

<b>Application Number</b>	17/1484/OUT	<b>Agenda Item</b>	
<b>Date Received</b>	22nd August 2017	<b>Officer</b>	Adam Bridgeman
<b>Target Date</b>	21st November 2017		
<b>Ward</b>	Abbey		
<b>Site</b>	Land Adjacent To Barnwell Lake Newmarket Road Cambridge		
<b>Proposal</b>	The erection of a cycle-themed cafe and shop along with associated infrastructure including car and cycle parking and new internal roads.		
<b>Applicant</b>	Barnwell Lake Cafe Ltd		

<p>SUMMARY</p>	<p>The development does not accord with the Development Plan for the following reasons:</p> <ol style="list-style-type: none"> <li>1) The proposal is inappropriate development, will result in significant visual harm and conflicts with the purposes of including land in the Green Belt. There are no very special circumstances which outweigh the harm.</li> <li>2) The proposal would lead to the loss Protected Open Space contrary to Local Plan Policy 4/2.</li> <li>3) The development is an A3 use outside of an existing local centre which is not supported by Local Plan policy 6/10.</li> <li>4) Highway Safety, flood risk and ecology issues are all unresolved giving rise to significant harm and form additional reasons for refusal.</li> </ol>
<p>RECOMMENDATION</p>	<p>REFUSAL</p>

**1.0 BACKGROUND**

1.1 Planning application C/88/0593 for the erection of a restaurant and dance floor with associated car parking and lakeside improvements was refused on 9 August 1989. The reasons for refusal were that the application was contrary to policies in the Romsey Local Plan and the Cambridgeshire County Council

Replacement Structure Plan, in respect of development in green belt. Reasons also included road safety problems, residential amenity, visual and landscape impacts, biodiversity impacts.

- 1.2 Planning application C/93/0242 was approved on 2 August 1993 for the formation and stabilisation of banks to Barnwell Lake, provision of fishing platforms and steps, improvement of access, footpaths and parking area, and erection of a shelter. This application provided for much of the existing infrastructure on the site as it exists, being the carpark and platforms, as well as the general form of the lake, including planting and bank stabilisation.
- 1.3 Outline planning permission C/5007/16/CC was approved on 19 July 2017 for phase 1 of the Chisholm Trail (The Trail). The Trail has been approved to traverse the site, entering through an underpass approximately halfway along the northern boundary of the site and Newmarket Road. The Trail will exit the site at the south east corner of the redline boundary, at the north east corner of Barnwell Lake. The Trail development proposes to use the site for temporary storage as a site compound for the construction of the Newmarket Road underpass, as well as the Trail Phase 1 linking Newmarket Road underpass to Coldhams Common. The construction work main site compound is located between Ditton Walk and Ditton Meadows. The Trail is yet to be commenced.

## **2.0 SITE DESCRIPTION/AREA CONTEXT**

- 2.1 The proposed site is 0.72ha, bounded by the railway line to the west, Barnwell Lake to the south, Abbey Stadium to the east and Newmarket Road to the north
- 2.2 Access onto the existing site is from Newmarket Road, through an existing driveway to a car park, with a walkway to the lake, all made of permeable gravel. The site declines from Newmarket Road to the Barnwell Pit Lake. A drain to the east of the site forms the eastern extent of the redline boundary, establishing a separation between Coldhams Common and the proposed development site. The area is currently a mixture of grassland and hedgerow vegetation.
- 2.3 Coldhams Common public open space is to the south of the site, which also extends along the east of the site to Newmarket

Road. The Elfleda Road Allotments and Abbey Stadium are located to the east of the proposal site.

- 2.4 Immediately across Newmarket Road, Barnwell Junction Pasture and Disused Railway extends approximately 400 metres north. To the south west corner of this area is the Chapel of St Mary Magdalene and Stourbridge Chapel, known as the Leper Chapel, which is a Grade I listed building. Ditton Meadows and Stourbridge Common, of which are both public open spaces, are located further north of Barnwell Junction Pasture and disused railway.
- 2.5 In respect of the existing built form adjoining the site, the Abbey Stadium and associated buildings and infrastructure makes up the eastern extent of the open space. A strip of Coldhams Common provides a buffer between the red line boundary and the stadium. To the west, the railway line provides a buffer between the site and the western industry and retail buildings. Across Newmarket Road to the north east and north west are a mix of residential dwellings, retail and industrial buildings. To the south of Barnwell Lake, off Coldhams Road, are industrial buildings.
- 2.6 The proposed area for development is within land designated as Green Belt under the Cambridge Local Plan 2006 and emerging Local Plan 2014. The application site is also designated as a Site of Local Nature Conservation Importance and Protected Open Space. The site is partially within the flood plain within Flood Zones 1, 2 and 3.
- 2.7 The site was identified as 'private protected open space' within the Open Space and Recreation Strategy 2011 and is considered to have environmental and recreational importance. The site is identified within the Cambridge City Wildlife Site Survey 2005, with the survey recognising that a range of biodiversity is on the site.

### **3.0 THE PROPOSAL**

- 3.1 The outline planning permission proposes the erection of an A3 unit described as a 'cycle themed café', shop and repair facility with associated infrastructure including car and cycle parking, new internal roads and landscaping.

- 3.2 The detailed information of the application seeks permission for the access only. All other matters are reserved for subsequent approval.
- 3.3 Vehicular access for servicing and visitor car parking is proposed to utilise the existing access point on Newmarket Road. At this stage, car parking is shown to the east of the site, expanding on the existing car park area. The servicing lane is shown to extend adjacent to Newmarket Road, along the northern boundary of the site. A service area is proposed to adjoin the café building in the north west corner of the site.
- 3.4 Bicycle access is proposed to be serviced by the recently approved Chisholm Trail route by an underpass beneath Newmarket Road. Access is also proposed to enter the redline site approximately 77 metres south of Newmarket Road, in close proximity to the south east corner of the redline site.
- 3.5 Bicycle parking for 100 cycles is proposed to be located to the immediate east of the café.
- 3.6 30 Car parking spaces are intended at the eastern side of the site beyond the proposed Chisholm Trail. (The indicative layout plan shows 32 car parking spaces).
- 3.7 The application proposes a single building along the west (extending towards the north west corner) of the redline site, with a portion of the building located within the Barnwell Lake, consisting of the following floor area:

<b>Use</b>	<b>Maximum amount (Sq m)</b>
Cafe and kitchen (Use Class A3)	354
Cycle shop and repair (Use Class A1)	105
WC's/plant	49
<b>Total</b>	<b>508</b>

- 3.8 The terrace area, decking and walkway along the building accounts for an additional 212m<sup>2</sup> which was not accounted for in the application for the building floor area.

3.9 The proposed hardstanding areas, being the service yard, access road, carparks 1 and 2 and the access road are calculated below as shown on proposed plan:

<b>Use</b>	<b>Approximate Maximum amount (Sq m)</b>
Car park (cumulative)	675
Access Road	460
Service Yard	155
Cycle parking	190
<b>Total</b>	<b>1480</b>

3.10 Overall, the proposed building, decking and infrastructure accumulate to 2200m<sup>2</sup> of floor area or hard standing area over the site.

3.11 A picnic and play area is proposed in the planning statement, however, this is not shown on the proposal plan.

3.12 The application suggests entering into agreement to deliver of the Café proposal in tandem with the Chisholm Trail.

3.13 The application is accompanied by the following documents:

- Design and Access Statement
- Transport Assessment Parts 1 – 5 (Inclusive)
- Planning Statement August 2017
- Ground Conditions Report 1 – 3 (Inclusive)
- Flood Risk Assessment
- Ecology Report
- Indicative Plans and Sections

3.14 An environmental impact assessment was undertaken on 25 September 2017. A negative screening opinion was adopted by CCC, which confirmed the proposal was not considered to be EIA development.

#### 4.0 SITE HISTORY

Reference	Description	Outcome
C/88/0593	Erection of restaurant and dance floor with associated car parking and lakeside improvements (amended by letter and drawings 11/01/88 and letter dated 31/07/89 and accompanying drawings).	Refused 9 Aug 1989
C/93/0242	Formation and stabilisation of banks to lake, provision of fishing platforms and steps, improvement of access, footpaths and parking area, erection of shelter to include provision for disabled persons, and landscaping.	Approved with conditions 2 Aug 1993
C/5007/16/CC	Phase 1 of the Chisholm Trail, a north-south pedestrian and cycle path from the River Cam to Coldham's Lane broadly parallel to the railway line. Including new underpass under Newmarket Road, bridge across Coldham's Brook, replacing culvert with bridge on Coldham's Common, new paths and improvements to existing paths.	Approved with conditions 19 July 2017

15/5418/PREAPP Pre application discussion Response  
 between the consultant made 29  
 Carter Jonas and February 2016  
 Cambridge City Council  
 (CCC) for the submitted  
 proposal.

## 5.0 PUBLICITY

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

## 6.0 POLICY

6.1 Relevant Development Plan policies:

PLAN	POLICY NUMBER
Cambridge Local Plan 2006	3/1 Sustainable Development 3/2 Setting of the City 3/3 Safeguarding Environmental Character 3/4 Responding to Context 3/6 Ensuring Coordinated Development 3/7 Creating Successful Places 3/9 Watercourses and Other Bodies of Water 3/11 The Design of External Spaces 3/12 The Design of New Buildings 4/1 Green Belt 4/2 Protection of Open Space 4/3 Safeguarding Features of Amenity or Nature Conservation Value 4/6 Protection of Sites of Local Nature Conservation Importance 4/13 Pollution and Amenity 4/15 Lighting 8/2 Transport impact 8/4 Walking and Cycling Accessibility 8/5 Pedestrian and Cycle Network 8/6 Cycle Parking 8/9 Commercial Vehicles and Servicing 8/10 Off-Street Car Parking

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

Central Government Guidance	National Planning Policy Framework March 2012 National Planning Policy Framework – Planning Practice Guidance March 2014
Supplementary Planning Guidance	Sustainable Design and Construction (May 2007)
Material Considerations	<p><u>City Wide Guidance</u></p> <p>Cambridge Landscape and Character Assessment (2003)</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Identifies the proposal site as a green finger and corridor.</li> </ul> <p>Cambridge City Wildlife Sites Register (2005) &amp; Criteria for the Designation of Wildlife Sites (2005)</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Barnwell Pit Site H6.1 – Identified as City Wildlife Site</li> </ul> <p>Green Infrastructure Strategy for the Cambridgeshire Sub-Region (2006)</p> <p>Cambridge City Council (2011) - Open Space and Recreation Strategy</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Barnwell Pit (Lake) Site Nat 08, identified as having environmental and recreational importance</li> </ul>
	<p><u>Area Guidelines</u></p> <p>Mill Road Area Conservation Area Appraisal (2011)</p> <p>Newmarket Road Suburbs and Approaches Study (October 2011)</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Site within Character Area 1</li> </ul>

## 6.3 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, only the following policy is considered relevant:

- Policy 4: The Cambridge Green Belt

## **7.0 CONSULTATIONS**

### **Policy Officer**

- 7.1 It is confirmed the site can be considered under Paragraph 89 of the NPPF, however the Policy Team conclude that the proposal is not an appropriate facility for outdoor sport and outdoor recreation. The proposal is not necessary for the function of the Chisholm Trail, with cafes and a cycle repair shop being located along Chisholm Trail or in an appropriate proximity to the site.

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

- 7.2 Objection. The increase in deliveries and the proposed 30 car parking spaces will attract further car driver trips on Newmarket Road.
- 7.3 The trip generation methodology is not considered robust and further details of new and linked trips is needed.
- 7.4 There are concerns about the excess in car parking off a network known to experience congestion. Too many spaces would encourage vehicle based trips to the café and would further intensify use of the access onto Newmarket Road. Enforcement options would need to be discussed to prevent people from using the car parking to commute into the City.

- 7.5 It was considered that improvements needed to surrounding pedestrian and cycle infrastructure should be identified, if the proposals are to be occupied prior to the Chisholm Trail opening.
- 7.6 Demand in respect of the development traffic requires further justification and consideration before County can comment on this matter.

### **Environmental Health**

- 7.7 The proposal is acceptable, subject to conditions to control construction/demolition/delivery noise/hours, and noise/vibration from construction. Also commented on lighting, and considers a lighting assessment should be undertaken as per a condition. The response also notes that there is potential for contaminated land to be found at the site, owing to the proximity to the railway line and duration that this line has been present. A condition to address unexpected contamination if found is recommended, alongside a Materials Management Plan.
- 7.8 There was no objection in respect to air quality, given the site is outside the air quality management area and the prediction of 275 vehicle trips per day. An odour control has been recommended for the café.

### **Urban Design and Conservation Team**

- 7.9 The Urban Design Team objected to the proposal, determining the detail provided delivers little guarantee about the final design which is inappropriate considering the site sensitivity. The car parking is considered excessive.

### **Cambridge City Council Landscape Team**

- 7.10 Cambridge City Council Landscape Team object to the proposal. The hard surfacing, including carpark, would cause significant harm to openness of greenbelt, with the site being 2 thirds of the width of the Greenbelt. There would be a loss of the unique character of Newmarket Road gateway. Buildings on site would not be consistent with the built form within the area, given the buffers being the railway line, Newmarket Road and Coldhams Common.

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

- 7.11 Considers the proposal acceptable given there are no principle sustainable construction issues which could not be overcome by design in later phases of development. It was noted that the building is too small for any of CCC policies on sustainability to apply (it needs to be over 1,000m<sup>2</sup> for the renewables policy to apply for example). A sustainability statement would be required at a later stage to be discussed at reserved matters stage.

### **Access Officer**

- 7.12 The Access Officer supports the application, given the proposal will encourage disabled use of the Leper Chapel. Further detail of the development could be delivered with reserved matters.

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

- 7.13 There was insufficient arboricultural information submitted with the application to allow assessment. An arboricultural impact assessment would be required to assess the application.

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

- 7.14 Considers the proposal acceptable, with the location likely to encourage users to walk and cycle to the development and to the nearby Leper Chapel. The officer considered the café and cycle repair will add to facilities in the area and will enhance the Chisholm Trail and Leper Chapel.
- 7.15 The cycle provision appears good although there are no details of type of rack or spacing.

### **Cambridgeshire County Council (CCC) Flood & Water (Lead Local Flood Authority (LLFA))**

- 7.16 Holding objection based on the flood plain compensation in relation to the approved Chisholm Trail project.
- 7.17 The proposed use of below ground attenuation is acceptable with the LLFA suggesting that the applicant considers including above ground SuDS in order to provide further water quality,

amenity and biodiversity benefits. Above ground SuDs are also preferable in terms of maintenance requirements.

### **Head of Streets and Open Spaces (Sustainable Drainage Officer)**

7.18 Object. The proposal is within Flood Zone 3 and no floodplain compensation was provided for as part of the application. The site is proposed to be used for flood compensation for the Chisholm Trail.

### **Head of Streets and Open Spaces (Biodiversity Officer)**

7.19 Refusal recommended. The site is a City Wildlife Site and is already subject to unfulfilled ecological mitigation through the Chisholm Trail permission. It is unclear from the proposal how this mitigation and the design of the development will interact to protect or enhance the City Wildlife Site.

7.20 Based on the limited information supplied, the proposal is likely to be detrimental to the City Wildlife Site. The application would be contrary to Cambridge Local Plan 2006 policy 4/6, emerging policies 69 and 70 of the draft Cambridge Local Plan and national planning policies (Paragraph 109, 117 and 118).

### **Historic England**

7.21 No comments on the application, referring the comment to CCC specialist. Historic England does not wish to offer further comment unless there is material change to proposal.

### **Natural England**

7.22 No comments.

### **Environment Agency**

7.23 Object. The Environment Agency objects to the proposal, determining the proposed flood risk assessment (FRA) does not appropriately define the flood risk to the site and provide sufficient floodplain mitigation for the impacts of the site.

7.24 In respect of groundwater and contamination, the response considers the application acceptable with the imposition of

conditions to manage contamination foul water and surface water pollution.

### **Cambridge Past, Present, Future**

- 7.25 Cambridge Past, Present, Future objects to the proposal determining there is insufficient information to assess harm on green belt. Agrees with Wildlife Trust about ecological concerns regarding inappropriate scale and massing in this area and excessive hard standing area. It is questioned whether there is a business case to have café/ shop.

### **Anglian Water**

- 7.26 Anglian Water confirmed that the wastewater and foul sewerage both have capacity. Surface water disposal does not relate to Anglian Water functions as proposed. The applicant would need to apply to Anglian Water to discharge of trade effluent. This would form a condition of consent. Overall, Anglian Water do not raise any issues that could not be managed by conditions of consent or by through detailed design at a later stage.

### **Network Rail**

- 7.27 No comment received.

### **Cambridgeshire Constabulary (Designing Out Crime Officer)**

- 7.28 The officer noted that there is no crime prevention strategy at this time. There is also suggestion that there will be bollard lighting within the car parking area, with bollard lighting only good for wayfinding. The tunnel (underpass) was also a concern to the officer in respect of lighting and natural surveillance.

### **Wildlife Trust**

- 7.29 Object. The proposal will result in the net loss of biodiversity. The development site is within Barnwell Pit City Wildlife Site (CiWS), a site which supports a mosaic of locally important habitats, with the application showing a large proportion of the development area as buildings, hard standing, access tracks, and car and cycle parking. The application mentions the enhancement of the site with new wildflower grassland and

native scrub planting. No detail is provided to support this information.

- 7.30 Part of the site is already included for mitigation for the Chisholm Trail. It is unclear how this will tie in with the proposal.

### **Developer Contributions Monitoring Unit**

- 7.31 No specific S106 financial contributions required under the Council's Planning Obligation Strategy SPD 2010.

### **Conclusion**

- 7.32 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.

### **REPRESENTATIONS**

- 7.33 The owners/occupiers of the following addresses have made representations:

- 529D Newmarket Road
- 529F Newmarket Road
- 542 Newmarket Road
- 7 Heffer Close, Stapleford
- 101 Coldhams Lane
- 45 St Bedes Crescent
- 17 Cromwell Road
- The Bike Depot, 140 Cowley Road
- 73 Brampton Road
- 2 Ventures Farm Court
- 72 Newmarket Road
- Station Lodge Barnwell Junction, Newmarket Road
- 54 Greville Road
- 57 Catherine Street
- 141 Flamstead Close
- 193 Coleridge Road
- 2 Plantation Ave
- 3 Heron's Close
- Flat 4, Ferndale House, Ferndale Rise
- 2 Heron's Close
- 27 Mingle Lane, Stapleford
- 52 William Smith Close

- 23 Cockburn Street
- 1 The Lakes, Twenty Pence Road, Cottenham
- Units 5-6 Brickyard Estate, Coldhams Road
- 2 Bolts Hill
- Unit 7 Brickyard Estate, Coldhams Road
- 37 Glemere Close
- 43 Cromwell Road
- 15 Lemur Drive
- 7 Earl Street
- 81 Kinross Road
- 55 Hills Ave
- 125 Suez Road
- 55 Ellands Way
- 588 Newmarket Road
- 19 Claygate Road
- 66 Holbrook Road
- 5 Hereward Close
- 537 Newmarket Road
- 58 Impala Drive
- 233 Chesterton Road
- 17 Rutherford Road

Four representations were either from the same address or had the same wording:

- 4 Ditton Lane
- 594 Newmarket Road

7.34 40 comments were received in support of the application and are summarised as follows:

- The café will provide leisure facilities for Coldhams Common, Ditton Meadows and the Leper Chapel (with adjacent pastures).
- In line with NPPF for protecting greenbelt.
- Improvement of 'damaged and derelict land' will result.
- Chisholm Trail will benefit from toilet facilities and refreshments.
- The scheme will be accessible for disabled people.
- The site would be improved at no cost to rate payer.
- The fishing platforms have been vandalised and undesirables mainly use the area.
- Without the scheme the Chisholm Trail will lack appropriate lighting.

- Will provide a food establishment for local businesses.
- The building appears invisible with the green roof and location.
- Providing a café here would ensure future developments of flats and retail could not be built onsite.

7.35 Twelve comments were received objecting to the application and are summarised as follows:

- Loss of green area.
- The Chisholm Café proposal will damage the site biodiversity.
- Loss of habitat for biodiversity.
- Impact of increased traffic on Newmarket Road.
- Objecting to the need for so many car parks.
- Inappropriate scale and massing in this area.
- Insufficient information to assess harm on green belt
- Contrary to local policy.
- Predicates sustainability and access on delivery of Chisholm Trail.
- Effects on landscape, trees, heritage impacts, loss of common land.
- Secondary ancillary development effects in particular the lack of visibility splays, safety lighting, drainage and any stabilisation of underwater banks within the pits.

7.36 Two comments were received not objecting or supporting the application and are summarised as follows:

- Concern along Newmarket for traffic.
- How would the car park be monitored.
- The car parking provision is excessive.
- There is no justification for the retail unit and what would be the strategy if café fails and buildings left unattended.
- The café would help reduce fly-tipping.

7.37 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 application, 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. Highway Safety
4. Amenity
5. Ecology
6. Renewable energy and sustainability
7. Car and Cycle Parking
8. Refuse Arrangements
9. Disabled Access
10. Public Art
11. Third party representations

### **Principle of Development**

#### Green Belt

8.2 The essential characteristics of Green Belts are their openness and permanence as set out in the NPPF paragraph 79. Inappropriate development is by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

8.3 New buildings for 'outdoor sports and outdoor recreation facilities' are within the scope of what can be considered as an exception to inappropriate development. The NPPF states in Paragraph 89 that development in the Green Belt is not considered acceptable unless the new building is considered an *appropriate facility* for outdoor sport and outdoor recreation. The facility also needs to preserve the openness of the green belt and not conflict with the purposes of including land within it.

#### Appropriateness

8.4 The applicant argues that the proposal is an appropriate facility for outdoor sport and outdoor recreation as considered against Paragraph 89 of the NPPF. In coming to this judgement, the applicant references the case law *Timmins v Gedling Borough Council 22/1/2015*, where the interpretation Paragraphs 89 and

90 of the NPPF should now be treated as *closed lists* of appropriate forms of development within the Green Belt. The applicant determines that within the case law, appropriate facilities for outdoor sport and outdoor recreation can be considered within the *closed list* under Paragraph 89.

- 8.5 The applicant presents 2 reasons justifying appropriateness. Firstly, that the building is constructed in an area of open space currently used by the fishing club. Secondly, that the new building would serve users of the 'recreational land and facilities including the Chisholm Trail'. Officers do not agree the proposed A3 building is an appropriate facility for either the use of the lake for fishing or the Chisholm Trail. This is because an A3 café of this scale is not necessary for the functioning of either use.
- 8.6 The application must be considered on the basis of an A3 use (which could include ancillary hot food takeaway). The 'cycle themed' aspiration is not within the control of the planning process. Any application for signage would need to be submitted separately under the Advertisement Regulations. The use, size and scale of the building, access road, car and cycle parking are vastly disproportionate in scale to the outdoor recreation uses it is purported to support. The A3 café in the indicative layout is isolated from the actual route of the Chisholm Trail (25m distant), which does not support the assertion it will meet the needs of future users of the Chisholm Trail. There is no justification for a new A3 unit in the Green Belt on the basis of outdoor sport and recreation.
- 8.7 None of the proposed facilities are necessary to ensure the operation of the Chisholm Trail, which was granted planning permission independent of the application proposal. The Chisholm Trail is an approved scheme running through the site, but which has a very different use and function to the proposed café and car parking. The Chisholm Trail is a new local cycle link to connect the new Cambridge North Station with Cambridge Station. It is not part of a more extensive cycle tourism route where there might be a need to provide facilities in a rural area. The site is very close to the City Centre and the Beehive retail park where there are food outlets, cycle shops and car parking.

- 8.8 Over half of the proposed development is to facilitate car parking, which is directly in conflict with the use and function of the Chisholm Trail that it is purported to facilitate. It is by definition an inappropriate development. It is neither reasonably proportionate to, nor functionally related to the Chisholm Trail. The application proposal would erode the vulnerable green belt wedge, through the proposed building, car parking and other paraphernalia, the primary function of which is to check the unrestricted sprawl of Cambridge. The proposal is in direct conflict therefore with the purposes of including land within Green Belt, contrary to paragraph 80 of NPPF and Cambridge Local Plan 2006 policy 4/1.
- 8.9 The applicant also refers to proposed car parking to help people access the Leper Chapel. However the underpass will be delivered through the Chisholm Trail permission and not the application proposal. Once the underpass is delivered, it is likely that the link from the Leper Chapel to the existing car park will be established and available without the delivery of additional car parking. Cambridge Past Present and Future, stewards of the Leper Chapel, do not support the application proposal. No management strategy for increasing opening hours or access to the Leper Chapel has been put forward by the applicant. This contributes to the overall officer view that little or no weight can be placed on this argument.
- 8.10 In summary the proposed buildings and associated infrastructure is not an appropriate facility for outdoor sport and outdoor recreation and is in conflict with the purposes of including land within the Green Belt. Whilst it is noted the application seeks outline permission only, the principle of a café and the quantum of development assessed in the Transport Assessment is inappropriate and in direct conflict with the purposes of including land within the Green Belt.

### Openness

- 8.11 The second test of Paragraph 89 of the NPPF is whether the facility preserves the openness of the Green Belt and does not conflict with the purposes of including land within it.
- 8.12 Within the previously dismissed appeal decision for a similar development on this site (C/88/0593), the inspector gave

considerable weight to this parcel of land and made clear the openness and purpose in maintaining the area as green belt:

*“6. Visually the appeal site is very much part of the Coldhams Common Open Space. This open space provides a very attractive break between the main built up part of Cambridge to the west of the railway and East Barnwell to the east. I consider that a particularly important part of this break is the narrow neck of undeveloped land, including the appeal site, to the south of the Newmarket Road, which can be seen easily by persons using that Highway.*

- 8.13 Notwithstanding the age of this appeal decision, officers share the view that one of the elements of the unique character of Cambridge is the existence of ‘green wedges’ extending into the city and that Coldhams Common can be regarded as such a green wedge. Officers consider this assessment remains relevant, particularly in setting the context of the site and the importance of preserving the site as an open space area of Green Belt.
- 8.14 The significance of this site as a key green buffer along Newmarket Road is evident within the Newmarket Road Suburbs and Approaches Study (October 2011). The road is identified as having historical significance for the city. The site is identified as a green buffer between the suburban character of the road to the east and the railway line and retail-led character of the road as it turns towards the City Centre. The site is also identified as a glimpse of the former rural landscape in the area.
- 8.15 The visual impact of the proposal and its impact on the setting of the common is likely to be significant viewed south from Newmarket Road. The proposed service yard will cut into the existing bank of vegetation adjacent to Newmarket Road which will result in tree losses and views of the building and associated development. A proper Arboricultural Impact Assessment has not been submitted which makes a full assessment of visual impact from the existing boundary more difficult. Notwithstanding, there will be very little space for supplementary planting. As a result the development will result in a continuation of urban sprawl over the railway line, which is the primary function of Green Belts to prevent happening.

- 8.16 Although the one storey building will be located in the north west corner close to the railway and Newmarket Road, the mass of the building in the location and context of the Green Belt in this site, along with extent of the proposed car parking and cycle parking will considerably impact on openness. Officers acknowledge some steps have been taken to mitigate the extent of the building, by proposing the building in the far north west corner, but it would still significantly erode openness both from the Newmarket Road vista and from the common. This will be exacerbated by the removal of some trees to facilitate the Chisholm Trail underpass and route through the common.
- 8.17 The perspective views provided in the design and access statement show the building to be difficult to view from Newmarket Road, however the one view provided from the road is limited to the railway bridge and is reliant on the existing vegetation remaining. Considering that structural planting parallel to Newmarket Road is shown in the provided plans and is likely, given the topography, to provide for the access road and service yard, existing vegetation along the northern boundary would likely need to be removed, exposing the main trunk views of Newmarket Road to the proposed buildings and car parks.
- 8.18 Notwithstanding the precise details of the landscape scheme and any supplementary planting, the presence of the development is likely to be evident to persons walking and cycling in the common. The development would clearly reduce the effectiveness of the 'green wedge' in an important position close to the main road. This would cause material harm to the Green Belt objective of preserving the unique character of Cambridge. Development in the neck of open land between East Barnwell and Cambridge and would cause prejudice to the objectives of containing the urban growth of Cambridge, maintaining its present setting, and preventing communities in its environments from merging into one another.
- 8.19 The proposed built form, including hard surfaces will not preserve the openness of the green belt in this area. Taking the wider site context into account, the Green Belt is approximately 150 metres wide at this point, with the proposed redline boundary 95 metres wide. The proposed mass is some 508<sup>sq</sup> m floor space for the café, shop and toilets building, with car

parking and other hard surfaces. The hard surfacing, including carpark, would cause significant harm to openness of greenbelt, with the site being 2 thirds of the width of the site frontage 'green wedge'. The building cannot be considered in isolation, where the cumulative infrastructure of the car parking, cycle parking, access road and service yard is considered to add to the proposed built form.

8.20 Users of Barnwell Lake and Coldhams Common will also be impacted upon by the proposal, whereby the northern area of the lake open space will effectively be replaced by built structure, whether it is the café or extension of car parks. Taking into account the perspective view from the southern area of the lake looking north in the Design and Access Statement, it is clear that this building is the only visible built form in the northern area of the site.

8.21 In summary, given the context, the green belt wedge is integral in providing an open area and delineation between the Abbey Ward and the Cambridge East area, while also maintaining the Green Belt link between the northern Fen Ditton and Coldhams Common Public Open Space areas. Officers consider that the openness and purpose of the green belt is not preserved by this proposal and the proposal is contrary to Paragraph 87, 88 and 89 of the NPPF and Cambridge Local Plan 2006 policy 4/1.

#### Very Special Circumstances

8.22 The applicant puts forward three very special circumstances should officers consider the proposal to be 'inappropriate development'.

8.23 Firstly, the applicant considers that the building would 'support' recreational activities in conjunction with the delivery of the Chisholm Trail. The applicant considers the café will be a key facility to enhance and support the use of the Chisholm Trail, which itself is a key piece of infrastructure for the purposes of transport and recreation. As set out in paragraph 8.7, the Chisholm Trail application did not consider the proposed café to be 'a key facility' and it was approved in its absence. This does not amount to very special circumstances.

8.24 The 'cycle repair and toilet' service facilities are not reasonably necessary in this Green Belt location. The site is in close

proximity to nearby amenities, including food establishments and cycle repair shops. A cycle repair facility is located at Halfords, within the Cambridge Retail Park on Newmarket Road, approximately 600 metres from the Chisholm Trail. Cafes and toilets are located at the Cambridge Train Station and on Mill Road, approximately 2 km south along the Chisholm Trail. It is also not unrealistic to expect a café and cycle repair facility to become available at the Cambridge North Railway Station, approximately 1.2 km north of the site along the Chisholm Trail. The provision of these facilities as part of the application proposal does not amount to 'very special circumstances'.

- 8.25 Secondly, the applicant argues the Chisholm Trail is contingent on the landowner being in a position to allow public access to the site and for the trail to run through it. This is a land assembly issue for the Chisholm Trail project and does not amount to very special circumstances to justify inappropriate development.
- 8.26 Thirdly, the applicant considers the low impact design of the building would safeguard the fundamental purpose of the Green Belt and would be barely visible. Officers do not agree for the reasons set out from paragraph 8.11.
- 8.27 Although the applicant considers the proposal 'appropriate development' based on its use to support the fishing lake, this has not been put forward as a 'very special circumstance' to justify inappropriateness. Officers agree the development cannot be justified in relation to the use of the lake for fishing.
- 8.28 The application proposal may provide improved vehicle access for some people, however, the lake, Chisholm Trail and Leper Chapel can either be accessed already, or will likely be accessible from the site once the underpass is built as proposed in the Chisholm Trail application. Conversely, access to the lake will be reduced because the indicative location of the café is on the lake edge itself. In summary, the above reasons do not amount to very special circumstances. Openness will be significantly harmed and officers are of the opinion the proposal is contrary to Cambridge Local Plan (2006) policies 4/1 and Paragraphs 87, 88 and 89 of the NPPF.

### Loss of Open Space

- 8.29 The proposal would also result in the loss of and harm to the character of the site as a Protected Open Space. It has not been demonstrated that the open space can either be satisfactory replaced elsewhere or that the site is not important for environmental reasons in accordance with Cambridge Local Plan Policy 2006 4/2. In the absence of this justification the principle of the development is not supported which forms reason for refusal 2.

### Summary

- 8.30 As considered against Paragraph 89 of the NPPF, the proposal is not considered an appropriate facility for outdoor sport and outdoor recreation. There is no necessity for the café in this area for the Chisholm Trail to function and it did not form part of that permission. It is also considered that the openness and purpose of the Green Belt is not preserved by this proposal. In conclusion, the proposal is considered inappropriate development and there are no very special circumstances which overcome the harm by way of inappropriateness.

### Location - Food and drink outlets

- 8.31 Paragraph 24 of the NPPF states that Local Planning Authorities should apply a sequential test for main town centre uses which are not in an existing centre.
- 8.32 A sequential test was not undertaken, whereby no alternatives to the proposal were proposed or discussed, whether it be location or size of proposal. The applicant considers this is not necessary because the proposal relates to the recreational use of the immediate vicinity. Officers do not accept that position and consider that further food and drink uses should only be permitted in an existing centre, in accordance with Cambridge Local 2006 policy 6/10 part b.
- 8.33 Given the proximity of existing facilities similar to the that which is proposed (Cambridge Retail Park and Mill Road), it has not been proven that there is no alternative district centre location. Government Guidance on the vitality of town centres reiterates the importance of ensuring town centres are not undermined by allowing town centre uses outside of existing town centres. In



the absence of a sequential test to demonstrate that alternative locations have been considered in existing centres, the proposal undermines their function.

- 8.34 The potential harm which could result from a café use located outside of a District or Local Centre is unclear at this stage because the absence of information contained within the Transport Assessment relating to trip generation and the likely levels of trips to anticipated to the proposed café.
- 8.35 Whilst it is recognised that applicants and local authorities should demonstrate flexibility on issues such as format and scale of sequential tests, the fact that the site is within the Green Belt justifies the need for a full and robust assessment of other suitable sites elsewhere.
- 8.36 In the absence of a sequential test, the provision of an A3 café use outside of an existing local, district or the City Centre is unacceptable in principle, contrary with Paragraph 24 of the NPPF and Cambridge Local 2006 policy 6/10 part b.

### **Context of Site, Design and External Spaces**

- 8.37 The impact of the building on openness and setting of the Green Belt is discussed in the Principle of Development subsection.
- 8.38 The detailed design of the proposed building is a reserved matter for subsequent approval. This approach is considered poor because the limited information does not provide any guarantee of its impact in such a sensitive location. Notwithstanding, some details have been provided which illustrate the likely design approach.
- 8.39 The Design and Access Statement states that much of the façade will be glazed, with areas of buff brick. A sedum roof is envisaged to minimise its prominence. Whilst these materials may reduce some of the prominence of the building, its detailed design and materials would need to be scrutinised if other issues were otherwise considered acceptable.

## *External spaces*

- 8.40 The building along with the accumulation with the hard standing areas will detract from the green character that the Chisholm Trail would benefit from once delivered. The requirement for service vehicles and users of the café/ shop who arrive by car to cross the Chisholm Trail is poor design and layout. The siting of the building given the proposed size and accumulation with the proposed infrastructure, will extend the built form of the adjoining sites into the Green Belt and impact upon the views of Coldhams Common from Newmarket Road, along with views north from Coldhams Common and the Lake, whereby minimal built form is currently visible. The indicative design does not mitigate this visual impact.
- 8.41 A cycling connection has been established through the Chisholm Trail permission, yet an excess of car parking has been proposed to service the Trail. An excessive area is proposed to be used for parking, which is disproportionate to the scale of the existing car park that exists. Very limited information has been provided on the landscape approach to mitigate this impact. The suggestions for possible landscape approaches in the Ecology Statement are not reflected in the other parts of the application submission.
- 8.42 Overall, based on the limited information supplied, the likely design and appearance of the proposed café building does not mitigate the visual harm described in the Principle of Development subsection above. The proposal is therefore not compliant with Cambridge Local Plan (2006) policies 3/4, 3/7, and 3/12.

## **Highway Safety**

- 8.43 The County Highways object to the scheme based on the information which has been submitted.
- 8.44 There is concern that the use of the proposed 30 car parking spaces (32 shown on the indicative plan) will negatively impact on Newmarket Road, which is already a congested network. The provision of too many car parking spaces would encourage vehicle based trips, which may intensify use of the access. Further trip generation information is needed, including details

of the proposed trips to the café. This work may also require junction modelling assessments.

- 8.45 The access road proposes to cross the Chisholm Trail and it is possible that there may be conflict between vehicles and users of the Chisholm Trail. Officers are however satisfied this could be addressed in the detailed site layout if other matters were considered acceptable.
- 8.46 Whilst in isolation these issues might be able to be addressed by the developer team, given that the principle of development is unacceptable, this forms reason for refusal 4. In my opinion the development as submitted is not compliant with Cambridge Local Plan (2006) policy 8/2 and 8/10.

### **Ecology**

- 8.47 The application fails to properly assess the impact on biodiversity and consequently the Council's Ecology Officer and The Wildlife Trust object to the proposals. There is significant concern that the proposals would result in a net loss in biodiversity, contrary to Cambridge Local Plan 2006 policy 4/6.
- 8.48 The site is within Barnwell Pit City Wildlife site which supports a mosaic of locally important habitats. The submitted Ecological Report makes reference to the enhancement of the site with new wildflower grassland and native scrub planting, but no details of this mitigation has been provided.
- 8.49 There is already unfulfilled ecological mitigation through the Chisholm Trail permission. It is unclear from the proposal how this mitigation and the design of the development will interact to protect or enhance the City Wildlife Site to ensure that any reserved matters can appropriately mitigate ecological effects. The application fails to provide an appropriate assessment of ecological effects on the site with no assessment of the total areas of habitat to be lost or gained.
- 8.50 Although the proposal is an outline application, there is insufficient evidence that the ecological impacts will be acceptable. Based on the limited information provided, a net loss of ecology is likely to result to the detriment of the City Wildlife Site which is contrary to Cambridge Local Plan 2006 policy 4/6.

## **Flood Risk**

- 8.51 The Environmental Agency, The Council's Sustainable Drainage Engineer and the County Council Lead Flood Authority have reviewed the proposal and object to the scheme. Part of the site is located within Flood Zone 3, including the building footprint. No floodplain compensation has been provided and no reference to the existing Chisholm Trail permission has been made. Part of the proposal site is intended to be used for floodplain compensation for the Chisholm Trail development, but this has not been addressed in the submitted Flood Risk Assessment.
- 8.52 Overall, I am of the opinion the application as proposed is incomplete and therefore contrary to Cambridge Local Plan 2006 policies 3/1 and 4/6, and NPPF Paragraphs 109, 117 and 118.

## **Amenity**

- 8.53 The site is located in a relatively isolated, out of centre location, so there are unlikely to be any impacts on neighbouring amenity. Noise, lighting, odour, air quality and waste could be appropriately managed through the imposition of planning conditions if the application was otherwise considered acceptable.
- 8.54 Officers do however have some concerns with the operation of the A3 use, which could include an ancillary take away provision late into the evening. This is likely to be more problematic during match days at Cambridge United if large numbers of people are coming and going to the site. Notwithstanding, if other matters were considered acceptable, this could be adequately controlled through the imposition of suitable planning conditions.

## *Contaminated Land*

- 8.55 The Environmental Health Team and The Environment Agency do not agree with the conclusions of the Phase 1 assessment that no further investigations are required. The report dismisses the presence of contamination from the adjacent Railway Line due to the absence of infrastructure such as goods, storage yards and sidings. Because of the location of the proposed

building to the railway, a suite of conditions would be necessary to manage the contamination risk if other matters were otherwise considered acceptable.

- 8.56 Officers consider the imposition of conditions could adequately manage the environmental impacts of the scheme. In isolation, this aspect of the proposal is in accordance with Cambridge Local Plan (2006) policies 4/13.

### **Renewable energy and sustainability**

- 8.57 The Council's Sustainable Design and Construction Officer recommends that water efficient appliances in the café kitchen and WCs are installed. However, these matters would be addressed at a detailed design stage. Overall the proposal is not in conflict with the Cambridge Local Plan (2006) policy 8/16 or the Sustainable Design and Construction SPD 2007.

### **Car and Cycle Parking**

- 8.58 The development proposed a total of 30 car parking spaces, although 32 car parking spaces are shown on the indicative layout. 10 are intended to serve the café, 10 to provide for the Leper Chapel and 10 to serve the existing fishing lake through a re-laid, formalised car park.
- 8.59 This is an overprovision of car parking. The adopted car parking standards advises 7 spaces be provided outside of the Controlled Parking Zone for non-food retail. There is no justification for providing car parking to serve the Leper Chapel.
- 8.60 The existing fishing lake is already served with approximately 10 car parking spaces. Whilst there are no specific standards for car parking within the adopted car parking standards, any increase in car parking in this location would not be supported.
- 8.61 In isolation, the increase in 20 car parking spaces is over and above the existing situation. The County Highways Authority object to the proposal based on the limited information provided to explain the trip generation associated with this provision (described in Highway Safety above). On the basis of the information submitted, the application provides an unacceptable overprovision of car parking, contrary to Cambridge Local Plan 2006 policy 8/10.

8.62 The application proposes 100 cycle parking spaces to the east of the building. The adopted local plan indicates approximately 30 spaces would be appropriate to serve the building. In the view of officers the proposed 100 spaces is a significant overprovision. The approved Chisholm Trail application does not identify this site as a 'destination' and there is no need for this amount of cycle parking. Instead, this further development of the site contributes to the adverse visual impact of the proposal and intensifies harm to the Green Belt setting.

### **Refuse Arrangements**

8.63 The indicative layout plan submitted does not identify an area for refuse, but officers have no doubt this could be provided at reserved matters stage if other matters were considered acceptable. Any external refuse area would however increase the incursion of urban paraphernalia into the Green Belt. In functional terms only however, refuse could be adequately accommodated in accordance with Cambridge Local Plan 2006 policy 3/12.

### **Disabled access**

8.64 The Council's Access Officer has supported the application, because it encourages a route for disabled people to the Leper Chapel. The proposal would allow disabled people to park and utilise the Chisholm Trail underpass. However, the Leper Chapel can be accessed with the current car park and the proposed underpass is not part of this application. Disabled access could be adequately addressed through reserved matters and therefore this issue in isolation is compliant with Cambridge Local Plan (2006) policies 3/7.

### **Public Art**

8.65 Major applications are required to contribute to public art in accordance with the Planning Obligation Strategy and Public Art SPD. The applicant has not provided any details of a scheme for public art. If the application was otherwise considered acceptable, I am satisfied a Public Art Delivery Plan could be ensured through the imposition of a suitable planning condition. The proposal could therefore be compliant with Cambridge

Local Plan (2006) policies 3/7 and 10/1 and the Public Art SPD 2010.

### Third Party Representations

8.66 45 third party representations have been received. The following matters are raised:

Table 1: Representations Received

<b>Issue</b>	<b>Officer response/report section</b>
The café will provide leisure facilities for Coldhams Common, Ditton Meadows and the Leper Chapel (with adjacent pastures).	The proposed café is not considered an appropriate facility for outdoor sport and outdoor recreation as per the definition of the NPPF 2012. See paragraph 8.24
In line with NPPF for protecting greenbelt.	The application is determined to be inappropriate development in the report and contrary to NPPF see report from paragraphs 8.2 – 8.30.
The Chisholm Café proposal will damage the site biodiversity, not the proposal	The application proposal will have impacts over and above the approved Chisholm Trail which have not been assessed in the application proposal.
Improvement of 'damaged and derelict land'.	See report from paragraphs 8.2 – 8.30.
Chisholm Trail will benefit from toilet facilities and refreshments.	Paragraph 8.24.
Access for disabled people.	Accessibility for disabled people could be considered in detail at reserved matters. See section paragraph 8.28 and 8.64.
The fishing platforms have been vandalised and undesirables mainly use the area	This is management issue for the fishing lake and does not justify inappropriate development in the Green Belt.

Loss of green area	The openness and purpose of Green Belt would be impacted upon by the proposal. See from paragraph 8.4.
Loss of habitat for biodiversity	The application is determined to have unacceptable biodiversity effects. See paragraph 8.47.
Impact of increased traffic on Newmarket Road	The transport assessment is incomplete. See paragraph 8.46.
Object to the need for so many car parks	See paragraphs 8.40 and 8.44.
Inappropriate scale and massing in this area	Agree, discussed in sections 8.2 to 8.30 and from 8.37.
Insufficient information to assess harm on green belt	Green Belt harm is assessed from paragraphs 8.2 to 8.28. The outline approach means it is more difficult to assess the detailed design of the building and the affect this will have on its setting.
Effects on landscape, trees, heritage impacts, loss of common land	Considered in the principle of development section.
Secondary ancillary development effects in particular the lack of visibility splays, safety lighting, drainage and any stabilisation of underwater banks within the pits.	The flood risk assessment is incomplete and needs further work to assess flood compensation.
How would the car park be monitored.	No information provided. A matter that could be covered at detailed design stage.
The car parking provision is excessive.	Agree; see paragraph 8.44.
There is no justification for the retail unit and what would be the strategy if café fails and buildings left unattended	The occupation of the premises could not be controlled through the planning process. The size of the retail unit does not require a Retail Impact Assessment.
The café would help reduce fly-tipping	This is a management issue and does not justify inappropriate development in the Green Belt.



## **9.0 CONCLUSION**

- 9.1 The proposed development is considered inappropriate in the green belt as directed by Paragraph 89 of the NPPF, and cumulatively other considerations do not outweigh the inappropriateness and harm to the green belt. The applicant has not advanced any justification which could amount to very special circumstances. The proposal also involves the loss of Protected Open Space and is an A3 use outside of a local or district centre. Flood risk, ecology and highway safety matters are all unresolved and form reasons for refusal. REFUSAL is recommended.

## **10.0 RECOMMENDATION**

**REFUSE** for the following reasons:

- 1) The proposed café and associated development is not considered an appropriate facility for outdoor sport and recreation because of its use, size and significant adverse visual impact. The proposal would erode the vulnerable green belt wedge, the primary function of which is to check the unrestricted sprawl of Cambridge, through the proposed building, car and cycle parking and service yard. The proposal is in direct conflict with the purposes of including land within Green Belt and would result in significant harm, contrary to paragraphs 87, 88 and 89 of NPPF and Cambridge Local Plan 2006 policy 4/1.
- 2) The proposal would result in the loss of and harm to the character of the site as a Protected Open Space. It has not been demonstrated that the open space can either be satisfactory replaced elsewhere or that the site is not important for environmental reasons and as such the proposal is in conflict with Cambridge Local Plan Policy 2006 4/2.
- 3) The proposed development consists of an A3 use located outside of an existing local, district or the City centre. Given the proximity of existing facilities similar to the that which is proposed (Cambridge Retail Park and Mill Road), it has not been proven that there is no alternative district centre location which can accommodate these facilities. Government Guidance on the vitality of town centres reiterates the importance of ensuring town centres are not undermined by

allowing town centre uses outside of the town centre. In the absence of a sequential test to demonstrate that alternative locations have been considered in existing centres, the proposal undermines town centre function without evidence of need outside of such a location, contrary to Cambridge Local 2006 policy 6/10 part b, whereby food and drink uses should only be permitted in an existing centre.

- 4) The proposed development provides insufficient information on the likely trip generation, linked trips, junction modelling assessments or justification for the level of car parking which is significantly in excess of the Council's Adopted Car Parking Standards. In the absence of this information it is not possible to assess the likely impacts of the development on local highway network, contrary to Cambridge Local Plan 2006 policy 8/2.
- 5) The proposed development fails to appropriately assess the flood risk to the site or provide sufficient floodplain mitigation. As such, this will give rise to a significant risk of increased flooding contrary to Local Plan policies 3/1, 4/6 and paragraph 103 of the NPPF.
- 6) The proposed development is likely to result in a net loss of biodiversity and does not adequately assess the impact on reptile species. In the absence of an assessment of the total areas of habitat to be lost and gained, significant adverse ecological impact is likely for the City Wildlife Site, contrary to Cambridge Local Plan 2006 policy 4/6.