

**KETT HOUSE AND 10
STATION ROAD,
CAMBRIDGE
GREATER CAMBRIDGE
LOCAL PLAN –
REGULATION 18:
ISSUES AND OPTIONS
CONSULTATION 2020**

Quality Assurance

Site name: Kett House and 10 Station Road, Cambridge
Client name: Brookgate Property and Aviva Investors
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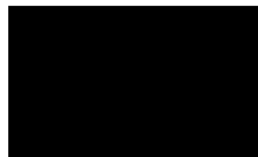
Signed



Date 18 February 2020

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Signed



Date 20 February 2020



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1.0 Introduction

Background

- 1.1 These representations have been prepared by Bidwells LLP on behalf of Brookgate Property and Aviva Investors to submit Kett House and 10 Station 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 The site was not submitted in March 2019 as part of the ‘Call for Sites’ consultation.
- 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 new design 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 Kett House and 10 Station Road presents an ideal opportunity for densification of an underused, brownfield site in a highly sustainable location.

- 1.8 Brookgate and Aviva are at an early stage in considering potential development concepts for the site and currently consider that a commercial-led scheme would be appropriate. Brookgate and Aviva are however keen to engage with the Council, stakeholders and the local community to refine and discuss the proposals further as part of the ongoing consultation on the emerging Greater Cambridge Local Plan.
- 1.9 These representations respond to the relevant questions within the consultation document in respect to the redevelopment opportunity at Kett House and 10 Station Road, Cambridge and within the context of the four big themes and options for growth.

2.0 Kett House and 10 Station 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 Kett House and 10 Station Road, Cambridge is submitted as a potential allocation for employment 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 on the south side of Station Road, Cambridge and currently comprises Kett House and 10 Station Road. The site is surrounded by office, retail and residential development as part of the Central Business District in the station area.
- 2.3 The Site is within the New Town and Glisson Road Common Conservation Area. 10 Station Road is identified as a 'Building of Positive Townscape Value' in the New Town and Glisson Road Conservation Area Character Appraisal (2012) and is therefore considered to be a "non-designated heritage asset".
- 2.4 10 Station Road was identified for redevelopment in the Station Area redevelopment masterplan. Full planning permission granted on 15 January 2020 for "The demolition of Jupiter House and the construction of a new office building comprising 5,654 sqm (GIA) of Class B1(a) floorspace including ancillary accommodation/facilities with a single basement of 1,715 sqm (GIA) providing 37 car parking spaces, with associated plant and new sub-station, 193 cycle parking spaces at street level and two options for provision of access to the development and for hard and soft landscaping" (15/2271/FUL). The reconstruction of Kett House was completed in 2002.

The Vision

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

The Economic Context

- 2.6 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.

2.7 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.”

2.8 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”

2.9 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.

2.10 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

2.11 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.

The Opportunity

2.12 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) and it has attracted a number of significant pre-lets; a sign of its desirability.

- 2.13 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).
- 2.14 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.
- 2.15 This limited supply and strong demand has led to significant increases in rent of 32% over the past five years. For the R&D, AI and business services sector, the location decisional drivers are access and ability to recruit the right skill sets. Central Cambridge provides this, but the small size of the core central area, the lack of available space and lack of development pipeline puts that resilience at risk and could undermine the growth of the R&D sector.
- 2.16 The redevelopment of Kett House and 10 Station Road provides a further opportunity to continue the successful transformation of this part of the city and provide additional capacity to support the further clustering around the Station or simply very well-located development opportunities.
- 2.17 There is an opportunity around the junction between Station Road and Hills Road to remove buildings that do not contribute positively to the Conservation Area and additionally to act as marker buildings at a key entrance point into a major business district well removed from the historic core of the city. The proposed development would act as a key focal point improving entrance into the station area quarter.

Emerging Concept Proposals

- 2.18 The proposed development is for a commercial-led development comprising mostly offices with potential for active ground floor frontages comprising flexible public facing retail, restaurant and cafe (Use Class A1, A3 and A4) together with car and cycle parking,
- 2.19 The Site is 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.



Figure 1: Site Visualisation



Figure 2: Existing Kett House



Figure 3: Elevation Visualisation

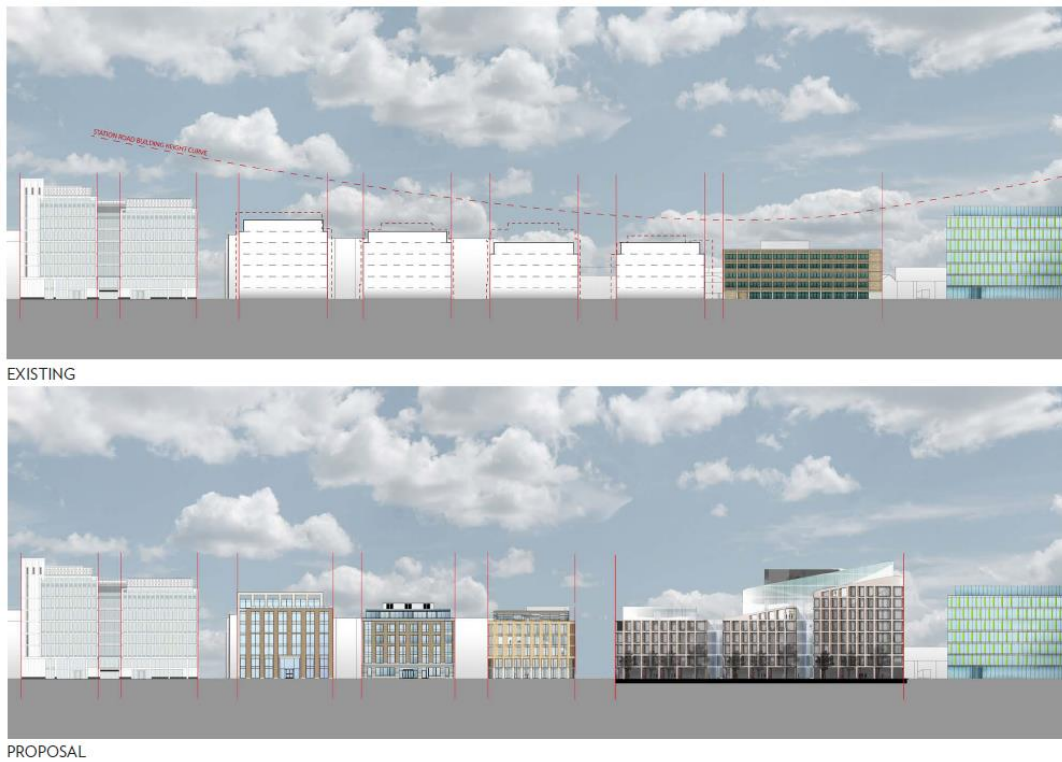
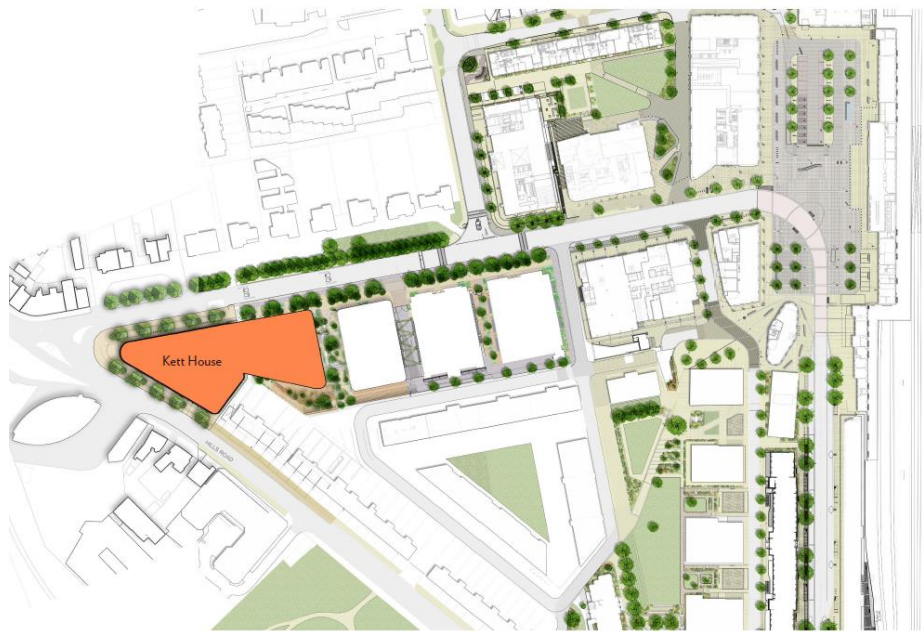


Figure 4: Context Alignment



Kett House and 10 Station Road Location

Benefits

- 2.20 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;
 - 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 on 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, improve the street scene along Station 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 and amenity space across/around the site;
 - Development that sensitively responds to the heritage context of the the New Town and Glisson Road Common Conservation Area;
 - 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; 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 redevelopment of Kett House and 10 Station Road could address the big themes in the following ways:

- **Climate Change** – Brookgate and Aviva recognise the climate emergency and wish to deliver a development that embraces the new agenda to work towards net zero carbon. The proposed commercial-led 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 public-facing commercial uses to offer a choice of services for workers and residents in the area. 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 is could lead to the plan being found unsound.
- 4.9 Kett House and 10 Station Road is a brownfield site in a highly sustainable location with access to key transport links including the train station (which is 300 metres east of the site), the Chisholm trail link and numerous other public transport connections including local bus services and the proposed metro connections. The proposed commercial-led development on the site, in a highly desirable location for 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 Kett House and 10 Station 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?

- 4.12 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 Kett House and 10 Station Road 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 Kett House and 10 Station Road could improve the natural environment by providing high quality public open space on site with potential for biodiversity features such as green roofs. In addition to this, strategic off site opportunities offer the opportunity to significantly increase biodiversity other than providing site specific biodiversity improvements.

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 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 Kett House and 10 Station Road with a high density commercial-led use development can help achieve 'good growth' that promotes wellbeing (including health) through the following inclusive and anti-poverty measures:
- Energy efficient buildings that maximise opportunities for enhancing sustainability on site;
 - 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; and
 - 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.

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.
- 4.26 Brookgate and Aviva are 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.

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

- 4.27 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.
- 4.28 For Kett House and 10 Station Road, social inclusion can also be delivered by building in public realm that encourages informal meeting and 'bumping' into people.

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

- 4.29 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.
- 4.30 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.
- 4.31 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?

- 4.32 Improvements in air quality should be achieved principally through the reduced use of polluting vehicles. For Kett House and 10 Station Road 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.
 - 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?

- 4.33 The Local Plan should include for a policy framework that sets out a positive strategy for the conservation and enjoyment of the historic environment. New development within or in proximity to heritage assets can be appropriate and make a positive contribution to local character and distinctiveness. This is supported by the NPPF (paragraph 185).
- 4.34 Greater Cambridge has a track record as a place where contemporary design and the historic environment co-exist in harmony. The site is located within the New Town and Glisson Road Common Conservation Area and 10 Station Road is identified as a 'Building that is Important to the Character of the Conservation Area in the Character Appraisal (2012).

As such the building is considered to be “non-designated heritage asset”. Permission has already been granted for the demolition and construction of a new office building on 15 January 2020 (15/2271/FUL) (originally submitted in 2015). The principle of demolishing the building has therefore already been found acceptable with a suitable design for the replacement building. The Site has the potential to deliver significant public benefits as referenced above and summarised in Section 2 of these representations which would outweigh any harm caused by the demolition of the unlisted building.

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

- 4.35 New development can provide opportunities for improvements in the quality of the historic environment. For example, the setting of heritage assets often has elements that detract from the significance of the asset. However, it will be important for the Local Plan to balance heritage protection with the demands of growth and proposals affecting heritage assets should continue to be required to include for an assessment of significance of any heritage assets affected.

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

- 4.36 ‘Place-making’ – creating and sustaining a positive and distinctive character in an area – is important to the economic success of the Greater Cambridge area, as identified by the CPIER. This is also supported by the NPPF (paragraph 124) which confirms that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 4.37 The NPPF continues by advising that plans should set out a clear design vision and expectations and design policies should be developed with local communities, so they reflect local aspirations. To provide maximum clarity about design expectations at an early stage, plans or SPDs should use visual tools such as design guides and codes. The Cambridgeshire Quality Charter for Growth sets out core principles of the level of quality to be expected in new developments in Cambridgeshire and the four ‘C’s’ of Community, Connectivity, Climate and Character align well with the four big themes of the emerging Local Plan. This forms a good basis to set out a design vision for the new Local Plan.

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 stage¹.

- 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.

¹ Cambridgeshire and Peterborough Industrial Strategy 2019 p 41

- 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 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 overseas².

² CPIER p54

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 Kett House and 10 Station Road for a high density commercial-led development which offers a healthy working environment would be welcomed. The delivery of a high-quality public realm which provides both recreational space and efficient 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*”³ 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.”*⁴

- 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 is 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

³ UK Industrial Strategy 2017 p18

⁴ CPIER p41

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. A flexible approach to the density and heights of development that will be provided on sustainable sites such as Kett House and 10 Station Road is welcomed.

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 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.
- 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. *“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 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.
- 6.4 Kett House and 10 Station Road 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 300 metres to the east of 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 housing and employment development in the Greater Cambridge area.

Question 43. What do you think about densification?

- 7.2 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.
- 7.3 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.
- 7.4 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.
- 7.5 The redevelopment of Kett House and 10 Station Road provides an opportunity to meet an identified need for Grade A office space within a newly formed city quarter. 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?

- 7.6 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.

- 7.7 Brookgate and Aviva 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.
- 7.8 Kett House and 10 Station Road are located on a key public transport corridor, being within easy walking distance of Cambridge central station which 300 metres to the east of the site, and the city centre is only 1km to the north west of the site. The site 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 Kett House 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 Brookgate and Aviva are fully supportive of the aims and objectives of Policy 25 and the drive to deliver an improved public realm along Station Road. 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. As 10 Station Road currently falls outside, but is adjacent to the Opportunity Area, this land should also be included within the Policy area.

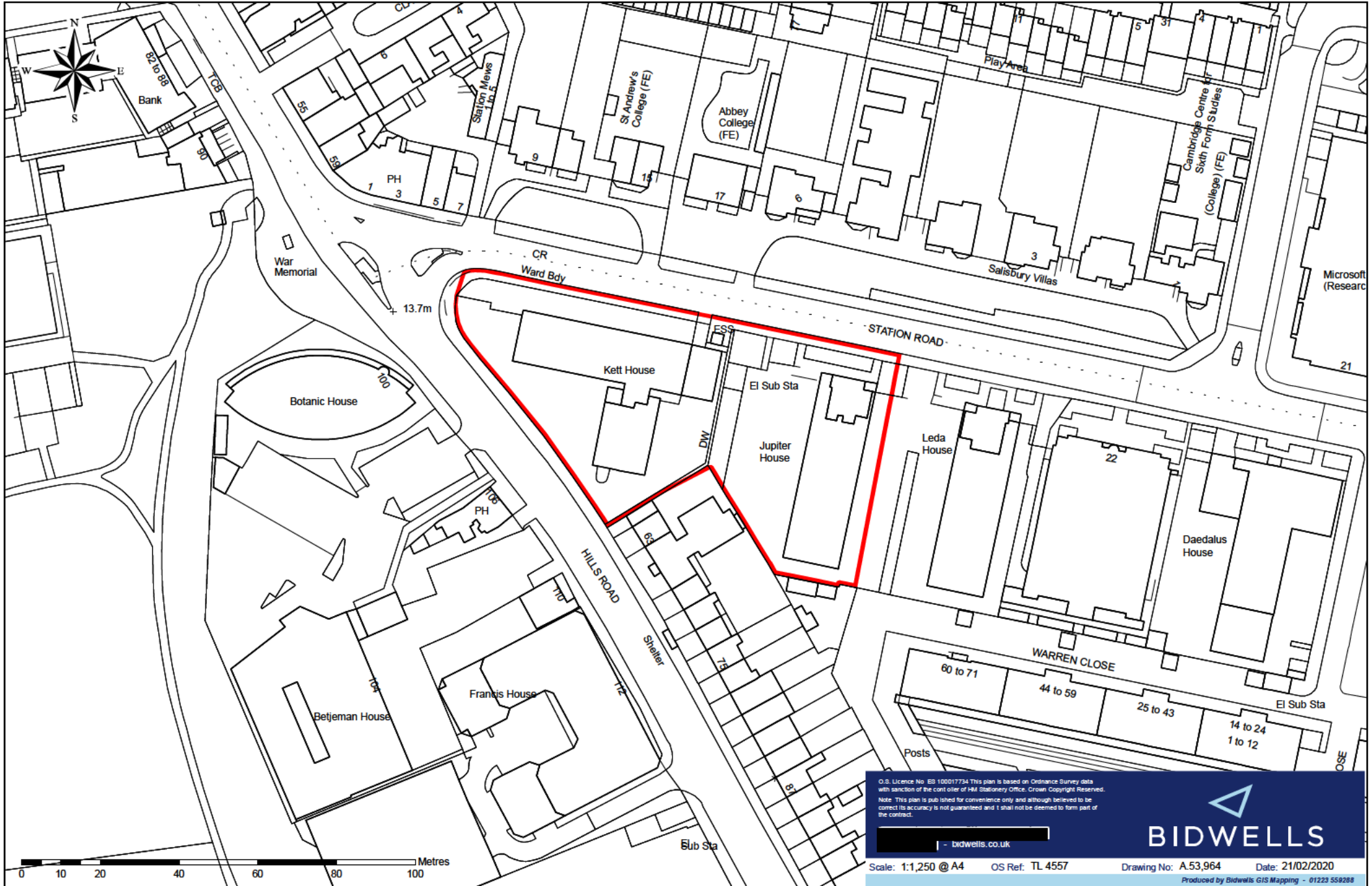
'Station Areas West and Clifton Road Area of Major Change' (Policy 21) Cambridge Local Plan (2018)

- 8.4 The site is located in the Station Areas West and Clifton Road Area of Major Change in the adopted Cambridge Local Plan (2018) under Policy 21. The Policy supports the continued and complete regeneration of vibrant, mixed-use areas of the city, centred around and accessible to a high quality and improved transport interchange. Kett House and 10 Station Road is not identified for specific development under Policy 21.
- 8.5 Brookgate and Aviva 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.

APPENDIX 1

SITE LOCATION PLAN

Kett House, Station Road



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