Development within soft green edge (The areas shown are approximate and subject to detailed development studies, masterplanning and landscape integration proposals. The areas indicated could be developed without causing significant detriment to Green Belt purposes. Area shown hatched will, in particular, need more detailed analysis to justify development. Sensitive design would be required to protect and enhance quality of urban gateway and approaches.)
-  New green finger linking Cambridge with a new Country Park and the Fen and Fen Edge landscape to the east
-  New access link between Cambridge and the countryside
-  New Fen Edge Country Park
-  New Public Open Space/Recreation land
-  Enhance approaches to the city centre through management initiatives, and highway, landscape, building and environmental improvements.

- Safeguard the special qualities of the east side of the city and its setting. See Dwg. No. 1641LP/14 for details.
- Ensure that peripheral development does not spread east of Airport Way where it would compound the threat, caused by existing extensive development on the east side of the city, to the dominance of the historic core and areas of distinctive and supportive townscape and landscape.
- Only limited peripheral development is possible in areas indicated if the setting and special character of the east side of the city is to be protected or improved.
- There is potential for land west of Airport Way and north of Newmarket Road to be sensitively developed without causing significant detriment to Green Belt purposes, creating a new soft green edge to Cambridge.

- If development were to occur, a new Green Belt boundary should be drawn and maintained indefinitely to protect Cambridge as one of England's most special historic cities.
- Protect and carefully manage the existing green finger and distinctive approach to Cambridge from Fen Ditton.
- A new green finger and an approach from the countryside, across new Public Open Space on the Airport site, though Coldham's Common and into Cambridge, are proposed.
- Enhance all other main routes into Cambridge from the east and protect them from further degradation.
- Protect the quality of views from key viewpoints when considering development proposals or changes within the rural landscape. This particularly applies to key elevated panoramic viewpoints from the chalk hills to the south and east.

- Conserve areas of supportive landscape at Coldham's Common, around Teversham, and between Fulbourn and Cherry Hinton. Conserve and/or enhance all other areas.
- Employ management and enhancement measures to maintain and enhance landscape and settlement character (including East Cambridge and villages).
- Ensure that the contrasts in landform are not masked by inappropriate development or management. Development should respect the historic pattern in relation to topography and, in particular, not encroach onto the higher chalk hills, or onto the low, flat fens.
- Preserve and enhance soft green edges to the city and villages, and take opportunities to enhance indistinctive hard edges.

- Protect and where appropriate promote designated sites and areas, including Nature Reserves, SSSIs and Conservation Areas, for public education and access.
- Maintain footpath, bridleway, byway and cyleway access in the open countryside, and between the city and the countryside. New access routes, and a new Fen Edge Country Park, are proposed.
- Maintain the separate identity of the necklace villages, and particularly the inner necklace villages of Fen Ditton, Teversham and Fulbourn. Ensure that treatment of the former hospital sites between Fulbourn and Cherry Hinton is predominantly rural and undeveloped in character.



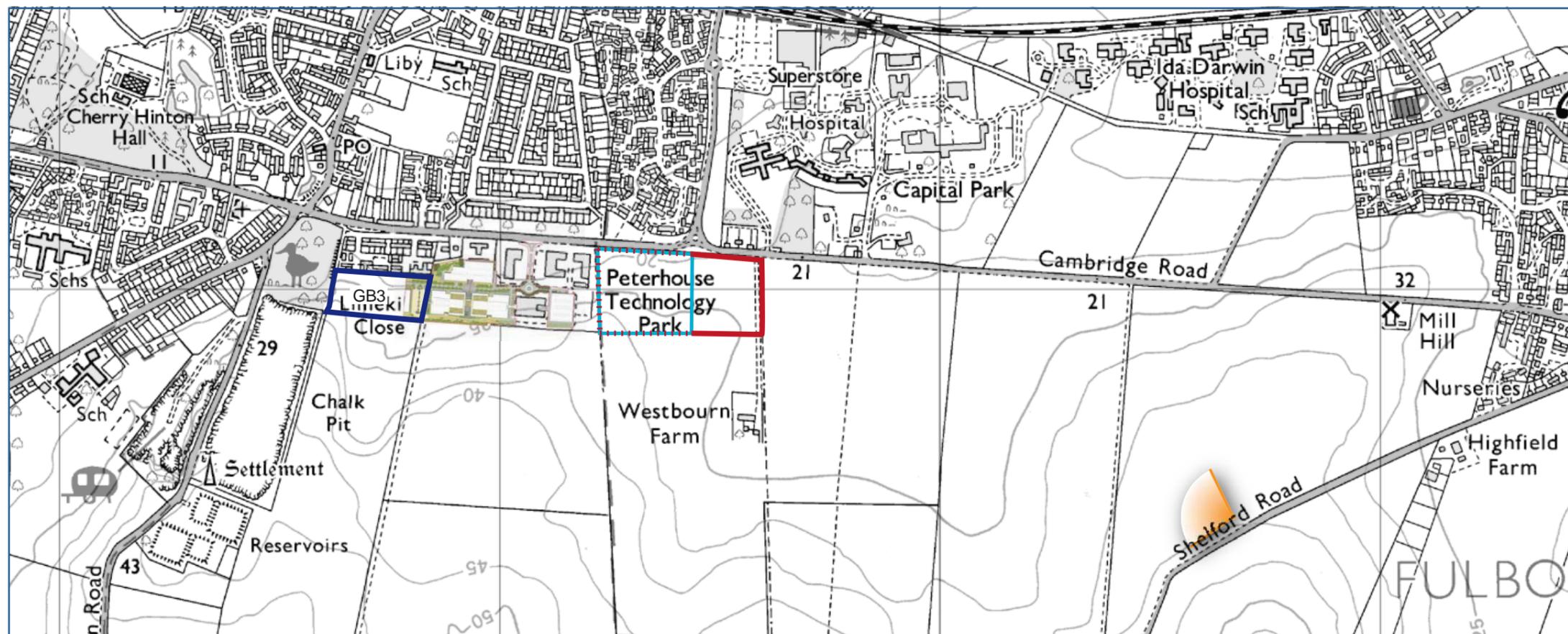


Appendix 5

Key View from Shelford Road: Extent of Existing Development and Allocation Sites 1665/P138)



Photo Viewpoint Location 1: Key view from Shelford Road



-  Key View Location
(as illustrated on Figure 9: Visual Assessment of the LDA CambridgeGreen Belt Study - November 2015)
-  Proposed Employment Allocation GB3
-  Proposed Employment Allocation (Policy E/2)
-  Proposed Main Modification Allocation (PM/SC/8/C)



Project	Southeast Cambridge
Drawing Title	Key View from Shelford Road: Extent of Existing Development and Allocation Sites
Scale	Not to Scale
Drawing Ref	1665/P138
Date	November 2016
Checked	LS/RH