

**LAND TO THE NORTH
OF STATION ROAD,
CAMBRIDGE
FIRST PROPOSALS
CONSULTATION
(REGULATION 18)**

Quality Assurance



Site name:	Land to the North of Station Road, Cambridge
Client name:	[REDACTED]
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1.0 Introduction

- 1.1 These representations on the ‘First Proposals’ (Regulation 18) draft of the emerging Greater Cambridge Local Plan (“Local Plan”) are prepared by Bidwells LLP on behalf of [REDACTED] who own land to the north of Station Road, Cambridge (“the Site”). A Site Location Plan is included at **Appendix 1**. The representations are submitted twice to formally lodge separately the two main development scenarios around the refurbishment/extension of the Villas and the redevelopment of the Villas; and so open up a discussion as to what the most appropriate long-term vision is for the Site, balanced against the changing planning and climate policy context.
- 1.2 These representations follow those submitted in 2020 in response to the Issues and Options consultation on the emerging Local Plan. The 2020 representations responded to the relevant questions within the consultation document and also set out three potential scenarios to represent the wide-reaching opportunities that the Site offers, ranging from a do-nothing scenario to a full redevelopment. Each scenario has a balance of pros and cons against the changing planning policy priorities, but ultimately the site represents an opportunity to provide a commercial-led scheme in a highly accessible location; a location that has a proven track-record to attract high calibre businesses.
- 1.3 The First Proposals consultation document sets out the Councils preferred approach to the level of growth that should be planned for, and where it should be planned over the plan period to 2041. It also describes the planning policies proposed to shape development and guide planning decisions. The First Proposals consultation is particularly seeking views on the emerging development strategy, the direction of travel for policies and issues the Councils should be considering as the policies are prepared.
- 1.4 The Greater Cambridge Housing and Economic Land Availability Assessment (HELAA) lists and maps sites within Greater Cambridge that may have potential for residential and economic development. A ‘Red, Amber, Green’ (RAG) scoring system was used to carry out the assessment. Sites were deemed to be unsuitable if they were assessed as ‘red’ against any of the criteria used.
- 1.5 The HELAA forms part of the evidence base for the emerging Greater Cambridge Local Plan and the outputs of the HELAA will assist the Councils in identifying the choices available for site allocations to meet development needs. Specifically, it has been used to inform the choices made at the First Proposals consultation stage, alongside a range of other evidence exploring the development needs of the area and how they should be met.
- 1.6 Land to the north of Station Road, Cambridge is identified in the HELAA under a single site reference 40133. The site is assessed as being available and achievable but not suitable based on impact to the historic environment which has been assessed as ‘red’. The site is not identified as a specific allocation within the First Proposals consultation document, although is located within the Cambridge Railway Station, Hills Road Corridor to the City Centre Opportunity Area.
- 1.7 These representations respond to the sites’ assessment within the HELAA and also the draft policies of the First Proposals consultation document. The proposal retains the concept of the three potential scenarios; however, further consideration has been given to them and further design detail provided in respect of two of the potential development scenarios; retention of the

Salisbury Villas with development to the rear and full redevelopment. This has been informed by additional site assessment work in terms of cultural heritage and sustainability.

- 1.8 Accordingly, these representations should be read alongside the following documents;
- Appendix 1 : Site Location Plan
 - Appendix 2 : Addendum to Vision Document (Allies and Morrison), including updated commentary on sustainability (Hoare Lea) and heritage (Bidwells LLP)
 - Appendix 3 : Updated Heritage Impact Assessment (Bidwells LLP)
 - Appendix 4 : Net Zero Report and Social Value Report (Hoare Lea)
- 1.9 The representations should also be read alongside the following documents submitted previously in response to the Issues and Options consultation in 2020, namely;
- Vision Document (Allies and Morrison);
 - Employment Needs Appraisal (Bidwells LLP);
 - Sustainable Transport Appraisal (Vectos);
 - Preliminary Ecology Appraisal (Ecology Solutions);
 - Arboricultural Survey and Constraints Plan (Haydens).
- 1.10 The College is still at an early stage in developing their emerging masterplan and are 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 to determine which balance of issues, in the face of changing planning and climate priorities, informs what is the most appropriate long-term future for the site.

2.0 Background

The Site and Surrounding Area

- 2.1 The site is to the north side of Station Road, Cambridge and stretches from the Hills Road/ Station Road junction eastward to Tenison Road. The site is composed of eleven buildings, comprising 1 - 4 Arundel Villas (semi-detached), St Andrews (detached) and 1 – 6 Salisbury Villas (detached). In these representations, they are all collectively referred to as the ‘Salisbury Villas’, for simplicity. The villas are currently in Use Class E(g) (i) (office) and Use Class D1 (language school).
- 2.2 The Salisbury Villas are set back approximately 16m from Station Road and, what would have originally been separate front gardens, have been joined together to form a second access road, parallel to Station Road, with parking behind a row of mature lime trees. To their rear, the Salisbury Villas all have deep plots.
- 2.3 The Site can be accessed from Station Road and the junction of Station Road and Tenison Road.
- 2.4 The Site is surrounded by office development to the east and south, as part of the ‘Area of Major Change’ to the Station Area, and residential properties lie to the north. No.s 55-59 Hills Road and No.s 1-7 Station Road (also within the ownership of [REDACTED]) lie to the west and are in retail use.
- 2.5 The Site is located within the New Town and Glisson Road Common Conservation Area.
- 2.6 None of the buildings within the Site are listed, however they are all identified as ‘Buildings of Local Interest’ (51-53 Hills Road and the Station Mews are excluded from this list). In addition, they are identified as ‘Buildings of Positive Townscape Value’ in the New Town and Glisson Road Conservation Area Character Appraisal (2012), (51-53 Hills Road and the Station Mews are excluded from this list). As such, the existing buildings are considered to be “non-designated heritage assets”.

The Vision

- 2.7 The vision remains the same as that presented in previous representations to the Local Plan, namely;
- ‘to breathe new life into the Site, continuing the successful transformation of this part of the city and to provide additional capacity to support the clustering in the local area, which has proven so important to Cambridge’s economy’.*
- 2.8 In order to guide the future development of the site, the [REDACTED] has developed four core objectives:
- Supporting a sustainable Cambridge by making appropriate and efficient use of a site in a highly accessible location;

- Spearheading solutions to move to a net zero-carbon society in the context of the climate emergency in this highly sustainable and accessible location;
- Delivering a lasting legacy of high-quality architecture with a distinctive character to create a unique sense of place as part of the [REDACTED] long-term endowment portfolio;
- Enhancing the green space and public realm at this important gateway into the city centre.

3.0 Economic Context

National Planning Policy

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

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

- 3.2 NPPF Paragraph 81 builds upon this:

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

- 3.3 NPPF Paragraph 82 states that planning policies should:

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

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

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

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

- 3.4 NPPF Paragraph 83 then states that;

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

Sub-Regional Context

- 3.5 The Cambridgeshire and Peterborough Combined Authority (CPCA) set a target of doubling the regional economic growth (GVA) over 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)

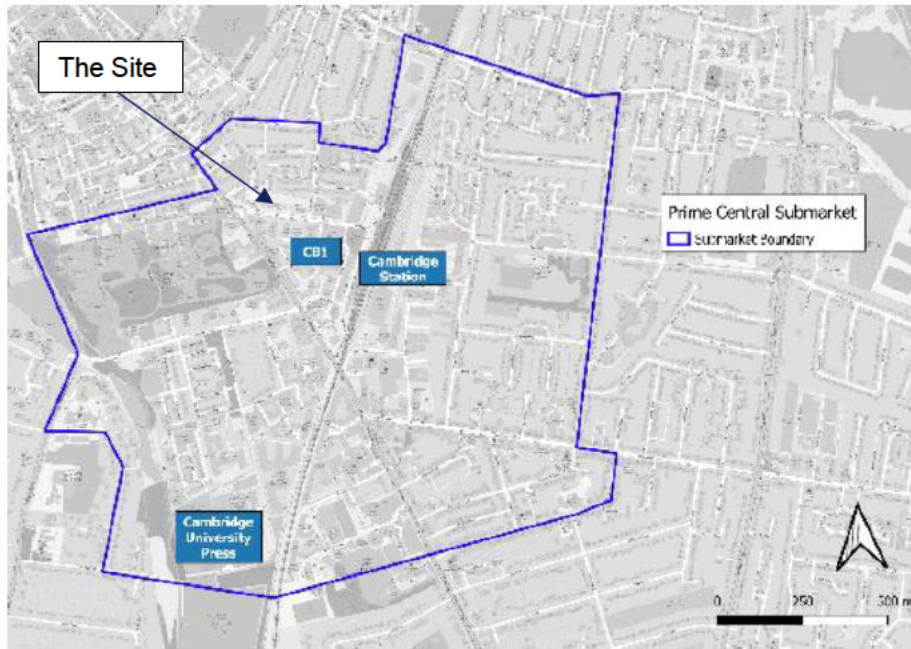
- 3.6 CPIER emphasises the need for productivity growth in the region one of its several recommendations included ensuring that, as a nationally strategic priority, Cambridge continues to deliver for KI businesses. The cluster effect is well-evidenced in Cambridgeshire and an opportunity exists for Greater Cambridge to encourage the forces of agglomeration through promotion of sites around existing groups of same-sector companies.
- 3.7 These knowledge-based clusters are key to Greater Cambridge's role as the engine for economic growth.

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

- 3.8 The Greater Cambridge Employment Land and Economic Development Evidence Study explores the characteristics of each key economic cluster including the challenges and opportunities that they face.
- 3.9 The Study identified four office submarkets within the Greater Cambridge market;
- Prime Central
 - City Centre Periphery / Rest of Cambridge City
 - Northern Cluster
 - South Cambridgeshire
- 3.10 'Prime central' lies in the centre of the Cambridge City local authority area. It comprises office floorspace within walking distance of Cambridge rail station, reaching Kings Cross within 50 minutes. Land to the north of Station Road falls within the 'Prime Central' submarket area (see Figure 1).
- 3.11 The Study states, at paragraph 2.73, that Agents have noted that there are severe supply pressures in the 'Prime Central' submarket area for small to mid-sized office occupiers, particularly between 1,000 to 5,000 sqft (around 100 to 500 sqm).
- 3.12 An analysis of Year's supply, also referred to as notional supply, based on a snapshot of availability in August 2019 was undertaken to understand how the various submarkets differ in terms of supply and demand. Figure 2 below confirms that **the Prime Central Submarket faces**

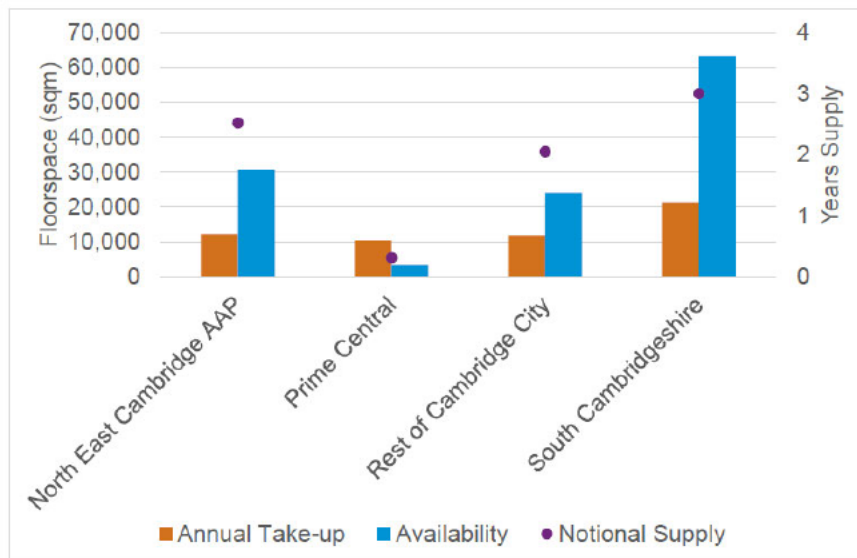
the most severe supply pressures, with only a notional available supply of 0.31 years. Rest of Cambridge City has circa 2 years supply.

Figure 1 : Prime Central Submarket Boundary



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

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



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

- 3.13 The Study also reports on the clusters in Cambridge and confirms that there is a need for additional floorspace in Life Science, ICT and Professional Services and Advanced Manufacturing sectors. Firms in the ICT and Professional Services sectors have particular concentrations around Cambridge Railway Station.
- 3.14 In terms of future employment needs, the Study considered that the most likely future level of jobs growth, is for 58,500 jobs between 2020 and 2041 (referred to as the 'central' scenario). However, the Study also identified a 'higher' scenario, placing greater weight on fast growth in the recent past, particularly in key sectors. The Study subsequently recommends that the 'higher' scenario is planned for particularly in relation to B1a/b needs. This ensures a flexible supply, encouraging business growth and inwards investment, and aligns with market feedback and past completions trends.

4.0 The Opportunity

- 4.1 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 Area of Major Change 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.
- 4.2 The area has seen job growth of 4% since 2015, much of which has been focused along Station Road where 0.5 million sq ft 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).
- 4.3 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. 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.
- 4.4 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.
- 4.5 In terms of the impact of COVID-19, this remains difficult to predict within a range of sectors. However, there has continued to be an encouraging level of consistent demand, particularly within the laboratory and office sectors. Indeed, office and laboratory demand has moved to its highest level since 2015. Data collected by Bidwells LLP confirms that overall demand in Cambridge stood at 1.7m sq ft at the end of H1 2021, an increase of 30% since the end of 2020 and 45% ahead of levels in mid 2020. The demand for office space of sufficient quality and specification to enable opportunities for collaboration spaces and creative practices whilst also providing the highest sustainability standards is also likely to remain high.
- 4.6 Land to the north of Station Road is the last section of the Station Road area to benefit from a clear and shared long-term vision and so represents a significant opportunity to continue the successful transformation of this part of the city and provide additional capacity to support the further clustering around the Station.
- 4.7 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 its historic context.
- 4.8 A range of supporting technical studies have been undertaken since 2020 to identify opportunities and constraints for the site in respect of the local economy, cultural heritage,

placemaking, biodiversity, transport and sustainability. These have informed the three potential design scenarios for the Site.

4.9 The supporting studies have concluded the following;

- **Meeting unmet development needs** - Station Road is the gateway into the city and the Station Road area forms a significant and thriving cluster of businesses. There is an opportunity to open up the site, currently somewhat isolated, to allow it to actively contribute to the hub of commercial buildings along Station Road;
- **A highly sustainable location** - the Site is extremely well located for access to key facilities and services, including transport infrastructure such as Cambridge Railway Station, the Cambridgeshire Guided Busway (CGB) and the city centre; all within a 10 minute walk. Furthermore, there are a number of strategic schemes coming forward which will improve mobility in the area (the Chisholm Trail and extensions to the CGB);
- **Going car free** - The site is currently dominated by a proliferation of car parking. The Sites' high accessibility presents a rare opportunity to reduce the amount of car parking in a City Centre location, encouraging sustainable modes of travel and reducing congestion;
- **Enhancing the public realm** - There is an opportunity to significantly enhance the public realm along Station Road, by comprehensively re-landscaping the forecourt area as a new linear public amenity space;
- **Preserving and enhancing heritage assets** – a series of impact considerations and potential heritage opportunities have been set out to develop a design response that accounts for the contribution made by the site to the various built assets around it;
- **Sustainability, social inclusion and wellbeing** - There is a significant opportunity to spearhead solutions around sustainability, social inclusion and wellbeing in the context of move to a net zero-carbon society
- **Enhancing Biodiversity** - there are no overriding ecological constraints to redevelopment, subject to further survey work, and there is good scope for biodiversity net gain. A Tree Survey and Constraints Plan has also been prepared which has informed the siting and design of the layout considerations.

5.0 The Emerging Concept Proposals

- 5.1 Representations in support of the Site to the Issues and Options consultation of the Local Plan in 2020 referred to three potential scenarios for the Site to represent the wide-reaching opportunities that the Site offers;
- **Scenario One** – Do nothing (the existing accommodation extends to circa 3,500m², including outbuildings);
 - **Scenario Two** – Retention of Salisbury Villas with development to the rear, potentially linked to the Villas (a total net floor space of circa 16,000m² could potentially be delivered plus public realm improvements along Station Road); and
 - **Scenario Three** – Demolition and redevelopment of Salisbury Villas (a total net floor space of circa 24,000m² could potentially be delivered plus public realm improvements along Station Road).
- 5.2 The three scenarios have been assessed within the context of the four ‘big themes’ referred to in both the Issues and Options consultation document and the First Proposals consultation document, namely;
- Climate Change
 - Biodiversity and Green Spaces
 - Wellbeing and Social Inclusion
 - Great Places
- 5.3 Scenarios Two and Three have been re-visited as part of these representations and in response to the sites’ assessment within the HELAA and further technical assessment work. Further detail on Scenarios Two and Three are provided in the supporting Vision Document Addendum and updated Heritage Impact Assessment. For completeness, commentary on all three scenarios and the benefits they can bring is provided below.

Scenario One: Do nothing

- 5.4 This scenario represents the status quo. The existing tenants would remain in place, essential repairs to the buildings would continue to be carried out, and the existing hard-standing and car parking would remain.

Scenario Two: Retention of Salisbury Villas with new development to the rear

- 5.5 This scenario retains and refurbishes the villas, including removing the unsightly outbuildings in the rear gardens and replacing with new buildings arranged around landscaped courtyard gardens. Building footprints could vary to allow for significant trees to be retained. The significant investment would allow for major refurbishment of the Villas.
- 5.6 This would create flexible, new-build floorspace in an attractive and tranquil environment with a unique character. Entrances could be in-between the existing villas allowing glimpses through to

the courtyard gardens. The new buildings could be connected to the villas through linking elements with stairs and lifts that serve both the new and existing buildings, potentially making them fully accessible. There is also an opportunity for a building to front on to Tenison Road, potentially incorporating an entrance.

- 5.7 This scenario seeks to make a direct and positive response to the character of this part of the New Town and Glisson Road Conservation Area, including its historical development, its urban structure, its tree-lined avenues, its consistent grain and its variety of architectural styles.
- 5.8 A family of new buildings or extensions could be developed with forms that respond to the scale and massing of the existing buildings on site and in the area around Station Road. Consideration could be given to the use of pitched roofs and gables in a variety of forms to produce granularity of form and a layered silhouette. This might help create a character that set it apart from the other more block-like new buildings on Station Road. A variation in roof form might also help to break down the overall massing and creates a rhythm that relates to the finer grain of the adjacent residential buildings.
- 5.9 The Station Road frontage could be comprehensively re-landscaped as a new linear public amenity space; a station promenade, with all the lime trees along Station Road retained. A piece of public realm, stretching along more than half of Station Road, would transform the experience, enjoyment and safety of everyone using Station Road adding value to the site and the wider area.
- 5.10 The promenade offers the opportunity to introduce a variety of new uses, such as event space and ‘garden rooms’, that place people at the heart of the proposals. What is currently a completely private and walled site would be transformed into a true piece of public realm in support of the adopted and emerging Opportunity Area. High quality landscaping which is well managed and benefits from natural surveillance will contribute to a sense of wellbeing and comfort not only for the users of the site but the wider community too.
- 5.11 The existing villas can be refurbished to comprise reception rooms, meeting rooms, break out spaces, offices and other supporting facilities.

Scenario Three: Demolition and redevelopment of the Salisbury Villas

- 5.12 This scenario envisages the demolition of the Salisbury Villas to create development plots for a series of new buildings. This scenario delivers the most amount of new floor space overall – potentially in larger, optimally-sized floor plates.
- 5.13 New buildings could be arranged either as a series of standalone new buildings with gaps in-between or as an articulated terrace of buildings with party walls. Building layouts could be designed to create optimal floor plates. The likely approach would be to include for a building frontage with a rhythm and granularity akin to the current villas, rather than overly slab-fronted buildings. As new buildings they offer the greatest potential to create the lowest operational carbon impact.
- 5.14 The Station Road frontage would be as per Scenario Two, providing a re-landscaped new linear public space.

Assessment of the Three Scenarios

- 5.15 The following section provides an assessment of the three scenarios in terms of the impacts arising and areas of potential mitigation, together with consideration of the public benefits arising. Commentary is also provided in response to the 'red' score identified in the HELAA under the matter of the Historic Environment.

Scenario One : Do Nothing

- 5.16 In terms of Scenario One, whilst there would be no impacts there would similarly be no benefits either; the existing buildings would not be able to benefit from comprehensive renovation works to give them a new lease of life, nor could new floor space be created for businesses to grow, no additional jobs would be delivered, the public realm would not be revitalised, no biodiversity gains delivered, no social value added and, per person, it would remain a carbon-intensive site.

- 5.17 Ultimately therefore, there is very limited opportunity for the Site to contribute to the four 'big themes' and would represent a significant missed opportunity.

Scenario Two : Retention of Salisbury Villas with new development to the rear

- 5.18 In terms of impacts, the Councils HELAA assessed the site as not suitable solely on the issue of the Historic Environment which scored 'red' and states the following;

"The site is within the Conservation Area and all the villas are buildings of local interest. Development to the rear or demolition of the villas and redevelopment of the site would harm the character of the Conservation Area. Development of the site would cause substantial harm or severe or significant "Less than substantial harm" to a designated heritage asset or the setting of a designated heritage asset which cannot be reasonably mitigated".

- 5.19 In response to the HELAA, Allies and Morrison have liaised further with Bidwells Heritage team on how the heritage considerations can be taken forward as an integral part of the design development for this particular scenario. More detail is also now available on the form, scale and design of the proposals under this scenario. This is presented in the Vision Document Addendum (Appendix X).

- 5.20 As such, it is now possible to define more precisely the levels of impact on heritage assets and an updated Heritage Impact Assessment has been prepared by Bidwells LLP which accompanies these representations (Appendix X). The key findings from the Heritage Impact Assessment are discussed below.

- 5.21 Retaining the existing villas and delivering their repair, restoration and viable re-use will represent a benefit to their heritage values. The enhancement of the public realm along Station Road, replacing car parking with high quality public realm, also offers a new character of space which will improve the current conditions significantly.

- 5.22 The proposal to create 'pavilions' to the rear of the villas will help to generate viable use for the villas and also make good use of the land in this sustainable location. Partial loss of existing openness within the rear garden would result from this, but public appreciation of these spaces is

limited, and the new development could create a series of smaller-scale garden spaces amongst high quality additions to the rear of the villas.

5.23 The Bidwells Heritage Impact Assessment concludes that the impact on the significance of the villas would be beneficial, including beneficial enhancements to their settings on the south side where their contribution to the Conservation Area is at its greatest. There would be some loss of existing open setting at the rear, but this would be less appreciable in the context of the Conservation Area and impacts would be “less than substantial” at the lower end of the scale in terms of the application of NPPF policies.

5.24 For a site to be scored ‘red’ in respect of the Historic Environment in the HELAA, the following must apply;

“Development of the site would cause substantial harm, or severe or significant “Less than substantial harm” to a designated heritage asset or the setting of a designated heritage asset which cannot be reasonably mitigated”

5.25 For a site to be scored ‘amber’ in respect of the Historic Environment in the HELAA, the following must apply;

Development of the site could have a detrimental impact on a designated or non-designated heritage asset or the setting of a designated or non designated heritage asset, but the impact could be reasonably mitigated.

5.26 In light of the updated Bidwells Heritage Impact Assessment and that development of the site under this scenario is capable of achieving “less than substantial” impacts at the lower end of the scale, the site should not be scored ‘red’ and instead should be scored ‘amber’.

5.27 It may therefore be possible that new built form could be accommodated on the site, alongside the villas, in a manner that retained their individual architectural interest as well as their contribution to the character and appearance of the Conservation Area.

5.28 Ultimately, any impacts arising would need to be clearly outweighed by public benefits arising from the proposals.

5.29 The significant public benefits that could be delivered under this scenario include;

- The opportunity to deliver **up to 13,000 sqm of high quality office accommodation** in a Core City District and in a sustainable travel location close to central Cambridge railway station
- Providing **up to 1,000 jobs, £75m of capital investment and £50m GVA**, thus supporting the local economy and community through expansion of an established R&D and AI Cluster and associated supply chains
- **Supporting economic growth** in a manner that promotes health and wellbeing for employees and the wider community through;
- **high quality architecture and passive design measures** which lower the cooling requirement and have shorter lifecycles, such as solar shading and high fabric performance

- provision of **3,000 sqm of significant public realm improvements along Station Road frontage** to create a promenade to support the Opportunity Area policy ambitions;
- **opportunities to travel sustainably and helping to tackle air pollution**, as well as bring physical benefits
- **Green infrastructure to offer greater resilience to a warmer and drier climate than currently exists, to provide a minimum of 10% Biodiversity Net Gain in ecosystem habitats and to provide broader ecosystem services** such as forming part of a sustainable drainage system;
- **Net zero carbon in operation enabled, with 0.19 carbon per person (CHECK)**
- **Improvements to flood resilience** through removal of large areas of hardstanding and incorporation of a range of future climate scenarios that better manage the water runoff into the wider city drainage system. Specifically, there is opportunity to explore the integration of measures such as green or blue roofs and sustainable drainage systems
- **Helping to maximise the benefits arising from major investment in a key public transport corridor** associated with sustainable transport and active travel
- **A landowner who wishes to work the community** in order to shape a proposal which meets the needs of and can provide wider benefits to the area.

Scenario Three : Demolition and redevelopment of the Salisbury Villas

- 5.30 In terms of impacts, the Councils HELAA 'red' score also applies to this scenario.
- 5.31 However, as per scenario two, more detail is also now available on the form, scale and design of the proposals under this scenario. This is presented in the Vision Document Addendum (Appendix X).
- 5.32 As such, it is now possible to define more precisely the levels of impact on heritage assets and an updated Heritage Impact Assessment has been prepared by Bidwells LLP which accompanies these representations (Appendix X). The key findings from the Heritage Impact Assessment are discussed below.
- 5.33 The removal of the existing villas would cause a loss of significance. That significance is at the level of between low and moderate/good in terms of individual values of each villa and the collective value of the group in the Conservation Area.
- 5.34 The re-development could bring forward equivalent improvements to public realm along Station Road, with consequent benefits to the public experience of the Conservation Area. The replacement built form could provide an alternative frontage to that new public realm, reflecting the granular rhythm of the villas and creating a strong and positive new architectural approach to the station.
- 5.35 Ultimately, any impacts arising would need to be clearly outweighed by public benefits arising from the proposals.
- 5.36 If Scenario Three was to be pursued, then additional benefits over and above those delivered under Scenario Two would include;

- The opportunity to deliver **up to 20,000 sqm of high quality office accommodation** in a Core City District and in a sustainable travel location close to central Cambridge railway station
- Providing **up to 1,400 jobs, £100m of capital investment and £70m GVA**, thus supporting the local economy and community through expansion of an established R&D and AI Cluster and associated supply chains
- **Net zero in operation enabled, with 0.18 carbon per person (CHECK)**

Summary

- 5.37 Each scenario has its pros and cons, but the greater the development, the greater the benefits for job creation and forming sustainable development in one of the most sustainable locations in Cambridge.
- 5.38 Ultimately Scenario 3 continues to offer the greatest opportunity to support economic growth and has the lowest carbon intensity; the lowest carbon per employee on site. The Council has recognised the climate emergency and aspires to move to a net zero carbon society. To achieve this, it cannot repeat the pattern of historic decisions and previous planning priorities. It must make some strong choices to prioritise those developments that can maximise long-term sustainable benefits; to achieve this will impact on other planning matters, not all matters can be prioritised.

6.0 Response to Policy S/DS : Development Strategy

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

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

- 7.1 Policy S/AMC provides continued policy guidance for existing Areas of Major Change in the urban area of Cambridge identified in the Cambridge Local Plan 2018, as still appropriate and where not covered elsewhere in the First Proposals.
- 7.2 It is proposed to carry forward The Station Areas West and Clifton Road Area of Major Change identified in the adopted 2018 Cambridge Local Plan.
- 7.3 Land to the north of Station Road continues to be excluded from the designation despite the fact that it has an important role to play in a coordinated and long-term Vision for the central business district along Station Road.
- 7.4 These representations therefore **object** to Policy S/AMC as currently drafted and it is requested that the boundary of the 'Station Areas West and Clifton Road Area of Major Change' is reviewed to include for Land on north side of Station Road to make sure its long-term future is properly considered and secured to best support the Cambridge Station Area.

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

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

8.2 It is proposed to continue to identify the Cambridge Railway Station, Hills Road Corridor to the City Centre Opportunity Area. Land to the north of Station Road continues to fall within this opportunity area.

8.3 The proposed policy direction for the Opportunity Areas is stated in the First Proposals consultation document as;

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

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

8.4 The [REDACTED] **supports** draft Policy S/OA and the proposal to carry forward the Cambridge Railway Station, Hills Road Corridor to the City Centre Opportunity Area to the emerging Greater Cambridge Local Plan.

8.5 The [REDACTED] is also supportive of the proposed policy direction, in particular the drive to deliver public realm improvements. The Opportunity Area policy should provide clear indication that positive weight would be provided to those developments that help to achieve the aims of the policy and act to fulfil the opportunity identified.

9.0 Response to Policy S/LAC: Other site allocations in Cambridge

- 9.1 Land to the north of Station Road, Cambridge is submitted as a potential allocation for employment in the Local Plan.
- 9.2 The supporting Vision Document provides further detail on the significant opportunity that the site presents, informed by additional site assessment work and in light of the four 'big themes' identified in the consultation document.
- 9.3 Land to the north of Station Road is the last section of the Station Road area to benefit from a clear and shared long-term vision and so represents a significant opportunity to continue the successful transformation of this part of the city and provide additional capacity to support the further clustering around the Station.
- 9.4 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 its historic context. 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.

10.0 Summary and Conclusions

- 10.1 These representations on the ‘First Proposals’ (Regulation 18) draft of the emerging Greater Cambridge Local Plan (“Local Plan”) are prepared by Bidwells LLP on behalf of [REDACTED] who own land to the north of Station Road, Cambridge (“the Site”).
- 10.2 These representations follow those submitted in 2020 in response to the Issues and Options consultation on the emerging Local Plan. The 2020 representations responded to the relevant questions within the consultation document and also set out three potential scenarios to represent the wide-reaching opportunities that the Site offers, ranging from a do-nothing scenario to a full redevelopment. Each scenario has its pros and cons set against the rapidly changing context around planning and climate priorities, but ultimately the proposals provide the opportunity to secure a long-term vision for the site and to provide a commercial-led scheme in a highly accessible location that has a proven track-record to attract high calibre businesses.
- 10.3 The Greater Cambridge Housing and Economic Land Availability Assessment (HELAA) lists and maps all submitted sites within Greater Cambridge that may have potential for residential and economic development. Land to the north of Station Road, Cambridge is identified in the HELAA under site reference 40133. The site is assessed as being available and achievable but not suitable on the basis of impact on the historic environment.
- 10.4 These representations respond to the sites’ assessment within the HELAA and also to the draft policies of the First Proposals consultation document. The proposal concept is as previously promoted through the Local Plan, in terms of presenting the three potential scenarios; however, further consideration has been given and design detail provided in respect of two of the potential development scenarios; retention of the Salisbury Villas with development to the rear and full redevelopment. This has been informed by additional site assessment work in terms of cultural heritage and sustainability.
- 10.5 The result of this additional site assessment work has concluded that Land to the north of Station Road is suitable for some form of development. This ranges from new built form added to the existing Villas, through to a full redevelopment if the planning priorities were focussed on economic growth and achieving a long-term reduced carbon impact.
- 10.6 The Council’s supporting documents that support its First Proposals consultation document highlight that there is a greater economic need than catered for within the First Proposals. As part of the on-going Plan-making process and the likely finding to be that further employment and economic generating development is required, then land north of Station Road provides the most appropriate and sustainable site to allocate for such a purpose. Such an allocation would also secure a long-term Vision for the site as part of a coordinated and composite masterplan for the Cambridge Station Area.




Land North of Station Road, Cambridge



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