

**TRAVIS PERKINS,
CAMBRIDGE
GREATER CAMBRIDGE
LOCAL PLAN –
REGULATION 18 :
ISSUES AND OPTIONS
CONSULTATION 2020**

Quality Assurance

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1.0 Introduction

Background

- 1.1 These representations have been prepared by Bidwells LLP on behalf of First Base to submit the Travis Perkins Site, 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 are considered likely to be necessary in order to allow for sufficient flexibility when considering the locations of new housing and employment development in the district. However, the principle of densification is supported and the Travis Perkins site presents an ideal opportunity for densification of an underused, brownfield site in a highly sustainable location.

- 1.8 First Base are at an early stage in considering potential development concepts for the Site and currently consider that a genuine mixed-use scheme would be appropriate. First Base are however keen to engage with the Council, stakeholders and the local community at the earliest opportunity to help shape, 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 Travis Perkins, Cambridge and within the context of the four big themes and options for growth.

2.0 Travis Perkins, 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 Travis Perkins, Cambridge is submitted as a potential allocation for residential and commercial development in the Local Plan. The extent of the site is shown on the site location plan at **Appendix 1**.
- 2.2 The Site is located to the east of Devonshire Road and adjacent to Cambridge station railway tracks. The site currently comprises a builder's merchant with associated yard. The area to the east is predominantly residential, with two to three storey buildings on the streets surrounding the site. The Site can be accessed from Devonshire Road.
- 2.3 Cambridge train station is located approximately 650 metres to the south of the site (a 5-minute walk or 2-minute cycle ride from the site).
- 2.4 The Site is allocated for residential development in the adopted Local Plan under Policy 24. Planning permission was previously granted on 8 April 2014 for 43 residential units including public open space, landscaping, access and parking (11/1294/FUL), which was only for part of the Site. This permission was not implemented and as explored in more detail below, a higher density and more efficient use of the land is proposed through the allocation of the Site for mixed-use development.
- 2.5 The Site is located adjacent to but not within the Mill Road Conservation Area, which was allocated as a separate conservation area on 21 November 2018. There are no listed buildings on the site.

The Vision

- 2.6 The vision is to transform the site, maximising the site's potential to deliver sustainable development through the densification of a brownfield site, providing a genuine mixed use development that is highly connected by foot to sustainable transport links. The proposed redevelopment of the site would provide additional capacity to support clustering in the local area, which has proven to be a key component in terms of growing Cambridge's economy.

The Economic Context

- 2.7 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.

2.8 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.”

2.9 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”

2.10 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.

2.11 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

2.12 In order to deliver this 'step change' in economic performance, the Consultation document states that around 2,900 homes a year would need to be built in Greater Cambridge if the jobs growth is achieved – an indicative total of 66,700 homes over 2017 – 2040.

Build to Rent

2.13 There is a clear demand for additional housing in Cambridge of a type and tenure that is affordable to the young professional households that make-up a considerable proportion of the population. These are people who often do not meet the criteria for social rented housing but cannot afford to buy their own home. A professional private rented sector can provide such accommodation.

2.14 The Government has clearly identified the growth of the institutional private rented sector as a fundamental component to increasing housing supply in England. Whilst it is unlikely that the

private rented sector will return to the dominance seen early in the previous century, it can make a significant contribution.

- 2.15 There is a need for higher quality housing to meet the needs of existing and future residents within the private rented sector and help to meet projected population growth and housing needs to 2031.
- 2.16 The Cambridge private rented sector is quite unique with a population profile characterised by young adults principally living as couples with no dependent children. Contrary to popular opinion, the private rented sector is not dominated by all-student households, which account for only 7.5% of private rented households, as most students live in dedicated communal establishments. The Cambridge private rented sector generally makes more effective use of housing space than other tenures with far fewer households with under occupancy.
- 2.17 Economic activity and employment rates are particularly high in the private rented sector in Cambridge with many working in financial, real estate, professional and administrative activities. Many are in professional or other senior occupations, despite the young age profile.
- 2.18 The Travis Perkins proposals for Build to Rent housing would address a specific need for more housing to serve the growing private rented sector and would also make a significant contribution to meeting housing needs within Greater Cambridge in a manner that would diversify housing choices within the market.

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 Travis Perkins site is to the north of Cambridge's newly formed Central Business District (CBD) (approximately 650m).
- 2.20 The 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 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.
- 2.22 The Travis Perkins site represents a significant opportunity to provide a highly sustainable mixed-use development in a central location with excellent transport connections, delivering real economic, environmental and social value.

- 2.23 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 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 In addition to the benefits of clustering employment uses around the Central Business District, there is a need for further residential development in the area.
- 2.25 The Cambridge Local Plan recognises that pressures on housing can lead to recruitment issues for employers¹, and that it is important to provide an appropriate mix of housing types and sizes². The South Cambridgeshire Local plan recognises the importance of the emerging private rented sector³. The Greater Cambridge Housing Strategy states that both the City and South Cambridgeshire are open to supporting the new private rented sector.
- 2.26 The Site is therefore considered an ideal location to provide mixed-use development that includes Build to Rent housing and commercial development.

The Emerging Concept Proposals

- 2.27 The proposed development is for a mixed-use development comprising residential and commercial development as follows:
- **Residential** – A high quality efficient design providing Build to Rent housing and associated amenities. A higher density development is envisaged that can accommodate more development than currently provided for in the Local Plan site allocation under Policy 24.
 - **Commercial** - A mix of commercial offices and flexible workspace that is highly energy efficient and designed to exemplar standards. The buildings would comprise flexible commercial space, which will attract a diverse range of businesses with a focus on the fast growing, knowledge intensive sectors, as well as active ground floor uses that would deliver amenities for those workers and the wider public. It is envisaged that a mix of modern collaborative workspaces alongside research and development labs will be provided to enable a cluster of like-minded organisations.
 - **Public Realm** - New landscaped public realm areas including biodiversity enhancement features such as additional trees, green roofs and roof gardens.
- 2.28 The development will promote a healthy, active, environmentally-friendly lifestyle by discouraging car use (through minimal or even nil car parking) and providing extensive car-free paths, as well as drinking fountains, shower facilities and bicycle facilities (secure parking, bicycle cafes, repair & hire shops etc.) for visitors, workers and residents with seamless integration with the proposed Chisholm Trail to promote all forms of exercise including cycling, walking & running.
- 2.29 The principles of the development would embody a community built around collaboration and connected living. The Site can deliver a community-focussed, sustainable place where

¹ Cambridge Local Plan Para 6.7

² Para 6.9

³ South Cambridge Local Plan 7.36

businesses, residents and the community are encouraged to collaborate and interact by designing informal, welcoming spaces, such as common rooms and cafes, as well outdoor furniture (benches, pods) for people to meet, relax and take some time out from their busy lifestyles.

Benefits

- 2.30 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 and residential land uses;
 - A mixed-use development provides the opportunity to share energy between the commercial and residential uses, which would see significant energy savings across the Site;
 - Providing high quality office accommodation in a highly attractive and highly accessible location with close access to major public infrastructure through proximity to the city centre and Cambridge railway station;
 - Delivering an identified need for Build to Rent housing that provides purpose built private rented sector accommodation;
 - Enhancing and extending the public realm into a site that is currently inaccessible to the public;
 - High quality buildings in a key location of the highest architectural quality designed to enhance the conservation area, improving the street scene along Devonshire Road;
 - The introduction of active ground floor frontages, creating potential links into the site and respecting the relationship to the surrounding area;
 - Introducing new areas of landscaping, boosting biodiversity, and amenity space across/around the site;
 - Development that sensitively responds to the heritage context of the adjacent Mill Road Conservation Area;
 - Achieving a development that will maximise the Site's potential as a key site between the railway station and city core that will attract business and the public alike;
 - Supporting the local economy by introducing new jobs and adding to the range of jobs available;
 - Designed to be open and permeable, with hybrid spaces for the local community to use; and
 - A transparent social value framework benefitting existing and future residents for the long-term; improving local social, economic and environmental outcomes.

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; to allow other impacts to happen in order to achieve these four priorities. The Local Plan policy framework will need to allow for a clear planning balance to take place to assess and prioritise impacts.

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 the Travis Perkins site could address the big themes in the following ways:

- **Climate Change** – First Base recognise the climate emergency and wish to deliver a development that embraces the new agenda to work towards net zero carbon. The proposed residential and commercial development will be designed to a high quality and incorporate low carbon technologies and energy efficiency measures. 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 future and existing residents.
- **Wellbeing and Social Inclusion** – the proposals would incorporate Build to Rent dwellings meeting an identified need for rented accommodation in the city and incorporate a mix of apartment sizes. The proposals would also 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 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 A needlessly stringent policy may inadvertently impede progress towards later years in the plan, or undermine results by not allowing for site-specific refinement. For example, policy for electric vehicle charging points should be sufficiently flexible to accommodate that quickly changing technology, as well the current grid challenges in implemented EV charging places. Energy policies should include flexibility for changing legislation, and technology, 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.
- 4.7 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.
- 4.8 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 could lead to the plan being found unsound.
- 4.9 The Travis Perkins site is a brownfield site in a highly sustainable location with access to key transport links including the train station (which is 650 metres south of the site), the Chisholm Trail link and numerous other public transport connections including local bus services and the proposed metro connections. The proposed mixed-use development on the site, in a highly desirable location for residential and commercial development offers real opportunities to deliver low carbon, or even net zero carbon development due to the high value of the area.

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

- 4.10 Greater Cambridge is a leading local authority on climate change policy, such as 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 humans, 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.
- 4.11 The densification and redevelopment of brownfield sites such as the Travis Perkins site 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?

- 4.12 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 context. For example, for some developments, Passivhaus energy standards may be achievable (going well above and beyond minimums set out in the Building Regulations), but for others, Building Regulations may need to be followed but an offset solution, such as a green bond or offset fund, could be used to achieve a net carbon reduction. Possible options need to be worked up in more detail as the Plan progresses and must build in flexibility.

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

- 4.13 The Local Plan should form a flexible policy framework, so as not to stifle the benefits of new technology or modern methods of construction.
- 4.14 As set out above, the redevelopment of the Travis Perkins site can contribute towards adapting to climate change and achieving net zero carbon by providing more energy efficient buildings on site. The opportunities for achieving the Council's climate change targets are more achievable through the allocation of higher density development in central locations such as the Travis Perkins site 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?

- 4.15 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 taken into account.
- 4.16 The Travis Perkins site could deliver a net increase in biodiversity and natural capital by providing high quality public realm on site, with new, open, green spaces, additional trees, roof gardens and other features such as green roofs.

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

- 4.17 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.

- 4.18 Public open space is proposed as part of the proposed redevelopment of the Travis Perkins site. Public realm improvements including tree lined avenues and small pocket parks 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?

- 4.19 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. Strategic off site opportunities offer the opportunity to significantly increase biodiversity other than providing site specific biodiversity improvements.

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

- 4.20 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.
- 4.21 This could be part of an on-site/off-site solution, which could generate notable s106 funds to achieve significant, meaningful and long-term planted and ecological areas. Ecological outcomes rather than an unconditional focus on native species should be considered in new planting.

Theme 3 Wellbeing and Social Inclusion

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

- 4.22 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.
- 4.23 The redevelopment of the Travis Perkins site with a high density mixed use development can help achieve 'good growth' that promotes wellbeing (including health) through the following inclusive and anti-poverty measures:
- Energy efficient homes and that delivers low energy and water bills;
 - Promotion of commercial development and job creation that offers the Living Wage and opportunities for those on lower incomes to increase wages to easily access jobs;
 - A wide range of social infrastructure and open space in new developments that provide pathways to free (i.e. no charge to the user) opportunities for improved health outcomes; and
 - Promotion of rented accommodation that meets an identified need for housing that is proportionate to income.

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

- 4.24 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.
- 4.25 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. First Base will ensure that the local residents, businesses and relevant stakeholders have the opportunity to input, influence and review proposals. A range of methods will be employed to ensure that there are multiple opportunities to get involved, including in-person meetings, digital via a website and social media and via an established community liaison group.

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

- 4.26 First and foremost, the Local Plan can achieve socially inclusive communities when planning new development by forming a spatial strategy that ensures that new development is accessible or can be made accessible. Providing everyone with the opportunity to walk, bus and cycle to jobs, schools, shops, services and social activities will be vital.
- 4.27 For the Travis Perkins site, social inclusion can also be delivered by building a safe, accessible and inclusive public realm that encourages informal meetings, dwelling, natural surveillance and 'bumping' into people.

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

- 4.28 New developments such as the proposed high density mixed use redevelopment of the Travis Perkins site 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.
- 4.29 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.
- 4.30 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?

- 4.31 Improvements in air quality should be achieved principally through the reduced use of polluting vehicles. For the Travis Perkins site this could include the following measures:
- Locating residential development and places of work that has a high footfall where there is good access to active travel and affordable, frequent, reliable and high quality public transport options;
 - Better cycle lanes, parking and cycle security (including the Chisholm Trail link) - achieved by developments directly and through a coordinated s106 infrastructure programme;
 - Reducing the volume of HGV movements in the city by relocating industrial sites such as the Travis Perkins site elsewhere and maximising the site for an alternative high density mixed use development;
 - Encouraging the use of less polluting vehicles, particularly during peak hours when emissions from stationary traffic makes conditions for pedestrians and cyclists and other vulnerable groups particularly bad;
 - Tree planting along road frontages: species selected for their pollution absorbing properties.

Theme 4 Great Places

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

- 4.32 The Site is located adjacent to but not within the Mill Road Conservation Area, which was allocated as a separate conservation area on 21 November 2018. There are no listed buildings on the site and the site comprises industrial uses. An important tree group is identified along the site's western boundary and also along parts of the northern boundary. There is a row of 'positive' unlisted buildings along Devonshire Road to the west of the site.
- 4.33 Promoting car-free developments that are designed for pedestrians and cyclists rather than cars; encouraging a move towards more sustainable, healthy forms of transport, such as walking and cycling or using public transport. Car use should be restricted to local car clubs (preferably Electric Vehicles with charging points) and car sharing.
- 4.34 The proposed redevelopment of the site for a mixed use development would represent a more suitable land use than the current industrial uses on site. A commercial and residential development on the site would offer the opportunity to re-envisage the site's layout and design and provide buildings that would be more suitable to the heritage context of the area.
- 4.35 Greater Cambridge has a track record as a place where contemporary design and the historic environment co-exist in harmony. There is a need for densification on such as the Travis Perkins site, to fully utilise brownfield land and maximise opportunities for sustainable development. The impact of the redevelopment proposals would need to be weighed in the balance of the public benefits arising from the proposed redevelopment. There are significant opportunities to maximise the sustainability of the site, providing energy efficient buildings that incorporate exemplar standards and maximising the site's location to transport links to encourage the use of active modes of transport.

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

- 4.36 The proposed redevelopment of the Travis Perkins site will need to sensitively take into account the surrounding Conservation Area and heritage assets. The principle of redeveloping the site for residential uses has been found acceptable through its designation under Policy 24. With the right design, it is considered that a site layout and the proposed massing of the buildings can be formulated that responds sensitively to the surrounding context of the area.

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

- 4.37 The proposed redevelopment of the Travis Perkins site can achieve a high quality design by responding to the site's context and characteristics. Not only is site layout key to achieving a positive design, ensuring that the proposed employment buildings are built to a high standard in terms of sustainability, achieving an energy efficient design.

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 stage⁴.

- 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

⁴ Cambridgeshire and Peterborough Industrial Strategy 2019 p 41

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 on the international property investment 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 overseas⁵. 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 the Travis Perkins site for a high density mixed-use development which offers a healthy working environment and Build to Rent housing would be welcomed. The delivery of a high quality public realm which provides both recreational space and efficient

⁵ CPIER p54

management of pedestrian and cycle through traffic is 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*”⁶ 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 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.”*⁷
- 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 CPIERs third key recommendation: “*Ensuring that Cambridge continues to deliver for KI businesses should be considered a nationally strategic priority*”.
- 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’.

⁶ UK Industrial Strategy 2017 p18

⁷ CPIER p41

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. A flexible approach to the density and heights of development that will be provided on sustainable sites such as the Travis Perkins site is welcomed.

6.0 Homes

Question 31. How should the Local Plan help to meet our needs for the amount and types of new homes?

- 6.1 There should be flexibility within the Local Plan to respond to changing housing needs over the Local Plan period. It is important to identify a baseline housing need but there should be scope for further development to come forward if it meets a particular housing need. This would support the Government's objective of significantly boosting the supply of homes to ensure that a sufficient amount and variety of land can come forward where it is needed and that the needs of groups with specific housing requirements are addressed (NPPF Para. 59).
- 6.2 There is an identified need for Build to Rent housing in Cambridge. The redevelopment of the Travis Perkins site offers an opportunity to provide a significant amount of rented accommodation in a highly sustainable location, making the best possible use of a brownfield site that is already allocated for residential development.

Question 32. Do you think we should provide for a higher number of homes than the minimum required by government, to provide flexibility to support the growing economy?

- 6.3 To support the Government's objective of significantly boosting the supply of homes, a sufficient amount and variety of land needs to be identified to meeting housing needs within the Joint Local Plan area. The Cambridge and Peterborough Independent Economic Review (CPIER) (September 2018) suggests that higher housing target numbers are likely to be needed in Cambridgeshire if the potential for higher growth in employment is to be met.
- 6.4 Housing requirements are minimums, not maximums to stay under at all costs. There is a well-evidenced affordability problem in Greater Cambridge; a greater supply of homes will be part of the solution. *"Too many of the people working in Cambridge have commutes that are difficult, long and growing: not out of choice, but necessity due to high housing costs."*⁸

Question 33. What kind of housing do you think we should provide?

- 6.5 There should be flexibility within the Local Plan to respond to changing housing needs over the Local Plan period. Consideration of individual site circumstances and the circumstances of a local area should be taken into account to determine the appropriate type of housing for development sites. Separate housing needs assessments should be used to inform the appropriate size, type and tenure of housing needed for different sections of the community, as set out within the Greater Cambridge Housing Strategy 2019-2023.
- 6.6 Flexibility will be key to a successful Local Plan; through market housing, low-cost and affordable housing. Allocations for Build to Rent housing would be welcomed on sites such as the Travis Perkins site.

⁸ Cambridgeshire and Peterborough Industrial Strategy 2019, p13

Question 35. How should we ensure a high standard of housing is built in our area?

- 6.7 Local Plan policies can require a high standard of design for new residential development, leading from Government policy and guidance. Appropriately worded design policies should require a high quality design for new dwellings. This could include sustainable design principles including measures to improve the energy efficiency of new homes, water saving measures, use of efficient insulation material and heating systems, the reduction and recycling of construction materials, provision of appropriate amenity space and accessibility. Policy should not be prescriptive for precisely how it will be accomplished, it can set a policy-level, but developers should be able to use a host of options to achieve the target.

7.0 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?

- 7.1 National Planning Policy advises (paragraph 102) that transport issues should be considered from the earliest stages of plan-making and development proposals 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.
- 7.2 The NPPF continues, at paragraph 103, in stating that the planning system should actively manage patterns of growth in support of the above objectives. *“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.”*
- 7.3 It is 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 more socially inclusive and sustainable methods of travel. New developments need to be designed so that this can happen from first occupation when habits start to form.
- 7.4 Travis Perkins is an ideal example of a site that has the opportunities to accommodate additional growth and encourage a shift away from car use and towards more sustainable modes of transport. Cambridge train station is located approximately 650 metres to the south of the site (an 8-minute walk or 2-minute cycle ride from the site).

8.0 Where to Build?

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

- 8.1 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 housing and employment development in the Greater Cambridge area.

Question 43. What do you think about densification?

- 8.2 Densification of existing urban areas has many advantages as outlined in the consultation document;
- Reduces the need to use greenfield land to accommodate growth;
 - Living in central, well-connected and vibrant areas is important for many people;
 - 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.
- 8.3 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.
- 8.4 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.
- 8.5 Travis Perkins is in single ownership and provides an opportunity to meet an identified need for Build to Rent housing, retirement housing and commercial uses. 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?

- 8.6 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.
- 8.7 First Base 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.

8.8 The Travis Perkins site is located on a key public transport corridor, being within easy walking distance of Cambridge central station which 650 metres to the south of the site (an 5-minute walk or 2-minute cycle ride from the site), and the city centre is only one mile to the north west of the site. The site is therefore in a highly sustainable location for growth.

9.0 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?

'Mill Road Opportunity Area' (Policy 24) Cambridge Local Plan 2018

- 9.1 The Travis Perkins site falls within the 'Mill Road Opportunity Area' (Policy 24) of the adopted Cambridge Local Plan (2018).
- 9.2 Policy 24 confirms that development proposals within the Mill Road Opportunity Area will be supported if they add to the vitality and viability of the street and protect and enhance its unique character, including the development of arts and cultural facilities. Travis Perkins, Devonshire Road is allocated as Site R9 (1.23 ha).
- 9.3 The supporting text to this policy states:
- "There are a number of sites with potential for redevelopment for **residential uses**, these include 315–349 Mill Road and Brookfields (R21), Mill Road Depot (R10) and the Travis Perkins site on Devonshire Road (R9)."*
- 9.4 Within Appendix B of the Local Plan, the Travis Perkins site is proposed for an indicative number of 43 dwellings (35 dwellings per hectare). The site is in a central location with excellent transport links. It is capable of accommodating a much higher density development than currently indicated within the Local Plan.
- 9.5 The densification and redevelopment of brownfield sites such as the Travis Perkins site offer opportunities to maximise energy efficiency measures on site and achieving low carbon development, thereby helping to achieve the Council's climate change targets. The opportunities for achieving low carbon development, net gain and energy efficiency development are more tangible if the indicative housing density for the site allocation is increased, and if the site allocation is expanded to include commercial uses.
- 9.6 First Base are supportive of the aims and objectives of Policy 24. 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. The Policy should however allow for more development on the site.

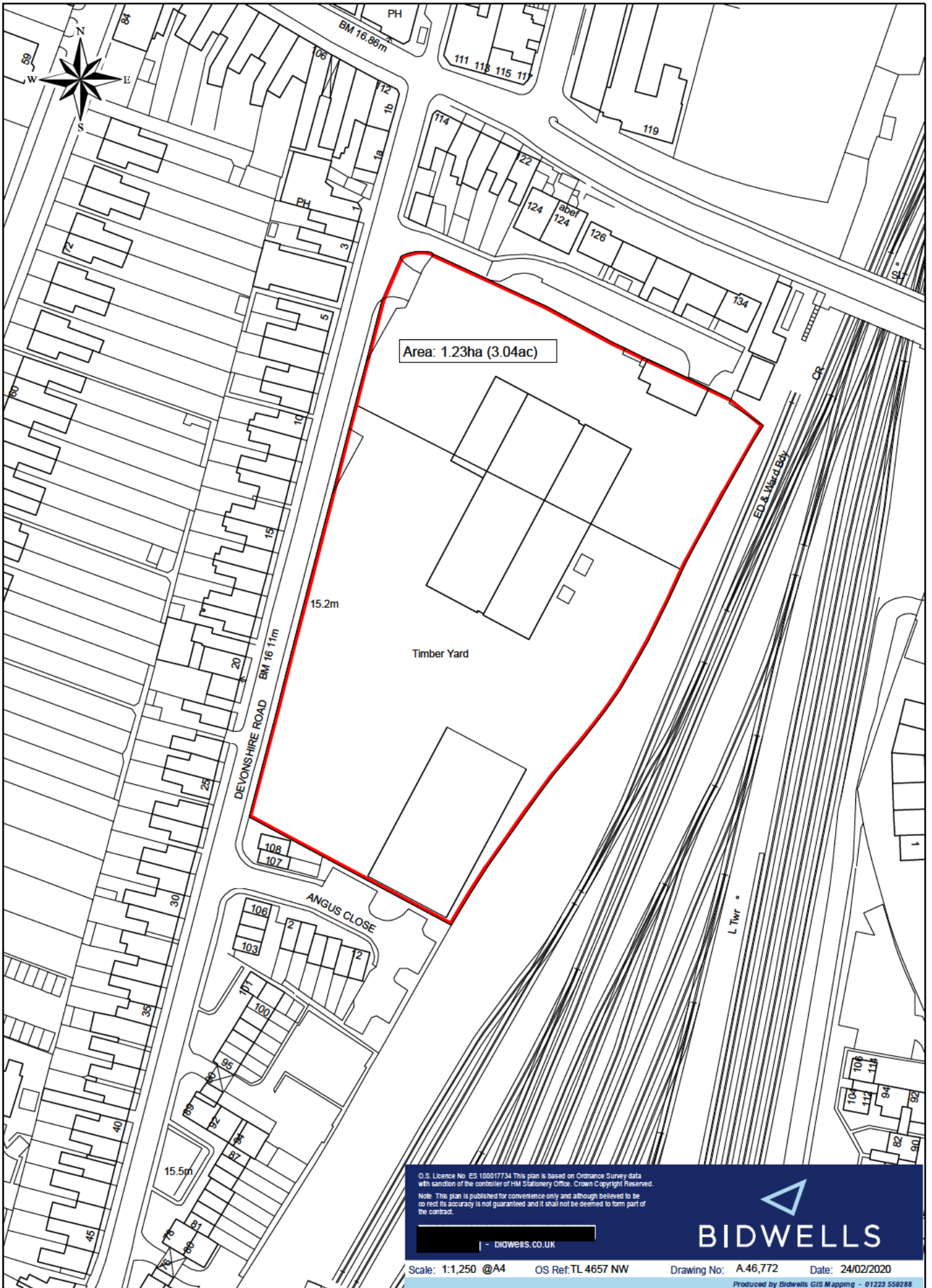
'Station Areas West and Clifton Road Area of Major Change' (Policy 21) Cambridge Local Plan (2018)

- 9.7 The site is located to the north of the Station Areas West and Clifton Road Area of Major Change. The Policy should recognise the importance of areas that contribute to the growth of Areas of such as the Travis Perkins site.

APPENDIX 1

SITE LOCATION PLAN

Travis Perkins, Land East of Devonshire Road, Cambridge



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