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Greater Cambridge Shared Planning
Planning Policy Team
Cambridge City Council
PO Box 700
Cambridge
CB1 0JH

Via Email Only: localplan@greatercambridgeplanning.org

Dear Sir or Madam,

GREATER CAMBRIDGE LOCAL PLAN – REPRESENTATIONS TO THE REGULATION 18: FIRST PROPOSALS 2021 CONSULTATION

I write on behalf of Pace Investments, the freehold owner of land at 100-112 Hills Road, Cambridge in response to the Greater Cambridge Local Plan Regulation 18: First Proposals 2021 consultation (“the consultation document”). Please refer to Appendix 1 for site location plan.

Introduction

These representations follow those submitted to earlier stages of the emerging GCLP. The Greater Cambridge Housing and Economic Land Availability Assessment (HELAA) lists and maps sites within Greater Cambridge that may have potential for residential and economic development. A ‘Red, Amber, Green’ (RAG) scoring system was used to carry out the assessment. Sites were deemed to be unsuitable if they were assessed as ‘red’ against any of the criteria used.

Land at 100-112 Hills Road, Cambridge is identified in the HELAA under site reference 40214. It is confirmed as suitable, available and achievable.

Part of the site (100-108 Hills Road) benefits from an extant planning permission 06/0552/FUL (as amended). The redevelopment of Botanic House (100 Hills Road) was completed under this permission in 2012.

Part of the site (104-112 Hills Road) is subject to a pending appeal to the Planning Inspectorate (Ref: APP/Q0505/W/21/3282911). This is for a commercial development which retains the Flying Pig.

The site is positioned at the junction of Hills Road and Station Road. The junction forms a key gateway between the historic centre of Cambridge and its mainline national rail station. It is a highly sustainable location which is identified for growth. The City Centre is some 1km north, or within a 10-15 minute walk. The national rail station is 500m to the east within a 5-8 minute walk.

The site is allocated within the Cambridge City Local Plan (2018) as:

- Proposal Site M44 and R44;
- Within the Station Areas West and Clifton Road Area of Major Change (Policy 21);

- Within the Cambridge Railway Station, Hills Road Corridor to the City Centre Opportunity Area (Policy 25); and
- Within the New Town and Glisson Road Conservation Area.

Economic Context

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

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

NPPF Paragraph 81 builds upon this:

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

NPPF Paragraph 82 states that planning policies should:

- “a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;
- b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;
- c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and
- d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.”

NPPF Paragraph 83 then states that:

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

Sub-Regional Context

The Cambridgeshire and Peterborough Combined Authority (CPCA) set a target of doubling the regional economic growth (GVA) over a 25-year period as part of the Devolution Deal in 2017. This requires the area going beyond what it has achieved in the past (to double an economy over twenty-five years requires an average annual growth rate of 2.81%; historically, since 1998, the local economy has only grown at around 2.5%). Achieving this requires employment growth and more importantly productivity growth, as we are already at comparatively high levels of employment.

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

The Cambridgeshire and Peterborough Independent Economic Review (CPIER) (2018) has outlined ambitious plans for growth over the next 20 years. Growth relies on increases in employment and productivity and the CPIER emphasises the need for productivity growth in this region as employment rates are so high. Economic growth is therefore essential for the next Local Plan.

Cambridgeshire and Peterborough Local Industrial Strategy (2019)

The Cambridgeshire and Peterborough Local Industrial Strategy sets out an industrial blueprint to deliver Cambridgeshire and Peterborough's vision of being a leading place in the world to live, learn, work, and do business. The actions in the strategy will help deliver the aims of the national Industrial Strategy and the recommendations of CPIER.

In terms of Life Sciences, the Strategy sets out a priority of expanding and building upon the clusters and networks that have enabled Cambridge to become a global leader in innovative growth and improving the long-term capacity for growth in Greater Cambridge by supporting the foundations of productivity.

Life Science Strategy for the Cambridgeshire and Peterborough Combined Authority (2021)

This Life Science Strategy for the Cambridgeshire and Peterborough Combined Authority highlights just how fundamental the sector is to the local economy.

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

The Greater Cambridge Employment Land and Economic Development Evidence Study explores the characteristics of each key economic cluster including the challenges and opportunities that they face. The Study confirms that there is a need for additional floorspace in Life Science, ICT and Professional Services and Advanced Manufacturing sectors.

Response to Policy S/DS: Development Strategy

Policy S/DS sets out the proposed strategy for the pattern, scale and design quality of places created in Greater Cambridge, not only for the plan period but beyond to 2050.

The proposed development strategy for Greater Cambridge is to direct development to where it has the least climate impact, where active and public transport is the natural choice, where green infrastructure can be delivered alongside new development, and where jobs, services and facilities can be located near to where people live, whilst ensuring all necessary utilities can be provided in a sustainable way.

The development strategy is **supported**.

Response to Policy S/AMC: Areas of Major Change in Cambridge

Policy S/OA identifies specific locations as Areas of Major Change. Areas of Major Change are extensive areas of development comprising defined and known sites collectively shaping the spatial structure of Cambridge.

It is proposed to continue to identify the Station Areas West and Clifton Road as an Area of Major Change and the site continues to fall within it.

Pace Investments **supports the principle** of draft Policy S/AMC and the proposal to carry forward the Station Areas West and Clifton Road as an Area of Major Change to the emerging Greater Cambridge Local Plan.

Response to Policy S/OA: Opportunity Areas in Cambridge

Policy S/OA identifies specific locations as Opportunity Areas that would benefit from a holistic approach to any future development that comes forward, to provide policy guidance for development that also improves public transport access and infrastructure delivery and seeks improvements to the public realm.

It is proposed to continue to identify the Cambridge Railway Station, Hills Road Corridor to the City Centre Opportunity Area and the site continues to fall within it.

Pace Investments **supports the principle** of Policy S/OA and the proposal to carry forward the Cambridge Railway Station, Hills Road Corridor to the City Centre Opportunity Area to the emerging Greater Cambridge Local Plan.

Policy S/LAC: Other site allocations in Cambridge

Policy S/LAC identifies specific site allocations for development in the Cambridge urban area, mainly rolling forward sites from the 2018 Cambridge Local Plan.

The site is identified under Policy S/LAC as site S/C/M44 as a mixed-use site.

For the avoidance of doubt, Pace wish to see a commercial allocation for the site (but includes the retention of the Flying Pig)

As noted within representations to the Call for Sites, having regard to the potential land uses identified under Policy 21 (Site M44) the Site Allocation provisions should recognise the key opportunities that the redevelopment of this high profile site offers, 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.

Indeed, it is noted that since the grant of existing planning permission extending to elements of the site, 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 severe 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 and expansion of its commercial land uses.

We reiterate that the landowner considers the allocation of the site for continued commercial uses (Classes B1(a) and B1(b) and all Class A uses) given its brownfield status and city centre location represents the most appropriate uses in any future development. The site also has the potential to create opportunity for greater public accessibility 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.

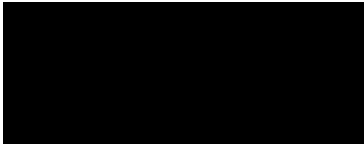
This is especially supported by its location within the city, that fact that the site is well served by public transport being within walking distance of Cambridge railway station. This offers the potential to optimise density whilst also maximising the development opportunity through the incorporation of innovative and high-quality design to create a redevelopment that will be eminently adaptable and which will relate positively to its location, the Conservation Area in which it sits, and to the adjoining listed features;

including Cambridge University Botanic Garden. Future proofing the building should be a key component in any development. As the site is currently in commercial employment uses, a scheme for promoting continued commercial uses should be considered a suitable redevelopment option for the site, particularly in view of the lack of Grade A commercial floorspace in this part of the city and the quantum of new residential units being provided in this part of the city since the grant of the now implemented planning permission.

We therefore submit that the emerging Greater Cambridge Local Plan 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.

Finally, it is noted that the Site has been assessed as suitable, available and achievable in the HELAA (reference 40214). Any matters scored as Amber in the HELAA are fully capable of being satisfactorily mitigated or compensated as demonstrated by the extant planning permission.

Yours faithfully



Jonathan Bainbridge
Partner, Planning

Enclosures Location Plan

Site at Botanic House, Hills Road, Cambridge

