

<b>Application Number</b>	14/1154/FUL	<b>Agenda Item</b>	
<b>Date Received</b>	17th July 2014	<b>Officer</b>	Mr Tony Collins
<b>Target Date</b>	16th October 2014		
<b>Ward</b>	Abbey		
<b>Site</b>	West's Garage Ltd 217 Newmarket Road Cambridge CB5 8HD		
<b>Proposal</b>	The erection of new student housing (222 study bedrooms) and associated communal facilities, cycle parking, and external landscaping following demolition of the existing buildings.		
<b>Applicant</b>	c/o Agent		

SUMMARY	<p>The development does not accord with the Development Plan for reasons which include the following:</p> <p>The scale and massing of the development do not respond appropriately to the context.</p> <p>The building would cause unacceptable overshadowing to neighbouring residential properties.</p> <p>The building does not provide an acceptable level of residential amenity for future occupiers</p>
RECOMMENDATION	REFUSAL

**1.0 SITE DESCRIPTION/AREA CONTEXT**

1.1 The site is a roughly rectangular site of 0.36 ha at the corner of Newmarket Road and River Lane. It has been occupied since the 1950's by a motor vehicle business. Vehicle repair operations

on this site have gradually diminished in favour of vehicle sales. The desire to create additional vehicle sales space lies behind the present site owners' wish to relocate

- 1.2 The site is not allocated in the Cambridge Local Plan (2006), nor in the Cambridge Development Plan 2014 Draft Submission. It lies within the area of the Eastern Gate SPD, and within the Eastern Gate Opportunity Area in the Draft Submission.
- 1.3 The site falls outside any conservation area, but the boundary of the Riverside section of City of Cambridge Conservation Area No.1 (Central) runs along the western and northern boundaries of the site. There are three rowan trees just outside the northeast boundary of the site (within land owned by the City Council) which are protected by their position within the conservation area.
- 1.4 The site falls within the controlled parking zone.

## **2.0 THE PROPOSAL**

- 2.1 The application proposes the removal of all buildings on the site (and the three rowan trees on adjacent land to the north), and the erection of buildings to house 222 students.
- 2.2 The scheme comprises four components grouped round a central courtyard which would be at basement level (one storey below Newmarket Road street level). On the west side would be a two-storey building (termed the 'pavilion' building) while ranges along Newmarket Road, River Lane and Rowlinson Way would form a single main building enclosing the other three sides of the courtyard. The pavilion would have rooms facing the courtyard only, while the other three ranges would be double-banked, with rooms facing both the courtyard and the street.
- 2.3 The main entrance would be at the corner of River Lane and Newmarket Road. There would be a subsidiary entrance half-way along the River lane frontage. The ground floor would have a large common room on the Newmarket Road side, with reception, post room, offices, meeting rooms and other communal spaces nearby. Cycle storage would be provided within the building off Newmarket Road and Rowlinson Way and bin stores off Newmarket Road and River Lane. The upper floors, whose configuration is described in

the assessment below, would contain student rooms grouped with shared kitchens.

2.4 The application is accompanied by the following supporting information:

1. Design and Access Statement
2. Planning Statement
3. Heritage Statement
4. Foul and Surface Water Drainage Strategy
5. Geoenvironmental Desk Study
6. Daylight and Sunlight Report
7. Energy Statement
8. Ventilation Statement
9. Transport Statement and Travel Plan
10. Noise Impact Assessment
11. Sustainability Statement and Checklist

2.5 Amended plans and an addendum to the Design and Access Statement have been received which show the following amendments and additional information:

- Extended mullions to the rear windows on the Newmarket Road range to protect privacy in Godesdone Road. (Diagrams to show arcs of visibility are also included)
- Bronze cladding and blind windows to rear of pavilion block facing Godesdone Road gardens
- Shadow studies of courtyard
- Comparison of courtyard with equivalent space in student accommodation at the Brunswick site.
- Enlarged windows in courtyard elevations.
- Sunlight and daylight analysis for courtyard rooms
- Shadow analysis of site context with and without the development
- BRE sunlight and daylight analyses of 6-24 River Lane
- Additional facade detailing (soldier courses, stone mouldings, rusticated brick piers)
- Specifications for photographs and CGI images in the application
- Additional information on River Lane tree planting

2.6 The application is brought before Committee because there is a representation of support, and the recommendation is for refusal.

### 3.0 SITE HISTORY

3.1 There is extensive history on this site in connection with the garage use, stretching back from 2006 to the 1960's, but the only relevant previous application is shown below.

Reference	Description	Outcome
13/1780	The erection of new student housing (257 study bedrooms) and associated communal facilities, cycle parking, and external landscaping following demolition of the existing buildings.	Withdrawn

### PUBLICITY

4.1 Advertisement:	Yes
Adjoining Owners:	Yes
Site Notice Displayed:	Yes

### 5.0 POLICY

5.1 See Appendix 1 for full details of Central Government Guidance, Cambridge Local Plan 2006 policies, Supplementary Planning Documents and Material Considerations.

5.2 Relevant Development Plan policies

PLAN	POLICY NUMBER
Cambridge Local Plan 2006	3/1 3/4 3/7 3/8 3/11 3/12 3/13 4/4 4/11 4/13 4/14 7/10 8/2 8/3 8/6 8/9 8/10 10/1

### 5.3 Relevant Central Government Guidance, Supplementary Planning Documents and Material Considerations

<p>Central Government Guidance</p>	<p>National Planning Policy Framework March 2012</p> <p>National Planning Policy Framework – Planning Practice Guidance March 2014</p> <p>Circular 11/95</p>
<p>Supplementary Planning Guidance</p>	<p>Sustainable Design and Construction (May 2007)</p> <p>Cambridgeshire and Peterborough Waste Partnership (RECAP): Waste Management Design Guide Supplementary Planning Document (February 2012)</p> <p>Planning Obligation Strategy (March 2010)</p> <p>Public Art (January 2010)</p> <p>Eastern Gate Supplementary Planning Document (October 2011)</p>
	<p><u>City Wide Guidance</u></p> <p>Arboricultural Strategy (2004)</p> <p>Cambridge and South Cambridgeshire Strategic Flood Risk Assessment (November 2010)</p> <p>Strategic Flood Risk Assessment (2005)</p> <p>Cambridge and Milton Surface Water Management Plan (2011)</p> <p>Cambridge City Council (2011) - Open Space and Recreation Strategy</p> <p>Cambridge City Council - Guidance for the</p>

	<p>application of Policy 3/13 (Tall Buildings and the Skyline) of the Cambridge Local Plan (2006) (2012)</p> <p>Cambridge Walking and Cycling Strategy (2002)</p> <p>Cambridgeshire Design Guide For Streets and Public Realm (2007)</p> <p>Cycle Parking Guide for New Residential Developments (2010)</p> <p>Air Quality in Cambridge – Developers Guide (2008)</p>
	<p><u>Area Guidelines</u></p> <p>Cambridge City Council (2002)–Eastern Corridor Area Transport Plan</p> <p>Riverside and Stourbridge Common Conservation Area Appraisal (2012)</p> <p>Newmarket Road Suburbs and Approaches Study (October 2011)</p>

#### 5.4 Status of Proposed Submission – Cambridge Local Plan

Planning applications should be determined in accordance with policies in the adopted Development Plan and advice set out in the NPPF. However, after consideration of adopted plans and the NPPF, policies in emerging plans can also be given some weight when determining applications. For Cambridge, therefore, the emerging revised Local Plan as published for consultation on 19 July 2013 can be taken into account, especially those policies where there are no or limited objections to it. However it is likely, in the vast majority of instances, that the adopted development plan and the NPPF will have considerably more weight than emerging policies in the revised Local Plan.

For the application considered in this report, the following policies in the emerging Local Plan are of relevance:

22 Eastern Gate Opportunity Area

## **6.0 CONSULTATIONS**

### **Cambridgeshire County Council (Highways Development Management)**

First comment (25<sup>th</sup> July 2014)

- 6.1 On-street works acceptable in principle. Building should be pulled back from River lane frontage to allow wider footway. Residents will not qualify for residents' parking permits.

Second comment (19<sup>th</sup> August 2014)

- 6.2 Holding objection because further information required. Expected to generate fewer motorised trips than the present use. Framework Travel Plan required. Preferred cycle route should be identified. Cycle parking meets City Council Standards, but confirmation that it is adequate to meet expected need is required.

Third comment(25<sup>th</sup> September 2014)

- 6.3 Further information required with respect to Tripos Court traffic data submitted. Cycling officer's concerns reiterated. Acceptability of proposed build-outs in River Lane to accommodate trees confirmed.

Fourth comment (10<sup>th</sup> November 2014)

- 6.4 No information submitted requires further comment from the highway authority.

### **Head of Refuse and Environment**

- 6.5 No objection. Conditions recommended with respect to: Demolition and Construction Environmental Management Plan (DCEMP), assessment and insulation against traffic noise, assessment and insulation against noise from the adjacent public house, plant noise insulation, contaminated land and waste and recycling.

Informatives recommended with respect to: Housing Health & Safety Rating System (HHSRS), noise insulation, waste and recycling.

## **Urban Design and Conservation Team**

### First advice (19<sup>th</sup> August)

- 6.6 Scheme needs to be amended to address a number of concerns identified in these comments.
- 6.7 The privacy of Godesdone Road would be better safeguarded through the introduction of screens at the second floor rear section of the Newmarket Road block. Further articulation of the roof form is needed.
- 6.8 In terms of shadow studies and daylighting, the scheme fails to provide certainty in terms of the proposed courtyard amenity space which appears to fail the criteria identified in the BRE guidelines. In addition, the impact on neighbouring properties is unclear.
- 6.9 The daylighting study highlights significant failings in terms of the VSC and ADF assessment resulting in a number of poor quality living spaces. Further breaks and articulation of the building massing may be required to resolve the concerns highlighted.
- 6.10 In the submitted D&A Statement, the applicant has provided a series of views to demonstrate the impact of the proposals from surrounding streets. The applicant has not provided the 'specification' of each view such as the eye height and focal length. As such it is not possible to verify whether what is shown are accurate visual representations. The SPD at paragraph 3.4.12 states that applicants *'will be expected to produce accurate 3D computer models to inform an appropriate massing of their development proposals and to demonstrate the impact on any key views and vistas'*. Given the proximity to the Conservation Area and the close proximity of properties and associated amenity spaces on Godesdone Road and Beche Road, the applicant needs to confirm the accuracy of submitted views.
- 6.11 In terms of the elevations, the materials palette is acceptable as is the vertical proportioning of the building. A further level of 'richness and detail' is needed to help break up the monolithic



qualities of the elevations and help the scheme respond more appropriately to the finer grain of the adjacent Conservation Area. The linear form of the Rowlinson Way block needs to be further articulated.

- 6.12 Confirmation is needed that the trees proposed along River Lane can actually be delivered. These are crucial to helping to integrate the development into its context. Details of improvements to the Newmarket Road public realm are also needed.
- 6.13 As proposed the scheme fails to meet Policy 3/4, 3/7 and 3/12 of the Cambridge Local Plan (2006) and cannot be supported in Urban Design & Conservation terms.

Second advice (5<sup>th</sup> November, following amendments)

- 6.14 Amendments and clarifications reviewed. Further comments, to address the urban design and conservation issues raised. We have reviewed this information and have the following comments to make.
- 6.15 Privacy of Godesdone Road residents – extended mullions resolves this concern.
- 6.16 Further articulation of the roof of the pavilion block – not sufficient; building still reads as strongly horizontal
- 6.17 Photo specifications suggest rear of the Newmarket Road block will read more significantly than previously thought and that it will impact on existing Godesdone Road properties - overbearing scale.
- 6.18 Shadow studies have been provided that show that the courtyard will be heavily shaded for over 6 months of the year – not acceptable. Comparison with Brunswick House student scheme – not valid because of level and degree of connection with exterior spaces.
- 6.19 Overshadowing in River Lane: analysis reveals that 3 of the existing houses opposite fail the BRE assessment as a result of the proposals. This indicates that the continuous built form and scale of this end is too great and fails to respond to the established

context. Reduction in storey heights, combined with a more broken form is required.

- 6.20 Some courtyard units previously failed the BRE VSC and ADF assessment Larger windows have resolved these concerns.
- 6.21 The introduction of the rusticated brickwork and cill and window head details all combine to provide both visual and shadow interest.
- 6.22 Rowlinson Way elevation, metal panels go some way to break up the linear nature of the block, but roof form still reads as a strong horizontal against the more varied forms of the adjacent Conservation Area. A further issue regarding overlooking of the rear gardens to houses fronting on to River Lane has been identified that needs to be resolved.
- 6.23 No confirmation has been provided that the trees on River Lane can be delivered.
- 6.24 Photo specifications have now been provided which reveal that the images shown on pages 36, 38, 39 of the Design & Access Statement Addendum were taken with a 17mm focal length, view across the Conservation Area is 22mm and photomerge images on pages 42, 43, 44 are all taken with an 18mm focal length. This has the effect of misrepresenting the scheme and making it appear less dominant than it will be in reality. Therefore the scheme will appear closer and more dominant than shown in each of these images and raises significant concerns about whether the overall scale and massing is appropriate for the existing established context.
- 6.25 The scheme has not addressed concerns of the D&C Panel regarding the bulky form of the Newmarket Road and River Lane building.
- 6.26 Conclusion: Overall the scheme fails to resolve a number of concerns and additional information has revealed significant new concerns which relate to the overall massing and consequent negative impacts of the scheme. As such it is likely that the proposals represent overdevelopment of the site and that an alternative development form is needed. Application in its current form fails to satisfy Policies 3/4, 3/7, 3/11, 3/13 and 4/11 of the Cambridge Local Plan (2006). Not supported.

## **Head of Streets and Open Spaces (Landscape Team)**

### Courtyard:

- 6.27 Unclear how drainage strategy requirements and landscape proposals will interact. Large attenuation tank required to manage storm water drainage will conflict with tree planting strategy. Absence of tree planting will mean a loss of quality.
- 6.28 Greatly concerned about the quality of daylight in the courtyard space. Brunswick House not comparable with this application. In-paving planting around the seating areas unsustainable and not supported. Access to courtyard awkward. Access from the ground floor common room should be provided.

### Streetscape

- 6.29 Disappointed by lack of articulation of the building frontage and lack of tree or shrub planting on Newmarket Road.
- 6.30 Street trees along River Lane are vital to making the development settle into its surroundings. Need utilities survey and highway authority approval to demonstrate deliverability. Rear aspect of the Rowlinson Way block should be pulled back to allow for either the retention of the existing trees or for the provision of new trees. This boundary represents the edge of the conservation area and the trees help to soften and illustrate this edge.

### Summary:

- 6.31 Not supported because of drainage/landscape interface issue, shadowing in the courtyard and requirement for streetscape softening.

## **Senior Sustainability Officer (Design and Construction)**

- 6.32 Use of photovoltaics, CHP and air-source heat pumps acceptable. 10% carbon saving exceeded. Noise implications of air-source heat pumps must be addressed. Green and brown roofs supported.

## **Head of Streets and Open Spaces (Walking and Cycling Officer)**

- 6.33 Cycle parking acceptable. Flush kerb needed for exit from Newmarket Road. Building should be set back from River Lane corner to allow for increased pedestrian use.

## **Access Officer**

- 6.34 Should be 12 disabled rooms. Should be one disabled space for every disabled occupier. Parking spaces should not be on the external road. Location of disabled rooms not clear. Recommendations on detailed design of rooms.

## **Environment Agency**

- 6.35 No objection subject to conditions on ground contamination, infiltration of water, piling, surface water drainage and pollution control.

## **Cambridgeshire Constabulary (Architectural Liaison Officer)**

- 6.36 No objection to the proposal from a crime prevention or security perspective.
- 6.37 Support: main entrance design, security staffing for at least 16 hours/day, visitor access strategy.
- 6.38 Recommend: changes to recessed entrance off River Lane, fire doors on River Lane to be alarmed, student access fobs to be for main entrance and individual cluster only, ground floor windows to be blocked by internal screen or to have restricted opening, improved lighting and CCTV to cycle store.

## **Design and Conservation Panel (Meeting of 14th May 2014)**

- 6.39 The conclusions of the Panel meeting were as follows:
- 6.40 **Courtyard.** Strong reservations were expressed as to the success of this central 'green oasis'. Located one storey below street level and flanked by elevations of five storeys, the Panel felt this would likely be a dank, gloomy area where planting beds would struggle to receive appropriate levels of sunlight. (Data on shadow/sunlight

analysis would have been a helpful addition to the presentation.) The fact that drainage for the courtyard was yet to be examined was an additional concern. The design team are also recommended to explore the less ambitious possibility of using the courtyard as a more flexible outdoor gathering space for students, subject to effective management.

#### 6.41 **River Lane elevation.**

- o Street trees. The Panel welcome the intention to introduce a new line of replacement street trees along this elevation that would help to offset the scale of the proposed development of this site. However, as the width of River Lane reduces significantly as it approaches Newmarket Road and there would likely be servicing requirements below ground, the deliverability of substantial re-planting was questioned.
- o Scale and massing. This was seen as a particular issue along this frontage and needs to be revised. As proposed, it appears longer and taller than the Newmarket Road elevation, with fenestration that fails to adequately break up the mass. A reduction in the scale is needed, with a stepping down for a less monolithic appearance. A reduction in the length of the facade to allow for replacement trees at the end of River Lane/Rowlinson Way junction could also contribute towards a more successful integration of a new development located adjacent to a Conservation Area.
- o Ground floor level accommodation (defensible spaces). Scepticism was expressed as to the likely success of these recessed areas as further opportunities for planting. It is the Panel's view that the proposed railings are likely to encourage the accumulation of litter, while poor levels of sunlight would make successful planting a challenge.
- o Student drop-off. For a proposal comprising 248 student rooms, the Panel were disappointed that a management plan for arrivals/departures at peak times was yet to be considered.
- o Servicing/car parking. The Panel understands that the City Council as landowner was yet to grant vehicular access to the scheme from Rowlinson Way.

6.42 **Newmarket Road frontage.** The Panel were broadly comfortable with the arrangement of the fenestration and vertical banding. The exploration into landscape improvements on Newmarket Road should also be investigated.

- 6.43 **River Lane/Newmarket Road corner.** This was seen as bulky and in need of re-examination.
- 6.44 **Student rooms.** Very little flexibility of layout or furniture is permissible in the narrow (2.2m wide) rooms. The architects are strongly advised to revisit the modules to create more useful, higher quality living spaces.
- 6.45 **Materials.** Very few comments were made as to the materials palette although it was generally regarded that the bronze-coloured cladding could be successful. (The architects are advised to angle the metal cills at a gradient that discourages pigeons from roosting.)
- 6.46 **Conclusion.** This development was presented as the creation of a 'gateway' in the context of the changing character of Newmarket Road. However, as the site abuts a Conservation Area comprising primarily two-storey residential dwellings, the Panel would have welcomed greater appreciation of the scheme's context and how this has informed its scale and massing particularly in relation to the impact on the modest dwellings on the western side of River Lane. The meanness of the student rooms underlines the overdeveloped nature of the proposal as a whole. The landscaping and opportunity for street trees particularly along River Lane and also Newmarket Road requires further consideration.
- 6.47 **VERDICT – RED (5), AMBER (1)**
- 6.48 The above responses are a summary of the comments that have been received. Full details of the consultation responses can be inspected on the application file.

## **7.0 REPRESENTATIONS**

- 7.1 The owners/occupiers of the following addresses have made representations objecting to the proposal:

52 Abbey Road  
69 Beche Road  
82 Beche Road  
84 Beche Road  
85 Beche Road  
86 Beche Road  
94 Beche Road  
6 Godesdone Road  
10 Godesdone road  
11 Godesdone Road  
12 Godesdone Road  
14 Godesdone Road  
20 Godesdone Road  
45 River Lane  
51 River Lane  
48 Riverside  
27 Silverwood Close

7.2 Representations of objection have also been received from:

Riverside Area Residents Association  
CHS Limited, the housing association responsible for houses in  
River Lane, Rowlinson Way and Stevenson Court  
The user of a garage on Rowlinson Way

7.3 The representations can be summarised as follows:

#### Principle

- Introduces transient population
- Intensity of use
- Wasted opportunity to build houses

#### Context and design

- Overlarge scale
- Too massive
- Inappropriate development model (Double-banked, pushed to edges of site)
- Unbroken rooflines
- Sets precedent for harmful development in historic high street
- Not appropriate to mimic scale of buildings south of Newmarket Road

- Not in keeping with conservation area
- Creates canyon
- Appropriating highway land for cycle parking and bin collection
- No improvement to public realm

### Neighbour amenity

- Overlooking towards: Godesdone Road, Beche Road, rear of west side of River Lane, opposite side of River Lane
- Overshadowing: in River Lane, in Godesdone Road
- Plant noise
- Rubbish
- Polluted air funnelled down river Lane
- Increased pedestrian traffic through housing area to the east
- Loss of privacy – River Lane
- Noise

### Amenity for future occupiers

- Not enough leisure space or services for student occupiers
- Courtyard overshadowed

### Highway issues

- Highway safety issues
- Cycle entrance from Newmarket Road unsafe
- Obstruction from delivery vehicles in River Lane
- Pedestrian safety at risk from narrower pavements
- Highway safety at corner
- Pick-up and drop-off
- Traffic generation

### Car parking

- Contractors parking
- Disabled parking
- Pressure on car parking

### Other issues

- Images misleading
- If City Council developed the garage area to the north this would create problems



- Impact on local doctors and dentists
- Unsatisfactory disabled access
- Archaeology

7.4 Several of the above respondents, including Riverside Area Residents Association and CHS have also commented on the amended scheme. All of these responses indicate that the amendments have no impact on their fundamental objections to the scheme as submitted.

7.5 Representations in support of the application have been received from the Estates Co-ordinator at Anglia Ruskin University

7.6 The above representations are a summary of the comments that have been received. Full details of the representations can be inspected on the application file.

## **8.0 ASSESSMENT**

8.1 From the consultation responses and representations received and from my inspection of the site and the surroundings, I consider that the main issues are:

1. Principle of development
2. Context of site, design and external spaces
3. Public Art
4. Renewable energy and sustainability
5. Disabled access
6. Residential amenity
7. Refuse arrangements
8. Highway safety
9. Car and cycle parking
10. Third party representations
11. Planning Obligation Strategy

### **Principle of Development**

8.2 This is not an allocated site. The principle of development for student accommodation would be in accordance with development plan policy provided that clauses in a Section 106 agreement were in place to restrict occupancy to full-time students of the city's two universities and to prevent such occupiers from keeping cars in the city. The applicants are

prepared to enter into such an agreement, but one has not been completed. In the absence of an agreement, there would be no mechanism for ensuring that occupancy would be restricted to full-time university students at an institution suitably close to the site, or that occupiers were prohibited from, keeping a car in the city. For all these reasons, the proposal, without a legal agreement would be contrary to Policy 7/10, and therefore this must be given as a reason for refusal.

- 8.3 In my opinion, in the absence of an appropriate legal agreement to restrict occupancy, the principle of the development is unacceptable and in conflict with policy 7/10 of the Cambridge Local Plan 2006.

### **Context of site, design and external spaces**

#### Scale and massing

- 8.4 The proposed buildings would increase in height from north-west to south-east. The 'pavilion' building on the west side of the site, backing on to Godesdone Road gardens, and the Rowlinson Way range to the north would have two storeys above ground level, the River Lane range would begin at two storeys, rise to three storeys after the first three bays, rise again to a set-back fourth storey after a further three bays, before reaching four full storeys for the last two bays. The full four storey height would be maintained on the diagonal façade at the corner, and along the eastern half of the Newmarket Road frontage. After the recess in the middle of this frontage, the fourth storey would be set back for four further bays, and then reduce to three storeys for the final, westernmost bay.
- 8.5 I have assessed the scale and massing of the proposal against the existing built form which surrounds the site and against the guidance given in the Eastern Gate SPD. In my view, parts of the proposed development are of an acceptable scale, but others are not. The Eastern Gate SPD shows height guidelines of 2-3+1 on the River Lane frontage of this site, and 3+1 on the Newmarket Road frontage. However, it also emphasizes the importance of varying roof heights (Paragraph 3.4.8: 'On development sites with long frontages, buildings should vary across individual buildings.') It does not prescribe building heights away from the main street frontages.

8.6 The configuration of the proposed building on River Lane follows this guidance closely until it reaches the Newmarket Road corner. I explain below that the most recent shadow studies submitted indicate that these heights create a problem for the amenity of neighbours, but in design terms the two-storey, three-storey and 3+1-storey sections are in my view acceptable. The building profile on Newmarket Road does not adhere as faithfully to the SPD guidance. Although the range as a whole varies in height from 3 to 3+1 to 4, a substantial part of the range is of four full storeys without setback on either the street or the courtyard elevations. This is above the guideline of 3+1. The applicants have asserted that an increased height at the River Lane corner is appropriate, both as a marker of the entrance point to the Riverside area and to promote legibility of the building entrance itself. I do not discount this argument entirely, despite the very strong representations made against it; I do not consider that the SPD guideline means that no four-storey element can be acceptable in any circumstances. However, paragraph 3.4.9 of the SPD states that 'any proposals seeking to exceed the guidance will need to be tested in a robust way and applicants will need to demonstrate through accurate 3D computer modelling that their proposal will not unduly impact upon the surrounding context'. The applicants have submitted 3D images, but have not until the most recent addendum, supplied the relevant specifications. The short focal lengths used in these images underplay the prominence which the proposed building would have, and as a result, it is my view that the Newmarket Road range, in the form currently shown, would introduce a disproportionate and unduly dominant element into the townscape, both when seen from the rear of houses in Godesdone Road, and when viewed against the Corner House public house from further east on Newmarket Road.

8.7 The existing buildings in the rear of the site are single-storey, but they have high gabled roofs, and in my view, notwithstanding neighbour representations which are strongly to the contrary, the two-storey height proposed for the pavilion and Rowlinson Way buildings is an appropriate reflection of this, and an acceptable response to the predominance of two-storey, pitched roof houses in the conservation area to the north and west. However, although the originally submitted drawings show some articulation in the form of these two buildings, and this has been increased in the later amendments, the blocks remain

strongly horizontal, and it is the largely unvaried roofline which would be problematic. Paragraph 3.4.14 of the Eastern Gate SPD states: '[policy]... is intended to avoid long unvaried rooflines of large new buildings forming dominant and intrusive horizontal bands on the skyline, which would detract from the roofscape of the conservation area and the skyline of the city...]. It is my view that despite amendment, the two rear blocks are insufficiently well-articulated, and given their proximity to the neighbouring houses, their form, as currently shown, would have the harmful impact on the character of the conservation area which the paragraph from the SPD cited above seeks to avoid.

- 8.8 In my opinion, the height and mass of the Newmarket Road range of the building, and the deficient articulation of all four parts of the scheme, are inappropriate for this context, and would be harmful to the character of the locality and the adjacent conservation area. In this respect, the proposal is in conflict with Cambridge Local Plan (2006) policies 3/4, 3/12 and 4/11. I acknowledge and agree with the assertion of Riverside residents that the double-banked, corridor-based, edge-of-site development model is one of the factors which underlies problematic aspects of the massing of this scheme, but that model in itself cannot form a reason for refusal.

#### Architectural detail

- 8.9 In this application, the applicants have responded to concerns about the horizontal mass of the building on both Newmarket Road and River Lane at the time of the previous application by introducing a number of elements which break up that mass and emphasize verticality. Recessed glazed section on both frontages, vertical window shapes, substantial reveals and the clear division of all the frontages into 5m wide, two-window bays which reflect the proportions of nearby houses, are all successful in this respect. In my view these features would diminish the perceived mass of the building and create a more comfortable relationship with the conservation area to the north and west.
- 8.10 Additional details introduced in the most recent amendments include a brickwork soldier course and stone moulding above the ground floor, and rusticated brickwork piers around the entrance. In my view these are positive changes, which would

respond well to the local context, enhancing articulation and increasing the legibility of the principal entrance.

### Materials

- 8.11 The application proposes a limited palette of materials; the building would be clad mostly in buff brick with pale mortar, and bronze metal would be used for doors, windows and metal cladding at the upper levels. In my view these materials would respond well to the local context. Appropriate quality could be secured by condition. In my view, the detailing and materials of the proposal are appropriate for the context and in accordance with policies 3/4 and 3/12 of the Cambridge Local Plan 2006, and the guidance in paragraphs 3.4.18 to 3.4.20 of the Eastern Gate SPD.

### Landscaping

- 8.12 The application proposes a central courtyard at basement level. Evidence submitted following the application demonstrates that this courtyard would be heavily shaded; the Newmarket Road range of the building rises five storeys from courtyard level on the south side. The landscape team also have concerns about the planting proposals for the courtyard, its drainage, and the limited accessibility of the courtyard from communal spaces which are at street level, one storey above. The applicants have asserted that the extent and quality of this open space is equivalent to that in the scheme approved and implemented on the Brunswick (former CRC) site not far to the west of West's Garage. I do not accept the validity of this comparison; the Brunswick courtyard has views to open spaces beyond its surrounding building on both the south and north sides, and is directly accessible from communal spaces at ground floor level; it would be a significantly more usable and more attractive space.
- 8.13 The loss of the existing rowan trees in Rowlinson Way would be detrimental to the character of the area, and I share the view of the urban design and landscape officers that the introduction of substantial street trees in River Lane to soften and 'green' this part of the development is absolutely essential if the transition from the development into the established conservation area to the north is to be successful. The highway authority has indicated that it is not opposed to the principle of street trees

being inserted in line with the applicants' proposal, included in the application and further illuminated in the addendum. However, I share the landscape team's continuing concern about the deliverability of these trees. The applicant's plan shows trees of very limited crown spread, and I am not convinced that the planting points shown would be sufficiently far from the building to allow for the growth of acceptable trees. More important still is the issue of underground services. The applicants have submitted a utilities survey diagram, and assert that it demonstrates the proposed tree planting strategy can be implemented. However, they have not matched the utilities survey up with the tree strategy to demonstrate this. In my view there is a potential conflict with the location of telephone cables, and an even more significant conflict with surface water drains, which my advice from the Sustainable Drainage Officer suggests are only 1m below the street surface at this point.

- 8.14 In my opinion, the landscaping proposals, both in the courtyard and the street, are unacceptable, and I do not consider these are matters which can be addressed by condition, because they involve issues which are fundamental to the design: the level of the courtyard floor, the height of the building, and the position of courtyard and street elevations. In this respect, the proposal is in conflict with Cambridge Local Plan (2006) policies 3/4, 3/7, 3/11, 4/4 and 4/11.

### **Public Art**

- 8.15 The applicants' expressed willingness to contribute to a wider public art scheme for the Eastern Gate area, in accordance with the Eastern Gate SPD, is acceptable in principle, but an Agreement has not been completed and therefore the proposal is in conflict with Cambridge Local Plan (2006) policies 3/7 and 10/1 and the Public Art SPD 2010.

### **Renewable energy and sustainability**

- 8.16 The application proposes the use of photovoltaics, combined heat and power and air source heat pumps. The Sustainability officer is content that the carbon savings generated by the scheme would exceed the 10% required by policy. The noise implications of air source heat pumps would need to be controlled by condition. The Sustainability officer is also content with other measures to increase sustainability, including the use

of green and brown roofs.

- 8.17 In my opinion the applicants have suitably addressed the issue of sustainability and renewable energy and the proposal is in accordance with Cambridge Local Plan (2006) policy 8/16 and the Sustainable Design and Construction SPD 2007.

### **Disabled access**

- 8.18 The proposal provides for disabled access and provides 12 accessible rooms, which are not all grouped in one place. The issues about detailed design raised by the access officer are not subject to planning control but are either covered by Part M of the Building Regulations or could be addressed by informatives on a decision notice.
- 8.19 In my opinion the proposal is compliant in respect of disabled access with Cambridge Local Plan (2006) policies 3/7, 3/12 and 7/10.

### **Residential Amenity**

Impact on amenity of neighbouring occupiers

Sunlight

- 8.20 The shadow diagrams provided do not give a complete picture of the likely overshadowing, but it is clear that even at the equinoxes, the proposed range of the building fronting River Lane, would start to overshadow the front of the houses opposite early in the afternoon, and continue to do so for some time. In the case of three rooms in these houses, this overshadowing would exceed BRE guidelines, but it would also represent for many of these houses, a very significant loss of sunlight compared to the present situation. In my view this is unacceptable. I do not consider that there would be any adverse overshadowing of premises to the north or west.

Privacy

- 8.21 In my view, the most recent amendments to the scheme, which introduce 'extended mullions' on windows on the rear of the west end of the Newmarket Road range, would resolve my earlier concerns about possible overlooking from these windows

and protect the privacy of residents of Godesdone Road. I do not consider there would be any unacceptable loss of privacy for Godesdone Road residents from the River Lane range windows, because even were it possible to see over the pavilion block, the distance involved would be in excess of 40m. Similarly, even if rear elevations and rear gardens of houses in Beche Road would be visible from upper windows in the rear of the Newmarket Road range, the distances involved would be more than 75m. I do not consider this to be unacceptable. In my view, however, the application has failed to demonstrate that there would not be a loss of privacy for the occupiers of 33 River Lane. The rear windows and most of the garden space of this house are not currently overlooked, but new windows in the Rowlinson Way range of the proposed building would overlook both, at a distance of about 13m and about 8m respectively. In my view this is unacceptable, and it is also my view that while rear gardens of the adjoining houses 35, 37 and 39 River Lane are to some degree overlooked by their neighbours, the number and location of windows in the Rowlinson Way range would also lead to an unacceptable loss of privacy for these occupiers at a distance of 13m 17m and 20m respectively. In my view, however, Beche Road houses and gardens are too far away and too affected by existing overlooking for the same concern about the Rowlinson Way range to apply. I am of the view that this overlooking issue from the Rowlinson Way range could be addressed by a relatively small amendment to the scheme, but no such amendment has so far been put forward.

#### Visual domination

- 8.22 Having noted the applicants' recent submission of specifications for the photographs and CGIs submitted with the application, I have come to the conclusion that these images, based on a 17mm focal length, rather than the 50mm focal length which is considered to provide a reasonable reflection of the perception of the human eye, underestimate the visual prominence of the key elements in the proposed scheme. Consequently, I am of the view that at the west end of the Newmarket Road range, and the south end of the River Lane range, the dominant visual impact of the proposal on neighbouring occupiers at 2-16 Godesdone Road and 6-16 River Lane would be unacceptable. I do not consider that the issue of visual domination is of concern anywhere else on the site.



## Noise and disturbance

8.23 I note neighbour concerns on this issue. However, given the very busy nature of Newmarket Road, the distance of the building from its neighbours, the fact that student accommodation is not likely to lead to a large number of motor vehicle movements, the positioning of the main entrance on Newmarket Road, and the fact that a relatively low proportion of the student rooms face outwards towards nearby houses, I do not consider that the impacts of noise, movement and light from the building on neighbouring occupiers would be unacceptable. I am also mindful of the fact that the premises could revert to vehicle repair activity, which generates considerable noise, without requiring planning permission. I am of the view that the particular issues associated with pick-up and drop-off at the beginnings and ends of university terms could be addressed by a condition requiring a management plan. I do not consider that the impact of increased pedestrian traffic to Tesco, or additional rubbish would cause significant harm to neighbouring occupiers.

8.24 In my opinion the proposal fails adequately to respect the residential amenity of its neighbours through undue visual domination at 2-16 Godesdone Road and 6-16 River Lane, overshadowing at 6-16 River Lane, and loss of privacy at 33 -39 River Lane and I consider that it conflicts in this respect with Cambridge Local Plan (2006) policies 3/4 and 3/12.

## Amenity for future occupiers of the site

8.25 In my view, the proposed development would be cramped. Recent amendments which enlarge some of the courtyard windows ensure that all rooms would meet BRE guidelines for light, however, and the space available to student occupiers in their rooms would be acceptable. I am disappointed that the proposal does not provide higher standards of light for future occupiers, but I do not consider that the scheme's weakness in this respect provides a reason to refuse the application. This shortcoming is a reflection of the unsatisfactory nature of the courtyard as a whole, which is in my view, too small, too heavily shaded, and insufficiently accessible from ground floor level, as well as having deficiencies in its planting. I have indicated my view that the courtyard is not compliant with policy in paragraphs 8/12 and 8/14 above.

8.26 In my opinion the courtyard shortcomings mean this is not a high-quality living environment and an appropriate standard of residential amenity for future occupiers, and I consider that in this respect it is in conflict with Cambridge Local Plan (2006) policies 3/7 and 3/12.

### **Refuse Arrangements**

8.27 I am of the view that adequate space is provided for the storage of waste and recycling on site. A management plan would be necessary to ensure satisfactory arrangements for collection and retrieval of bins, but this could be addressed by condition.

8.28 In my opinion, subject to such a condition, the proposal is compliant with Cambridge Local Plan (2006) policy 3/12.

### **Highway Safety and the highway network**

8.29 The highway authority has raised issues about the narrowness of the footway at the corner of the site. The authority has also requested additional information relating to existing and future trip generation and a travel plan. Such information has not been supplied and the County Council cannot therefore properly assess the impact the proposal might have on the highway network. In my view it would probably be possible to resolve these issues relatively easily, but at present I cannot be certain that highway impacts would not be acceptable and the proposal is therefore in conflict with policy 8/2 of the Cambridge Local Plan 2006. The highway authority has not raised concerns about the safety of the cycle entrances, nor has the cycling officer. The highway authority has not raised concerns about obstruction from delivery vehicles.

### **Car and Cycle Parking**

8.30 The proposal provides no car parking space on site. It provides disabled parking spaces within the street parking spaces on River Lane. In the view of the Access Officer this is not appropriate. He is also of the view that one disabled parking space should be available for every accessible room – 12 in this case. I acknowledge that the disabled car parking provided in this way is limited. To refuse the application on this basis, however, would rely on the requirement in policy 7/10 to make

appropriate provision for students who are disabled. Policy 7/10 does not define either the quantum or the proximity to rooms which is necessary to make disabled car parking 'appropriate' and in my view such a reason would be difficult to defend. Were the application to be approved, student use of cars could be precluded by a Section 106 agreement, and I do not consider that the application would increase pressure on car parking in the area, which is controlled. Pick-up and drop-off of students at term ends could be controlled by a management plan, secured by condition. The cycling officer has indicated that the cycle parking proposed is adequate.

8.31 In my opinion the proposal is compliant with Cambridge Local Plan (2006) policies 8/6 and 8/10.

### **Third Party Representations**

8.32 I have listed the issues raised below and indicate either the paragraph above where they are addressed, or my assessment of them.

<b>Principle</b>	
Introduces transient population	8.2
Intensity of use	8.2, 8.23, 8.29, 8.30
Wasted opportunity to build houses	8.2
<b>Context and design</b>	
Overlarge scale	8.4-8.8
Too massive	8.4-8.8
Inappropriate development model (Double-banked, pushed to edges of site)	8.8
Unbroken rooflines	8.6-8.8
Sets precedent for harmful development in historic high street	8.6
Not appropriate to mimic scale of buildings south of Newmarket Road	8.6
Not in keeping with conservation area	8.5-8.8
Creates canyon	I do not accept that the scheme would have this impact

Appropriating highway land for cycle parking and bin collection	Only to a very limited degree. Acceptable in my view
No improvement to public realm	No policy basis to require this
<b>Neighbour amenity</b>	
Overlooking	8.21
Overshadowing	8.20
Overshadowing in Godesdone Road	8.20
Plant noise	Condition could address this
Rubbish	8.23
Polluted air funnelled down river Lane	I do not consider there is evidence for this.
Increased pedestrian traffic through housing area to the east	8.23
Loss of privacy – River Lane	River Lane house frontages are already exposed to public view from the street
Noise	8.23 +condition
<b>Amenity for future occupiers</b>	
Not enough leisure space or services for student occupiers	8.12, 8.25
Courtyard overshadowed	8.12, 8.25
<b>Highway issues</b>	
Highway safety issues	8.29
Cycle entrance from Newmarket Road unsafe	8.29
Obstruction from delivery vehicles in River Lane	8.29
Pedestrian safety at risk from narrower pavements	8.29
Highway safety at corner	8.29
Pick-up and drop-off	8.23, 8.30 + condition
Traffic generation	8.30
<b>Car parking</b>	
Contractors parking	condition
Disabled parking	8.30
Pressure on car parking	8.30
<b>Other issues</b>	
Images misleading	8.6

If City Council developed the garage area to the north this would create problems	Civil matter
Impact on local doctors and dentists	No policy basis to use this as reason for refusal
Unsatisfactory disabled access	8.18, 8.19. Not raised by access officer. I
Archaeology	condition

## Planning Obligations

8.33 The Community Infrastructure Levy Regulations 2010 have introduced the requirement for all local authorities to make an assessment of any planning obligation in relation to three tests. If the planning obligation does not pass the tests then it is unlawful. The tests are that the planning obligation must be:

- (a) necessary to make the development acceptable in planning terms;
- (b) directly related to the development; and
- (c) fairly and reasonably related in scale and kind to the development.

8.34 In bringing forward my recommendations in relation to the Planning Obligation for this development I have considered these requirements. The Planning Obligation Strategy (2010) provides a framework for expenditure of financial contributions collected through planning obligations and the Public Art Supplementary Planning Document 2010 addresses requirements in relation to public art. The applicants have indicated their willingness to enter into a S106 planning obligation in accordance with the requirements of the Strategy and relevant Supplementary Planning Documents. The proposed development triggers the requirement for the following community infrastructure:

### Open Space

8.35 The Planning Obligation Strategy requires that all new residential developments contribute to the provision or improvement of public open space, either through provision on site as part of the development or through a financial contribution for use across the city. The proposed development requires a contribution to be made towards open space,

comprising outdoor sports facilities, indoor sports facilities, and informal open space. The total contribution sought has been calculated as follows.

8.36 The application proposes 222 student units, each of which is assumed to be occupied by one person. Contributions to facilities for children and teenagers are not required from such accommodation. The totals required for the new buildings are calculated as follows:

<b>Outdoor sports facilities</b>					
Type of unit	Persons per unit	£ per person	£per unit	Number of such units	Total £
studio	1	238	238	222	52836
1 bed	1.5	238	357		
2-bed	2	238	476		
<b>Total</b>					<b>52836</b>

<b>Indoor sports facilities</b>					
Type of unit	Persons per unit	£ per person	£per unit	Number of such units	Total £
studio	1	269	269	222	59718
1 bed	1.5	269	403.50		
2-bed	2	269	538		
<b>Total</b>					<b>59718</b>

<b>Informal open space</b>					
Type of unit	Persons per unit	£ per person	£per unit	Number of such units	Total £
studio	1	242	242	222	53724
1 bed	1.5	242	363		
2-bed	2	242	484		
<b>Total</b>					<b>53724</b>

8.37 Potential future occupiers of the proposed development might well attend institutions which already provide sufficient open space and facilities in these categories. Were this to be ensured through a Section 106 agreement, the contributions required in

one or more of the above categories might be significantly reduced or eliminated. Without an agreement, however, it must be assumed that the full contributions listed above would be required. In the absence of a S106 planning obligation to secure the requirements of the Planning Obligation Strategy (2010) and in accordance with the Cambridge City Council Open Space Standards Guidance for Interpretation and Implementation (2010), the proposal is in conflict with Cambridge Local Plan (2006) policies 3/8 and 10/1 and the Planning Obligation Strategy 2010 and the Cambridge City Council Open Space Standards Guidance for Interpretation and Implementation (2010).

### Waste

- 8.38 The Planning Obligation Strategy (2010) requires that all new residential developments contribute to the provision of household waste and recycling receptacles on a per dwelling basis. I am awaiting advice from the Waste and Street Services Strategy Manager on the contribution level that is required.
- 8.39 In the absence of a S106 planning obligation to secure the requirements of the Planning Obligation Strategy (2010), the proposal is in conflict with Cambridge Local Plan (2006) policies 3/7, 3/12 and 10/1 and the Planning Obligation Strategy 2010.

### Public Art

- 8.40 The development is required to make provision for public art and officers have recommended as set out in paragraph 8.15 above that in this case a commuted public art payment to the S106 Public Art Initiative is appropriate. This commuted sum needs to be secured by the S106 planning obligation.
- 8.41 In the absence of a S106 planning obligation to secure this infrastructure provision, the proposal is contrary Cambridge Local Plan (2006) policies 3/7 and 10/1 and the Public Art SPD 2010.

### Monitoring

- 8.42 The Planning Obligation Strategy (2010) requires that all new developments contribute to the costs of monitoring the implementation of planning obligations. It was agreed at

Development Plans Scrutiny Sub- Committee on 25 March 2014 that from 1 April 2014 monitoring fees for all financial and non-financial planning obligations will be 5% of the total value of those financial contributions (up to a maximum of £50,000) with the exception of large scale developments when monitoring costs will be agreed by negotiation. The County Council also requires a monitoring charge to be paid for County obligations in accordance with current County policy

- 8.43 For this application a monitoring fee of £8313 plus the monitoring costs for waste storage is required to cover monitoring of Council obligations plus the County Council monitoring fee and the monitoring fee associated with the provision of public art.

#### Planning Obligations Conclusion

- 8.44 It is my view that the planning obligation is necessary, directly related to the development and fairly and reasonably in scale and kind to the development and therefore the Planning Obligation passes the tests set by the Community Infrastructure Levy Regulations 2010.

### **9.0 CONCLUSION**

- 9.1 In my view the principle of student accommodation on this site is acceptable. The present scheme is an improvement on that previously withdrawn, and has been further improved by the amendments.
- 9.2 However, it has become clear in the course of considering the application, that the incompatibility of the scheme's height and mass with its sensitive context, the extent to which the internal spaces of the scheme itself and neighbouring properties are overshadowed, and the uncertainty surrounding deliverability of street trees are significant deficiencies which must lead to a recommendation of refusal.

### **10.0 RECOMMENDATION**

**REFUSE** for the following reasons:



In the event that the application is refused, and an Appeal is lodged against the decision to refuse this application, delegated authority is sought to allow officers to negotiate and complete the Planning Obligation required in connection with this development

1. Because of its height, unbroken length and poorly articulated roofline, the Newmarket Road range of the building would be poorly integrated into the locality, reading discordantly against the prevailing character on the north side of this road, creating an uncomfortable discontinuity of scale against the Corner House public house at its eastern end, and causing an unacceptable sense of visual domination for occupiers of houses on the east side of Godesdone Road. The application lacks the robust computer modelling necessary to support its claim that a full four-storey height on Newmarket Road and River Lane would not have a harmful impact on the surrounding context, and would be contrary to the Eastern Gate SPD, policies 3/4, and 3/12 of the Cambridge Local Plan 2006, and government guidance on good design in Section 7 of the National Planning Policy Framework 2012.
2. Because of its height, limited articulation, and position hard up against the back of a narrow footway on River Lane, the eastern range of the building would overwhelm the houses on the opposite side of River Lane, overshadowing and visually dominating them to an unacceptable degree, contrary to policies 3/4 and 3/12 of the Cambridge Local Plan 2006 and government guidance on good design in Section 7 of the National Planning Policy Framework 2012.
3. The limited articulation, and particularly the largely unbroken horizontal form, of the northern Rowlinson Way range and the western 'pavilion' building would create a sense of overbearing bulk which would not respect the character of surrounding buildings in Godesdone Road, River Lane and Beche Road, would be poorly integrated with the locality, and would detract from the character of the Riverside section of City of Cambridge Conservation Area No.1 (Central), contrary to policies 3/1, 3/4, 3/12 and 4/11 of the Cambridge Local Plan 2006, and government guidance on good design and conserving the historic environment in Sections 7 and 12 of the National Planning Policy Framework 2012.

4. The proposed basement courtyard would be heavily shaded because of the scale and massing of the proposed buildings, and would be poorly related to the communal functions of the building at street level. The application also fails to demonstrate that adequate drainage and appropriate tree planting can be reconciled in the courtyard. For these reasons, the landscape design would be poorly related to the function of the building and would not create outdoor space which is usable, safe and enjoyable, contrary to policies 3/7 and 3/11 of the Cambridge Local Plan 2006 and government guidance on good design in Section 7 of the National Planning Policy Framework 2012.
5. The application fails to demonstrate the deliverability within River Lane of street trees of sufficient scale to enable the eastern range of the building to be well-integrated into the locality and the Riverside section of City of Cambridge Conservation Area No.1 (Central), contrary to policies 3/1, 3/4, 3/11, 3/12, 4/4 and 4/11 of the Cambridge Local Plan 2006, and government guidance on good design and conserving the historic environment in Sections 7 and 12 of the National Planning Policy Framework 2012.
6. The evidence submitted with the application is insufficient to demonstrate that the proposal would not have a harmful impact on the highway network or highway safety, contrary to policies 8/2 and 8/3 of the Cambridge Local Plan 2006 and government guidance in Section 4 of the National Planning Policy Framework 2012.
7. Occupancy of the speculative purpose-built student accommodation proposed is not limited to full-time students of the University of Cambridge or Anglia Ruskin University, nor do management arrangements exist to ensure occupiers do not keep cars in the city, nor could it be guaranteed that this location is suitably close to the educational institution involved. These issues render the proposal contrary to policy 7/10 of the Cambridge Local Plan 2006.

8. The proposed development does not make appropriate provision for open space and sports facilities, waste facilities, public art and monitoring in accordance with Cambridge Local Plan 2006 policies 3/7, 3/8, 3/12 and 10/1, and as detailed in the Planning Obligation Strategy 2010, Public Art SPD and the Open Space Standards Guidance for Interpretation and Implementation 2010.