



Independent Examinations

Cambridge City Council and South Cambridgeshire Local Plan

Matter CC2G - Cambridge Railway Station, Hills Road Corridor to the
City Centre Opportunity Area

Cambridge Assessment (5305)

CC2G 27445
12 May 2016



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1 Introduction

- 1.1 This Hearing Statement is submitted on behalf of University of Cambridge (UoC). The original representations [ref: 27445] were made by Cambridge Assessment, an element of UoC, being that the original comments that this Hearing Statement is founded upon relate to four sites:
- 1 Regent Street (including Furness Lodge)
 - 1-3 Hills Road
 - 7-9 Hills Road
 - 72 Hills Road
- 1.2 At the time of the earlier representations Cambridge Assessment occupied the four sites and had a long-term interest in them. The situation now, as is widely and publically known, is that Cambridge Assessment is to vacate all four of these Sites and re-locate within a single new development, currently under construction, called The Triangle.
- 1.3 The overarching UoC have always owned the Sites but will now take back the long term custodianship of the Sites. The UoC is now undertaking site surveys and feasibility work to determine what the best long-term use and development for each Site is. That work has not yet concluded and is not yet able to be in the public domain.
- 1.4 In this regard UoC is now better placed to provide the up to date representation for the Sites.

2 Issues

2G.1 Policy 24

ii. Would there be any planning merit in amending the boundary of the OA so as to include 1 Regent Street and Furness Lodge?

- 2.1 1 Regent Street and Furness Lodge should be included within the OA as this site lies immediately adjacent to the north-western most extent of the proposed OA. An initial review suggests that the site may not be currently utilised to its full potential and any redevelopment of the site, either in whole or in part, could present opportunities to support the aims and objectives of draft Policy 24 in prompting more sustainable transport modes and delivering a reinforced sense of place and improved public realm within the OA.
- 2.2 The site also sits adjacent to the University Arms Hotel (which is included within the OA) which is currently undergoing redevelopment and refurbishment so the inclusion of this site within the OA would provide opportunities for any future redevelopment (of whatever that may be) of 1



Regent Street and Furness Lodge to compliment the redevelopment of the adjacent site and improve the relationship between the site, Park Terrace, the University Arms Hotel, Parker's Piece and Regent's Street itself.

- 2.3 We therefore request that the OA is extended to include 1 Regent Street and Furness Lodge. It is timely that UoC has now to consider the future of the Site and this opportunity should be supported by the OA.

v. Would the policy be consistent with the proposals for Hills Road as set out in the County Council; Transport Strategy for Cambridge and South Cambridgeshire, March 2014 (RD/T/120)?

- 2.4 The proposals set out in the County Council's Transport Strategy for Cambridge and South Cambridgeshire identify Hills Road as a route where comprehensive bus priority is required in the medium to long term, and this is likely to involve the restriction of general vehicular traffic, in order to improve the timeliness and reliability of bus and cycle journeys.
- 2.5 This desire of the County Council will need to be considered in association with the aims of the City Council as set out in draft Policy 24 for coordinated streetscape and public realm improvements to ensure that any such works would not be abortive given the longer term aim of the County Council. In particular this would have to be considered against the key projects identified by the City Council as these would not appear to be in accordance with the County Council's aims.
- 2.6 This will fall to be a technical matter, but UoC supports the intent for public realm improvements to Hills Road; so long as the Transport Strategy does not widen the roadway to a point that it leaves narrow and poor quality pavements, then the two should be compatible. The County Council should be encouraged to consider high-quality surface treatments that add to the public realm.

2G.2 E5

i. Would there be any planning merit in amending the allocation to include 1-4 Hills Road and Drossier House, Harvey Road; and to consider a mixed use approach with potential for retail and leisure uses providing more active frontages onto Hills Road?

- 2.7 There is no planning merit to extend the proposed allocation. Any increase to the allocation area would draw in buildings that are of a different, and more historic, character and a different size and scale to those which it is currently proposed will be included within the allocation.
- 2.8 Due to the different character of these buildings it is considered that any development proposals relating to these buildings, including their design and any proposed change of use, may not be able to be considered so readily along with a non-descript office building.



2.9 In principle it is not considered that the employment allocation is necessary. The two sites that comprise E5, straddling Harvey Road, are previously developed land in a very sustainable location. General planning policy would support the appropriate change of use or redevelopment of the Sites. Given the timely opportunity for the UoC to consider the future of the Sites it appears unnecessary to shackle that opportunity but rather allow the most appropriate form of development (whatever that may be) to come forward through the planning system and through public consultation.

2.10 If it is considered that an allocation must be imposed then it is imperative that this allows for opportunities beyond merely B Class Uses. A mixed use approach, rather than a sole employment use, should be allocated to site E5. This would be in accordance with the aims and objectives of draft Policy 24 itself which states that development within the OA will be supported if it will deliver "local shops and services" and would ensure the soundness of the draft Local Plan for the reasons set out below:

1) A sole employment allocation could affect the viability of any redevelopment proposals:

This is considered to be particularly the case in relation to E5 due to the site being large (1.4ha) and having a number of existing buildings which currently provide a lower standard of office accommodation which is particularly inefficient with the existing buildings not lending themselves well to long-term refurbishment.

In order to improve the office accommodation currently provided on site it is quite conceivable that the sites' redevelopment would be required which would have significant costs associated with it due to the need for the existing buildings on site to be demolished and the site cleared prior to any redevelopment proposals being moved forward.

At paragraph 173 the National Planning Policy Framework (NPPF) makes clear that "Pursuing sustainable development requires careful attention to the viability and costs in plan-making and decision taking" and at present the sole employment allocation of E5 cannot be considered to be in accordance with this paragraph of the NPPF and cannot therefore be considered sound.

The E5 area is a large site such that a B Class-only use could be too large for the market to accept one Site and so in order to gain a viable scheme for such redevelopment proposals it may be necessary to include other uses such as retail, student accommodation or leisure uses, for example, which would be in accordance with the Councils aims and objectives and draft Policy 24, in order to have a number of opportunities for different companies/uses to occupy part of the Site and would also enable the draft Plan to be found sound.

2) A sole employment allocation fails to recognise that the intensification of the use of the site could allow for the increased provision of employment space on the site along with other uses:



Given the discussions above regarding the current inefficient use of the site and the likely need for the site to be redeveloped in order for this to be improved it is considered that redevelopment proposals for the site could allow for the more efficient use of land, devoting less space to surface level car parking and also exploring opportunities for taller buildings to be provided on the site along with more efficient internal layouts so that the quantum of development achieved on the site could exceed that which currently exists to fulfil the intent of the current E5 allocation proposal whilst also allowing other uses to come forward in accordance with the broader aims and objectives of draft Policy 24.

3) A sole employment allocation has the potential to preclude the opportunity to provide active frontages at ground floor level on Hills Road:

One of the key objectives of draft policy 24 is to "deliver and reinforce a sense of place; and local shops and services". In allocating site E5 solely for employment use the Council directly contradicts this aim and therefore brings into question the soundness of the draft Plan.

The sole provision of new employment floorspace on this site will not encourage in any meaningful way the provision of an enhanced interaction with the street and ground floor level and will not assist in the creation of streets that will foster a sense of community as the Council desires to see.

The future development of the site should therefore be allowed to come forward in line with general planning policy or, should the allocation of the site be considered necessary, the site should be allocated for mixed use redevelopment in order to ensure the soundness of the draft Plan.

4) It does not reflect the evidence of need for more retail and leisure uses in this area of the city:

The Cambridge Retail and Leisure Study Update 2013 defined a need for retail and leisure growth along Hills Road and the Station area which the employment allocation will restrict again calling into question the soundness of the plan.

For the reasons set out above the mixed use of the site is considered to be more appropriate than a sole employment use. It is therefore considered that, should the allocation of the site be necessary, this should make allowance for the mixed use redevelopment of the site in order to take account of the need identified by the Cambridge Retail and Leisure Study Update thereby enabling the Plan to be found sound.

5) It would conflict with the delivery of sustainable development:

In seeking to limit the redevelopment of the site to employment uses only the draft policy misses an opportunity to promote a mix of uses on a single site.



The benefits of this in sustainability terms are that this has the potential to reduce the need to travel between different destinations across the city and would enhance the economic well-being of the Site and City by providing more opportunities to more companies and uses that would support the City. The conflict of the existing sole employment allocation with the overarching aim of National Planning Policy brings the soundness of the Plan into question. In order to ensure the soundness of the Plan the sole employment use allocation of E5 should be removed and, if the allocation of the site is considered necessary, a mixed use allocation should be brought forward.

- 2.11 The above overview demonstrates that there is significant planning merit in removing the emerging employment allocation which is currently proposed and either:
- a) Deleting the emerging policy and allowing any development on this previously development land to be unconstrained to find the most appropriate development for this important location; or
 - b) If some form of allocation is deemed necessary for this to be a mixed use allocation. For any development to comprise a significant proportion of B Class Floorspace along with allowance for other supporting uses appropriate to the Site.
- 2.12 This will bring benefits in terms of the delivery of the Council's own aims contained in draft policy 24 with regard to increasing the likely deliver of significant development to support economic growth, public realm improvements and delivering active frontages and fostering a sense of community thereby ensuring that the Plan can be found sound.

