Greater Cambridge Local Plan – Regulation 18 : First Proposals Consultation 2021 Land south of Bateman Street, Cambridge Trinity Hall December 2021



LAND SOUTH OF BATEMAN STREET, CAMBRIDGE GREATER CAMBRIDGE LOCAL PLAN – REGULATION 18 : FIRST PROPOSALS CONSULTATION 2021

Quality Assurance

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SITE LOCATION PLAN

1.0 Introduction

- 1.1 These representations have been prepared by Bidwells LLP on behalf of Trinity Hall, Cambridge who own Land south of Bateman Street, Cambridge ("the Site") and in response to the Greater Cambridge Local Plan Regulation 18: First Proposals 2021 consultation ("the consultation document"). Please refer to **Appendix 1** for site location plan.
- 1.2 These representations follow those submitted in 2020 in response to the Issues and Options consultation on the emerging Local Plan.
- 1.3 The First Proposals consultation document sets out the Councils preferred approach to the level of growth that should be planned for, and where it should be planned over the plan period to 2041. It also describes the planning policies proposed to shape development and guide planning decisions. The First Proposals consultation is particularly seeking views on the emerging development strategy, the direction of travel for policies and issues the Councils should be considering as policies are prepared.
- 1.4 The Greater Cambridge Housing and Economic Land Availability Assessment (HELAA) lists and maps sites within Greater Cambridge that may have potential for residential and economic development. A 'Red, Amber, Green' (RAG) scoring system was used to carry out the assessment. Sites were deemed to be unsuitable if they were assessed as 'red' against any of the criteria used.
- 1.5 The HELAA forms part of the evidence base for the emerging Greater Cambridge Local Plan and the outputs of the HELAA will assist the Councils in identifying the choices available for site allocations to meet development needs. Specifically, it has been used to inform the choices made at the First Proposals consultation stage, alongside a range of other evidence exploring the development needs of the area and how they should be met.
- 1.6 Land south of Bateman Street is identified in the HELAA under site reference OS044 (referred to as '82-90 Hills Road and 57-63 Bateman Street'). The site in the HELAA however excludes 90 Hills Road. It scores green for being available and achievable and amber for suitable. The Site is proposed to be carried forward as a Mixed Use allocation in the First Proposals consultation document, under site reference S/C/M5: 82-88 Hills Road and 57-63 Bateman Street. The Site also continues to fall within the Cambridge Railway Station, Hills Road Corridor to the City Centre Opportunity Area.
- 1.7 These representations respond to the sites' assessment within the HELAA and also to the draft policies of the First Proposals consultation document.
- 1.8 Trinity Hall, as landowner, is at an early stage in considering potential development concepts for the site and currently consider that a commercial-led, mixed use scheme would be appropriate. Trinity Hall is however keen to engage with the Council, stakeholders and the local community to refine and discuss the proposals further as part of the ongoing consultation on the emerging Greater Cambridge Local Plan.

2.0 Background

- Land south of Bateman Street, Cambridge is situated on the south western side of Hills Road and to the south of Bateman Street. It comprises Bateman House (82-88 Hills Road), 90 Hills Road, 63 Bateman Street (Innes House) and 57-62 Bateman Street, together with associated car parking to the rear.
- 2.2 The buildings on site vary from two to four storeys in height, with Bateman House being the tallest building on the corner of Hills Road and Bateman Street.
- 2.3 Bateman House is in E (g) (i) office use at part first, second, third and fourth floor and E (c) use at ground and part first floor. No. 90 Hills Road is in E (g) (i) office use, 63 Bateman Street is in D1 use and 57-63 Bateman Street is in F1 use.
- 2.4 The areas north and east of the site are predominantly in business and retail use (Use Class E). To the west of the site, along Bateman street, is a mixture of residential (Use Class C3) and language school (Use Class F1) uses. Cambridge University Botanic Garden lies to the south of the Site.
- 2.5 The Site is within the Cambridge City Controlled Parking Zone (CPZ).
- 2.6 The Site lies within the Cambridge Railway Station, Hills Road Corridor to the City Centre Opportunity Area under the adopted Cambridge City Council Local Plan (Policy 25) and is allocated for mixed redevelopment of residential and employment, under 'Site M5'. The Proposals Schedule, at Appendix B of the adopted Plan, refers to an indicative site capacity for M5 of 20 residential dwellings and 0.5 ha of employment.
- 2.7 Part of the Site (Bateman House and 90 Hills Road) also lies within the 'Hills Road Local Centre'. Policy 25 of the adopted Local Plan confirms that the 'Hills Road Local Centre' forms one of the 'key projects' to be delivered through development proposals within the 'Cambridge Railway Station, Hills Road Corridor to the City Centre Opportunity Area'. The project essentially relates to aspirations for public realm and traffic management improvements, notably for

'reconnection of both sides of the street and improvement of the pedestrian user experience through removing barriers and obstacles. Traffic management and the reallocation of space will help to reduce vehicle speeds and highlight the revitalised 'hub' of Hills Road'

2.8 The Site is within the New Town and Glisson Road Common Conservation Area. The section of Bateman House that fronts Hills Road, together with No. 90 Hills Road, are identified as 'Buildings which Detract' in the New Town and Glisson Road Conservation Area Townscape Analysis. Claremont Villas to the east of the Site are identified as 'Building of Local Interest'. Cambridge Botanic Gardens is a Historic Park and Garden.

3.0 The Economic Context

National Planning Policy

3.1 National Planning Policy (NPPF, Paragraph 8a) identifies the economic objective of the planning system:

"...to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure..."

3.2 NPPF Paragraph 81 builds upon this:

"Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential." (emphasis added).

3.3 NPPF Paragraph 82 states that planning policies should:

"a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;

b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;

c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and

d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances."

3.4 NPPF Paragraph 83 then states that;

"planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries"

Sub-Regional Context

3.5 The Cambridgeshire and Peterborough Combined Authority (CPCA) set a target of doubling the regional economic growth (GVA) over 25 years as part of the Devolution Deal in 2017. This requires the area going beyond what it has achieved in the past (to double an economy over twenty-five years requires an average annual growth rate of 2.81%. Historically, since 1998, the

local economy has only grown at around 2.5%.). Achieving this requires employment growth and more importantly productivity growth, as we are already at comparatively high levels of employment.

Cambridgeshire and Peterborough Independent Economic Review (CPIER) (2018)

- 3.6 The Cambridgeshire and Peterborough Independent Economic Review (CPIER) (2018) has outlined ambitious plans for growth over the next 20 years. Growth relies on increases in employment and productivity and the CPIER emphasises the need for productivity growth in this region as employment rates are so high. Economic growth is therefore essential for the next Local Plan.
- 3.7 The CPIER notes a missed opportunity to supply AI, science and technology and bio-medical clusters from within the region: 10.8% of supplies come from within the company's local area (30mile radius) while 27.8% came from overseas. Growing these local supply chains, particularly the high value ones would help disperse the economic benefits and provide a wide range of different jobs. Availability of suitable sites and premises in excellent locations outside of Cambridge is a key factor in spreading the economic growth.
- 3.8 The CPIER also states that locations with high levels of public transport access should be identified for businesses with high employment densities. This would include sites within walking distance of train stations, travel hubs and along transport corridors.

"by ensuring good quality public transport is in place before development, the number of those new residents who will use the transport is maximised. This is also likely to be the best way to stretch some of the high-value businesses based within and around Cambridge out into wider Cambridgeshire and Peterborough. These companies will not want to be distant from the city, but these clusters could 'grow' out along the transportation links, providing connection to other market towns."

3.9 CPIER acknowledges that knowledge-based clusters are key to Greater Cambridge's role as the engine for economic growth. An opportunity exists therefore for Greater Cambridge to encourage the forces of agglomeration through promotion of sites around existing groups of same-sector companies.

Greater Cambridge Employment Land and Economic Development Evidence Study (November 2020)

- 3.10 The Greater Cambridge Employment Land and Economic Development Evidence Study explores the characteristics of each key economic cluster including the challenges and opportunities that they face.
- 3.11 The Study identified four office submarkets within the Greater Cambridge market;
 - Prime Central
 - City Centre Periphery / Rest of Cambridge City
 - Northern Cluster
 - South Cambridgeshire

3.12 'Prime central' lies in the centre of the Cambridge City local authority area. It comprises office floorspace within walking distance of Cambridge rail station, reaching Kings Cross within 50 minutes. Land south of Bateman Street falls within the 'Prime Central' submarket area (see Figure 1).



Figure 1 : Prime Central Submarket Boundary

Source : Greater Cambridge Employment Land and Economic Development Evidence Study, Figure 8

- 3.13 The Study states, at paragraph 2.73, that Agents have noted that there are severe supply pressures in the 'Prime Central' submarket area for small to mid-sized office occupiers, particularly between 1,000 to 5,000 sqft (around 100 to 500 sqm).
- 3.14 An analysis of Year's supply, also referred to as notional supply, based on a snapshot of availability in August 2019 was undertaken to understand how the various submarkets differ in terms of supply and demand. Figure 2 below confirms that the Prime Central Submarket faces the most severe supply pressures, with only a notional available supply of 0.31 years. Rest of Cambridge City has circa 2 years supply.
- 3.15 The Study also reports on the clusters in Cambridge and confirms that there is a need for additional floorspace in Life Science, ICT and Professional Services and Advanced Manufacturing sectors. Firms in the ICT and Professional Services sectors have particular concentrations around Cambridge Railway Station.

4 70,000 60.000 Floorspace (sqm) 3 50,000 fears Supply 40,000 2 30,000 20,000 10.000 North East Cambridge AAP Ο 0 outh Campidgeshie Annual Take-up Availability Notional Supply

Figure 2 : Notional Years Available Supply by Submarket (Office)

Source: Greater Cambridge Employment Land and Economic Development Evidence Study, Figure 15

3.16 In terms of future employment needs, the Study considered that the most likely future level of jobs growth, is for 58,500 jobs between 2020 and 2041 (referred to as the 'central' scenario). However the Study also identified a 'higher' scenario, placing greater weight on fast growth in the recent past, particularly in key sectors. The Study subsequently recommends that the 'higher' scenario is planned for particularly in relation to B1a/b needs (office and laboratory space). This ensures a flexible supply, encouraging business growth and inwards investment, and aligns with market feedback and past completions trends.

The Opportunity

- 3.17 The Station Road area in Cambridge has changed beyond all recognition since the preparation of the Station Area Development Framework (SADF), adopted in April 2004. Significant development has since come forward in recent years along Station Road as part of the CB1 masterplan resulting in the delivery of a bustling city quarter today.
- 3.18 Further development has taken place along Hills Road with the development of Botanic House, the refurbishment of 90 Hills Road and the redevelopment of 51 Hills Road. Land to the south of Bateman Street now finds itself located at the heart of Cambridge's newly formed Central Business District (CBD).
- 3.19 The area around Station Road and Hills Road has seen job growth of 4% since 2015, much of which has been focused along Station Road where 0.5 million sf of offices has been built since 2013. The new occupants (such as Microsoft, Amazon, Samsung and Apple) have created a new Research and Development (R&D), AI and business services cluster. Such knowledge intensive industries tend to cluster together, pulled by the forces of agglomeration (easy access to knowledge, workforce, supply chains, markets).
- 3.20 This clustering has significant benefits to Cambridge and the wider UK economy and to grow this cluster requires office development in close proximity to the existing occupants along Station

Road. However, future business development in the area is constrained by the lack of high quality office space. All the commercial buildings within the CB1 masterplan area, along Station Road, now have planning permission or a resolution to grant permission.

- 3.21 For the R&D, AI and business services sector, the location decisional drivers are access and ability to recruit the right skill sets. Central Cambridge provides this, but the small size of the core central area, the lack of available space and lack of development pipeline puts that resilience at risk and could undermine the growth of the R&D sector.
- 3.22 In terms of the impact of COVID-19, this remains difficult to predict within a range of sectors. However, there has continued to be an encouraging level of demand, particularly within the laboratory and office sectors. Indeed, office and laboratory demand has moved to its highest level since 2015. Data collected by Bidwells LLP confirms that overall demand in Cambridge stood at 1.7m sq ft at the end of H1 2021, an increase of 30% since the end of 2020 and 45% ahead of levels in mid 2020. The demand for office space of sufficient quality and specification to enable opportunities for collaboration spaces and creative practices whilst also providing the highest sustainability standards is also likely to remain high.
- 3.23 The redevelopment of Land to the south of Bateman Street provides a further opportunity to continue the successful transformation of this part of the city and provide additional capacity to support the further clustering around the Station or simply very well-located development opportunities.
- 3.24 Trinity Hall is at an early stage in considering potential development concepts for the site and currently consider that a commercial-led scheme would be appropriate. Trinity Hall is however keen to engage with the Council, stakeholders and the local community to refine and discuss the proposals further as part of the ongoing consultation on the emerging Greater Cambridge Local Plan.
- 3.25 The Site is within single ownership and capable of delivering a well-designed, high quality development that could make efficient use of a brownfield site, in a highly sustainable location, whilst also being able to respect the significance of the heritage assets. The key opportunities for the site are outlined below:

Meeting unmet development needs

 Hills Road forms part of the gateway into the city and a significant and thriving cluster of businesses. There is an opportunity for the Site to actively contribute to the hub of commercial buildings along Hills Road and deliver employment to help meet the needs of Cambridge whilst also supporting the local economy and community;

A highly sustainable location

- the Site is extremely well located for access to key facilities and services, including transport infrastructure such as Cambridge Railway Station, the Cambridgeshire Guided Busway (CGB) and the city centre; all within a 10 minute walk
- There are a number of strategic schemes coming forward which will improve mobility in the area (the Chisholm Trail and extensions to the CGB)
- Opportunities to promote sustainable transport modes reduce car use to ease congestion and reduce airborne pollutants. The same measure offers opportunities to promote active travel choices (walking, cycling) to enhance health and wellbeing.

Enhancing the public realm

There is an opportunity to significantly enhance the public realm along Hills Road and in turn create wellbeing through improved green spaces to relax and socialise. New areas of green infrastructure can also mitigate against climate change, through creating resilient new habitats. In turn helping to fulfil the aspirations of the Opportunity Area policy.

Sustainability, social inclusion and wellbeing

- Trinity Hall are committed to ensuring that any development proposal would meet the highest sustainability standards
- This site presents a significant opportunity to spearhead solutions around sustainability, social inclusion and wellbeing in the context of move to a net zero-carbon society. In addition to its central location being able to support active travel choices; a number of climate change mitigation and adaptation measures would be incorporated in to redevelopment proposals for the Site

Preserving and enhancing heritage assets

Land south of Bateman Street, Bateman House and 90 Hills Road are identified as buildings that detract from the Conservation Area in the New Town and Glisson Road Conservation Area Townscape Analysis. Any redevelopment proposal provides the opportunity to make a positive contribution to local character and distinctiveness and provide opportunities for improvements in the quality of the historic environment

4.0 Response to Policy S/DS : Development Strategy

- 4.1 Policy S/DS sets out the proposed strategy for the pattern, scale and design quality of places created in Greater Cambridge, not only for the plan period but beyond to 2050. Within the Cambridge urban area the strategy proposes, *inter alia,* continuing existing Areas of Major Change and Opportunity Areas allocated in the previous plan.
- 4.2 The proposed development strategy for Greater Cambridge is to direct development to where it has the least climate impact, where active and public transport is the natural choice, where green infrastructure can be delivered alongside new development, and where jobs, services and facilities can be located near to where people live, whilst ensuring all necessary utilities can be provided in a sustainable way.
- 4.3 The development strategy is broadly **supported** however opportunities for densification of existing urban areas in locations well served by public transport should be maximised wherever possible and the approach supported by Local Plan policy.

5.0 Response to Policy S/AMC : Areas of Major Change

- 5.1 Policy S/AMC provides continued policy guidance for existing Areas of Major Change in the urban area of Cambridge identified in the Cambridge Local Plan 2018.
- 5.2 It is proposed to carry forward The Station Areas West and Clifton Road Area of Major Change identified in the adopted 2018 Cambridge Local Plan.
- 5.3 Land to the south of Bateman Street continues to be excluded from the designation despite the fact that it has an important role to play in the continuing redevelopment and revitalisation of the emerging central business district along Station Road and has an adopted allocation that seeks the redevelopment of the site adjacent to the Area of Major Change.
- 5.4 These representations therefore **object** to Policy S/AMC as currently drafted and it is requested that the boundary of the 'Station Areas West and Clifton Road Area of Major Change' is reviewed to include for Land to the south of Bateman Street to make sure its long-term future is properly considered to best support the Cambridge Station Area as part a coordinated and considered Area of Major Change.

6.0 Response to Policy S/OA: Opportunity Areas in Cambridge

- 6.1 Policy S/OA identifies specific locations as Opportunity Areas that would benefit from a holistic approach to any future development that comes forward, to provide policy guidance for development that also improves public transport access and infrastructure delivery, and seeks improvements to the public realm.
- 6.2 It is proposed to continue to identify the Cambridge Railway Station, Hills Road Corridor to the City Centre Opportunity Area. Land south of Bateman Street continues to fall within this opportunity area.
- 6.3 The proposed policy direction for the Opportunity Areas is stated in the First Proposals consultation document as;

"Opportunity Areas provide opportunities to enable development that can reinforce and create character and identity in key corridors and centres of the city, often through associated public realm improvements. Opportunity Areas embrace mixed uses and multiple functions, which provides opportunities and challenges, and requires a policy framework to promote and guide overall change during the life of the plan.

Given the opportunity nature of these sites they do not include any particular levels of development and are not counted towards meeting our needs."

- 6.4 Trinity Hall **supports** draft Policy S/OA and the proposal to carry forward the Cambridge Railway Station, Hills Road Corridor to the City Centre Opportunity Area to the emerging Greater Cambridge Local Plan.
- 6.5 Trinity Hall is also supportive of the proposed policy direction, in particular the drive to deliver public realm improvements. The opportunity that Land south of Bateman Street can provide in terms of an improved public realm along Hills Road should be particularly recognised in future policy wording. The Policy should explicitly attach positive weight to a development that helps to meet the aims of the Opportunity Area policy.

7.0 Policy S/LAC: Other site allocations in Cambridge

- 7.1 Policy S/LAC identifies specific site allocations for development in the Cambridge urban area, mainly rolling forward sites from the 2018 Cambridge Local Plan.
- 7.2 Land south of Bateman Street is proposed to be carried forward as a Mixed Use allocation under Policy S/LAC (site reference S/C/M5: 82-88 Hills Road and 57-63 Bateman Street). However, the site excludes No.. 90 Hills Road.
- 7.3 Trinity Hall **supports** the continued allocation of Land south of Bateman Street but requests that the allocation also includes for No. 90 Hills Road. Trinity Hall remains committed to the sites' positive redevelopment as a Commercial-Led, Mixed Use allocation.
- 7.4 The Science and Technology sector is the engine of the Cambridge Phenomenon that has driven the economy and it will remain an important part of the local economy and job market. Alongside, it is important to have all types of commercial space to provide for a wide range of job opportunities and to serve Greater Cambridge at close quarters to not overly rely on longdistance travel to service the area with goods and services. Further prime office floorspace in high quality developments is also needed to consolidate and expand the world class facilities which have recently put CB1 on the international property investment map.
- 7.5 Opportunities for densification of existing urban areas in locations well served by public transport should be maximised wherever possible. Furthermore, the redevelopment of areas around Cambridge central station for high quality offices within mixed use development which offers a healthy working environment is supported, together with the delivery of a high quality public realm.
- 7.6 Densification of existing urban areas in locations well served by public transport will also help to keep Cambridge as a compact city whilst still supporting the significant unmet needs arising from knowledge intensive (KI) companies, especially artificial intelligence firms around Cambridge Central station. This supports CPIERs third key recommendation: *"Ensuring that Cambridge continues to deliver for KI businesses should be considered a nationally strategic priority"*.
- 7.7 Land south of Bateman Street, Cambridge is within single ownership and capable of delivering a well-designed, high quality development that could make efficient use of a brownfield site, in a highly sustainable location, whilst also being able to respond to local character and protect the historic environment.
- 7.8 The Site has been assessed as suitable, available and achievable in the HELAA (reference OS044). Any matters scored as Amber in the HELAA are fully capable of being satisfactorily mitigated or compensated.
- 7.9 The key opportunities for the site are outlined below:

• Meeting unmet development needs

 Hills Road forms part of the gateway into the city and a significant and thriving cluster of businesses. There is an opportunity for the Site to actively contribute to the hub of commercial buildings along Hills Road and deliver employment to help meet the needs of Cambridge whilst also supporting the local economy and community;

• A highly sustainable location

- the Site is extremely well located for access to key facilities and services, including transport infrastructure such as Cambridge Railway Station, the Cambridgeshire Guided Busway (CGB) and the city centre; all within a 10 minute walk
- There are a number of strategic schemes coming forward which will improve mobility in the area (the Chisholm Trail and extensions to the CGB)
- Opportunities to promote sustainable transport modes reduce car use to ease congestion and reduce airborne pollutants. The same measure offers opportunities to promote active travel choices (walking, cycling) to enhance health and wellbeing.

Enhancing the public realm

 There is an opportunity to significantly enhance the public realm along Hills Road and in turn create wellbeing through improved green spaces to relax and socialise. New areas of green infrastructure can also mitigate against climate change, through creating resilient new habitats. In turn helping to fulfil the aspirations of the Opportunity Area policy.

Sustainability, social inclusion and wellbeing

- Trinity Hall are committed to ensuring that any development proposal would meet the highest sustainability standards
- This site presents a significant opportunity to spearhead solutions around sustainability, social inclusion and wellbeing in the context of move to a net zero-carbon society. In addition to its central location being able to support active travel choices; a number of climate change mitigation and adaptation measures would be incorporated in to redevelopment proposals for the Site

Preserving and enhancing heritage assets

Land south of Bateman Street, Bateman House and 90 Hills Road are identified as buildings that detract from the Conservation Area in the New Town and Glisson Road Conservation Area Townscape Analysis. Any redevelopment proposal provides the opportunity to make a positive contribution to local character and distinctiveness and provide opportunities for improvements in the quality of the historic environment

8.0 Summary and Conclusions

- 8.1 These representations have been prepared by Bidwells LLP on behalf of Trinity Hall, Cambridge who own Land south of Bateman Street, Cambridge ("the Site") and in response to the Greater Cambridge Local Plan Regulation 18: First Proposals 2021 consultation ("the consultation document").
- 8.2 These representations follow those submitted in 2020 in response to the Issues and Options consultation on the emerging Local Plan.
- 8.3 The First Proposals consultation document sets out the Councils preferred approach to the level of growth that should be planned for, and where it should be planned over the plan period to 2041. It also describes the planning policies proposed to shape development and guide planning decisions. The First Proposals consultation is particularly seeking views on the emerging development strategy, the direction of travel for policies and issues the Councils should be considering as policies are prepared.
- 8.4 The Greater Cambridge Housing and Economic Land Availability Assessment (HELAA) lists and maps sites within Greater Cambridge that may have potential for residential and economic development. A 'Red, Amber, Green' (RAG) scoring system was used to carry out the assessment. Sites were deemed to be unsuitable if they were assessed as 'red' against any of the criteria used.
- 8.5 Land south of Bateman Street is identified in the HELAA under site reference OS044 (referred to as '82-90 Hills Road and 57-63 Bateman Street'). It scores green for being available and achievable and amber for suitable, in the context of no detailed proposals being yet available to assess. The Site is proposed to be carried forward as a Mixed Use allocation in the First Proposals consultation document, under site reference S/C/M5: 82-88 Hills Road and 57-63 Bateman Street. The Site also continues to fall within the Cambridge Railway Station, Hills Road Corridor to the City Centre Opportunity Area.
- 8.6 These representations broadly **support** the following policies;
 - Policy S/DS : Development Strategy;
 - Policy S/OA : Opportunity Areas in Cambridge;
 - Policy S/LAC : Other site allocations in Cambridge
- 8.7 The overarching development strategy to direct development to where it has the least climate impact, where active and public transport is the natural choice, where green infrastructure can be delivered alongside new development, and where jobs, services and facilities can be located near to where people live is supported.
- 8.8 In particular, Land to the south of Bateman Street has an important role to play in the continuing redevelopment and revitalisation of the emerging central business district along Station Road and Hills Road. It should continue to fall within the Cambridge Railway Station, Hills Road Corridor to the City Centre Opportunity Area and continue to be identified as a Commercial-Led, Mixed Use allocation. However, the allocation must also include for No. 90 Hills Road.
- 8.9 These representations **object** to Policy S/AMC : Areas of Major Change.

8.10 The boundaries of the Station Areas West and Clifton Road Area of Major Change should be reviewed as part of the emerging Greater Cambridge Local Plan, to include for Land to the south of Bateman Street so that, as an allocated site, it can be considered as part of a considered vision for the area.

Land South of Bateman Street





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