

**104-112 HILLS ROAD,
CAMBRIDGE
GREATER CAMBRIDGE
LOCAL PLAN –
REGULATION 18 :
ISSUES AND OPTIONS
CONSULTATION 2020**

Quality Assurance

Site name: 104-112 Hills Road, Cambridge

Client name: [REDACTED]

Type of report: Regulation 18 : Issues and Options Consultation 2020

Prepared by: Jess Hill BA (Hons) MA MRTPI

Signed [REDACTED]

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Reviewed by: Mike Derbyshire BA (Hons) MRTPI

Signed [REDACTED]

Date



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1.0 Introduction

Background

- 1.1 These representations have been prepared by Bidwells LLP on behalf of ██████████ ██████████ to submit 104-112 Hills Road, Cambridge (“the Site”) and in response to the Greater Cambridge Local Plan Regulation 18 : Issues and Options 2020 consultation (“the consultation document”). Please refer to **Appendix 1** for site location plan.
- 1.2 These representations follow those submitted in March 2019 as part of the ‘Call for Sites’ consultation and provide greater detail on the significant opportunity that the site presents, informed by additional site assessment work.
- 1.3 The consultation document has been published by Cambridge City Council and South Cambridgeshire District Council as the first formal stage of consultation towards preparing the new joint Local Plan for Cambridge and South Cambridgeshire; the Greater Cambridge Local Plan. Consultation took place from 13 January 2020 to 24 February 2020.
- 1.4 The Greater Cambridge Local Plan is proposed to set out future land use and planning policies for the Greater Cambridge area to 2040 in respect of accommodating growth for new homes, jobs and infrastructure.
- 1.5 The consultation document explores four ‘big themes’ that will influence how homes, jobs and infrastructure are planned. The big themes are:
 - **Climate change** – how the plan should contribute to achieving net zero carbon, and the mitigation and adaptation measures that should be required through developments;
 - **Biodiversity and green spaces** – how the plan can contribute to our ‘doubling nature’ vision, the improvement of existing green spaces and the creation of more;
 - **Wellbeing and social inclusion** – how the plan can help spread the benefits of growth, helping to create healthy and inclusive communities; and
 - **Great places** – how the plan can protect what is already great about the area, and design new developments to create special places and spaces.
- 1.6 Within the above four big themes, the consultation document then identifies what the Councils consider are the key issues and options for where future growth (jobs and homes) might go. This includes an option of ‘**Densification of existing urban areas**’ which is outlined as an option which could provide more homes and jobs on underused land within Cambridge and also potentially in existing new settlements. This could be by building taller buildings or redeveloping underused sites at higher densities.
- 1.7 A combination of approaches to the distribution of spatial growth is considered likely to be necessary in order to allow for sufficient flexibility when considering the locations of new development in the district. However, the principle of densification and the reuse and optimisation of previously developed land is wholeheartedly supported. 104-112 Hills Road presents an ideal

opportunity for employment led development and as an underused, brownfield site in a highly sustainable location, it is a particularly good example of where densification should be promoted.

1.8 [REDACTED] has undertaken extensive pre-application engagement with the Council, other stakeholders and the local community regarding potential development options for the site. [REDACTED] is keen to continue 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.

1.9 These representations respond to the relevant questions within the consultation document in respect to the redevelopment opportunity at 104-112 Hills Road, Cambridge and within the context of the four big themes and options for growth.

2.0 104-112 Hills Road, Cambridge

Question 2. Please submit any sites for employment and housing you wish to suggest for allocation in the Local Plan. Provide as much information and supporting evidence as possible.

The Site

2.1 104-112 Hills Road, Cambridge, together with Botanic House, is submitted as a potential allocation for mixed-use development in the Local Plan. The extent of the proposed allocation is shown edged in red on the site location plan at **Appendix 1**.

2.2 All of the land within the proposed allocation is in the freehold ownership of [REDACTED]. It is located off Hills Road within the Cambridge urban area, south of the junction with Station Road and east of the Botanic Gardens, covering approximately 1.03 hectares (ha).

2.3 The proposed allocation area comprises Botanic House, to the north. The area is bounded to the east by Hills Road, whilst to the south and west, the boundary abuts with the Cambridge University Botanic Garden. A multi storey-car park is located within the Site, in the south west corner between Francis House and Betjeman House.



Figure 1 – The Estate (edged red)

- 2.4 Whilst the south and west boundaries are marked by well established, mature trees located within the Botanic Garden, there is no green space within the proposed allocation area and hard surfacing, or built form, is the prevailing land cover.
- 2.5 The potential allocation area currently comprises entirely brownfield land featuring the following commercial buildings and areas:
- Botanic House: 98-100 Hills Road, Cambridge;
 - Betjeman House (including Broadcasting House): 104 Hills Road, Cambridge;
 - Car park to the rear of Betjeman House;
 - The Flying Pig Public House: 106 Hills Road, Cambridge;
 - Land at the former Osborne Arms: 108 Hills Road, Cambridge;
 - Ortona House: 110 Hills Road, Cambridge; and
 - Francis House: 112 Hills Road, Cambridge.
- 2.6 It should be noted that for the purposes of this submission the proposed allocation area includes Botanic House, and together with the remaining properties comprises the local 'Estate', whereas the application proposals that [REDACTED] are progressing excludes Botanic House.
- 2.7 Reference to 'Site' (or 'Estate') through this submission refers to the properties referred to in paragraph 2.5, including Botanic House, whilst 'application site' refers to the emerging development proposals for the site, which excludes Botanic House.

Background

- 2.8 The site is allocated under Policy 21 in the Local Plan within the "Station Area West (2) Site M44" within a designated Area of Change. Policy 21 identifies "Station Area West (2)" as land comprising 1.17 hectares fronting Hills Road which "will include:
- "i. B1 (a) and B1 (b) employment;
 - "j. residential use; and
 - "k. a mix of uses in classes A1, A2, A3, A4 and A5".
- 2.9 Planning permission was granted for the redevelopment of the majority of the Site¹ in 2007 (06/0552/FUL), for 'redevelopment to provide mixed use scheme comprising 156 residential units; B1 office use; retail/food and drink (Classes A1; A3 and A4 uses, including retention of

¹ The approved development included for redevelopment of Botanic House: 98-100 Hills Road, Cambridge; Betjeman House (including Broadcasting House): 104 Hills Road, Cambridge; the car park to the rear of Betjeman House; the Flying Pig Public House: 106 Hills Road, Cambridge and land at the former Osborne Arms: 108 Hills Road, Cambridge. It did not include for Francis House and Ortona House, which at that time were not under control of the Applicant.

only the front façade of 'Flying Pig' Public House), and new community use, together with associated basement car parking and servicing; amenity space (external and internal) with associated hard and soft landscaping; including re-location of the war memorial and provision of public art respectively'. It was subsequently the subject of a S.73 submission under reference 08/1053/S73 that was granted on 23 October 2008. Botanic House was constructed as the first phase of this consent (completed 2012). The remainder of this permission has not been implemented but remains extant in planning terms.

- 2.10 The site already benefits from having an existing and highly successful new office building at its northern end; Botanic House, which comprises the implemented part of the 2008 permission and which underpins the existing allocation in the Local Plan. Given the time that has passed following the completion of Botanic House and the acquisition of other properties to form a comprehensive estate, it is now proposed to deliver a commercial mixed-use, office led, development on the increased area. As part of these proposals, the redevelopment will not only deliver the public realm, landscaping and amenity space plus activated ground floor uses as mentioned previously, but enable greater interaction between the site, and its land uses, with the adjoining Cambridge University Botanic Garden. Interaction that might not otherwise occur under the current designation and planning permission.

The Vision

- 2.11 [REDACTED] is seeking to bring forward an innovative design that delivers a world class, forward-thinking commercial development. It will contribute towards the city's plan to grow significantly, whilst safeguarding the city's outstanding heritage and environmental assets. To achieve this, the development is to be a truly exemplary scheme in both function and approach. It will create both an energised workspace and a lifestyle destination that is appropriate to Cambridge. Sitting at a key nodal point in the city, the development will be a 'place' in its own right, as well as a gateway to the city centre.
- 2.12 To deliver such a development, the keystone of all design decisions will be the desire to set a new development standard by delivering an environmentally sustainable building which being both 'green' and 'smart' is fit for the future. The development will aspire to achieve BREEAM 2018 'Outstanding'; be WELL 'Platinum' capable; achieve WIRED certification; and be 'Intelligent Building' enabled. Through the evolution of the design, additions to these exemplary credentials will be considered and potential opportunities and innovative approaches explored.

The Economic Context

- 2.13 National Planning Policy confirms that planning policies should help create the conditions in which businesses can invest, expand and adapt (NPPF, paragraph 80). The NPPF specifically states that "**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**" (emphasis added). The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.
- 2.14 The NPPF continues, at paragraph 81, in advising the 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.”

2.15 Paragraph 82 adds 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; ...at a variety of scales and in suitably accessible locations”

2.16 The Cambridgeshire and Peterborough Independent Economic Review (CPIER) (2018) and the Cambridgeshire and Peterborough Industrial Strategy (2019) provide such a vision and have each outlined ambitious plans for growth over the next 20 years.

2.17 Furthermore, the Cambridgeshire and Peterborough Combined Authority (CPCA) has set a target of doubling the regional economic growth (GVA) over the next 25 years. 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

2.18 In order to deliver sustainably deliver this ‘step change’ in economic performance, more land will need to be provided within sustainable locations in Cambridge’s city centre.

The Opportunity

2.19 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. The Site now finds itself located at the heart of Cambridge’s newly formed Central Business District (CBD).

2.20 The Station Road area 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).

- 2.21 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 within CB1. However, future business development in the area is constrained by the lack of high-quality office space. All the potential sites for development of new commercial buildings within the CB1 masterplan area, along Station Road, now have planning permission or a resolution to grant permission. Current availability in this area is now less than 1.5% with no Grade A space within this.
- 2.22 104-112 Hills Road represents a significant opportunity to continue the successful transformation of this part of the city and provide additional capacity to support the further clustering around the Station Area.
- 2.23 The Site is within single ownership and capable of delivering an exemplar 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 site's proximity to Cambridge railway station, links to the Chisholm trail and the transport interchange at the Station also enables opportunities to promote sustainable transport modes.
- 2.24 Given the current position in respect to the supply of Grade A office space in the core city centre market, and the difficulties in identifying sites to meet future need, makes this area especially attractive in the market, particularly for commercial land uses. The extent of recent development in the area enhances this, together with the role and function that Cambridge has under wider Government growth plans.

Proposed Development

- 2.25 The proposed development is the subject of extensive and ongoing discussions with the Council as part of ongoing pre-application engagement to establish the optimal use and design for the site. The proposed development currently comprises the following key elements:
- Demolition of Betjeman, Ortona and Francis Houses, rear carpark to Francis House.
 - Retention of and alterations to the Flying Pig Public House (as opposed to the simple retention of the façade in the extant 2008 planning permission).
 - New development in the form of two new buildings; one in the northern part of the site (Building B) and the other in the southern part (Building C), reflecting and evolving upon the architectural language of Botanic House (Building A).
 - It is proposed that the two buildings will be state-of-the-art workplaces incorporating principally office floorspace and combined flexible public facing retail, restaurant and cafe (Use Class A1, A3 and A4) at ground floor, together with car and cycle parking, servicing and plant.

- Associated landscaping and public realm improvements through the site and especially to the Hills Road frontage is to be included within the plans and proposals seek to establish a relationship with the Botanic Gardens too.

2.26 The proposed redevelopment of the site represents a major regeneration project facilitated by the demolition of a number of office buildings to create a comprehensive commercially led redevelopment, with some retail and food and beverage at the ground floor level. The Flying Pig Public House is located onsite and will be retained as part of the Proposed Development.

2.27 This is an important site, in the heart of the City Centre Business District, and it provides one of the few remaining centrally located opportunities to provide new high-quality office space. The site is situated close to the railway station and guided bus service and is within 10 minutes' walk from the historic City Centre. The site deserves, (and provides an opportunity to deliver) a world class scheme, to enhance the immediate neighbourhood, and provide much needed office accommodation which will help support the economic growth of the region.

2.28 The Site is located within the New Town and Glisson Road Conservation Area and is identified as a development site within the Conservation Area Appraisal. The heritage context of the site is being explored in detail with the Council through extensive pre-application engagement.

Benefits

- 2.29 The redevelopment of the site allows for a number of opportunities to bring economic, social and environmental benefits to the local area, including:
- making efficient use of commercial brownfield land in a highly sustainable location to deliver a range of commercial land uses particularly in the A use classes and in Classes B1(a) and B1(b);
 - providing high quality Class A office accommodation in a highly attractive and highly accessible location with close access to major public infrastructure through proximity to Cambridge railway station;
 - improving the public realm at an important gateway into the city centre;
 - creating a landmark Estate in a key location of the highest architectural quality designed to enhance the conservation area, improve the street scene along Hills Road;
 - the introduction of active ground floor frontages, creating potential links into the site and respecting the relationship to the neighbouring Cambridge University Botanic Gardens;
 - introducing new areas of landscaping and amenity space across/around the site;
 - improvements to the character and appearance of the New Town and Glisson Road Conservation Area through the removal of Francis House and Betjeman House (currently identified as 'Buildings which Detract' in the New Town and Glisson Road Conservation Area Townscape Analysis) and the replacement with high quality architecture and design;
 - achieving a development that will maximise the sites potential as a key site between the railway station and city core that will attract business and the public alike; and

- supporting the local economy by introducing new jobs and adding to the range of jobs available.

3.0 General

Question 4. Do you agree that planning to 2040 is an appropriate date in the future to plan for? Please choose from the following options:

Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree

If not, what would be a more appropriate date and why?

- 3.1 Agree.
- 3.2 The proposed Local Plan period up to 2040 is considered appropriate and to accord with the requirements set out within the NPPF for local authorities to identify a sufficient supply and mix of sites between years 1-15 of the plan (Para 67).

4.0 Themes

Question 6. Do you agree with the potential big themes for the Local Plan?

- 4.1 Agree.
- 4.2 The four big themes for the Local Plan are considered suitable and all are considered to be important in the consideration of the spatial distribution of growth in the district and for the determination of planning applications. The four big themes will generate a new way of planning, this may require a different way to make decisions; prioritising the four themes may require compromise in the balancing exercise in relation to other issues. The Local Plan will need to be on the need for a 'planning balance' in order to assess and prioritise the impact of development proposals.

Question 7. How do you think we should prioritise these big themes? Rank the options below 1-4 (1-Most Preferred 4-Least Preferred)

- 4.3 The four big themes are all considered to be important aspects to achieving positive development. All four themes should be used to inform the spatial strategy within the Local Plan in terms of distributing growth and determining planning applications to deliver growth. It is therefore not considered necessary to rank the options in order of preference.
- 4.4 The proposed development of 104-112 Hills Road could address the big themes in the following ways:
- **Climate Change** – recognise the climate emergency and wish to deliver a development that embraces the new agenda to work towards net zero carbon. The proposed commercial

development will be designed to a high quality and long life-span. It will incorporate low carbon technologies and energy efficiency measures. During operation, the development will be free of fossil fuels and free of carbon emissions. The site is also in a sustainable location with access to excellent public transport connections including the new Chisholm trail link, thereby reducing residents' reliance on private cars for travel.

- **Biodiversity and Green Space** – through the provision of on-site green infrastructure to create recreational and ecological assets to be enjoyed by the people of Cambridge.
- **Wellbeing and Social Inclusion** – the proposals will at its heart incorporate an improved public realm and deliver facilities that will promote healthy lifestyles and wellbeing through the provision of on-site recreation and the site's accessibility to employment, education, shops and public transport by active and sustainable modes of travel.
- **Great Places** – there is an opportunity to maximise the site's potential to deliver densification in a well-connected area, providing open space on site and opportunities for increased recreation.

Theme 1 Climate Change

Question 8. How should the Local Plan help us achieve net zero carbon by 2050?

- 4.5 The increased focus on climate change is welcomed. Climate change policy and good practice is changing quickly, and the plan will need to build in suitable flexibility to accommodate these changes within the lifetime of the plan. Climate change scenarios predict extensive changes by 2050, much of which is dependent on government and human action so there is substantial uncertainty over outcomes.
- 4.6 Whilst emerging policy should wholeheartedly support use of green modes of transport, such as electric vehicles and bikes/ scooters, a needlessly rigid policy may inadvertently impede progress towards later years in the plan or undermine results by not allowing for site-specific refinement.
- 4.7 For example, policies requiring the delivery of electric vehicle charging points should be sufficiently flexible to accommodate emerging quick changing technology, as well potential solutions to the current grid challenges in implemented EV charging. Such policies should also include flexibility to enable responses to changing legislation, as well as the opportunity to refine a plan-wide policy for site specifics. As the Zero Carbon Futures Symposium Report (2019) submitted within the evidence base notes on page 10: where targets are too limited, and without consideration of project contexts, policy can drive dysfunctional behaviour such as photovoltaic solar panels being installed on North facing roofs merely to achieve policy compliance not to produce effective carbon reductions.
- 4.8 Allowing for changing technologies and approaches should also help with viability as technology and approaches improve and are more widely adopted, thereby reducing costs. Escalating targets and policies may be able to accommodate these changes, while providing clarity to developers on the costs of development over time.

- 4.9 Where applicants are striving to deliver beyond widely applied 'standards', we would urge authorities to apply weight to the benefits of the uplift in standards within the planning balance.
- 4.10 The local plan Sustainability Appraisal (SA) should address variable climate change scenarios, as we would expect that different climate changes scenarios will be of interest at examination. Lack of rigorous assessment of these scenarios in the SA is could lead to the plan being found unsound.
- 4.11 The redevelopment of 104-112 Hills Road offers a significant opportunity to regenerate a site and significantly reduce the carbon output of the existing buildings. As part of the emerging proposals, [REDACTED] has instructed its design team to prepare a scheme that will deliver an environmentally sustainable, green, smart building fit for the future and this commitment extends to encouraging its future occupants to access the site by green modes of transport, such as public transport, walking, and cycling. Where private vehicles are used there should be a strong emphasis on electric vehicle solutions.

Question 9. How do you think we should be reducing our impact on the climate? Have we missed any key actions?

- 4.12 Greater Cambridge is a leading local authority on climate change policy. This can be seen through the early declaration of a 'Climate Change Emergency' and also through the newly adopted Sustainable Development SPD. This leadership should continue, as it is central to the sustainable development of Cambridge, leading to better development for people, the environment, and for economic development. It should be borne in mind that Cambridge's knowledge economy increasingly demands high sustainability standards: sustainability, health and wellbeing, with climate change at the heart, is a key part of continuing Cambridge's economic development. This should remain a priority as part of a policy framework the recognises climate change as a key part of sustainable development across social, environmental and economic objectives.
- 4.13 Development should be promoted within previously developed sites that are highly accessible. Indeed, the densification and redevelopment of brownfield sites such as 104-112 Hills Road offer opportunities to maximise energy efficiency measures on site and achieving low carbon development, thereby helping to achieve the Council's climate change targets.

Question 10. Do you think we should require extra climate adaptation and resilience features to new developments?

- 4.14 A policy approach with multiple options for delivering net zero carbon is likely to be most effective in delivering development, as well as carbon neutrality. A multi-pronged approach should allow different solutions for different developments, reflecting their use, local context and site-specific opportunities and constraints.
- 4.15 In the context of commercial development, developers should be encouraged to strive to do more than the regulatory minimums, but policies should seek to ensure certainty of delivery.

- 4.16 Where achieving standards requires a different approach in the design of buildings, the Councils must consider this and apply weight to the benefits of delivering low carbon sustainable development. The Council will need to be cognisant that changes to what are current 'design' norms may change as buildings strive to achieve higher environmental standards and reduce their carbon and climate impacts. This may require greater flexibility and a greater degree of understanding in respect to the issues concerned in delivering highly sustainable new developments, and that this will come at a cost.

Question 11. Are there any other things we should be doing to adapt to climate change? We want to hear your ideas!

- 4.17 The Local Plan should form a flexible policy framework, so as not to stifle the benefits of new technology or modern methods of construction.
- 4.18 As set out above, the redevelopment of 104-112 Hills Road can contribute towards adapting to climate change and achieving net zero carbon by providing a more energy efficient building on site, replacing the previous less efficient buildings. The opportunities for achieving the Council's climate change targets are more achievable through higher density development in central locations such as 104-112 Hills Road as investment can be made into achieving high standards of sustainability on site.

Theme 2 Biodiversity and Green Spaces

Question 12. How should the Local Plan help us improve the natural environment?

- 4.19 This Local Plan must deliver effective policy which protects and enhances natural capital. We support delivery of net gain for new development. Such policy must be flexible enough to enable creative and cost-effective solutions for the delivery of net gain and support the Vision for the Natural Future of Cambridgeshire in 2050 as outlined by Natural Cambridgeshire and affiliated organisations. An off-site net gain solution should be clearly allowed for by policy. While it is a Local Plan priority as a part of one of the four big themes, the Local Plan policy must allow for a planning judgement and balanced decision to allow for site and development specific issues to be considered.
- 4.20 104-112 Hills Road will improve the natural environment by providing high quality public open space on site and biodiversity features such as green roofs, green street scape and amenity areas for the people of Cambridge.

Question 13. How do you think we should improve the green space network?

- 4.21 This should come through from an up to date base assessment of Greater Cambridge assets, which leads to a Local Plan wide (and beyond) strategy. Development proposals can then be shaped around the identified priorities. As part of a policy framework that allows for off-site mitigation and off-site net gain enhancements can be used to improve the wider green space network.

- 4.22 Public open space is proposed as part of the proposed redevelopment of 104-112 Hills Road. Public realm improvements can contribute to the city's green space network and contribute towards improving air quality.

Question 14. How do we achieve biodiversity net gain through new developments?

- 4.23 The new Local Plan must ensure that policy in this matter is sufficiently flexible to accommodate the required biodiversity net gain in the most effective and efficient way for each development, with both on-site and off-site solutions possible.

Question 15. Do you agree that we should aim to increase tree cover across the area?

- 4.24 Yes. With the right trees, in the right areas. A policy framework to seek tree cover increase but allows for a planning balance within decision-making to enable the benefits and impacts of each development to be assessed.
- 4.25 In the case of the Site, any replacement tree cover must reflect the needs of the Botanic Garden to safeguard its status as an open air, living laboratory. Tree species must be specified with this in mind and species that are not compatible with those in the adjoining Botanic Garden are not to be introduced into the locality.

Theme 3 Wellbeing and Social Inclusion

Question 16. How should the Local Plan help us achieve 'good growth' that promotes wellbeing and social inclusion?

- 4.26 The Local plan should include a spatial strategy that connects homes with jobs; good quality public transport; facilities/services and high-quality open spaces. Policies should also highlight wellbeing and social inclusion as a key priority for new developments.
- 4.27 The redevelopment of 104-112 Hills Road with a high-density commercially led mixed-use development will help to achieve 'good growth' that promotes wellbeing (including health and mental health) through the delivery of a development which establishes an inclusive and integrated community founded on social equity, civic and community engagement and accessible design. Such principles should be supported within the emerging Local Plan.

Question 17. How do you think our plan could help enable communities to shape new development proposals?

- 4.28 The Local Plan could help enable communities to shape new development proposals through creating policies and procedures that encourage meaningful consultation and require developers to demonstrate how schemes have been influenced by local communities.
- 4.29 Community engagement should be sought during the design process, during construction and through opportunities to influence the scheme and /or be engaged in its management and maintenance after completion (where relevant), particularly in circumstances where unforeseen consequences emerge.
- 4.30 [REDACTED] is committed to providing a positive legacy from the development that it promotes, and this can be achieved from meaningful engagement with the local community to gain their input into the design of the proposed development, including the site layout and provision of specific local infrastructure or contributions towards this. Indeed, this intention has been demonstrated in [REDACTED] recent exemplar engagement with the local community and other stakeholders.
- 4.31 [REDACTED] is a landowner that takes a long-term view of delivering positive development that provides benefits for the local community.

Question 18. How do you think we can make sure that we achieve socially inclusive communities when planning new development?

- 4.32 One simple way to increase the social inclusivity of development is to ensure that it is easy to access for all. In this regard, the Local Plan should support the intensification of development within and around areas of high accessibility by means of public transport. The Station Road, Hills Road CBD is a particularly good example of this.
- 4.33 Development should also provide safe and efficient means of access by modes of transport other than the private car. This should be achieved by promoting access on foot, cycle and bus and striving to reduce the opportunity for easily accessing developments within a motor vehicle.
- 4.34 Developments which seek to place the wellbeing of its occupants at the heart of the designer's brief should be supported. This includes consideration of operational functions and ongoing management of new development.
- 4.35 Finally, where developments are seeking to deliver wider improvements to the public realm, whether through hard or soft interventions this should be a key consideration of the decision-making exercise. Developments must encourage social inclusion and informal interaction.

Question 19. How do you think new developments should support healthy lifestyles?

- 4.36 New developments should support healthy lifestyles by creating a spatial strategy that can support connected spaces where people do not have to rely on the private car for their daily

routine of school, work, shopping and leisure. Enabling active lifestyles and opportunities for social interaction is a priority.

4.37 The Local Plan should provide open space within developments where possible, alongside a policy framework to allow for off-site enhancements where appropriate, particularly when they can improve provision for existing communities. Standards within policies that determine the quantity and quality of provision should reflect an evidence-based assessment of need and benefits delivered.

4.38 A further measure to ensure new developments should support healthy lifestyles is for them to consider the needs of all age ranges and abilities in the detailed design of open spaces and public realm. New developments should also encourage healthy eating choices through the provision of healthy options and minimising/preventing fast food outlets.

Question 20. How do you think we should achieve improvements in air quality?

4.39 The operational impact of buildings upon local air quality must be minimised. The Local Plan should support all development which reduces the use of combustion fuels within development. Indeed, it is ██████ view that policy should seek to be innovative and place its full support behind development that results in zero CO2 emissions.

4.40 As set out elsewhere within these representations, improvements in air quality should also be achieved through the reduced use of polluting vehicles and encouraging the use of other modes of green and sustainable transport.

Theme 4 Great Places

Question 21. How should the Local Plan protect our heritage and ensure new development is well designed?

4.41 As set out above, the proposed redevelopment has been subject to extensive discussions with the Council as part of ongoing pre-application engagement to establish the optimal use and design for the site. ██████ is seeking to bring forward an innovative and highly sustainable commercial-led development achieving exemplar standards in terms of maximising opportunities for energy efficiency. The heritage assets in and around the site have been considered carefully as part of the design process. The proposed redevelopment will retain certain heritage and cultural elements on the site including the Flying Pig Public House, whilst bringing forward an extremely high-quality design that will add to the vitality of the surrounding area.

Question 22. How do you think we should protect, enhance and adapt our historic buildings and landscapes?

4.42 As set out above, high standards of design and sustainability are being sought as part of the proposed redevelopment of the site. A significant improvement to the public realm on site will be achieved as part of the proposed development.

Question 23. How do you think we could ensure that new development is as well-designed as possible?

- 4.43 As set out above, the proposed redevelopment can achieve a high-quality design by responding to the site's context and characteristics.

5.0 Jobs / Economy

Question 24. How important do you think continuing economic growth is for the next Local Plan?

- 5.1 As referred to in Section 2 of these representations, National Planning Policy confirms "*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*" (NPPF, paragraph 80). The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.
- 5.2 Cambridge's hi-technology clusters, particularly in AI, bio-tech and agri-tech are recognised in the UK Industrial Strategy as an essential element of the UK economy to support "*...towns such as MK, Oxford and Cambridge (that) have been hot spots for job creation. We must promote growth through fostering clusters and connectivity across cities, towns and surrounding areas.*"
- 5.3 Growth relies on increases in employment and productivity and the Cambridge and Peterborough Independent Economic Review (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. As part of the devolution contract to Cambridgeshire and Peterborough is a commitment to doubling the economic output of the area (Gross Value Added) over 25 years. This is a challenging target and needs to factor at the heart of the Plan.

Question 25. What kind of business and industrial space do you think is most needed in the area?

- 5.4 A wide variety of business and industrial space is most needed in Greater Cambridge, in terms of location, size, function and price, in order to support the growth of the economy, offering choice to meet an occupier's individual needs:

"The requirements for physical space, like finance, have stages. What a business needs in its start-up phase is different to its needs as it matures and grows. It is vital, if an innovation ecosystem is to be effective for there to be variety and availability at every stage².

² Cambridgeshire and Peterborough Industrial Strategy 2019 p 41

- 5.5 Flexible commercial space in urban and rural areas supports the growth of local business and strengthens opportunities for local supply chains to engage in the growth industries of the region. Local supply chains are recognised by the UK Government as a means of delivering ‘clean growth’ (UK Industrial Strategy) as they contribute to the Strategy’s mission to halve energy use in new buildings, partly by facilitation of local supply chains.
- 5.6 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 long-distance 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 and the emerging CBD within the Station Road/ Hills Road area on the international property and innovation map.
- 5.7 All new employment space should be located and built to maximise the health and wellbeing of employees and visitors. Healthy buildings in locations that reduce commute times and improve the sleep and wellbeing of its occupants contribute significantly to their productivity. Improving productivity is a primary route through which the Greater Cambridgeshire economic expansion objectives of doubling GVA and inclusive growth will be achieved.

“If workers can be more productive, they can bring home more take-home pay, which will flow into the local economy. And they will be able to enjoy a higher standard of life. It is this, before anything else, which needs to be looked at to create an inclusive economic future.” CPIER p38

Question 26. Do you think we should be protecting existing business and industrial space?

- 5.8 A broad range of employment opportunities accessible by active modes of transport (including public transport) needs to be maintained in urban and rural areas to ensure local jobs are available. All existing space and allocations should be assessed to understand their suitability for employment uses in the current climate of energy use reduction, the need for local employment, access for the workforce by public transport or active means of travel, which locations can deliver the highest health and wellbeing for workers and surrounding people.

Question 27. How should we balance supporting our knowledge intensive sectors, with creating a wide range of different jobs? What kind of jobs would you like to see created in the area?

- 5.9 Whilst the focus of Cambridge is the Science and Technology sector as the driving force of the economy, there is a requirement for a range of job opportunities, in urban and more rural areas. The Local Plan policy framework needs to provide for a full range of opportunities; as planned allocations and windfall employment opportunities.

- 5.10 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 overseas³. 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.
- 5.11 The redevelopment of areas around Cambridge central station for high quality offices including brownfield sites such as 104-112 Hill Road should be welcomed. This must be supported by the delivery of a high-quality public realm which provides both recreational space and efficient management of pedestrian and cycle through traffic – especially essential in areas around the Central Business District around the train station.

Question 28. In providing for a range of employment space, are there particular locations we should be focusing on? Are there specific locations important for different types of business or industry?

- 5.12 The UK industrial Strategy advocates focusing on our strengths, "*fostering clusters and connectivity across cities, towns and surrounding areas*"⁴ Sites which support these clusters are necessary and could be urban, edge of town or rural.
- 5.13 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 [and occupiers] 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."*⁵

- 5.14 Taller prime office buildings could locate at Cambridge's railway stations to focus development at transport hubs; keeping the city compact, but supporting the demand for high quality office space, particularly that arising from knowledge intensive (KI), especially artificial intelligence firms around Cambridge Central station. This supports CPIER's third key recommendation: "*Ensuring that Cambridge continues to deliver for KI businesses should be considered a nationally strategic priority*".

³ CPIER p54

⁴ UK Industrial Strategy 2017 p18

⁵ CPIER p41 – This is of relevant to all forms of development

- 5.15 The cluster effect is well-evidenced in Cambridgeshire and an opportunity exists for Greater Cambridge to encourage the forces of agglomeration through promotion of sites around existing groups of same-sector companies. This is certainly the case for the Science and Technology Sector. A spatial strategy to provide for a range of commercial and job opportunities should be informed by the cluster approach, but not at the expense of unduly restricting employment opportunities across the Plan area, particularly to transport corridors.
- 5.16 Non-knowledge intensive companies tend to be more footloose and typically locate where premises are provided rather than through bespoke development, while some companies expand from humbler often rural beginnings in converted buildings. To enable this growth dynamic employment locations in settlements of all sizes and classification should be allocated or be permissible, with larger concentrations of floorspace in areas with better public transport and access to active modes of travel. CPIER supports this position noting that deeper networks on smaller clusters on the periphery of Cambridge could help spread the 'Cambridge effect'.

Question 29. How flexible should we be about the uses we allow in our city, town, district, local and village centres?

- 5.17 An overly prescriptive policy framework can harm the viability and vitality of centres. A modern, responsive policy approach is welcomed to allow for a wider range of services and facilities. In particular, a flexible approach to the density and heights of development that will be provided on sustainable sites such as 104-112 Hills Road is supported.

6.0 Infrastructure

Question 37. How should we encourage a shift away from car use and towards more sustainable modes of transport such as public transport, cycling and walking?

- 6.1 National Planning Policy advises (paragraph 102) that transport issues should be considered from the earliest stages of plan-making so that:
- a) *“the potential impacts of development on transport networks can be addressed;*
 - b) *“opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;*
 - c) *“opportunities to promote walking, cycling and public transport use are identified and pursued;*
 - d) *“the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and*
 - e) *“patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.”*

6.2 The NPPF continues, at paragraph 103, in stating that the planning system should actively manage patterns of growth in support of the above objectives. It states:

“Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health.”

6.3 It is therefore important for the Local Plan to ensure developments create an environment where accessibility to day to day services and other facilities is easy and a choice of transport modes is available. This will enable the local community to choose the most sustainable methods of travel. New developments need to be designed so that this can happen from first occupation when habits start to form.

6.4 104-112 Hills Road is an ideal example of a site that has the opportunity to accommodate additional growth whilst encouraging a shift away from car use and towards more sustainable modes of transport. Indeed, in this particular case Cambridge train station is located approximately 500 metres to the east of the site (a 6-minute walk or 3-minute cycle ride from the Site).

7.0 Where to Build?

Question 42. Where should we site new development? Rank the options below 1-6 (1 Most Preferred 6-Least Preferred)

7.1 A combination of approaches to the distribution of spatial growth are considered likely to be necessary in order to allow for sufficient flexibility when considering the locations of new development in the Greater Cambridge area.

7.2 Development should absolutely be supported where it provides for the efficient reuse of previously developed sites that are well located in relation to existing centres and which have high levels of accessibility by public transport.

Question 43. What do you think about densification?

7.3 Densification of existing urban areas has many advantages as outlined in the consultation document;

- Reduces the need to use greenfield land to accommodate growth;
- Provides for central, well-connected and vibrant development supporting a strong community and identity;
- Reduces the need to travel by car and so makes a positive contribution to addressing climate change;
- Sites growth near to existing centres, which can continue to support their vitality and viability.

- 7.4 The principle of densification is supported. The NPPF confirms, at paragraph 118, that planning policies should “*give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs*” and “*promote and support the development of under-utilised land and buildings*”. The NPPF continues, at paragraph 112, in advising that planning policies should support development that makes efficient use of land, taking into account, *inter alia*, the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it.
- 7.5 As set out above, a combination of approaches for the spatial distribution of growth in the area is likely to be required. However, opportunities for densification of existing urban areas in locations well served by public transport should be maximised wherever possible.
- 7.6 104-112 Hills Road is in single ownership and provides an opportunity to meet an identified need for Grade A office space within the emerging CBD of the Station Road/ Hills Road area. The Site presents a significant opportunity for redevelopment whilst still being able to respond to local character and protect the historic environment. The Site is proposed for allocation in the emerging Local Plan on this basis.

Question 48. What do you think about siting development along transport corridors?

- 7.7 Development is best suited to being located along transport corridors to promote sustainable development and transport issues should be considered from the earliest in accordance with Para. 102 of the NPPF.
- 7.8 [REDACTED] support the principle of siting development along transport corridors, in accordance with national planning policy and guidance which encourages development to be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.
- 7.9 104-112 Hills Road is located on a key public transport corridor, being within easy walking distance of Cambridge central station and the city centre. It is therefore in a highly sustainable location for growth.

8.0 Any Other Issues?

Question 49. Do you have any views on any specific policies in the two adopted 2018 Local Plans? If so, what are they?

‘Cambridge Railway Station, Hills Road Corridor to the City Centre Opportunity Area’ (Policy 25) Cambridge Local Plan 2018

- 8.1 104-112 Hills Road falls within the ‘Cambridge Railway Station, Hills Road Corridor to the City Centre Opportunity Area’ (Policy 25) of the adopted Cambridge Local Plan (2018).

8.2 Policy 25 confirms that development proposals within the Cambridge Railway Station, Hills Road Corridor to the City Centre Opportunity Area will be supported if they help promote and coordinate the use of sustainable transport modes and deliver and reinforce a sense of place and local shops and services. Development proposals are also expected to deliver a series of coordinated streetscape and public realm improvements.

8.3 [REDACTED] are fully supportive of the aims and objectives of Policy 25. This policy objective should be followed through to the new Greater Cambridge Local Plan and the Site should continue to fall within the Opportunity Area.

'Station Areas West and Clifton Road Area of Major Change' (Policy 21) Cambridge Local Plan (2018)

8.4 104-112 Hills Road is located within the "Station Area West (2) – Site M44" within a designated Area of Change. Policy 21 identifies Station Area West (2) as land comprising 1.17 hectares fronting Hills Road which "will include":

- "i. B1 (a) and B1 (b) employment;
- "j. residential use; and
- "k. a mix of uses in classes A1, A2, A3, A4 and A5."

8.5 [REDACTED] are fully supportive of the aims and objectives of Policy 21. This policy objective should be followed through to the new Greater Cambridge Local Plan and the Site should continue to fall within the Area of Major Change.

8.6 Having regard to the potential land uses identified under Policy 21 (Site M44) the Site Allocation provisions should recognise the key opportunities that exist in the redevelopment of this high profile site, located on the main route from the Railway Station and the developments along Station Road into the City Centre; a site that can deliver a development that embraces innovation, is dynamic and bold, creating the workplace of the future, whilst exploiting its highly accessible location. It is a site that has the potential to bring significant benefits to the local environment through the creation of new amenity space, public realm and enhancing public accessibility.

8.7 Since the original grant of planning permission Cambridge has seen significant new development within the station area and along Station Road, including significant amounts of new residential. There is currently limited Grade A office space available in the core city centre market. The limited space that is being built, is already identified, or which could potentially come forward, is already attracting strong interest and there are few sites available to meet the need for this standard of space. Accordingly, the lack of Grade A office space in the city centre, the limited amount of space coming forward and the lack of available sites, due to the constraints of Cambridge's core area, makes this site highly desirable for retention of its commercial land uses.

8.8 Accordingly, it is considered that potential uses are appropriate, but that the wording of the allocation should make clear that flexibility is to be applied with regard to the mix of the proposed

uses. This will ensure that the site's redevelopment can respond most appropriately to local needs at the point of redevelopment occurring.

- 8.9 When considering the allocation for office development, the site has the potential to create opportunity for greater levels of access to today's agile work environments which encourage cross fertilisation of ideas and thought. Through the activation of the ground floor of the building, the provision of high-quality public realm around the site, and through the provision of appropriate amenity space to serve future occupiers, it is expected that the ground floors of the future development, and its wider public realm will become a new place in Cambridge.
- 8.10 The new Greater Cambridge Local Plan therefore needs to be flexible to enable a response to changes in economic circumstances and of the importance of ensuring enough land of the right types is available in the right places and at the right time to support growth and Cambridge's commercial importance and vision at local, regional, national and international levels.

APPENDIX 1
SITE LOCATION PLAN

