

Agenda Item 4

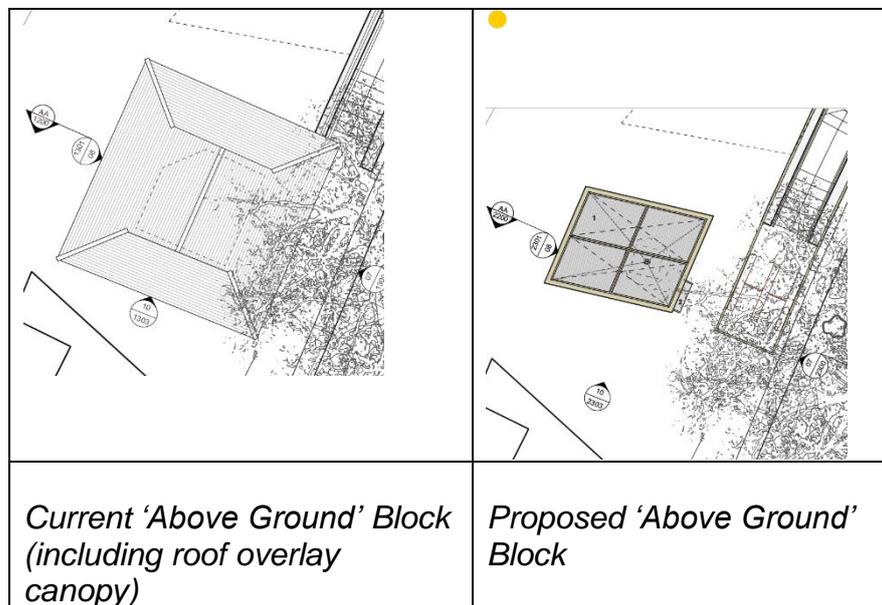
Applicant's response to points raised in petition asking Cambridge City Council to hold a Development Control Forum in relation to application no. 19/1350/LBC

Site Address: Public Toilet, Silver Street, Cambridge, Cambridgeshire
Description: Refurbishment of existing basement toilets and associated works to include the provision of a new guard rail to the basement stairs, and the erection of a replacement wheelchair accessible WC and kiosk (following demolition of the existing wheelchair accessible WC structure).
Applicant: Cambridge City Council (Streets and Open Spaces)
Agent: Gort Scott, 55 Leroy Street London SE1 4SN

The following paper sets out the applicant's response to each of the points raised in the petition in response to application no. 19/1350/LBC. For ease of reference, the petition points are presented in red italic text and the applicant's response in normal black text.

Policy 55. Responding to context. Design & integration with the immediate locality

1. The new footprint extends the current solid build-line to the line of the overhang canopy.



The statement is inaccurate. As shown above the proposed above-ground toilet/kiosk block is situated in approximately the same location as the current disabled toilet block. The proposed replacement block structure is of similar size and scale but omits the existing roof overhang producing a much-reduced overall footprint.

2. The siting, massing, scale does not respond to the context.

The siting, mass and scale of the replacement above ground building is like that existing as the resultant project definition sought to minimise changes to the street-scene following rigorous consultation with key stakeholders.

3. It is not well integrated with the immediate locality. This design presented in isolation, lacks consideration of the public realm gathering area. There is no rubbish bin plan, seating plan or cycle rack plan. No restriction of advertising plan.

The design has been developed with reference to other buildings in the area (including Darwin and Queens' College) and the Grade II listed river bridge. The original mandate (Environment Scrutiny Committee, 15.03.16) was to "construct a new lightweight structure to complement or replace the existing street level building with the existing below ground facilities retained for alternative use or abandoned altogether." The report mentioned that this "option would have the most impact upon the existing street-scene, and the building would need to feature a high-quality exterior finish with a bespoke architectural design."

The points raised relating to the surrounding public realm infrastructure fall outside of the planning application site. The existing bin, seating and cycle rack facilities are considered to represent an acceptable level of provision. The toilet redevelopment plan does not create increased demand/ need for additional public realm infrastructure. The Council is involved in a review of city centre spaces and movement needs which will lead to the creation of the Making Space for People Supplementary Planning Document (SPD) and associated design guide, which can then be used to inform investment decisions around public realm infrastructure needs and improvement priorities.

Policy 61: Conservation and enhancement of Cambridge's historic environment.

4. Silver Street bridge is a Grade 2 listed Heritage Asset. The new kiosk /disabled toilet building, and new railings do not enhance the significance of the setting and views.

Historic England "considered the proposals would not cause harm to the significance of the Grade II listed Silver Street Bridge; to the setting of nearby listed buildings or to the character and appearance of the street-scene in this part of the Central Cambridge Conservation Area." They are further "of the view that the scale, massing and detailed design would be an enhancement on the existing situation and have no objections on heritage grounds." (planning application consultee response 21.10.19).

The original project Heritage Impact Statement (2013) undertaken by consultants

Faithful & Gould, on behalf of the applicant, stated “Our assessment has identified that the special character of the Conservation Area and the individual heritage assets within the immediate environs would not automatically and detrimentally be impacted by the construction of a proposed public conveniences.”

The more recent 2019 Heritage Impact Statement concluded “The proposal causes no harm. It does involve a change, but change is not necessarily harmful. If any harm is perceived, it is minimal and the public benefits.”

The new railings are in keeping with the aesthetics of the design.

5. There is inadequate detailed analysis of the asset and proposal.

A thorough and rigorous design development approach has been taken, over a period of several years in accordance with the RIBA (Royal Institute of British Architects) Plan of Work. This included two Design & Conservation Panel reviews Chaired by RIBA, detailed involvement at pre-application stage with Historic England, County Council/Highways, Visit Cambridge & Beyond and numerous external advisory bodies; as well as numerous project development meetings with key local government officers including the City Council’s Disability Access Officer, Conservation Officer, Senior Arboriculturist Officer and Street and Open Spaces Assets Officer.

Policy 59: *Designing landscape and the public realm*

6. The proposal requires substantial undercutting the canopy of the willow tree to accommodate the height of the kiosk and water collecting tower. This harsh treatment of the tree is not acceptable.

REF 1513 Tree Works Protocol Silver Street Willows Pollarding involves the re-pollarding of the two adjacent weeping willows back to the previous pruning points. These works are required to address structural concerns of the trees highlighted by the recent failure of one of the willow trees in full leaf during a windstorm on Saturday 10th August 2019.

7. The tree is important for biodiversity, providing shade and shelter and is an existing feature that contributes positively to the quality and character of the area.

The benefits of these existing trees are recognised. REF 1513 Tree Works Protocol Silver Street Willow Pollarding seeks to ensure they can be retained in safe, and healthy condition.

The City Council has a duty of care to maintain their trees in order to minimise the risks posed by trees to members of the public. Following a recent inspection of the trees it is considered appropriate to carry out pollarding works to reduce the risk of failure in this highly occupied area. The trees have historically been managed as pollards and it is appropriate for us to continue to manage them as such on a cyclical basis following thorough inspections. The frequency of pollarding operations will be derived following the next round of inspections in three years’

time, but it may be appropriate to manage these trees on a 3 – 5-year cycle of pollarding.

Policy 63: Works to a heritage asset to address climate change

8. The rainwater capture scheme feature is unlikely to function effectively under a tree canopy with leaf fall.

The design of the perforated panels in the roof allow rain through to a rainwater tank and act as a leaf-guard. A gently sloping roof on top of the kiosk will funnel rainwater into a water collection tank on top of the building for toilet flushing in both the disabled toilet and basement toilets. The effectiveness of the rainwater capture will be monitored, and if minor pruning works in between the cyclical pollarding programme is considered both necessary and not detrimental to the overall health and aesthetic of the trees, then this will be carried out. At present, we do not feel that the functionality of the rainwater harvest system will be greatly affected by the proximity of the adjacent trees although continued monitoring will ultimately determine its efficacy.

9. The embodied energy costs of removing and replacing the existing forged metal work railings are not considered. The design and condition of the railings are not evaluated.

The existing railings to the below-ground stairwell are not a listed feature of the bridge and were installed in 1985 along with the current toilets. The new railings proposal is an intrinsic part of the overall design aesthetic.

Trading

10. Is the new Kiosk an additional licensed retail unit or is it replacing one of the two existing units in this location? We object to any additional licensed retail units in this location.

The Council is proposing the inclusion of a kiosk to be licensed as a visitor information point/ trading concession, given the strategic ‘gateway’ location to the city for visitors; and associated need to provide sustainable revenue streams to enable it to continue to fund the delivery of vital Council services, such as the public toilets which will continue to represent best value for city residents and visitors.

***Do you think there are changes that could be made to overcome your concerns?
Yes.***

If yes, please explain:

- Retain the Willow tree canopy’s natural shape, allowing for normal pruning.***

As points 6 and 7 above.

- *The tree canopy should not be reduced by a third to accommodate the extra height of the new kiosk / toilet. The design of the roof tank should be modified instead.* As points 6 and 7 above.
- *Reduce the footprint of build line so it does not extend into the busy pavement space area.* See Points 1 and 2 above.
- *Evaluate condition & design of existing railings and consider retaining them.* See Point 9 above.
- *Present a public realm improvement plan across the bridge area with a detailed analysis of the broader context. Views, river setting, bins, benches, racks and signage.* This is outside the scope of the planning application and will be addressed through the development and implementation of the Making Space for People SPD and associated design guide See Point 3 above.
- *We do not object to the new Kiosk if one or both current kiosks on the bridge were removed.* The existing lease holders are acting in accordance with their licence conditions. The licensing of the other kiosks is not a planning matter.
- *Please note - We do accept the principles of refurbishment of the Public Toilets on and under Silver Street Bridge.* No response.

Cambridge City Council (Streets and Open Spaces)
10 January 2020

