



Planning Committee Date	12 February 2025
Report to	Cambridge City Council Planning Committee
Lead Officer	Joint Director of Planning and Economic Development
Reference	23/03204/OUT
Site	Beehive Centre, Coldhams Lane, Cambridge
Ward / Parish	Abbey
Proposal	Outline application (with all matters reserved) for the demolition of existing buildings and structures and redevelopment of the site for a new local centre (E (a-f), F1(b-f), F2(b,d)), open space and employment (office and laboratory) floorspace (E(g)(i)(ii) to the ground floor and employment floorspace (office and laboratory) (E(g)(i)(ii) to the upper floors, along with supporting infrastructure, including pedestrian and cycle routes, vehicular access, car and cycle parking, servicing areas, landscaping and utilities. (The Development is the subject of an Environmental Impact Assessment)
Applicant	Railway Pension Nominees Ltd
Presenting Officers	Cuma Ahmet / Andrew Martin
Reason Reported to Committee	Major planning application of City-wide significance
Member Site Visit Date	3 February 2025
Key Issues	<ol style="list-style-type: none"> 1. Heritage Impacts 2. Townscape and Visual Impacts 3. Water Resources 4. Residential Amenity 5. Transport and Highway Safety 6. Planning Balance 7. Section 106 Planning Obligations
Recommendation	REFUSAL of outline planning permission on grounds of residential amenity impact.

1.0 Executive Summary

- 1.1 The application seeks outline planning permission, with all matters reserved, for the comprehensive redevelopment of the site, including the demolition of the existing buildings, to deliver a research and development-led mixed-use scheme, comprising of 10 building plots, which also incorporates a new local centre; open space; and associated infrastructure.
- 1.2 The applicant's vision for the site is to create a workplace and innovation cluster alongside a new destination for the local community, with the proposed local centre to provide opportunities for shops, cafes, restaurants, services, leisure facilities, health and wellbeing uses, and co-working spaces. In terms of the employment offering, the proposed development is estimated to create approximately 6,450 jobs, including entry level positions, mid-skilled roles, and training opportunities. The proposal is therefore intended to transform the existing retail park, which is currently dominated by a ground surface car park, into a vibrant, inclusive, landscape-led, urban quarter that prioritises sustainable modes of transport, and embeds sustainability into all aspects of its design.
- 1.3 Whilst the application is made in outline, with the detailed matters of access, scale, appearance, landscaping, and layout reserved for future consideration, it is supported by sufficient information to demonstrate how 10 building plots could be spatially provided on the site in combination with a network of public open spaces, connectivity routes, and sustainable urban drainage systems (SuDs). Notably, to enable a robust assessment and provide certainty around the maximum extent of the plots; the height of buildings, including flues; the distribution and mix of uses; the points of access and circulation routes; and the composition and arrangement of the strategic landscaping and open spaces, a series of Parameter Plans have been submitted for approval. In addition, a Design Code has been submitted for approval to define key site-wide and plot-based design requirements and guidance that would ensure any future reserved matters applications achieve the high standards of placemaking, and accessibility required by national and local planning policy.
- 1.4 Illustrative material has been submitted with the application, including an Illustrative Masterplan, an Illustrative Landscape General Arrangement Plan, and an Illustrative Landscape Masterplan, to show a possible, rather than definitive, design and layout for the proposed development. As such, whilst the illustrative details submitted are material to the consideration and assessment of the application, on the basis that they seek to demonstrate how the amount of development proposed could be satisfactorily accommodated on the site, they are not sought for approval and are given little weight.
- 1.5 In September 2024, the application was subject to a significant revision. This revision was made in response to concerns raised by officers, consultees, and the community. A full 30-day re-consultation was

undertaken on the revised application, having regard to it being an EIA development. Whilst a more detailed overview of the proposal and its evolution can be found in Section 3 below, in brief, the changes introduced through the revised scheme have reconfigured the spatial arrangement of building plots, open spaces, and internal connection routes, as well as reducing the number, overall massing, and maximum height of the proposed buildings; rationalising the access strategy; enhancing the active travel measures; strengthening the sustainability measures; and concentrating the local centre and community uses around key open spaces, and pedestrian and cycle routes. These changes to the scheme reflect the positive and proactive approach taken by the applicant, who, during the pre-application and application stages of the project, has undertaken four comprehensive phases of public and stakeholder engagement, as summarised within the submitted Statement of Community Involvement (SCI) (August 2023) and SCI Addendum (August 2024).

- 1.6 In terms of the principle of development, the site is not allocated within the adopted Cambridge Local Plan (CLP) (2018), however, it is located within the urban area of Cambridge where the spatial strategy embedded into Policy 2 of the CLP focusses new employment development, alongside site allocations, Areas of Major Change, Opportunity Areas, and the City centre. Policy 40 of the CLP directly addresses the development and expansion of business space and allows for new offices, research and development and research facilities within the urban area outside of the City centre, Opportunity Areas, Areas of Major Change, and site allocations, subject to an assessment of their merits against the relevant policies of the development plan.
- 1.7 It is recognised that the spatial strategy for new housing developments under Policy 3 of the CLP also identifies the urban area as having an important role in terms of delivery, but, in the absence of an explicit policy requirement for the site to deliver residential development, or a mix of employment and residential uses, the principle of an employment led scheme on the site is acceptable in accordance with Policies 2 and 40. As such, despite the spatial strategy providing opportunities for housing and employment within the urban area, the absence of a residential component as part of the proposed development does not conflict with the spatial strategy, and it cannot not be considered unacceptable in this regard. The Council is not counting on the site to deliver its revised housing requirements. It is also acknowledged that, in recognition of its potential to accommodate new development at a higher density than existing, the Beehive Centre has been identified as a new Opportunity Area within the First Proposals of the emerging Greater Cambridge Local Plan.
- 1.8 As aforementioned, the research and development use proposed would be complimented with ancillary retail and town centre uses to serve employees and the local community. The applicant has submitted sufficient information, in the form of a Town Centre Use/Retail Planning Statement (August 2024) and a Town Centre Use/Retail Planning Response Statement (August 2024), to demonstrate that the quantum and mix of retail

and town centres uses proposed would be acceptable having regard to the nature of the development, including its out of centre location and the potential for it to impact upon other local centres, as well as town centre vitality and viability. The proposed development would pass the sequential test, without giving rise to any unacceptable impacts on local centres or the city centre, in accordance with the requirements of Policy 6 of the CLP and the relevant objectives contained within the National Planning Policy Framework (NPPF).

- 1.9 Due to the nature of the proposed development and the imperative to make efficient use of land, there would be a shift in the type of retail accommodated on the site, with a move away from large-format retail to smaller-format retail. The redevelopment of the site would subsequently result in the loss of the existing occupiers from the site. Whilst there is concern within the community about the loss of the existing occupiers, the planning system is concerned with operational development and changes of use, it cannot protect individual occupiers. The loss of the existing occupiers would be beyond the scope of the Council's planning function to intervene. Meanwhile, an acceptable mix and distribution of the proposed retail and town centre uses would be secured through the requirements of the Design Code, as well as the Local Centre Strategy to be secured through a S.106.
- 1.10 Members will be aware from their briefing on 15 January 2025 that Railpen have begun a master planning exercise for the Cambridge Retail Park (CRP) which they also own. Their intention is to re-accommodate valued retailers from Beehive, where possible, subject to commercial agreements, including ASDA, TK Maxx, B&M, Next, Pets at Home, and Wren, on a reimagined CRP site with enhanced landscaping, connectivity, and placemaking. Railpen has confirmed that the proposed consolidation of the large format retail onto CRP will proceed independently of the current Beehive redevelopment proposals, as they believe there is insufficient demand to support both retail parks and that CRP is the preferred destination for a retail focus. It should be noted that these are early proposals and are not for consideration under this planning application. This information is provided merely to offer some comfort and context regarding Railpen's advised intentions.
- 1.11 The proposed development would also result in the loss of an existing leisure facility, comprising a fitness centre with a swimming pool and gymnastics offering. As part of the proposed development, there is flexibility for a wide range of uses at the ground floor level, including for Use Class F2(d) and Use Class E(d), which respectively include swimming pools and indoor sport and recreation. However, the applicants have confirmed that it is not their intention to re-provide a swimming pool as part of the redevelopment. As such, a partial conflict with Policy 73 of the CLP arises and this is dealt with in the main body of the assessment and as part of the S106 sought obligations. This is because the policy requires the loss of an existing leisure facility to be compensated through a replacement facility to at least the same scale as the existing. Whilst a new gym or

similar on-site leisure facility might arise from the proposal, a swimming pool would not.

- 1.12 In terms of design, the application demonstrates that the proposed development can be accommodated on the site with a strategic control framework and design approach that responds well to the site's context. It also realises the opportunity to reimagine the existing retail park, transforming an inefficient use of land into a vibrant, employment-led urban quarter in a sustainable location that has capacity for a change in scale and density. There is certainty that the outline proposals will enable a high standard of detailed design in respect of placemaking and character at the reserved matters stage. This is without prejudice to the need to consider the impacts on neighbouring residential amenity, which are addressed in Section 24 of the report and summarised in paragraph 1.16 below.
- 1.13 Concerning heritage, the revised application demonstrates notable improvements with changes to the amount, scale, and layout of the development, in addition to the use of more prescriptive language in the Design Code regarding flues. However, harm would still arise from the proposed height and massing, affecting the setting of Mill Road Conservation Area, Mill Road Cemetery, alongside five Grade I listed buildings, two Grade II listed buildings, and four conservation areas in the wider area, due to the visibility and impact on the Cambridge skyline. The harm in all instances would be less than substantial, with the cumulative harm being less than substantial at a moderate level. This harm must be weighed against the public benefits of the scheme, in line with local and national policy and also with regard to legislative requirements.
- 1.14 Regarding townscape and visual considerations, the townscape of the site and its immediate surroundings would benefit from the regeneration of a negative townscape area. However, there would be a significant adverse townscape effect on the Cambridge skyline, alongside significant adverse visual effects on the receptors at Castle Hill Mound, Coldhams Common – South, Redmeadow Hill, Little Trees Hill, Limekiln Road Layby, and the Church of St Mary the Great, due to the introduction of tall buildings on the site. High-quality design, urban greening measures, and public open space improvements help to mitigate these adverse effects, reducing them to a low level that are weighed against the scheme's public benefits.
- 1.15 In relation to water resources, the proposed development would significantly increase water demand in the Cambridge area, but this demand would not fully materialise for at least six years should planning permission be granted. The site is also likely to be included in the emerging Local Plan as an opportunity area, may benefit from a water credits scheme, and may benefit from a strategic connection to Grafham Water by approximately 2032 serving the Greater Cambridge area. The Joint statement on addressing water scarcity in Cambridge (6 March 2024) provides a positive foundation for the emerging approach to managing the strategic effects of increased water demand and has been given further weight in recent appeal decisions by the Secretary of State (SoS). Officers

are confident that the Applicant's strategy to address water usage/demand for its own proposal would meet and exceed current adopted policy requirements in the CLP.

- 1.16 Turning to residential amenity, the proposed development would significantly and adversely reduce daylight and sunlight to many habitable rooms and gardens in surrounding properties beyond the most recent guidelines published by the Building Research Establishment (BRE), with fundamental concerns arising in relation to impacts focused mainly, but not exclusively, on occupiers within St Matthew's Gardens and Silverwood Close. The scale and position of the buildings would also create an oppressive visual enclosure for residents in St Matthew's Gardens and Silverwood Close. There would be a major conflict with local and national planning policies that seek to protect residential amenity. Even the illustrative proposal submitted – which has been modelled in three-dimensional form – and which is not for approval under this outline application, would result in considerable harm to residential amenity.
- 1.17 The Applicant's sustainable transport strategy, which includes various improvements to promote active and sustainable travel, is supported and considered essential for achieving its transport and sustainability objectives. Both the Local Highway Authority (LHA) and Active Travel England (ATE) do not object to the proposals, subject to conditions and S.106 obligations.
- 1.18 The proposed development would meet policy requirements in respect of carbon reduction and sustainable design, biodiversity, trees, drainage and flood risk, contamination and other environmental issues, public art, and all other matters.
- 1.19 The Applicant has committed to supporting a comprehensive S106 package which would, over the lifetime of the development if approved, deliver a range of public and planning related benefits.
- 1.20 It is important to note that Railpen is committed to vacating the existing buildings on Beehive as part of their broader strategy to consolidate the large format retail offering onto CRP, where there are vacant units and future plans for improvement. That aside, the current site represents an inefficient use of previously developed land in a highly sustainable location. Chapter 11 of the NPPF highlights the importance of making efficient use of land and acknowledges the significant contribution that previously developed land can make in meeting identified needs, including employment. Additionally, Chapter 6 of the NPPF emphasises the need to drive innovation and capitalise on the performance and potential of areas with high productivity, particularly in meeting the needs of a modern economy, including laboratories. However, while there is an opportunity for the Council to facilitate significant investment and align with the Government's growth agenda in this crucial sector, providing new employment and retail uses as part of an innovative urban quarter that reduces car dominance, including the removal of 490 parking spaces, while

addressing the poor urban fabric and limited biodiversity, the development must be determined in accordance with the development as a whole.

- 1.21 When assessed against the development plan as a whole, the proposed development would generate a significant range of social, economic, and environmental benefits in alignment with the three dimensions of sustainable development and in this respect, officers are of the view that the resulting public benefits would outweigh the heritage and townscape harms identified with the assistance of conditional safeguards such as Design Coding.
- 1.22 However, whilst it would be an unreasonable proposition to resist any perceptible change or harm to the residential amenity and environments of neighbouring occupants, officers are of the view that the extent and level of harm that would arise in respect of residential amenity (daylight / sunlight / enclosure) is significantly adverse to the point that the scheme should not be supported. Intrinsicly, the proposal does not appear have appropriately interfaced with its residential context in a manner befitting its location and constraints. It is directly south of many residential properties yet proposes large uncompromising buildings at great scale near rear facing gardens and habitable rooms. The parameters of the proposal do not appear to have evolved with residential amenity as a key consideration.
- 1.23 Taking all matters into consideration, the balance of the harm arising from the proposal against the benefits of the scheme in the circumstances of this application weighs towards a refusal of planning permission.
- 1.24 Officers recommend that the Planning Committee **REFUSE** the application for a singular reason relating to adverse residential amenity impacts (refer to Section 31 of the report 'Recommendation' for refusal reason).

2.0 Site Description and Surrounding Context

Area of Major Change		Protected Open Space (off-site)	X
Conservation Areas	X	Public Rights of Way & Bridleways	X
Listed Buildings	X	Tree Preservation Order Areas	X
Buildings of Local Interest	X	Flood Zone 1	X
Scheduled Monuments	X	Local Nature Reserve	X
Registered Park and Garden	X	City Wildlife Sites	X
Green Belt	X	Air Quality Management Area	X
Cambridge Airport Safeguarding Zones	X	Surface Water Flood Zone (low, medium, and high)	X

- 2.1 The application site is a retail park, known as The Beehive, situated approximately 1.5km to the east of the city centre within the urban area of

Cambridge. It is not an allocated site, nor is it within any adopted policy area designation, such as an Opportunity Area or Area of Major Change. The site has been identified as a potential Opportunity Area within the First Proposals for the emerging Greater Cambridge Local Plan, but this is currently at the Regulation 18 initial issues and options consultation stage. Consequently, the emerging allocation carries very little weight in the consideration of this application.

- 2.2 In its current format the 7.58 hectare site is occupied by 11 units, organised around a large, sprawling car park, with the exception of one unit, occupied by Porcelanosa, which is located to the northern edge of the site adjacent to the Coldhams Lane roundabout. Most of the retail units are two/three storeys with generic, functional forms and designs. The Porcelanosa unit exhibits a higher design quality, with a curved roof and a supporting arched timber skeleton providing a degree of interest onto the roundabout.
- 2.3 In terms of landscaping, the existing site is mostly hard surfaced to accommodate the extensive car park, although tree and hedge planting do feature within the car park and along the northern edge of the site. There are a total of 119 individual trees, groups of trees, and hedgerows present within the site, 10 of which are subject to individual Tree Preservation Orders (TPOs).
- 2.4 The primary access to the site, and the only access for vehicles, is taken from Coldhams Lane roundabout on the northern boundary. Pedestrian and cycle connections to the site are more numerous, with accesses from St Matthew's Gardens, York Street, and Sleaford Street (Vera's Way).
- 2.5 With regards to the site's surroundings, to the north of the site is the Cambridge Retail Park with its various retail units, as well restaurants, a gym, and a trader's estate. The eastern boundary of the application site is defined by the railway line, beyond which is an existing residential area with a gym and an industrial estate to the north. Coldhams Common, a protected semi-natural green space within the Green Belt, is located further to the east and north-east. To the south, west, and north-west of the site are residential areas with properties in Sleaford Street, York Street, St Matthew's Gardens, and Silverwood Close situated immediately adjacent to the existing retail park boundary. There also protected open spaces at Silverwood Close, St Matthew's Gardens, and St Matthew's Piece.
- 2.6 Cambridge Train Station is just over 1km to the south of the site. On the approach to the train station, and adjacent to the railway line more generally, there is a perceptible increase in the scale of built form, particularly in comparison to the more traditional, urban and suburban forms of residential development found in the area. Examples of this increase in scale include the residential redevelopment of the former Ridgeons site (Timber Works), to the south-east of the site; the residential-led redevelopment of the former Mill Road Depot site (Ironworks), to the south of the site; and the comprehensive mixed-use redevelopment of the station quarter itself, known as CB1. Whilst not built, approved employment

schemes at both Devonshire Gardens and the Grafton Centre are likely to create a higher urban density more generally within this sector of the City.

- 2.7 As the site is located just outside the historic core, it is adjacent to an area rich in heritage assets with numerous conservation areas, listed buildings, non-designated heritage assets, and a registered park and garden. A more detailed assessment of heritage assets affected by the proposed development is provided in Section 15 below, however, notable heritage assets within the immediate context of the proposed development include the Mill Road Conservation Area which adjoins the southern boundary of the site; the Mill Road Cemetery, a Grade II Registered Park and Garden within the Mill Road Conservation Area, which contains a Grade II listed cemetery lodge, individually listed monuments, and historic structures identified as buildings of local interest. The Grade II listed buildings of St Matthews Church and 247 Newmarket Road are also in close proximity, to west and north of the site respectively.
- 2.8 Elsewhere in the city, beyond the immediate locality, prominent heritage assets include the Grade I listed buildings of Kings College Chapel, Church of St Mary the Great, St John's College, All Saints Church, and Jesus College, as well as the Grade II listed building at Christchurch. Moreover, the Central, Kite, Castle and Victoria Road, and Riverside and Stourbridge Common Conservation Areas are all due consideration taking into account the location of the site and the proposed scale of development. The Old Cheddars Lane Pumping Station and Castle Mound, both of which are Scheduled Monuments, also fall within the site's wider setting.

3.0 The Proposals

- 3.1 Outline planning permission, with all matters reserved, is sought for the comprehensive redevelopment of the site to deliver a research and development-led mixed-used scheme consisting of 10 building plots; a new local centre, incorporating flexibility for a range of community, leisure, retail, and town centre uses; a network of public open spaces; and supporting infrastructure, including access and connectivity, landscaping, sustainable drainage, servicing, and utilities.
- 3.2 To facilitate the proposed mixed-use urban quarter, all existing buildings in the current retail park would be demolished. The proposed demolition will result in the loss of buildings with a cumulative Gross External Area (GEA) of 24,382 sqm, and a cumulative Gross Internal Area (GIA) of 22,637 sqm. The existing surface car park would also be lost and a total of 61 existing trees would be removed, while the remaining 58 trees on-site would be retained and protected. Of the trees to be removed, 10 are Category B (moderate quality), and 51 are Category C (low quality). Two of the trees proposed for removal are subject to a Tree Preservation Order (TPO).
- 3.3 A total of 10 new building plots are proposed. The maximum extent of the plots, in addition to the maximum building heights permitted for each plot, are identified on the Maximum Building Heights & Plots Parameter Plan

submitted for approval. The plots are shown to be organised in an orderly and broadly linear arrangement, with a greater concentration of built form towards the eastern boundary of the site and the railway line. All flues would be restricted to prescribed areas on the rooftops of buildings on Plots 2, 3, 5, and 6, all of which are located adjacent to the railway and set away from the nearest residential receptors, with a maximum height allowance for the flues of up to 25% of the host building. Maximum building heights across the site, excluding flues, would range from 15.9 metres to 35.7 metres. When accounting for flue allowances, the maximum combined building and flue heights on Plots 2, 3, 5 and 6 would range from 25.87 metres to 44.62 metres. Aside from restricting flues to certain rooftop areas and plots, to limit their visibility and prominence as much as possible, the Maximum Building Heights & Plots Parameter Plan also incorporates measures to break up massing on the majority of plots, such as staggered heights and lower parapets adjacent to the site boundaries, except for on Plot 10, and recessed breaks to the primary facades of Plots 3 and 5.

3.4 The proposed development would encompass a total GEA of 166,685 sqm and a GIA of 157,670 sqm. This includes research and development floor space, basements, plant floors, 4,593 cycle parking spaces, a Multi-Storey Car Park for 374 cars, and a new local centre. The submitted Land Use Parameter Plans confirm that the majority of the proposed development would fall under use classes E(g)(i) and E(g)(ii), representing office and research and development uses. However, at ground floor level for 10 of the plots, it denotes a mix of other uses to be integrated as part of the new local centre. Specifically, use classes E(a) to (f), F1(b) to (f), F2(b) would be permitted within the local centre, collectively providing opportunities for:

- Retail (E(a))
- Food and drink (E(b))
- Services (E(c))
- Indoor sport, recreation, or fitness (E(d))
- Medical or health services (E(e))
- Creche, day nursery or day centre (E(f))
- Display of art (F.1(b))
- Museum (F.1(c))
- Library (F.1(d))
- Public hall or exhibition hall (F.1(e));
- Place of public worship or religious instruction (F.1(f));
- A hall or meeting place for the principal use of the local community (F.2(b));
- An indoor swimming pool or skating rink (F.2(d)).

3.5 The illustrative details provided, whilst not submitted for approval, indicate that when incorporating a mix of office and laboratory space the functional commercial floorspace would be 85,431 sqm GIA, whilst 5,178 sqm GIA of active mixed-use floor space would be dedicated to the new local centre, equating to around 17 units of differing sizes. Subsequently, as a guide,

the proposed development could result in an overall functional floorspace, excluding plant, basements, and parking, of 90,609 sqm GIA.

- 3.6 In-between and surrounding the proposed buildings, a legible network of open spaces, incorporating both hard and soft landscaping, would be created. These proposed spaces would vary in design to suit the creation of their respective character areas. A key objective of the overall strategy is to facilitate a variety of inclusive and attractive open spaces that are multi-functional, promoting community cohesion, health and wellbeing, sustainable travel, sustainable drainage, biodiversity net gain, and urban greening. As part of this approach, 290 new trees would be planted, alongside hedgerows, lawns, areas of wildflower planting, ornamental planting, and vertical greening through the use of climbing plants. Opportunities for green roofs are also to be maximised and taken where possible.
- 3.7 Whilst the detail of access is a reserved matter, the application is required to demonstrate the area or areas where access points to the development proposed will be situated. The Access and Circulation Parameter Plan submitted identifies that the vehicular access to the site will be taken from the location of the site's existing junction with Coldhams Lane, with pedestrian accesses from Coldhams Lane, St Matthew's Gardens, York Street, and Sleaford Street. Cycle access would be provided from the main access junction with Coldhams Lane, as well as from York Street and Sleaford Street. These various access points reflect the location of existing accesses and would feed into an internal movement framework that prioritises walking and cycling over car use. Notably, cars and buses would be restricted to a single route which follows the northern boundary of the site and loops around Plot 8. Service vehicles would be able to use the same route as the cars and buses, as well as further route leading to the railway corridor. In contrast, pedestrian and cycle routes would be more numerous, interconnecting across vehicle free zones with measures to be imposed to reduce conflicts and ensure safety and inclusivity for all users.
- 3.8 To strengthen the design expectations and requirements of the development, a Design Code has been submitted for approval. The Design Code establishes rules and requirements that would guide any subsequent reserved matters proposals to ensure that site wide and plot-based design standards are achieved, as well as ensuring clarity and consistency on key themes across the development. Some of the key themes covered within the Design Code include sustainability; spatial framework and connectivity; built-form principles; inclusive design; character areas; mix and distribution of uses; green and blue infrastructure; ecology and biodiversity; and active travel. Therefore, whilst the application is made in outline with all matters reserved, key components of the proposed development would be secured through compliance conditions relating to the submitted Parameter Plans and the Design Code.
- 3.9 Given the scale of the proposed development, the CEMP indicates that delivery would be phased over a period of six years from the start on site.

The submitted Indicative Phasing Plan identifies seven potential phases, but it does not indicate their sequencing. It is also only indicative. Therefore, it will be necessary, in the event that planning permission is granted, to secure a final, more detailed phasing plan.

Application Amendments

- 3.10 A 30-day consultation was undertaken on the original application submission between August and September 2023. Following the receipt of consultation feedback and further rounds of discussion between the applicant, officers, and consultees, an updated scheme was progressed and submitted in September 2024. The updated submission included changes to the number, design, and massing of the proposed building plots. It also features updated arrangements for access and connectivity, as well as a revised network of open spaces and landscaping. The updated submission was re-consulted on for a further 30-days between September and October 2024 with all neighbours, contributors, and consultees notified. New site notices were also displayed in proximity of the site.
- 3.11 In December 2024, following consultation responses from the Council's Urban Design, Landscape, Conservation, Sustainability, and Ecology Officers, the applicant submitted an updated Design Code. The updated Design Code was accompanied by supporting information that detailed the changes made and provided explanations for why certain changes could not, or would not, be incorporated. An addendum to the Daylight and Sunlight Report was also submitted at the request of officers to further clarify the impact of the development on neighbouring properties. A 14-day re-consultation of neighbours, contributors, and relevant consultees was undertaken on this latest documentation. The Council has commissioned an independent analysis of the applicant's Daylight and Sunlight reports which, given the importance of its findings to the officer recommendation, is attached as Appendix E to this report.

Environmental Impact Assessment (EIA)

- 3.12 The proposed development has been assessed as falling within the remit of the Town and County Planning (Environmental Impact Assessment) (EIA) Regulations 2017 (as amended) (the EIA Regulations). This is because of the characteristics, location and potential impacts of the proposed development. The EIA process ensures that any potentially significant effects of the development are considered and, where appropriate, mitigated by measures to prevent/avoid, reduce and where possible offset. The Government's Planning Policy Guidance highlights that the Environmental Statement (ES) should focus on the 'main' or 'significant' environmental effects only, and that the ES should be proportionate.
- 3.13 The National Planning Practice Guidance states *at Paragraph: 002 Reference ID: 4-002-20140306*:

“the aim of EIA is to protect the environment by ensuring that a local planning authority when deciding whether to grant planning permission for a project, which is likely to have significant effects on the environment, does so in the full knowledge of the likely significant effects, and takes this into account in the decision making process.”

- 3.14 An EIA is undertaken to inform planning application decisions for particular projects, based on the requirements set out in the EIA Regulations. The ES reports the findings of an independent assessment of environmental effects and objectively of any planning argument for the proposed development. The test of consent for a planning application is whether the proposals are an acceptable use of the land, in terms of and measured against relevant planning policies – at national and local levels.

Scope

- 3.15 The applicant voluntarily entered the EIA process, however, the proposal was the subject of a scoping opinion prior to submission in accordance with the Town and County Planning (Environmental Impact Assessment) Regulations 2017 (see planning history). The Council was supportive of the scope of the EIA covering the matters of air quality, flood risk and drainage, heritage, ground conditions and contamination, townscape and visual impact, noise and vibration, socio-economics, and transport, but also requested that water resources be scoped into the assessment. Officers are satisfied that the submitted ES is based on the advice set out in the EIA Scoping Opinion and the EIA Regulations.
- 3.16 Following the amendment to the application in September 2024, the EIA was updated to align with the changes to the project, with these updates documented in the submitted ES Addendum. The Non-Technical Summary is attached at Appendix A.

Methodology

- 3.17 The ES considers the likely significant effects of the proposed development during its construction and once it is complete and operational.
- 3.18 Regulation 26 of the EIA Regulations states that when determining an application in relation to which an ES has been submitted, the relevant planning authority, the Secretary of State or an Inspector, as the case may be, must –
- a) examine the environmental information;
 - b) reach a reasoned conclusion on the significant effects of the proposed development on the environment, taking into account the examination referred to in sub-paragraph (a) and, where appropriate, their own supplementary examination;
 - c) integrate that conclusion into the decision as to whether planning permission or subsequent consent is to be granted; and
 - d) if planning permission or subsequent consent is to be granted,

consider whether it is appropriate to impose monitoring measures. This requirement is dealt with throughout the report.

4.0 Community Engagement

4.1 The proposed development has been the subject of extensive stakeholder consultation prior to being submitted as a planning application. A detailed account can be found in the Applicant's submitted 'Statement of Community Involvement' and 'Statement of Community Involvement Addendum'.

4.2 In summary, community consultation events have involved:

- June 2022 – consultation webinars and public exhibitions held to introduce the project to local stakeholders and start collecting feedback. Following these initial engagement events, three workshops were undertaken on green space and landscape, youth facilities, and community space and ownership.
- November 2022 – as the proposals developed and a masterplan emerged, a second round of consultation webinars and public exhibitions were held.
- July 2023 – a third round of consultation took place on the pre-submission masterplan. This entailed two public exhibitions and two webinars.
- July 2024 – in response to post-submission consultation feedback and further discussion with officers and consultees, the applicant developed a revised proposal which was then the subject of two public exhibitions and a webinar, prior to submission in September 2024.

4.3 A pre-application Members Briefing was held on 10 November 2022 and was attended by the Applicant and their representatives, officers, ward members and Planning Committee Members.

4.4 The Applicant has indicated a commitment to continuing engagement with all stakeholders beyond the planning submission.

5.0 Relevant Site History

5.1 The site has been the subject of a large number of planning applications since the 1970s. Planning permission has historically been granted for a variety of uses including warehousing, garden centre, storage and distribution, petrol station, retail, car showroom, supermarket, and offices.

5.2 The site appears to have been in its present format since the early 2000s, and the most relevant application to the current proposal is:

- 22/0550/SCOP: Request for a formal scoping opinion for the demolition and redevelopment of the Beehive Centre, including in Outline Application form for the demolition and redevelopment for a new local centre (E(a-f), F1(b-f), F2(b,d)), open space and employment (office and laboratory) floorspace (E(g)(i)(ii) to the upper floors; along with

supporting infrastructure, including pedestrian and cycle routes, vehicular access, car and cycle parking, servicing areas, landscaping and utilities.
EIA Scoping Report Issued February 2023.

6.0 Policy

6.1 National

National Planning Policy Framework 2024
National Planning Practice Guidance
National Design Guide 2021
Environment Act 2021
Town and Country Planning (Environmental Impact Assessment) Regulations 2017
Conservation of Habitats and Species Regulations 2017
Equalities Act 2010
Planning and Compulsory Purchase Act 2004
Levelling Up and Regeneration Act 2023
Local Transport Note 1/20 (LTN 1/20) Cycle Infrastructure Design
ODPM Circular 06/2005 – Protected Species
Circular 11/95 (Conditions, Annex A)
Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 Regulation 33

Joint statement on addressing water scarcity in Greater Cambridge, 6 March 2024.

Written Ministerial Statement from Minister of State for Housing, Communities and Local Government, Matthew Pennycook, 30 July 2024

Written Ministerial Statement from Secretary of State for Levelling Up, Housing and Communities and Minister for Intergovernmental Relations, Michael Gove 19 December 2023

Invest 2035: the UK's modern industrial strategy, Department of Business & Trade (24 November 2024).

6.2 Cambridge Local Plan 2018

Policy 1: The presumption in favour of sustainable development
Policy 2: Spatial strategy for the location of employment development
Policy 5: Sustainable transport and infrastructure
Policy 6: Hierarchy of centres and retail capacity
Policy 8: Setting of the city
Policy 14: Areas of Major Change and Opportunity Areas
Policy 28: Sustainable design and construction, and water use
Policy 29: Renewable and low carbon energy generation
Policy 31: Integrated water management and the water cycle
Policy 32: Flood risk
Policy 33: Contaminated land

Policy 34: Light pollution control
Policy 35: Human health and quality of life
Policy 36: Air quality, odour and dust
Policy 37: Cambridge Airport Public Safety Zone and Air Safeguarding
Policy 40: Development and expansion of business space
Policy 42: Connecting new developments to digital infrastructure
Policy 55: Responding to context
Policy 56: Creating successful places
Policy 57: Designing new buildings
Policy 59: Designing landscape and the public realm
Policy 60: Tall buildings and the skyline in Cambridge
Policy 61: Conservation and enhancement of historic environment
Policy 62: Local heritage assets
Policy 67: Protection of open space
Policy 68: Open space and recreation provision through new development
Policy 69: Protection of sites of biodiversity and geodiversity importance
Policy 70: Protection of priority species and habitats
Policy 71: Trees
Policy 73: Community, sports and leisure facilities
Policy 80: Supporting sustainable access to development
Policy 81: Mitigating the transport impact of development
Policy 82: Parking management
Policy 85: Infrastructure delivery, planning obligations and the Community Infrastructure Levy

6.3 **Neighbourhood Plan**

N/A

6.4 **Supplementary Planning Documents**

Biodiversity SPD – Adopted February 2022
Cambridgeshire Flood and Water SPD – Adopted November 2016
Health Impact Assessment SPD – Adopted March 2011
Landscape in New Developments SPD – Adopted March 2010
Open Space & Recreation Strategy SPD – Adopted October 2011
Planning Obligations Strategy SPD – Adopted March 2010
Public Art SPD – Adopted January 2010
Sustainable Design and Construction SPD – Adopted January 2020

7.0 **Other Guidance**

Cambridgeshire Design Guide for Streets and Public Realm (2007)
Cambridgeshire and Peterborough Waste Partnership (RECAP): Waste Management Design Guide
Cambridge Air Quality Action Plan
Greater Cambridge Retail and Leisure Study (June 2021)
Greater Cambridge Employment and Housing Evidence Update (January 2023)
Greater Cambridge Growth Sectors Study: Life science and ICT locational, land and accommodation needs (Final Report, September 2024)

8.0 Consultations

8.1 Anglian Water – No Objection

8.2 The response notes that the foul drainage from the development is in the catchment of the Cambridge Water Recycling Centre (WRC) which does not currently have capacity to treat flows from the development. However, Anglian Water acknowledges that it is obligated to, in the event of planning permission being granted, accept foul flows from approved developments and would therefore, in the event of planning permission being granted, take the necessary steps to ensure there is sufficient treatment capacity at the Cambridge WRC.

8.3 It is also noted that Anglian Water has applied to the Environment Agency for an interim new permit to address exceedance. Anglian Water's long-term plans for Cambridge WRC are linked to the Cambridge relocation project and the Development Consent Order. The new Cambridge WRC will take all existing flows from current Cambridge WRC and all flows from future growth within the WRC catchment. Anglian Water are working with Greater Cambridgeshire to understand the long-term growth figures, using the emerging local plan allocations and planning permissions. This will allow Anglian Water to design and deliver a new Cambridge WRC which can meet future demand.

8.4 Post-decision engagement is requested in relation to the used water network, and support is given to the use of sustainable urban drainage systems (SuDs) subject to it meeting their requirements.

8.5 The response raises no objection to the proposed development subject to a Surface Water Management Strategy condition and the following informatives:

- Anglian Water assets
- Notification of intention to connect to the public sewer
- Protection of existing assets
- Building near to a public sewer
- Sewer adoption agreement

8.6 Access Officer – See Disability Consultative Panel comments below

8.7 Requested the application be presented to the Disability Panel in October 2023. Full comments have been attached at Appendix D.

8.8 **Active Travel England – No Objection**

8.9 Active Travel England (ATE) responded to the initial consultation on the original scheme, and acknowledged that the proposal could deliver significant active travel improvements for the site and for the local community, however, the following concerns were raised:

- Route for cyclists through the site could be more direct and coherent.
- Cycle parking could be given greater priority in terms of its location within the development.
- Illustrative site access is a conventional roundabout designed to facilitate and prioritise the flow of vehicles, contrary to LTN 1/20 which requires clear protected space for cyclists.
- Roundabout fails to follow guidance on how to safely design roundabouts for cyclists.
- Review of current approach is recommended, or that the access drawing is not listed as an approved drawing, to allow further design work to be carried out prior to the reserved matters stage.

8.10 Active Travel England were re-consulted when the revised submission was received in September 2024, which incorporated positive changes in relation to the areas of concern raised by ATE. They have advised that the principle of its changes to the spatial structure and movement layout better prioritises cycling and walking and therefore does not object. Its recommendation is made subject to securing detailed design of the future main access and cycle parking.

8.11 **Arts Development Officer – Objection**

8.12 Amendments to the Public Art Strategy are welcomed, particularly the emphasis on community engagement and temporary art. However, there are significant concerns about the deliverability within the current budget. To ensure a more diverse and impactful artistic contribution across the site, commissions should broaden their focus to include architectural collaborations alongside landscape elements.

8.13 While the inclusion of lighting as a creative and functional component of public art is welcomed, the insufficient budget undermines the Strategy's potential. This concerning for a site of strategic importance to Cambridge, where public art can enhance the city's cultural and historical narrative and reputation. To achieve these ambitions and comply with the Public Art SPD, it is essential to revise the budget to reflect the development's scale and significance. Adequate funding and a wider artistic approach are necessary for the Strategy to deliver a vibrant and meaningful public art programme that supports Cambridge's aspirations and mitigates the impact of development.

8.14 **Cambridge City Airport – No Objection**

8.15 No objection to the proposed development subject to the following conditions:

- Instrument Flight Procedures Assessment
- Submission of a Navigational Aids Impact Assessment
- Submission of a Bird Hazard Management Plan
- Landscaping Scheme
- Photovoltaic panels: Glint and glare assessment

8.16 An informative in relation to cranes is also requested.

8.17 **Cambridge Fire & Rescue Services – No Objection**

8.18 Cambridge Fire & Rescue Service has responded advising that no additional fire hydrants are required as part of the development, as there are ample operational fire hydrants within the immediate area.

8.19 **Conservation Team – Objection**

8.20 The Conservation Officer acknowledges that the proposals have been amended in response to initial heritage and other objections. This includes reduction in number of buildings; reduction in heights on some plots; reconfiguration of layout, open spaces, and landscaping; and a strengthening of Design Code requirements related to the design of plant and flues.

8.21 Despite the reduction in the revised parameters, concerns remain with regards to the height and massing of the buildings and their subsequent impact on heritage assets. The response is summarised as follows:

- Height and scale of development would result in a harmful impact on the Mill Road Conservation Area, as experienced from key viewpoints in the area, notwithstanding the positive amendments and Design Code measures.
- Amended proposals are more comfortably aligned with the horizon than the previous iteration, with the changes to Plot 2 representing a noticeable improvement, limiting the perceived ‘sprawl’ of the development. Similar improvements acknowledged in views from Redmeadow Hill.
- Development would still be noticeably higher and bulkier than the surrounding low-rise context and would therefore continue to result in adverse impacts on the historic townscape, creating a new focus on the skyline.
- There would be cumulative impacts with the approved Grafton Centre redevelopment which is of comparable scale and sits beside the proposals when viewed from Castle Mound.

- Flues remain a serious concern due to their likely prominence on the skyline, rising up to 25% above the height of each building and being of an unspecified location and design within the outline parameters.
- Updated Design Code recommends the PV zone is omitted from the flue height calculation, allowing the flues to be meaningfully shorter.
- Design Code also provides some comfort on the location and design of flues.
- Partial reduction in height of development has lessened impacts on a number of the affected heritage assets, with the reduction to Plot 2 being a notable improvement.
- The proposed development would adversely affect the setting and significance of Kings College Chapel, St Mary the Great Church, St John's College, All Saints Church, Jesus College, and Christ Church.
- The proposed development would adversely affect the significance of the Mill Road, Central, Kite, Castle and Victoria Road, and Riverside and Stourbridge Common Conservation Areas.
- The proposed development would adversely affect the significance of the Mill Road Cemetery registered park and garden.
- In all instances the identified harm would be less than substantial and so, in accordance with the NPPF, the harm should be weighed against the benefits of the proposal, with great importance and weight given to the conservation of the designated heritage assets.
- Cumulatively, the harm to the significance of the heritage assets is considered to be less than substantial at a moderate level.

8.22 **County Archaeology Team – No Objection**

8.23 Identifies that the proposed development has the potential to impact on archaeology from the prehistoric, roman, and medieval periods. The County's Archaeological Officer disagrees with the conclusion of the submitted Archaeological Assessment that no further archaeological investigations are required given modern disturbance is likely to have impacted on archaeological remains.

8.24 County Archaeology raise no objection to the proposed development subject to a condition for a programme of archaeological evaluation to assess the presence, absence, and significance of any surviving archaeological deposits and to establish the need for archaeological mitigation as necessary. An informative related to the requested condition is also suggested.

8.25 **County Highways Development Management – No Objection**

8.26 The Highway Authority notes the applicant's confirmation that the inclusion of a CYCLOPS junction design in the proposal is indicative and is shown to demonstrate that the red line for the site is able to encompass any potential design for the access. Consequently, the Highway Authority has ceased engaging with the applicant on the RSA Stage 1, as this could be interpreted as the Highway Authority accepting the CYCLOPS junction as the most appropriate access form to accommodate the increased level of

pedestrian and cycle traffic predicted by the Transport Assessment. This is not the case, as other design solutions may work equally well, if not better.

8.27 The Highway Authority has requested an obligation within the S106 that the existing junction design be reviewed and modified to accommodate the increased level of pedestrian and cycle traffic, necessitating some form of new access arrangement.

8.28 The Highway Authority's response concludes by removing its request for the application to be refused, as the access to the development needs only to be established in principle by the outline planning application. Given there is an existing access to the site, the Highway Authority consider that the principle is established, but recognises the need to modify the access due to the proposed modal share.

8.29 **County Highways Transport Assessment Team – No Objection**

8.30 The Transport Assessment Team has no objection to the proposed development subject to a Travel Plan and mitigation package being secured through the S.106. Identified mitigation includes:

- Delivery of new access junction that provides safer access for pedestrians and cyclists to enable the modal shift to walking and cycling.
- Delivery of improved accesses at Sleaford Street, York Street, and St Mathews Gardens to enable the modal shift to walking and cycling.
- Delivery of improved cycle route through the site with some off site signage improvements to enable the modal shift to walking and cycling.
- Contribution of £30,000 towards the cost of implementing additional resident parking schemes in the surrounding area.
- Delivery of enhanced bus services to serve the site from park and ride and local out of town bus services to enable the modal shift to bus use.
- Delivery of cycle lanes and pedestrian improvements on Coldhams Lane between the site access and Newmarket Road to enable the modal shift to walking and cycling.
- Delivery of new bus stops and bus stop shelters on Coldhams Lane, with a maintenance contribution for the bus stop shelters of £20,000 should this be required to enable the modal shift to bus use.
- Contribution towards strategic transport including Greater Cambridge Partnership schemes of:
 - £350,000 to the Chisholm Trail
 - £657,000 to the Eastern Access with possible alternatives delivery of a new crossing over Newmarket Road at its junction with Coldhams Lane
 - £30,000 to the Bottisham Greenway
- Contribution of £5,000 towards measures to restrict car parking in the contra flow cycle lane on Harvest Way (CCC scheme).
- Contribution of £866,000 towards a flexible fund to be used for the above strategic transport schemes or additional bus services – to be determined with the applicant.

- Contribution of £409,000 towards a Monitor and Manage Fund to be used for the above strategic transport schemes, additional bus services or other schemes agreed with the applicant. To be allocated if the car mode share targets are not met.
- Establish a Transport Review Group to review progress and allocate funds.
- Travel Plan implementation, monitoring and management including car park management.

8.31 **Design Out Crime Officer (Cambridge Constabulary) – No Objection**

8.32 Response acknowledges that Cambridge Constabulary have been in early consultation with the applicant. It also notes that amendments have been made to the design and layout of the proposal. However, further comment is withheld until the reserved matters stage.

8.33 **Ecology Team – No Objection**

8.34 No objection to the proposed development subject to the following conditions:

- BNG Plan
- Biodiversity Enhancement Scheme
- Green Roofs
- Landscape and Ecological Management Plan
- Ecologically Sensitive Lighting

8.35 **Environment Agency – No Objection**

8.36 Following its initial consultation response, the Environment Agency (EA) notes that the Cambridge Water Company's (CWC) draft Water Resources Management Plan (WRMP) has improved. The EA also recognises that the *Joint statement on addressing water scarcity in Cambridge* could support the measures in the WRMP and will continue to monitor its delivery. On that basis, the EA has removed its holding objection.

8.37 The consultation response acknowledges the Darwin Green appeal decision which was informed by the *Joint statement* and its proposal to implement a water credit system. The EA has reaffirmed its commitment to work with MHCLG, Defra, and the Council to support the delivery of a water credits system, as well as working with the Council on strategic solutions as part of the new local plan.

8.38 The response concludes by recommending that the development should conform to the requirements of Policy CC/WE of the emerging Greater Cambridge Local Plan by achieving full credits for category WAT 01 for BREEAM unless demonstrated to be impracticable. The developer is also encouraged to achieve full credits under BREEAM categories WAT 02, 03, and 04.

8.39 Environmental Health Team – No Objection

8.40 No objection to the proposed development subject to the following conditions and informatives:

- Demolition and Construction Environmental Management Plan
- Construction Method Statement
- Commercial noise
- Noise management plan
- Artificial lighting
- Commercial extraction discharge ductwork
- Delivery hours
- Phase 2 Site Investigations and Phase 3 Remediation Strategy
- Electric Vehicle Charging Points
- Back-up generators
- SPD informative

8.41 East West Railway Company Limited (EWR Co) – No Objection

8.42 Subject to the inclusion of a condition on any planning permission requiring that the reserved matters details within the EWR safeguarding area are agreed in writing with EWR Co prior to submission, EWR Co considers that the application would not prejudice the delivery of the railway and therefore has no objections.

8.43 Health and Safety Executive – No Objection

8.44 The proposed development does not appear to fall under the remit of planning gateway one, as the definition of a 'relevant building' is not met.

8.45 A relevant building is defined as a building which:

- Contains two or more dwellings or educational accommodation; and
- Meets the height condition of 18 metres or more in height, or 7 or more storeys.

8.46 Historic England – No Comments

8.47 Following amendments to the application in September 2024, Historic England responded to the re-consultation stating that it does not wish to offer advice. The response was caveated that it should not be interpreted as a comment on the merits of the application, and that the views of the Council's specialist conservation and archaeology advisers should be sought.

8.48 This represents a non-substantive response to the amended scheme. It neither offers new comments nor reaffirms previous concerns and objections to the original submission. Consequently, as also suggested by

Historic England, officers are relying upon the Council's Conservation Officer's response.

8.49 Landscape Design Team – No Objection

8.50 The Landscape Team welcomes the amended submission which successfully resolves the landscape concerns. They have raised no objection to the application subject to the following conditions:

- Outline/Strategic Landscape Maintenance and Management Plan
- Hard and Soft Landscape Scheme
- Design Code Compliance
- Street and Public Area Lighting Scheme
- Details of transitions between areas outside of the red line boundary and the site, such as those at York Street, Sleaford Street, and St Matthew's Garden.

8.51 For context, the previous response from the Landscape Team provided more detail and, while it requested minor amendments to the Design Code which have since been made, it concluded that the revised submission has successfully resolved the majority of negative and harmful impacts. Regarding landscaping and public open space, the response confirms that the proposals have been significantly improved and that there are no outstanding objections to them. Concerning the townscape and visual effects, the response confirms that the site can accommodate the proposed increase in scale and massing, with the identified harm being at an acceptably low level.

8.52 The Landscape Team consider the provision of extended public open space, new play areas and opportunities for play, increased tree planting, and other greening measures which improve biodiversity, as well as the ground-floor public offering, will positively offset the low level of harm identified. The Landscape Team are therefore able to support the development.

8.53 Lead Local Flood Authority – No Objection

8.54 The Lead Local Flood Authority (LLFA) is satisfied that, based upon the submitted documents, the surface water from the proposed development can be managed through the use of rain gardens, permeable paving, attenuation tanks, a detention basin and blue roofs. The LLFA have no objections in principle to the development subject to the following conditions and informatives:

- Detailed surface water drainage strategy
- Surface water management during construction
- Verification of the completed surface water drainage system.
- Signage informative
- Green roofs informative
- Pollution control informative

- Construction surface water maintenance informative

8.55 Ministry of Defence (Infrastructure Safeguarding Team) – No Objection

8.56 The MOD has stated that the proposed development falls outside its safeguarded area and does not affect other defence interests and therefore has no objection to the development proposed.

8.57 Natural England – No Objection

8.58 Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes.

8.59 Sustainability Team – No Objection

8.60 Following receipt of amendments to the Design Code, the Sustainability Officer responded raising no objection to the proposed development, subject to the following conditions:

- Sustainability and energy strategies
- BREEAM pre-assessments
- Water calculator
- Commercial water metering
- Water efficiency implementation
- Rainwater and greywater harvesting
- Submission of Water Conservation Strategies

8.61 Tree Officer – Objects

8.62 Acknowledges the submission of an Arboricultural Impact Assessment (AIA) and notes that 113 individual trees and six tree groups have been assessed in detail. Noted that 61 trees are to be removed, representing an improvement on the 68 trees previously indicated for removal. Of the 58 trees and groups to be retained, 34 are to be unaffected by the development.

8.63 Concern raised in relation to the value given to trees within the AIA; existing trees on site have not been given sufficient time to reach full potential; and the loss of two trees, T77 and T78, which are subject to Tree Preservation Orders (TPOs).

8.64 Considered that the proposed planting of 212 new trees across the site is unrealistic, and so a reduction in this number should be anticipated at the reserved matters stage, with many of the trees likely to be limited in stature or shrubs. To enable replacement trees to reach their full potential, it is essential that strategic planting of larger trees be located where they can be protected for the long term.

- 8.65 Support given to the proposed green space to the south of the Coldhams Lane roundabout; creation of a larger, main open space at Hive Park; and improvements made to other open spaces, so that some larger tree species can be considered at the reserved matters stage.
- 8.66 Response concluded by objecting to the removal of the two TPOs, but broadly supporting the remainder of the proposed development, due to increase in spaces for strategic tree planting, subject to the following conditions:
- Tree protection methodologies
 - Detailed tree planting plans for each reserved matters application
- 8.67 **Urban Design Team – No Objection**
- 8.68 The Council's Principal Urban Design Officer is satisfied that the majority of their previous comments have been addressed, however, the response of no objection is subject to their recommended conditions and further investigation of the daylight and sunlight impacts on neighbouring properties.
- 8.69 For context, the previous urban design response supported many aspects of the revised submission, explaining that, overall, they are more comfortable with the limits and site wide envelopes that are established through the revised Parameter Plans and substantially revised Design Code. It also outlined that the revised application would create a much-improved structure, creating a more robust overarching strategic framework that strikes a good balance between flexibility and control, and has the potential to guide the future reserved matters applications in a coherent and more responsive way.
- 8.70 The previous response to the revised submission did, however, recommend further refinements to the Design Code in relation to the introduction and the sections on sustainability and urban heat island; legibility framework; active travel framework; uses and mix; servicing, access and car parking strategy; street typologies; landscape vision; lighting, wayfinding and security; site wide built-form design principles; character areas; plot specific codes; and the example compliance checklist.
- 8.71 The following conditions have been recommended:
- Further work/amendment to Outline Wayfinding Strategy
 - Design Code condition
 - DAS to be listed as a document for approval
 - Site wide 15mph design speed
- 8.72 A S.106 obligation securing a meanwhile use strategy has also been requested.

- 8.73 **Design Review Panel Meeting of 23 April 2024 (pre-application stage)**
- 8.74 Full response attached at Appendix C.
- 8.75 **Disability Consultative Panel of 31 October 2023 (pre-application stage)**
- 8.76 The applicant presented the scheme to the panel highlighting the proposed accessibility measures, including step-free access, cycle access, and public transport. It was noted that whilst there will be a reduction in parking, accessible parking will still be provided in excess of the policy requirement, with accessible cycle parking also to be provided in accordance with relevant guidance.
- 8.77 The presentation also covered the accessibility of the layout and buildings. And a landscape strategy was presented with an emphasis on the design principle to ensure the character of the site is welcoming and inclusive. Attention was drawn to the materiality, furniture, lighting, wayfinding, and inclusive design language.
- 8.78 Panel comments and queries covered toilet provision and design; completion timescales; bus provision; the potential cinema; cycle and pedestrian connectivity; street furniture; safety and surveillance; accommodation of independent businesses; whether residential uses are to be incorporated; and children's play. The applicant team engaged and responded to the points of discussion.
- 8.79 The Panel's response is attached at Appendix D.

9.0 Third Party Representations

- 9.1 At the time of writing this report, approximately 367 representations have been received during the first, second, and third rounds of public consultation.
- 9.2 Those in objection have raised the following issues categorised under relevant theme:

Planning Principles/Land Use(s)

- No housing proposed.
- Increase in jobs and absence of housing would worsen the housing crisis.
- No evidence of need for the proposed lab space.
- Unsustainable development contrary to the Local Plan and NPPF.
- Proposal should include more retail, restaurants, gyms, and services.
- There should be an obligation securing a gym with a pool, to replace the Everlast gym/pool.
- Some big box retail should be retained.

- Loss of retailers including ASDA, M&S, Wren, TK Maxx, Hobbycraft, Pets at Home, and B&M.
- Loss of veterinary practice.
- Removal of existing uses would have an adverse impact on individuals with physical health issues and those who cannot drive.
- Loss of retail will require local residents to drive to alternative supermarkets.
- This development should be happening on the outskirts of Cambridge.
- Site is not sustainably located.
- Increase in pressure on oversubscribed infrastructure, including education and healthcare.
- People are working from home not offices.
- There are empty offices in Cambridge to be re-used.
- A replacement gym would need to be affordable, other gyms in the area are more expensive.
- Any replacement gym is unlikely to include a pool, due to costs.
- There would be no replacement facilities on the site for some years.
- Labs should be accommodation in science parks.
- Future of the site should be decided through consultation and the new Local Plan.
- Site is not allocated for employment.
- Lab space would be isolated from other science and R&D units.

Design/Character/Heritage/Townscape and Visual

- Height and massing of the proposed buildings would be out of character with the surrounding context.
- Overdevelopment of the application site.
- Harm to the Mill Road Conservation Area.
- Harm to the character of open spaces (Silverwood Close, Cromwell Road, and Coldhams Common).
- Harm to the historic Cambridge skyline.
- Viewpoint assessment contains no viewpoints from Silverwood Close, York Street, or Sleaford Street.
- 3D model should be produced.
- Submission contains misleading information on building heights, showing existing properties as 20 metres in height.
- Design proposals are boring, generic, and lack distinctiveness.
- Inadequate open space.
- Design will encourage crime and antisocial behaviour.
- Inappropriate flue heights.
- Lack of active frontages.
- Absence of a quality arrival space.
- Request for further CGI aspects refused.
- Re-use of existing structures should have been considered.
- Lab building storeys are considerably higher than residential storeys.
- 7/8 storey commercial buildings would be equivalent to 13 residential storeys.

Biodiversity and trees

- Loss of wildlife.
- Loss of trees without justification.
- New trees would take time to establish and mature.
- Bats will be disturbed.
- Site serves as a corridor for wildlife from Coldhams Common.
- Unclear what the impact will be on trees adjacent to the site in Rope Walk.
- Poor response to biodiversity crisis.
- Larger trees and native trees are needed.
- Loss of protected trees (TPOs).
- TPO trees off-site need to be protected.

Amenity

- Loss of daylight and sunlight to surrounding properties, including overshadowing of gardens, with exceedances of BRE standards.
- Loss of privacy and increase in overlooking, including from buses.
- Demolition and construction phases would disturb neighbours for years.
- Service vehicles would become a nuisance to neighbouring properties.
- Revised proposals would be worse due to closer proximity of buildings to Silverwood Close.
- Proposals would negatively affect the wellbeing and health of neighbours.
- Disruption to neighbours who work from home.
- Increase in noise, vibration, and artificial lighting.
- Oppressive outlook for neighbours.
- Vehicle movements would give rise to fumes.
- Security cameras would reduce privacy.
- Days on which construction will occur have increased.
- Cafes and restaurants would be open throughout the day and night.
- Skate Park will lead to noise and disturbance 24 hours a day.
- Daylight and Sunlight report is flawed, using inappropriate justifications and inaccurate modelling.
- Consideration not given to the amenity of neighbouring gardens.

Environment

- Increase in air pollution.
- Sustainability measures are inadequate and would not outweigh the environmental harm and energy requirements.
- Added burden on water supply with no final and tested solution for mitigation.
- Grafham Water and Fens Reservoir schemes will not be completed in time for the development.
- Proposal would worsen the Urban Heat Island Effect already affected the area, with modelling not provided.

- Unacceptable contribution to climate change
- There would be sewerage spillages into the River Cam due to inadequate infrastructure.
- Anglian Water has confirmed there is inadequate sewerage infrastructure.
- Dust from construction activities.
- Unacceptable flood risk.
- Increase in light pollution.
- Disruption of wind and airflow.
- Not known what activities will be undertaken in the labs or what contaminants/pollutants will be released.
- Waste management strategy is inadequate and unrealistic.
- Proposal does not address solar gain.

Highways and Transport

- Increase in traffic and congestion during construction and occupation phases.
- Closure of Mill Road bridge will add to congestion issues.
- Unrealistic approach to public transport.
- Less parking should be provided.
- Proposals would lead to inappropriate parking practices in the surrounding area.
- Inadequate parking proposed.
- Access is inadequate.
- Conflict between pedestrians and other road users.
- Cycle infrastructure is poor, including non-compliance with LTN 1/20.
- Rope Walk should remain as a private road.
- Bus service improvements are not good enough.
- Secure cycle parking required.
- Issues for emergency access.
- Reduction in traffic on Beehive would only increase traffic on Cambridge Retail Park.

Other

- No evidence of benefits for the community.
- Current site is liked and well-used by the local community.
- House prices will become even less affordable.
- If approved, the development would set a precedent for other similar developments.
- Independent equalities impact assessment should be undertaken prior to determination.
- Developers only concerned with profit and viability.
- Railpen could redevelop Cambridge Retail Park instead.
- Breach of Right to Light.
- Combined impacts with The Grafton Centre and Cambridge Retail Park.

- Local open spaces would be overwhelmed, particularly St Matthew's Piece.
- Interest groups supporting the proposal are benefitting from Railpen's investments.
- Commuters will park at Cambridge Retail Park.
- Overshadowing of surrounding properties would hinder solar panels.
- Inequality due to lack of inclusive access.
- Old and disabled people will be disadvantaged by the proposals.
- Piling and construction activities could damage neighbouring properties.
- Neighbouring house prices will go down.
- Engagement strategy has focussed on young people.
- Porcelanosa building should be left intact.
- Beehive is a place where people can park and shop for free.
- Parking is too expensive for access retail in the City centre.
- Queried what the contingency plan is if the site were to stall or not be completed.
- Cambridge is being gentrified.
- Development is prejudicing those on lower incomes.
- Lunchtime food and drink offerings would increase single use waste.
- Archaeological value of the site is greater than suggested.
- There are discrepancies and inconsistencies within the submission.
- Application is premature.
- Right to Light.
- Proposal will become another CB1.
- Health impacts not adequately addressed.
- Applicant is using 'planning fatigue' to their advantage.
- Queried what will happen if the Cambridge Congestion Charge is introduced.

9.3 Those in support have raised cited the following reasons:

- Developer has taken on board feedback.
- Revised proposals are significantly improved.
- Current site is poor quality and makes poor use of land in central Cambridge.
- Proposal represents high quality design and an efficient use of brownfield land.
- Significant increase in jobs, including for local people.
- Reduction in car movements.
- Improved public spaces and services for the community.
- Retention of retail.
- Benefits to the local economy, including tax revenue.
- Redevelopment would reduce pressure on the countryside and remove the need for new towns.
- Proposed lab space would address unmet need.
- Efficient water usage.
- There are other supermarkets in the local area.
- No Urban Heat Island effects.

- Increase in social capita and infrastructure.
- Pioneering employment and skills plan.
- 100% BNG and planting of 212 trees.
- Improvement to bus services.
- Underprivileged young people will benefit from Railpen's plans, i.e. work experience, career advice, and learning and development opportunities.
- Chisholm trail needs further attention.
- Route from the station to the site should be prioritised for optimisation.
- We need to make it easier for innovative companies to grow.
- It would support Cambridges growing life science sector.
- Relieve pressure on the Green Belt.
- No impact on the Mill Road Conservation Area.
- Current car park is bad for the environment.
- If not supported, more high-quality jobs will be lost to other lab space centres, like Boston.
- Existing stores can be a source of antisocial behaviour.

10.0 Member Representations

10.1 Cllr. Richard Robertson responded to the application, as Ward Member for the Petersfield Ward, on 13 October 2023 requesting that a submitted leaflet, prepared by Cllrs Mike Davey, Richard Robertson, Richard Howitt, and Alex Bulat, be taken as an objection to the application. The leaflet related to the original application submission, so it does not reflect the detail of the latest proposal. The content of the leaflet is summarised as follows:

- The outline consent becomes the minimum that must be accepted when further applications are submitted for the detail.
- No housing is proposed.
- No car parking for workers, even though an estimated 5,400 workers would be travelling to the site every day congesting the roads, cycle paths, and pavements.
- Significant scale of the 14 buildings not clearly shown.
- Community facilities could be provided by a much less imposing scheme.
- Existing shops are at most 8 metres tall, whereas the proposed blocks would be between 15 and 40 metres tall.
- Three of the tallest blocks would have a flue of up to 25% extra height, meaning the tallest block could be 50 metres in height.
- Such large buildings would create wind tunnels and Urban Heat Islands.
- Local residents would be overlooked and overshadowed, while also experience an increase in noise, air, and light pollution.
- Insufficient information provided about the views of the development from neighbouring residential properties.
- Further visualisations requested on the impact on adjacent residents.
- Inadequate public open space.
- While Beehive traffic would be reduced, the traffic would still exist on the local road network due to relocation of the supermarket and other stores.

- Unclear in the absence of proposed housing where the new workers would live.
- Extra buses would not be enough to mitigate against increase in workers.
- Applicant has promised to relocate some of the shops from Beehive to Cambridge Retail Park, with the main supermarket, Asda, to be moved to the far end to take over the Curry's shop.
- Harmful impact on the Cambridge skyline.

11.0 Local Interest Groups and Organisations

11.1 **Abbey People** submitted representations on 15 October 2024 supporting the proposals for the following reasons:

- Railpen has been supporting the work of Abbey People through donations and volunteer days since 2023.
- Railpen has also sponsored Abbey People.
- Support of the application is not due to Railpen's engagement with the Charity.
- Positive community engagement approach.
- Reduction in car journeys and promotion of active travel.
- Key retailers to be retained.
- Reduction in scale and re-arrangement of buildings.
- Proposed skills partnerships and contribution towards a youth facility.
- Improved use of the site and provision of public realm.
- Drastic increase in jobs.
- Increased in biodiversity and environmental sustainability.
- Substantial built environment, transport, leisure, and economic benefits expected for the Abbey community.
- Proposed plans fully supported.

11.2 **Better Beehive** submitted representations on 18 December 2023, 29 October 2024, and 13 January 2025 objecting to the proposals. The 2023 response to original submission objects for the following reasons:

- Proposal represents overdevelopment and would set a precedent.
- Need not justified, especially in light of Council's own evidence.
- Unacceptable harm to the City skyline, local character, heritage assets, water resources, traffic/highway impacts, and residential amenity.
- Contrary to planning policy.
- Absence of residential uses.
- Inadequate infrastructure capacity and lack of climate change mitigation, including Urban Heat Island effects.
- Harm to human health through air pollution and urban heat island effects.
- Unclear what research activities would occur with potential harm to the environment and human health. LPA has a duty of care.
- Cumulative effects with other developments, including the Grafton Centre redevelopment.
- Lack of 3D imagery from neighbouring areas, despite requests.

- Beehive Centre offers an important community function with its retail.
- Unjustified loss of trees and inadequate tree planting strategy.

11.3 The second response, received in October 2024 following major revision to the application, is summarised as follows:

- Revisions do not overcome objections to overdevelopment, unjustified need, precedent, traffic/transport issues, unsustainable location, visual impact, lack of infrastructure, local character, poor design and landscaping, heritage assets, absence of housing, cumulative impacts, water resources, climate change, human health, and residential amenity.
- Multi-storey Car Park moved closer to Silverwood Close.
- Green spaces would still not address the Urban Heat Island Effects.
- Queried who would deliver and manage communal and public spaces.
- Design Code could be improved.
- Mixed-use development would be more appropriate.

11.4 The most recent response, received in January 2025, focuses on the Daylight and Sunlight Report Addendum and revised Design Code submitted in December 2024. The concerns raised are summarised as follows:

- Numerous properties in St Matthews Gardens and Silverwood Close would fail to comply with BRE guideline levels for daylight and sunlight, including overshadowing.
- Illustrative scheme would still result in harm to residential amenity.
- Residential amenity harm is unacceptable.
- Design Code postpones consideration of daylight and sunlight to the reserved matters stage.
- Concern that the height and massing will remain as shown in the outline parameter plans.
- The site continues to be over developed, with too numerous, overly large buildings, far too close together and too close to domestic dwellings.

11.5 **CamCycle** submitted representations on 28 October 2024. Whilst it has objected, it advises its main areas of concern (stated below) could be overcome by planning conditions.

- Requests that the main cycle route is consistently 4 metres width;
- Requests clearer strategy for the wider cycle network in nearby areas including Cambridge Retail Park and along Coldhams Lane to Newmarket Road;
- Requests further clarity at detailed design stage to ensure each unit has adequate cycle parking close to building entrances and can be easily accessed from the cycle network;
- Requests clarity at detailed design stages whether a shared, ramped provision with interconnected basement access could be provided in order that its future cycle user experience can be prioritised;

- Requests delivery of a high-quality active travel central route (even if temporary) which connects to both Sleaford Street and York Street as part of enabling works.

11.6 **Cambridge Living Street (CLS)** submitted a representation on 29 September 2023 objecting to the proposals for the following reasons:

- Concerned about the negative implications of the proposals on users and passersby on foot, on a mobility scooter, or in a wheelchair.
- Proposals disincentivise active travel.
- Relocation of retail will extend walking times for local residents, seriously inconveniencing the vulnerable and disabled.
- Queried whether existing rights of way would be maintained during the construction phase.
- Public health risk due to construction pollution.
- Construction phase will significantly increase traffic.
- Speed limit should be reduced to 20mph on Coldhams Lane.
- Road crossings need generous phasing for fragile pedestrians and disability vehicles.

11.7 **Cam Valley Forum** submitted a neutral representation on 10 October 2024 for the following reasons:

- Concerned that Anglian Water have noted there is inadequate capacity for the proposed foul water flows.
- Urge the use of conditions to prevent harm.
- If permitted, the proposals would increase pollution in the Cam.
- Some users of the river have already become ill due to faecal contamination.
- Labs produce very significant levels of phosphate pollution.
- There have already been mass fish die-off in the Cam, so an increase in pollution is unacceptable.
- No duty for Anglian Water to provide a sewerage connection to non-residential uses.
- Condition recommended preventing occupation until there is adequate foul water treatment capacity.
- Anglian Water have highlighted there will be an unacceptable risk of flooding downstream.
- Condition should be imposed requiring surface water to be managed on-site.

11.8 **Cambridge Past, Present, and Future** submitted representations on 4 October 2023 and 15 October 2024 objecting to the proposals. The 2023 response to original submission objects for the following reasons:

- Speculative development contrary to emerging policy with no justification.
- Inaccessible location.
- Harm to Mill Road Conservation Area, Coldhams Common, and historic skyline.

- Commercial use is inappropriate for the site and not needed given recent consents and policy evidence suggesting needs have been met.
- Unclear how modal shift will be achieved.
- Traffic modelling is inappropriate.
- Conflict between highway users.
- Parking strategy does not accommodate for retail uses and community visitors.
- Could lead to inappropriate parking practices.
- Overdevelopment.
- Does not sufficiently promote active travel.
- Bulky intrusion to skyline with harmful visual impacts.
- Poor public realm, open space, and landscaping.

11.9 The most recent response, received in October 2024, raises the following concerns:

- Revised plans do not address previous concerns.
- Site is not identified in the Local Plan as a location for offices and R&D development.
- Need has not been justified, particularly given recent consents and the conclusion in the Growth Sectors Study (Iceni, September 2024) that the need for wet labs has been met.
- Buildings still too large in terms of visual impact and harm to the Conservation Area.
- Absence of residential.
- Poor location for accessibility.
- Encouraging Park & Ride is encouraging people to drive to Park & Ride.
- Inadequate access and connectivity proposed.
- Highway safety issues.
- Buildings still amalgamate into a single mass.
- Cumulative visual impacts with the Grafton Centre.
- Harm to heritage assets in the City's historic core, due to visual impact.
- Out of character with surrounding low-rise context.
- Lack of landscaping to eastern boundary.
- Could lead to inappropriate parking practices in the area.
- Concerned about impact in terms of water resources, including chalk aquifers.

11.10 **Friends of St Matthew's Piece** submitted a representation on 17 September 2023 objecting to the proposals for the following reasons:

- Inadequate open space would lead to pressure on St Matthew's Piece, which does not have capacity to accommodate the increase.
- The adverse impacts would be particularly felt by those within restricted range of travel, including the elderly, disabled people, and young children.
- Bulk and scale of the development would be out of character with the area, and harmful to the Mill Road Conservation Area.

- Harmful visual impact due to views across the city being adversely affected.
- Disruption of wind and airflow.
- Overshadowing and overlooking of neighbouring properties.
- Significant impacts on the water table.
- Water use would place severe stress on trees in St Matthew's Piece.
- Urban Heat Island effects, including cumulative effects with the Grafton Centre.
- Contrary to policies in the Local Plan.

12.0 Assessment

12.1 From the consultation responses and representations received including inspection of the site and surroundings, the key considerations are:

1. Principle of Development - (Section 13)
2. Design, Layout, Scale and Landscaping - (Section 14)
3. Heritage Assets - (Section 15)
4. Townscape and Visual Impacts - (Section 16)
5. Carbon Reduction and Sustainable Design - (Section 17)
6. Biodiversity - (Section 18)
7. Trees - (Section 19)
8. Drainage and Flood Risk Management - (Section 20)
9. Water Resources - (Section 21)
10. Ground Contamination and Remediation - (Section 22)
11. Other Environmental Issues - (Section 23)
12. Residential Amenity - (Section 24)
13. Transport Impacts, Highway Safety and Parking - (Section 25)
14. Public Art Strategy - (Section 26)
15. Other Matters - (Section 27)
16. Third party reps – (Section 28)
17. Planning Obligations – (Section 29)
18. Planning Balance – (Section 30)
19. Recommendation – (Section 31)

12.2 Supporting Appendices are as follows:

- Appendix A - Environmental Statement: Non-Technical Summary
- Appendix B – Retail Impact Assessment(s) (Applicant's)
- Appendix C - The Greater Cambridge Design Review Panel Response
- Appendix D - Disability Consultative Panel Review
- Appendix E - Daylight and Sunlight Effects (Independent Review)
- Appendix F - Third Party Representations not addressed within the report
- Appendix G - Officer's Recommended Planning Conditions

13.0 Principle of Development

Local Plan Policy

- 13.1 The Application Site is not identified and/or retained in the adopted CLP (2018) for the current occupying development (large format retail shops) and/or indeed designated for any future alternative development and/or uses.
- 13.2 Within this context, the principle of redevelopment to create a new research and innovation quarter will need to be considered in terms of its compliance with the following key local plan aims and objectives of the CLP (2018):
- **Policy 2 (*Spatial strategy for the location of employment development*); and**
 - **Policy 40 (*Development and expansion of business space*).**
- 13.3 Policy 2 of the CLP (2018) states that the Council's strategy is to support the Cambridge economy, by offering a wide range of employment opportunities, with a key emphasis on growing the Cambridge Cluster of knowledge-based industries and institutions and other existing clusters in the city. In addition to identifying existing employment land allocations, it confirms explicitly that **employment development will be focussed on the urban area, Areas of Major Change, Opportunity Areas and the city centre.** (*bold emphasis added*).
- 13.4 As described in Section 2 of this report, the Application Site is located in an accessible edge of centre location within the city. The proposal to locate new employment generating uses in the form of labs and offices (*or 'knowledge based' uses*) on this edge of city centre site, with good levels of access, is therefore considered to be consistent with the stated aims and objectives of Policy 2.
- 13.5 Policy 40 of the CLP (2018) states that it will encourage new offices, research and development and research facilities to come forward in the city centre and Eastern Gateway; in areas around the two stations (subject to policies in Section 3 of the CLP); and research and development facilities in the Cambridge Biomedical Campus (including Addenbrooke's Hospital), and at the West of Cambridge site, provided they satisfy other relevant policies under Section 3 of the CLP. **Proposals for development of these types of uses elsewhere in the city will also be considered on their merits and alongside the policies in Section 3 of the CLP, with further provisos that the redevelopment of larger employment sites consider introducing shared spaces to enhance vitality and attractiveness.** (*bold emphasis added*).
- 13.6 The proposed redevelopment of the Beehive Centre to create a new research and innovation location in Cambridge City is also considered to comply with the aims and objectives of Policy 40 for the following main reasons:

- it is located on the edge of the city centre boundary;
- the proposals would represent a more efficient use of previously developed land (in comparison to the current land use); and
- it consolidates (further) confidence and support for the Cambridge economy (in terms of job creation and long-term investment) and more importantly reinforces the Council's stated aim to grow the Cambridge Cluster of knowledge-based industries.

13.7 The following sections deal with relevant matters that are connected to the consideration of the appropriateness of the proposals for new research and development at the Beehive Centre.

Need for new science and research floorspace

13.8 The Cambridge region remains a strategic location for life science and technology research sectors, both in national and international terms. The importance of life science and technology sectors to the UK economy has been highlighted in the Government's recently published green paper, '*Invest 2035: the UK's modern industrial strategy*' (November 2024), where it is identified as one of eight high growth sectors that it seeks to specifically support over the next 10 years. The aims of the Government's industrial strategy are also embedded in the recently updated version of the NPPF under Section 6. Key paragraphs which are specifically relevant to planning policy and decision making should be noted:

- *Paragraph 86 part (c): pay particular regard to facilitating development to meet the needs of a modern economy, including by identifying suitable locations for uses such as laboratories, gigafactories, data centres, digital infrastructure, freight and logistics; and*
- *Paragraph 87 part (a): clusters or networks of knowledge and data-driven, creative or high technology industries; and for new, expanded or upgraded facilities and infrastructure that are needed to support the growth of these industries (including data centres and grid connections).*

13.9 Policy 2 of the CLP (2018) remains consistent with the updated version of the NPPF.

Cambridge office and laboratory market evidence

13.10 The following paragraphs consider the Applicant's and the Council's sector-based market evidence/analysis of the relative demand and supply for office and laboratory space in the Cambridge region.

13.11 The Applicant's supporting market-based analysis of recent and future needs for lab and office space in Cambridge is contained in its supporting report '*Cambridge: Office & Laboratory Occupational Market Update The Beehive Centre Redevelopment*,' (Bidwells, August 2024)). The analysis makes the following key observations, which are summarised as below.

Recent market demand

- occupier demand for office and laboratory floorspace in H1 2024 (H1 - the first half of financial year) stood at just over 1.45 million sqft (c.134,709 sqm) which was made up of 754,700 sqft (c.70,114 sqm) of office and 690,500 sqft (c.64,150sqm) of laboratory demand;
- due to the tighter funding environment (comparative), demand for lab floorspace fell between 2022 and 2023 to H1 2024. However, demand has since stabilised and remains resilient across a broad range of floorspace sizes and is expected to increase further as the funding environment improves; and
- demand for smaller lab space (below 10,000 sqft) (c.929 sqm) grew reflecting a strong pipeline in university spin-outs and scale-ups.

Mismatch of supply and demand

- total available office space at the end of H1 2024 was c.873,000 sqft (c.81,104 sqm) compared to a demand of c.755,000 sqft (c.70,142 sqm) (at same date point) with strong market signals that the available supply will be exceeded; and
- total available lab space was nil throughout most of 2022 against demand of over 1 million sqft (c.92,903 sqm) and despite evidence of this easing towards the end of H1 2024, there remained an acute mismatch (differential) of c.128,000 sqft (c.11,892 sqm) in supply compared to c.691,000 sqft (c.61,196 sqm) in demand.

Future availability of office and laboratory floorspace

- **Office space availability:**

- City centre schemes to be delivered by year end 2024 (10 Station Road and Brooklands) are respectively 20% - 50% under offer and/or let already with remaining availability in advanced stages of discussion;
- One Cambridge Square (Cambridge North) was the largest office building delivered in 2023 and is approaching 80% let less than 12 months before practical completion;
- Optik (Peterhouse Technology Park) forecast for practical completion on 2025 has generated good levels of interest; and
- Devonshire Gardens and Botanic Place will not become available to market until 2026 and 2027.

- **Laboratory space availability:**

- Lease take-ups at locations such as Cambridge Biomedical Campus and Unity Campus has been strong;

- Delivery in 2024 of c.150,000 sqft (c.13,935 sqm) expected to be fully let following practical completion; and
- Currently no labs in urban city centre locations available for occupiers to grow and locate.

13.12 The key messages to be taken from the Applicant's submitted market evidence is as follows:

- the market demand for office and lab space has remained resilient despite recent cooling in (investor based) funding;
- the supply of office and lab space across the region continues to lag behind real-term demand; and
- the take up of current existing supply of office space in the City remains strong with limited or no (comparable) availability in lab space availability particularly in start-up or scale-up.

13.13 The Council's (adopted) evidence for anticipated floorspace requirements is contained in Section 8 of '*The Greater Cambridge Growth Sectors Study: Life science and ICT locational, land and accommodation needs*,' (Iceni, September 2024). It should be noted that longer term floorspace commitments that were originally identified in the Regulation 18 First Proposals (Preferred Options) Local Plan (2021) are not considered in the overall assessment of potential future supply.

13.14 The anticipated floorspace supply and demand (in aggregate terms) between 2020 and 2041 is as follows:

- Demand = 889,700 sqm
- Supply (committed planning permissions) = 1,044,338 sqm
- Completions (2020-2023) = 73,363 sqm
- Total balance of floorspace (supply vs demand) = +228,001 sqm

13.15 The Council's evidence makes further assumptions on how the broad availability of floorspace (as indicated above) could be delivered over the same period. Table 8.3 in the evidence base illustrates the assumed availability (by floorspace type and period) as follows:

Type	Completed 2020-23	2023-24	2025-29	2030-41	2042+	+ First Proposals
Office	27,552*	7,869	100,717	68,576	-	NEC / Cambridge East
Dry lab / ICT	20,966	1,033	30,973	45,778	-	-
Dry lab ICT / science (West Cambridge)	-	-	96,667	56,667	56,667	-
Office / dry lab (dedicated to life science)	-	8,872	105,691	39,959	-	-
Wet labs general	15,600	3,840	111,409	15,635	-	Cambridge East / NEC / Babraham
Wet/dry lab genomics (Wellcome Genome Campus)	-	4,417	73,083	24,500	-	-
Wet labs clinical (Cambridge Biomedical Campus)	9,245	11,286	58,218	34,722	-	CBC
Mix / unknown type	-	-	72,448	15,313	-	-
Total	73,363	37,316	694,259	301,149	56,667	-

Source: GCSP, Icen analysis

13.16 Based on its assessment of the relative demand and supply of the office and lab market, the following key conclusions are subsequently noted:

- **Life sciences:**

- There has been a lack of available wet labs (across the size bands) through the 2020-23 period.
- Whilst there was a theoretical committed supply in planning terms, some of this has been long term and not readily deliverable.
- The need for scale-up space (particularly from 500 – 1,000 sqm and up to 2,500 sq.m) has been particularly acute and less well provided for, with Cambridge's portfolio historically better placed for smaller start-ups and more mature businesses.
- Constraints have been due to a combination of viability and space being taken up by larger firms. It is estimated that up to 40% of space should be provided for this size category going forward and current proposals appear better suited to support this.

- The supply for wet lab space through 2025-2030 and beyond is now substantial. However, subject to the details of development proposals, there may remain a shortfall in scale-up space provision. There is also likely to remain a shortfall in wet lab commitments later in the Plan period towards 2041 which can be met through the draft allocations in the emerging Local Plan.
- **ICT:**
 - The future supply of general office space appears relatively healthy looking ahead, however there are likely to be additional requirements later in the post 2030 Plan period, depending on the specific details of current supply and how it is configured to the market.
 - High quality start-up and moreover scale-up space will remain in demand and need to continue to be provided for across the office market spectrum. How well current supply supports this segment will be subject to details of development proposals, however indications are that this sector will be better served.

Conclusion of office and lab market needs

- 13.17 Officers acknowledge that there are nuances between the respective supporting evidence(s), particularly in terms of the assumptions being made in relation to availability (supply) of both office and lab floorspace in both the short and medium terms (at least for the next 5 years to 2030). However, there is also a shared understanding in that there are (and will continue to be) significant challenges in achieving a balance between the needs of the life science and ICT sectors and the relative availability of suitable sites that can be delivered across the Cambridge region. Therefore, adopting a flexible approach to decision making (on a case-by-case) basis will be necessary so that a resilient and flexible supply pipeline can be provided throughout the different economic cycles.
- 13.18 In the instance of this planning application, it is considered that the proposals would assist in meeting some of the anticipated (and growing) needs that are currently being identified, and especially for the following reasons:
- Demand for high quality office space is likely to outstrip short-term supply in the City;
 - Lab space availability is currently underprovided in the City; and
 - Start-up and scale-up space remains acutely underprovided across the Cambridge region.
- 13.19 The current outline planning application through its scale, design and edge of centre location, provides an important opportunity to secure an identified need for office and lab floorspace in the City. Supporting the proposals in this instance recognises the inherent challenges in delivering physically available and viable floorspace in the short to medium including the contribution it can make in order to maintain the Cambridge region as a

national and global destination for life sciences and ICT research in the much longer term.

Retail and town centre uses

Reduced provision of retail and town centre use

- 13.20 As noted in Section 3, the proposed research and development use would be accompanied by a smaller quantum of retail and town centre uses that equate to a total floorspace of approximately 5,178 sqm (GIA), and when completed, will serve future employees and the local community.
- 13.21 The move from large-format retail to smaller format retail is motivated (in principle) by the nature of the proposed development and the imperative to make efficient use of land. However, this approach to redevelopment has manifested strong community concerns which mainly relates to the loss of existing occupiers and a resulting need to travel further to access alternative and/or similar services.
- 13.22 In each of these instances, the CLP does not:
- a) include the Beehive Centre within the existing hierarchy of shopping designations (see Policy 6); or
 - b) contain other related local plan policy protections that could either retain or secure re-provision of the existing retail quantum or type/mix.
- 13.23 Whilst it is acknowledged that the Beehive Centre currently provides for a range of convenience and comparison retail needs, the function of the planning system is not to override a landowner's commercial prerogative but to encourage and support sustainable development which can secure long term environmental, social and economic benefits. The loss of existing occupiers is therefore beyond the scope of the Council's planning function to intervene. Additionally, the function of the existing site as a retail destination in its own right could not be reasonably resisted under adopted policy.
- 13.24 Notwithstanding all of the above, the outline application would still re-provide for a wide range of smaller scale retail and town centre units / uses which would be secured through the requirements of the submitted Design Code and subsequent future reserved matters applications. Furthermore, a Local Centre Strategy should be secured via Section 106 obligation which will assist the Council in securing an attractive retail offer that can meet the needs of the future working population, local community and associated visitors. As set out in the Executive Summary, the applicants have signalled their intention to move some of the valued retailers from Beehive, including ASDA, TK Maxx, B&M, Next, Pets at Home, and Wren, onto a reimagined CRP site with enhanced landscaping, connectivity, and placemaking.

Loss of existing leisure facility

- 13.25 The proposed development would also result in a loss of an existing leisure facility (Everlast Fitness Club), which comprises gym, fitness suite/hall and swimming pool (c.20mx9m).
- 13.26 The current development proposals include flexibility for a wide range of uses at ground floor level, including Use Class F2(d) and Use Class E (d), which would respectively facilitate provision for swimming pools and indoor sport and recreation.
- 13.27 The Applicant has acknowledged that the loss of the existing onsite leisure facility would in part conflict with Policy 73 of the CLP and has also declined (at this stage) to commit to a planning obligation that would secure re-provision of a swimming pool or similar/suitable leisure facility on site advising that:
- the current facility onsite is a private and member only venue under a limited period lease agreement;
 - the feasibility of a swimming pool is cost prohibitive;
 - there are other nearby/similar leisure facilities;
 - that potential active well-being opportunities are already being supported elsewhere onsite, e.g. within the potential future community centre (located to ground floor of Building 10) which would provide opportunities for adaptable community floorspace that will allow for active uses, such as Pilates, dance classes and other forms of exercise classes; and
 - The proposal includes for new and extensive free-to-use external space to facilitate outdoor activities and more generally support improved health and wellbeing

Conclusion of loss of an existing leisure facility

- 13.28 The aim of Policy 73 of the CLP clearly requires that the loss of an existing leisure facility should be compensated through a replacement facility to at least the same scale. The applicants recognise that the proposal does not wholly comply with either of the policy allowances provided under Policy 73. Whilst the Applicant's reasons for not committing itself at this stage is noted, the conflict with Policy 73 still remains and accordingly will need to be weighed in the planning balance. In forming a judgement on this issue, members should be cognisant that the swimming pool / gym itself is: a) limited in size; b) not a public facility; and c) located in an area of the City where there are two gyms and a pool (Nuffield and the Gym Group) in close proximity to the site and, additionally, that within Abbey Ward, Abbey Pool provides a significant public swimming facility readily accessible from the site. As such, there may be some displacement of demand to other public / private facilities as a result of the development but the degree and nature of harm arising through conflict with Policy 73, in officer's view, should not be considered significant when viewed against the scale of the proposal put forward and its wider planning benefits. Nonetheless, in order to more fully mitigate the impact of the proposal, officers are currently reviewing the

scope for an off-site swimming pool contribution to enhance existing public swimming provision elsewhere in the City. This sought mitigation is outlined as part of the S106 chapter to this report.

Sequential and retail impacts on nearby shopping centres

- 13.29 In determining the acceptability of the proposed (reconfigured) retail and town centre uses, particularly outside the Council's established hierarchy of centres, the sequential approach and retail impact tests are required to be considered. The Applicant's supporting '*Town Centre Use/Retail Planning Statement*' (August 2023) and further information in its updated *Town Centre Use/Retail Planning Statement 'Response statement'* (August 2024) considers both the sequential and retail impacts and are attached at Appendix B of the report. The aforementioned retail assessment(s) has relied on the Council's retail and leisure evidence base, '*Greater Cambridge Retail and Leisure Study*' (2021) (GCR&LS))
- 13.30 In relation to the sequential approach to site selection, the NPPF requires that:
- *(paragraph 91) "Local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered."*
 - *(paragraph 92) "When considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored."*
- 13.31 The Planning Practice Guidance (PPG) provides guidance on how the sequential test should be used in Town Centres and Retail Section. Paragraph 11 is particularly relevant in that: a) any assessment should be proportionate and appropriate for the given proposal; and b) the following considerations should be taken into account in determining whether a proposal complies with the sequential test:
- *with due regard to the requirement to demonstrate flexibility, has the suitability of more central sites to accommodate the proposal been considered?*
 - *is there scope for flexibility in the format and/or scale of the proposal?*
 - *if there are no suitable sequentially preferable locations, the sequential test is passed.*

- 13.32 Fundamentally, the locational and specific need for the proposed town centre use floorspace is addressed through providing a mix of town centre uses (Classes E and F uses) which would in part replace some of the lost floorspace that is currently provided on the site.
- 13.33 The reconfigured floorspace (as proposed) is intended to create a high-quality Local Centre that: a) is purposely designed to activate and enhance the proposed public realm; and b) meet the specific needs of future employees and the day-to-day needs of local residents. Given the site-specific need for the proposed retail/town centre use floorspace, it is considered that it would not be suitable or viable to locate it in any other centre and as such a sequential assessment of sites outside the current application site should not be required.
- 13.34 However, for robustness the Applicant's retail statement considers the suitability and availability of alternative sites within a defined catchment area. Recommendations made by the Council's retail consultant (Urban Shape) in respect of increasing the size of the catchment area and the average size of premises/land deemed available/suitable were agreed and are considered separately in the aforementioned updated retail survey ("Response Statement"). The catchment area (as amended) includes as follows:
- Fitzroy/Burleigh Street/Grafton PSA (The Grafton), Cambridge City Centre
 - Mill Road East District Centre
 - Mill Road West District Centre
 - Norfolk Street Neighbourhood Centre
 - Fairfax Road Neighbourhood Centre
- 13.35 The findings for the respective centres (as above) can be found in the detailed surveys at Appendix B of this report. In summary however, the sequential assessment demonstrates that none of the sites assessed within each of the catchment areas are preferably suitable or available for the proposed retail and town centre uses. On this basis, officers accept that the proposed development would pass the sequential test requirements as set out above.
- 13.36 In terms of potential retail impacts, the NPPF (paragraph 94) advises that retail and leisure developments outside town centres must undergo an impact assessment if they exceed a locally set floorspace threshold or the default threshold of 2,500 sqm. Policy 6 of the CLP (2018) aligns with the NPPF approach, requiring a retail impact assessment for developments over this threshold and potentially for those below if they have a cumulative effect on nearby centres. The NPPF further specifies that planning applications should consider the potential impact on existing investments and the vitality and viability of town centres (in the identified catchment), and that planning permission should only be denied if the development is likely to cause a significant adverse impact, though this is just one factor to weigh in the decision-making process.

- 13.37 Similar to the sequential approach, paragraph 17 of the PPG states that the impact test is undertaken in proportionate and locally appropriate way and that it is assessed in relation to all town centres that may be affected.
- 13.38 It should be acknowledged that a retail impact assessment would not be required in this case (normally) given that: firstly, the proposed development involves a gross reduction of retail floorspace; and secondly, its reconfigured form is to provide an ancillary amenity for future employees and the local community including enabling of its broader placemaking aims and objectives.
- 13.39 Notwithstanding this, the Applicant's retail statement(s) includes a retail impact assessment to determine whether the proposed town centre uses are appropriately scaled to meet the needs of new employees and local residents and also provides a qualitative vitality and viability assessment of nearby centres in order to evaluate any potential vulnerability to retail impacts. The catchment area of nearby centres identified for the purposes of this assessment are as follows:
- Mill Road East District Centre
 - Mill Road West District Centre
 - Mitchams Corner District Centre
 - Barnwell Road Local Centre
 - Arbury Road/Milton Road Local Centre
 - Norfolk Street Neighbourhood Centre
 - Fairfax Road Neighbourhood Centre
 - Ditton Lane Neighbourhood Centre
 - Green End Road Neighbourhood Centre
 - Chesterton High Street Neighbourhood Centre
 - Hawthorn Way Neighbourhood Centre
- 13.40 In accordance with the 2 tests prescribed in paragraph 94 of the NPPF (see 13.30 above), the Applicant's assessment makes the following observations (in summary):
- **Potential impacts on investment in centres:**
 - The assessment of the potential impact on existing, planned, and committed in-centre investment in surrounding defined centres reveals that no relevant retail or town centre investment needs to be considered in relation to the proposed development.
 - A review of all the centres confirmed that there are no significant in-centre investments that could be impacted by the proposed development.
 - No investment is identified in either The Mill Road East and West district centres. The only identified investment in these areas is the Mill Road Opportunity Area and its associated sites. These sites are also not designated for town centre or retail use development, and all three have planning permission, with two already constructed and the

third set to be implemented soon. As such, it does not expect the proposed development to significantly impact these sites.

- Overall, there no other relevant in-centre investments identified that would need to be factored into the impact assessment.

- **Potential quantitative and qualitative impacts on centre vitality and viability:**

Proposed Convenience Goods Floorspace:

- The application site currently includes established stores such as M&S Foodhall, Asda, and B&M, which serve both the local population and a wider catchment area. These stores generate a significant convenience goods turnover of approximately £39.9 million (adjusted for inflation to 2023 prices).
- The proposed convenience goods floorspace is expected to generate just £1.08 million in turnover, representing only 2.7% of the existing turnover at the site.
- Since the existing convenience stores already generate a considerable portion of their turnover from the local area, any spending not captured by the new Local Centre will likely be diverted to other nearby centres such as Mill Road East and West including Cambridge Retail Park (CRP). Therefore, in terms of the impacts on convenience goods expenditure, the proposed development is predicted to have a positive effect on its nearest defined centres.
- Overall, a quantitative retail impact assessment for convenience goods is deemed unnecessary.

Proposed Comparison Goods Floorspace:

- The Beehive Centre already offers significant comparison goods retailing, generating a turnover of £41.7 million (adjusted for inflation to 2023 prices). The proposed comparison goods floorspace at the Local Centre is projected to generate only £0.43 million, which is just 1.0% of the adjusted turnover at the Beehive Centre.
- The Beehive Centre mainly offers comparison goods in a retail warehouse format, with retailers like Asda and B&M selling items (such as toiletries, books, chemist goods, pet products, and home goods) that overlap with local centres. It's considered that residents in the area will spend over £0.43 million on these goods at the Beehive Centre. As a result, it is unlikely that this will significantly impact trade at other nearby centres, or if it does, the effect would be minimal.
- Even assuming that a portion of this turnover is drawn from the Mill Road district centres, the quantitative impact would be only 5.4% of spend, which is too small to be considered significant.
- Overall, a quantitative impact assessment for comparison goods is also deemed unnecessary.

Proposed Restaurant/Café Floorspace:

- The GCR&LS (2021) does not provide turnover estimates for existing restaurants or cafés in Cambridge that can be used in a quantitative impact assessment and therefore the Applicant's assessment relies on a qualitative approach, focusing on the Mill Road East and West district centres.
- The proposed restaurant and café floorspace is projected to generate a turnover of £3.59 million which will be derived from its immediate local catchment of residents as well as beyond, e.g. visitors ancillary/linked trips to CRP and Mill Road district centres. Given that the predicted trade will be shared across a number of nearby district and local centres, the quantitative impacts of the proposals is considered low.
- The proposed restaurants and cafés will be situated in a modern environment alongside planned employment spaces. While the specific occupiers are not yet identified, it is expected that they will be national retailers catering mainly to employees within the development site, offering services such as coffee before work or meals during lunch or after work.
- It is noted that Applicant's collaboration with Indie Cambridge is seeking to ensure that the proposed redevelopment enhances the local offering, particularly focusing on supporting the Mill Road district centres and preserving their unique identity and role, rather than competing with them.
- Mill Road is known for its vibrant and diverse range of independent restaurants and cafés, contributing to its cosmopolitan atmosphere. The proposed restaurant/café provision at the Local Centre is distinct from the offering at Mill Road, with the latter focusing on independent, varied food and beverage establishments, many of which cater to different tastes and cultural backgrounds.
- Given this distinction and the limited overlap between the two areas, the impact on the Mill Road district centres' restaurant and café sector is expected to be low. As such, the proposed restaurant/café floorspace is unlikely to significantly affect the vitality and viability of Mill Road's existing food and beverage establishments.

13.41 On the above basis, it is considered that the quantitative and qualitative analysis demonstrates that the proposed development is unlikely to cause significant adverse impacts on nearby defined centres.

Conclusion of sequential and retail impact tests

13.42 In summary the supporting retail statement(s) has adequately demonstrated that the proposed development passes the sequential and retail impact tests and would not give rise to any unacceptable impacts on local centres or the city centre. Accordingly, the proposed quantum and (potential) mix of retail and town centres uses would be acceptable having regard to the nature of the development, including its out of centre location and the potential for it to impact upon other local centres, including town centre

vitality and viability, in accordance with the requirements of Policy 6 of the CLP and the relevant aims and objectives contained within the National Planning Policy Framework (NPPF).

Site suitability for housing

- 13.43 Officers note community comments that the Application Site would be better suited (either in whole or part of a mixed-use development) in meeting the City's housing requirements.
- 13.44 The spatial strategy for new housing developments under Policy 3 of the CLP has identified the urban area as having an important role in terms of accommodating housing. However, in the absence of an explicit planning policy requirement for the Application Site to deliver residential development, or a mix of employment and residential uses, the principle of an employment led scheme on the site is acceptable in accordance with Policies 2 and 40 of the CLP.
- 13.45 Therefore, despite the spatial strategy providing opportunities for housing and employment within the urban area, the absence of a residential component as part of the proposed development would not conflict with the spatial strategy, and therefore would not be considered unacceptable.

Overall conclusions on principle of proposed development

- 13.46 Based on the latest sector evidence available, the need for additional office and lab floorspace in the City area (particularly) has been demonstrated and therefore, it is crucial that adequate supply continues to meet the evolving requirements of the life sciences and ICT sectors. The recent speech made by Rt Hon Rachel Reeves (Chancellor of the Exchequer) on 29 January 2025 in respect of 'kickstarting economic growth' has reaffirmed the national importance of the Oxford - Cambridge Growth Corridor and in particular the opportunity to harness the potential for growing its reputation for science and technology, research and development.
- 13.47 In spatial terms, this edge of city centre site would represent a major (if not rare) opportunity to accommodate some of the sector's identified current and long-term needs, whilst also allowing sustainable change and efficient renewal of previously developed land to be embraced.
- 13.48 The proposed reconfigured retail and town centre uses will not cause adverse harm to either local or city shopping centres as evidenced by its assessment of the sequential and retail impact tests. Proposals for a mix of retail and town centre uses onsite to support the needs of future employees and local community including the anticipated delivery of a high-quality public realm provide helpful foundations that would enable an attractive and vibrant new destination in the City to be formed.
- 13.49 However, there remains a partial conflict in relation to the loss of an existing leisure facility with no clear commitment made by the Applicant to re-

provide onsite. The reasons given for not committing to re-provision are noted.

14.0 Design, Layout, Scale and Landscaping

- 14.1 Policies 55, 56, 57 and 59 seek to ensure that development responds appropriately to its context, is of a high quality, reflects or successfully contrasts with existing building forms and materials and includes appropriate landscaping and boundary treatment.
- 14.2 Paragraph 135 of the NPPF details that planning policies and decisions should ensure that developments function well and add to the overall quality of the area. To achieve this, amongst other matters, it requires developments to be visually attractive and establish a strong sense of place, using the arrangement of streets, spaces, and building types to create attractive, welcoming, and distinctive places to live, work, and visit. Moreover, developments should be sympathetic to their context and surroundings, whilst not preventing or discouraging appropriate innovation or change, such as increased densities. These principles are also elaborated upon within the National Design Guide (NDG) and the National Model Design Code.
- 14.3 The application seeks outline planning permission with all matters reserved for later consideration, however, it is still necessary to establish whether the scale and nature of the proposed development would be acceptable. To assist in this assessment process, the applicant has submitted sufficient information to demonstrate a framework of design principles that would be used to shape more detailed proposals, while also allowing sufficient flexibility so as not to inhibit the evolution of detailed proposals, should planning permission be granted.
- 14.4 For the purposes of this report, the assessment of the design approach is broken down into the following three themes:
- Layout, scale and massing
 - Building design and appearance
 - Landscape character and public realm
- 14.5 Each of the following considerations is assessed separately: heritage impacts (Section 15), townscape and visual effects (Section 16), biodiversity (Section 18), and residential amenity (Section 24).
- 14.6 The application has been the subject of a Design Review Panel, a Disability Consultative Panel (see Appendices C and D of the report), extensive pre-application discussions with officers, as well as numerous member briefings, ensuring thorough engagement and input from stakeholders.

Layout, scale and massing

- 14.7 The submitted Maximum Building Heights & Plots Parameter Plan outlines the spatial arrangement, maximum heights, and overall extent of 10 building plots. It is embedded within the report below for reference purposes (see Figure 1). The building plots are distributed across the site in an orderly and broadly linear manner, with a greater concentration of massing and height towards the eastern boundary and railway corridor.
- 14.8 The Access and Circulation Parameter Plan indicates that the layout would incorporate vehicular access to the site from Coldhams Lane, with pedestrian accesses from Coldhams Lane, St Matthew's Gardens, York Street, and Sleaford Street. Cycle access would be provided from Coldhams Lane, York Street, and Sleaford Street. All of the proposed access points reflect the location of existing access points, informing an arrangement of routes through the site that reference the surrounding network of streets and prioritise movements in the order of pedestrians, cyclists, and lastly, vehicles.
- 14.9 The parameter plans establish a framework that provides a clear structure for building plots, circulation spaces, internal and external connections, as well as defining a series of character areas. The character areas, which will be discussed further below, are distinguished by transitions in landscaping, enclosure, open space typologies, and primary ground-floor uses.
- 14.10 In terms of the scale and massing, maximum heights, including plant and PV, would vary across the 10 plots as follows:
- Plot 1: 15.9 metres (25.99 metres AOD)
 - Plot 2: 25.4 metres (35.20 metres AOD)
 - Plot 3: 20.7 metres (31.15 metres AOD)
 - Plot 4: 30.1 metres (41.30 metres AOD)
 - Plot 5: 35.7 metres (47.25 metres AOD)
 - Plot 6: 31.0 metres (42.65 metres AOD)
 - Plot 7: 28.7 metres (40.67 metres AOD)
 - Plot 8: 28.7 metres (40.84 metres AOD)
 - Plot 9: 32.9 metres (45.23 metres AOD)
 - Plot 10: 25.1 metres (37.10 metres AOD)
- 14.11 Flues, restricted to a maximum height allowance of up to 25% of the host building, would be allowed on certain rooftop zones on Plots 2, 3, 5, and 6, all of which are situated adjacent to the railway line. These Plots would therefore have combined maximum building and flue heights as follows:
- Plot 2: 31.75 metres (44.0 metres AOD)
 - Plot 3: 25.88 metres (38.9 metres AOD)
 - Plot 5: 44.63 metres (59.06 metres AOD)
 - Plot 6: 38.75 metres (53.31 metres AOD)

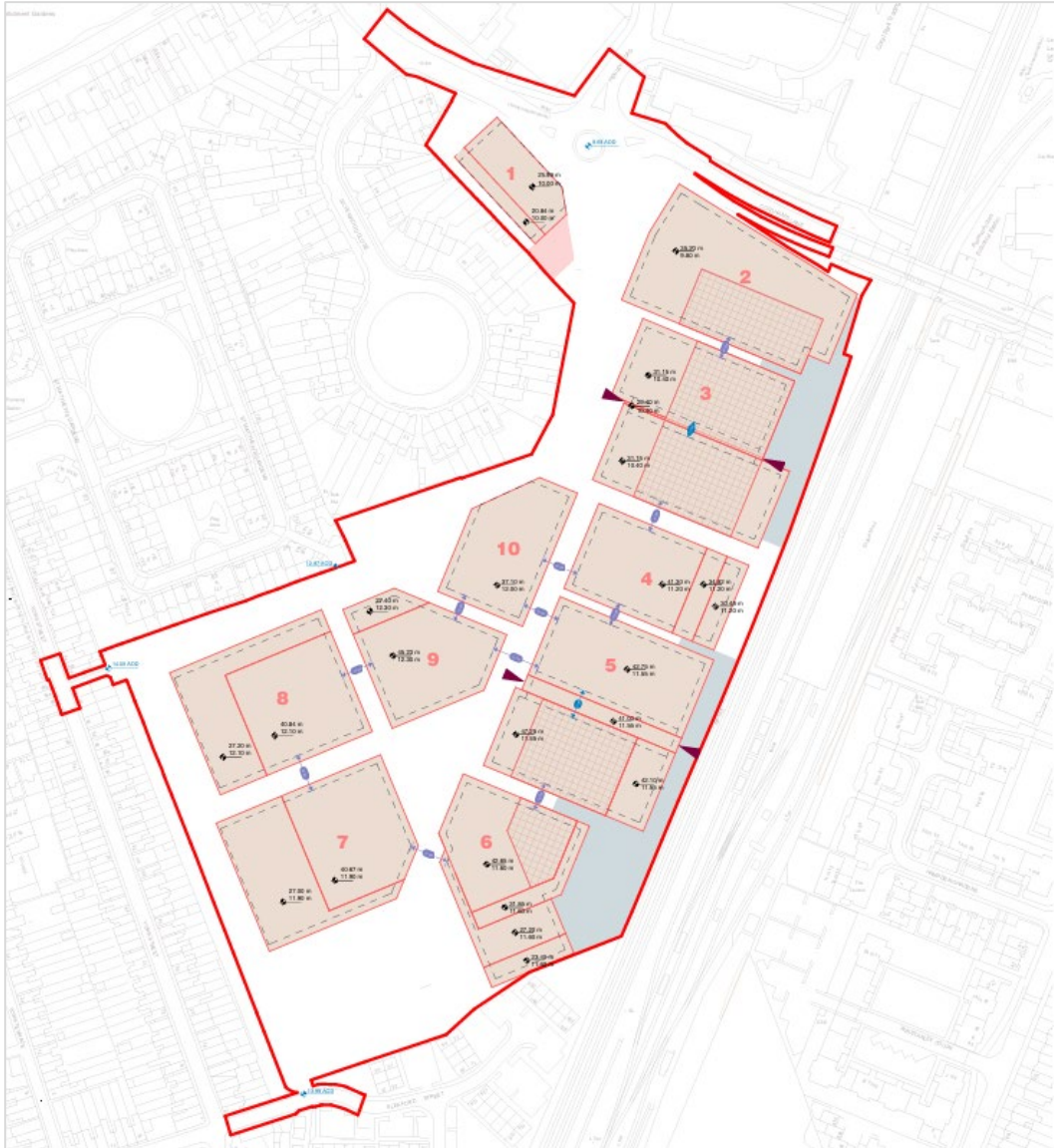


Figure 1: Maximum Building Heights & Plots Parameter Plan

14.12 It is also notable that the maximum parameters for Plots 1, 4, 5, 6, 7, 8, and 9 integrate stepped roofs, meaning that sections of their built form would have maximum parapet heights that are appreciably lower than their maximum overall heights. These steps in height would range from 5.15 metres to 19.25 metres. Plots 6, 7, 8, and 9 exhibit the greatest roof height variations, with step changes of between 13.67 metres and 19.25 metres, due to their proximity to residential properties on Sleaford Street, York Street, and St Matthew's Gardens. Additionally, Plots 3 and 5 incorporate recessed breaks in their primary facades. These design parameters aim to reduce the perceived massing near site boundaries and sensitive receptors, particularly neighbouring residential properties, while also providing an articulated roofscape and visual interest. Notwithstanding, the impact of the proposed buildings upon residential amenity, in terms of daylight, sunlight, overshadowing, and visual enclosure, are discussed separately under Section 24 (Residential Amenity).

- 14.13 The maximum parameters have responded to the latest feedback received from the Greater Cambridge Design Review Panel (DRP). In response to the concerns about the height of Plot 2 and the need for more variation in the rooflines, the applicant has reduced the height of Plot 2 and refined the roofscapes to resolve the length and horizontality of their combined silhouette. These adjustments result in a more interesting roofscape and a single taller cluster of buildings on Plots 5, 6, and 9, with the massing on these plots having also been reduced towards the site boundaries through the integration of stepped roofs.
- 14.14 In addition to the aforementioned parameters, the Design Code establishes further rules and requirements to ensure a high standard of design comes forward at the reserved matters stage. For instance, part three of the Design Code outlines strategies to shape each building plot beyond the massing envelope defined by the parameters. This includes requirements for each building to respond to adjacent buildings to prevent visual coalescence and to adopt a modulated approach to massing, breaking down larger footprints into smaller, more distinct architectural entities. The Design Code also specifies that, unless otherwise qualified on the parameter plans, the upper AOD level of each building measured at parapet level, must include all building elements such as roof top plant, lift overruns, and photovoltaic panels. The only exception to this rule noted on the Maximum Building Heights & Plots Parameter Plan relates to Plot 10, where lift overruns and access stairs may exceed the maximum parameter height by up to 1.25 metres.
- 14.15 Part three of the Design Code also addresses the design of rooftops, rooftop plant, and flues. These sections collectively require uncluttered roof profiles and variation in roof character; minimisation of rooftop plant which, when required, assimilates into the design of the roofscape; and a minimisation of flues which, when required, must be integrated into the architectural strategy and undergo visual testing to limit the impact on the city skyline and historic landmarks. Flues should also be articulated as a maximum of two stacks per building, and, where multiple stacks are required, grouped together to limit the number of instances where the prevailing roofscape is broken.
- 14.16 To compliment the site-wide design principles, each plot is governed by Design Code requirements tailored to its individual opportunities and constraints, with all plots, except Plot 10, having additional codes related to height and massing. These plot specific codes provide further control over design of each building, ensuring the creation of responsive and distinctive character areas while seeking to minimise their wider impacts. Additionally, the Design Code incorporates numerous other rules and requirements related to layout, built-form, legibility, accessibility, movement and safety.
- 14.17 One way in which the framework established by the submitted Parameter Plans and Design Code could come forward is shown on the Illustrative Masterplan. This illustrative plan is not for approval, but it is helpful for the purpose of visualising how the key elements of the development, namely

the buildings, open spaces, streets, and active travel components, could be integrated as part of a layout for a vibrant mixed-use environment.

Similarly, illustrative visualisations contained within the DAS and Design Code help to bring to life how the spaces might feel and function, providing an overall sense of a human scaled streetscape, with buildings of varied scales.

- 14.18 In terms of the way in which the proposed layout, scale, and massing relates to the site surroundings, it is recognised that the proposal represents a significant increase in density over the existing site context. This is most noticeably felt when considering the maximum height parameters. While this proposed increase contrasts with the low-rise nature of the immediate surroundings, especially the residential areas to the north, south and west, the proposed design responds to the character transition by staggering heights and breaking up the overall massing of the plots. Additionally, the proposed layout structure, established through the submitted parameters, integrates a grid-based approach that references the surrounding network of streets. The overall design intent is then further strengthened through the Design Code which embeds high-quality urban design principles into the development so that it can contribute positively to the urban character of the area.
- 14.19 There is also an opportunity to increase the efficiency of the land use through a higher density re-development on the site. This is reflected in the proposed Opportunity Areas that cover this site and the Newmarket Road Retail Park (Cambridge Retail Park), draft policy references S/OA/NR and S/OA/BC respectively, in the First Proposals for the emerging Greater Cambridge Local Plan (Regulation 18). In identifying the two potential Opportunity Areas the accompanying wording explains that they ‘are areas of low density, large-scale retail uses with extensive surface car parking. This does not make very good use of an expansive area of land in the heart of Cambridge.’ However, as aforementioned, very little weight can be afforded to the draft allocation in the emerging Greater Cambridge Local Plan due to the early stage of its development.
- 14.20 This approach to the site aligns with Paragraph 129 of the NPPF which states that planning decisions should support development that makes efficient use of land. It goes on to explain that such decisions should take into account a number of considerations, including the desirability of maintain an area’s prevailing character and setting, or of promoting regeneration and change. Similarly, paragraph 135 of the NPPF sets out that while new developments should be sympathetic to local character and history, including the surrounding built form and landscape setting, this should not be at the expense of appropriate innovation or change, such as increased densities.
- 14.21 Other re-development sites within the railway corridor have successfully increased scale and density, including the former Ridgeons site, the Mill Road Depot, and the CB1 development at the train station. Therefore, it is logical and beneficial for the redevelopment of Beehive, a brownfield site on

the edge of the city centre that is currently underutilised, to align with the wider change and regeneration occurring in the railway corridor and increase its density and scale accordingly.

- 14.22 To conclude on layout, scale, and massing, the Parameter Plans and Design Code provide a framework and structure that, whilst representing an increase in scale and density, would respond to the character of the area, as well as the opportunity to reimagine the site to create a high-quality urban quarter. Consequently, the proposed layout, scale, and massing would – excluding provisions which safeguard residential amenity - be in accordance with Policies 56 and 57, in addition to the design objectives contained within the NPPF.

Building design and appearance

- 14.23 As this is an outline application with all matters reserved, the submission contains relatively limited detail on what the design and appearance of the buildings could be. Illustrative drawings are provided, but they relate to the layout and general arrangement of the development, rather than elevational design and materiality. Notwithstanding, the extent of plots, their arrangement, and maximum heights are, as discussed above, established through the submitted parameter plans, creating an outline envelope of 10 large buildings of various heights.
- 14.24 The Design Code adds further texture to the proposed building envelopes by coding for setbacks, stepped plans, and angled facades to reduce the visual impact of mass and break down bulk. Additionally, the codes mandate diverse and responsive material selection, with measures to resist repetitive grid elevations across entire facades. Instead, the Design Code sets out that all building facades must be thoughtfully designed to achieve ‘design excellence’ through a 21st Century response to the rhythms and richness found in Cambridge. This includes ensuring that buildings have well-designed ground floor frontages that enhance the public realm, support site connectivity, and create a positive, engaging experience for users and passersby. The rooftops would also be varied and attractive, contributing to a rich townscape that responds to different edge contexts, while supporting sustainability and biodiversity through the incorporation of green and brown roofs.
- 14.25 Beyond aesthetics, the design of the buildings would be accessible and welcoming to all. The Design Code requires inclusive design be evidenced at every stage of the design process, from concept to completion. It also reaffirms that all buildings must meet Building Regulations and the Equality Act 2010, and guides reserved matters applications towards internal layouts that adhere to design guidance for accessibility. This approach to accessibility and inclusivity extends beyond the buildings to the public realm, as will be discussed further below.
- 14.26 As discussed in relation to layout, scale, and massing above, the DAS and Design Code include illustrative visualisations, as well as precedent

images, to give a sense of what kind of elevations, entrance lobbies, materials, and architectural forms might come forward within the proposed parameters and codes. These visualisations showcase attractive facades and elevations featuring finer grained elements with mixed-use ground-floor levels. This illustrative design approach would activate and enhance the street scenes, providing visual amenity and improving public security through passive surveillance of spaces.

- 14.27 Some concern has been raised in the local community regarding the loss of the Porcelanosa building, which exhibits a higher design quality than the boxy retail units which otherwise occupy the site, with support expressed for a revised design approach that retains it. Officers acknowledge that the building does offer architectural merit, however, it does not benefit from any policy or statutory protection, so its demolition cannot be reasonably resisted.
- 14.28 Officers are satisfied that there is sufficient certainty that the 10 proposed buildings would be capable of achieving the high standard of design necessary at the reserved matters stage, with the Design Code going further in its aspiration to create an exemplary, high-quality, innovation neighbourhood. Therefore, insofar as there are no concerns at this outline stage regarding the future appearance of the buildings, the proposed development would be in accordance with Policies 56 and 57, in addition to the design objectives contained within the NPPF.

Landscape character and public realm

- 14.29 The submitted Landscape and Open Space Parameter Plan provides the basic structure of the proposed landscape and public realm. This structure takes the form of gateway areas of publicly accessible green space to the north and south of the site, connected via more urban, hard landscaped centre with streetscape areas, planted edges, and service or access areas to the edges. It is important to note that parameters require the hard landscaped areas and the streetscape areas to be supplemented with incidental green space planting.
- 14.30 The parameters align with the applicant's proposed place shaping principle of promoting urban greening. This involves transforming the existing site from a car park dominated place, with trees planted between parking spaces, to one of green streets and a new city park. As part of the vision, over 275 new trees would be planted alongside new lawns, ornamental planting, hedges, green roofs, and green facades achieved by climbing plants.
- 14.31 The way in which the proposed landscaping and public realm varies across the site would contribute to the creation of the six-character areas. These character areas are:

- **Abbey Grove***: Located at the northern entrance to the site, it would be an important gateway incorporating significant tree planting to create an attractive outdoor seating areas.
- **Garden Walk***: A linear, transitional space linking Abbey Grove to the larger open spaces of Maple Square and Hive Park. It would incorporate street furniture and a variety of trees and planting.
- **Maple Square***: The main civic space capable of supporting the day-to-day amenity needs of the site, as well as other community events, with its hard surface treatment to be broken up with new tree planting, and rain gardens.
- **Hive Park***: The largest single area of open space on the site, measuring 0.71 hectares, situated towards the south-west entrance gateway, with opportunities for recreation, play, and large tree planting. This space would be similar in size to St Matthew's Piece which measures approximately 0.62 hectares. Hive Park will play a significant role in helping the site interface with the Mill Road Conservation area.
- **The Lanes**: Linear spaces with a focus on providing attractive streetscapes that enable a robust movement network.
- **Railway Corridor**: A functional area designed to accommodate bulk gas storage, service bays, and large HGV movements. It is designed to be a private space, rather than for public access.

*The character areas of Abbey Grove, Garden Walk, Maple Square, and Hive Park collectively create the Beehive Greenway, an attractively planted, direct and legible pedestrian and cycle route that runs north to south through the site.

- 14.32 While factors such as ground-floor uses, movement networks, enclosure, and building design contribute to the character areas, the surface treatment and landscaping strategies are vital to their success. In this case, the Design Code supports a positive landscape and tree strategy with codes to optimise tree retention and planting, ensure diversity, resilience, and maintenance of vegetation, achieve ecological benefits, and encourage the inclusion of landmark trees. Additionally, there are codes to facilitate a public realm strategy that ensures diversity and cohesion, as well as functionality for outdoor events, play, and leisure.
- 14.33 The public realm and landscape would also be accessible with predominantly flush levels; alternate graded routes where stairs cannot be avoided; play areas with inclusive elements; inclusive signage design; and regular intervals of street furniture that is inclusive by design.
- 14.34 The submitted Local Centre and Public Realm Management Strategy (August 2024 Revision) outlines a framework for long-term design objectives and management objectives, which involves either Railway

Pension Nominees Ltd or an estate management company owning and managing external common parts of the site. The Landscape Team consider approach set out to be sound. However, future management arrangements would be finalised and secured through the accompanying S.106 should planning permission be granted.

- 14.35 Overall, the proposed structure of strategic landscaping and open spaces are much improved since the original submission. The public realm areas are now larger and more usable, accommodating large-growing trees and replacement planting, while also meeting the recreation, movement and biodiversity needs of the development. There are no concerns regarding the amount or variety of open space proposed, including its overall design, with the proposed Hive Park offering a recreation destination commensurate in size to St Matthew's Piece. Consequently, there will be sufficient open space to meet the needs of future users of the site. It is not anticipated that other existing open spaces, including St Matthew's Piece and Coldhams Common, will be overwhelmed by an increase in demand. The reconfiguration of the layout also facilitates more tree lined streets for the bus and vehicle routes. Therefore, the proposed development would be in accordance with Policies 55 and 56, in addition to the design objectives contained within the NPPF.

Conclusion

- 14.36 The application provides a robust overall strategic control framework, demonstrating that the quantum of development proposed can be accommodated on the site in an acceptable manner. The Parameter Plans and Design Code establish a design approach that appropriately responds to the site's context and opportunities. There is sufficient certainty that the outline proposals will enable a high standard of detailed design to emerge at the reserved matters stage, subject to conditions. This position is supported by the Design Team and the Landscape Team, whose consultation responses summarised earlier in this report raise no objections to the matters discussed above. It is also notable that the revised application has sought to address the concerns raised by the DRP, particularly in relation to the height, massing, and articulation of the maximum building envelopes. The proposed development would – excluding provisions which safeguard residential amenity - subsequently accord with Policies 55, 56, 57, and 59 of the CLP, in addition to the design objectives contained in the NPPF.

15.0 Heritage Assets

Legislative and planning policy context

- 15.1 In considering whether to grant planning permission for development which affects a listed building or its setting, section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that the local planning authority shall have special regard to the desirability of preserving the

building or its setting or any features of special architectural or historic interest which it possesses.

- 15.2 Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 imposes a general duty on the local planning authority when considering applications for development that affect conservation areas. It requires that special attention be paid to the desirability of preserving or enhancing the character or appearance of conservation areas. This duty applies to any buildings or other land in a conservation area.
- 15.3 In consideration whether to grant planning permission for the development of land in England which affects a relevant asset or its setting, including scheduled monuments and registered parks and gardens, Section 102 of the Levelling-up and Regeneration Act 2023 requires the local planning authority to have special regard to the desirability of preserving or enhancing the assets or its setting. This includes preserving or enhancing any feature, quality or characteristic of the asset or setting that contributes to the significance of the asset.
- 15.4 Paragraph 212 of the NPPF sets out that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation, and the more important the asset, the greater the weight should be. Paragraph 213 of the NPPF stipulates that any harm to, or loss of, the significant of a heritage asset should require clear and convincing justification.
- 15.5 Paragraph 215 of the NPPF states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
- 15.6 Policy 60 of the CLP states that any proposed for a structure that breaks the existing skyline and/or is significantly taller than the surrounding built form will be considered against certain criteria. These include the need to demonstrate how the proposals fit within the existing landscape and townscape (criteria a), and the impact on the historic environment (criteria b).
- 15.7 Policy 61 of the CLP requires development to preserve or enhance the significance of heritage assets, their setting and the wider townscape, including views into, within and out of the conservation area. Policy 62 seeks the retention of local heritage assets and where permission is required, proposals will be permitted where they retain the significance, appearance, character or setting of a local heritage asset.

Impacts of proposed development on setting and significance of heritage assets

- 15.8 The application site is situated near the historic core of the city, an area abundant in heritage assets, including numerous conservation areas, listed

buildings, non-designated heritage assets, and a registered park and garden. The application is accompanied by a Heritage Statement (August 2024) prepared by Bidwells, which is included as Appendix 7.1A of the submitted Environmental Statement (ES). This Heritage Statement assesses the significance of the built heritage assets potentially affected by the proposals and evaluates the potential impacts on them. It identifies the following heritage assets within the immediate context of the site for consideration:

- Mill Road Conservation Area
- St Matthew's Church – Grade II
- 247 Newmarket Road – Grade II
- Cambridge Gas Company War Memorial – Grade II
- St Andrew the Less – Grade II
- York Street Terraces (excluding nos. 86-92a even, 98-104 even, and 101-111a odd) – Positive Unlisted Buildings
- Ainsworth Street Terraces – Positive Unlisted Buildings
- Stone Street Terraces – Positive Unlisted Buildings
- Sleaford Street Terraces – Positive Unlisted Buildings
- York Terrace(s) – Positive Unlisted Buildings
- 33-38 Abbey Walk – Buildings of Local Interest
- Sturton Street Terraces – Positive Unlisted Buildings
- 179 Sturton Street – Positive Unlisted Building
- 192-198 Sturton Street – Positive Unlisted Buildings
- Milford Street Terraces – Positive Unlisted Buildings
- Gwydir Street Terraces – Positive Unlisted Buildings
- Edward Street Terraces – Positive Unlisted Buildings
- Norfolk Street Terraces – Positive Unlisted Buildings
- Norfolk Terrace – Positive Unlisted Buildings

15.9 Due to the scale of the development, the Heritage Statement also identifies the following heritage assets within the wider context of the site for consideration:

- Central Conservation Area
- Riverside and Stourbridge Conservation Area
- Kite Conservation Area
- New Town and Glisson Road Conservation Area
- Castle and Victoria Road Conservation Area
- West Cambridge Conservation Area
- University Library – Grade II
- King's College Chapel – Grade I
- St John's College – Grade I
- All Saints Church – Grade I
- Jesus College – Grade I
- Church of Our Lady and the English Martyrs – Grade I
- Christ Church – Grade II
- Mill Road Cemetery – Grade II Registered Park and Garden

- Custodian’s House Mill Road Cemetery – Grade II
- Old Cheddars Lane Pumping Station – Scheduled Monument
- Chapel of St Mary Magdalene Stourbridge Chapel – Grade I
- Church of St Mary the Great – Grade I

15.10 The Heritage Statement concludes that that there would be a variety of impacts on heritage assets ranging from neutral to minor adverse. Less than substantial harm is identified to the following heritage assets:

- Ainsworth Street Terraces – Positive Unlisted Buildings
- York Street Terraces – Positive Unlisted Buildings
- Christ Church – Grade II
- Jesus College – Grade I
- All Saints Church – Grade I
- Castle and Victoria Road Conservation Area
- Central Conservation Area
- Mill Road Conservation Area

15.11 Chapter 7 of the ES (Cultural Heritage) summarises that there is potential for operational phase effects on the setting of the heritage assets in the surrounding area, however, none of the overall effects are considered to be of more than moderate adverse significance in the long term. It also finds that there would be a moderate-minor beneficial effect on the setting of the Mill Road Conservation Area.

15.12 The Council’s Conservation Team have reviewed the proposed development and the accompanying Heritage Statement. Their response acknowledges that the revised application represents an improvement over the original application, citing positive changes to the amount, scale, and layout of development. The use of more prescriptive language within the Design Code in relation to plant and flues it also welcomed. However, despite the positive amendments, the Conservation Team have remaining concerns about the maximum height and massing of the proposed buildings, specifically given their local context of Victorian terraced housing, and the close proximity to historic landmarks in the city centre.

15.13 Regarding the impact on the heritage assets in the site’s immediate vicinity, the Conservation Team have identified harm to the significance of the Mill Road Conservation Area and the Mill Road Cemetery (Grade II Registered Park and Garden). Despite enhancement to the edge of the Conservation Area through an improved layout and arrangement of public open space, harm to the Conservation Area would occur due to the visibility of the buildings and their flue zones from the junction of York Street and Sleaford Street. The harm to Mill Road Cemetery would result from the upper storeys of the proposed built form protruding above the rooflines in some locations, causing a low degree of harm. These harms to the Conservation Area and Mill Road Cemetery therefore stem from the proposed development adversely affecting the settings of the heritage assets, which contribute towards their significance.

- 15.14 In terms of the heritage assets in the wider area, the Conservation Team has identified harm to the significance of Kings College Chapel (Grade I), St Mary the Great Church (Grade I), St John's College (Grade I), All Saints Church (Grade I), Jesus College (Grade I), Christ Church (Grade II), and the University Library (Grade II). However, the reduction in the scale of the development has downgraded the harm to the significance of the University Library to a low level. Additionally, there would be harm to the significance of the Central, Kite, Castle and Victoria, and Riverside and Stourbridge Common Conservation Areas. The harm to the significance of these listed buildings and conservation areas arises from their contribution to the Cambridge skyline, either through their low-rise scale or landmark presence, which the proposed development would compete with, particularly when viewed from the Castle Mound and Redmeadow Hill views, due to its bulkier massing, greater scale, and the presence of flues. In this respect, there would be cumulative impacts with the approved Grafton Centre redevelopment. As with the heritage assets in the immediate vicinity of the site, the harm identified to the wider listed buildings and conservations areas would stem from the proposed development adversely affecting the settings of the heritage assets, which contribute towards their significance.
- 15.15 In concluding their comments, the Conservation Team considers the harm in all instances to fall under the category of less than substantial, with the cumulative harm considered to be less than substantial at a moderate level. Officers agree with the Conservation Team's conclusion, which differs from the conclusion of the submitted Heritage Statement that still identifies less than substantial harm but to fewer heritage assets. However, it is fundamental to recognise that there two separate legal tests when considering harm to listed buildings and harm to conservation areas, under sections 66 and 72 of the Listed Buildings and Conservation Areas Act 1990, respectively. Likewise, section 102 requires separate consideration of the effects on relevant heritage assets, including registered parks and gardens. Therefore, officers consider it important to clarify that less than substantial harm is being identified separately for the listed buildings, the conservation areas, and the Registered Park and Garden.
- 15.16 As noted in Section 8 above, Historic England responded to the revised application by stating that it does not wish to offer advice and that the views of the Council's specialist conservation and archaeology advisers should be sought. It is disappointing that Historic England has not engaged with the revised application, which has sought to reduce the impacts of the development on the city skyline, as advocated in their earlier comments on the original scheme.
- 15.17 Given the significant revisions made to the application, it is no longer appropriate to rely on Historic England's earlier comments on the original scheme. Therefore, as also suggested by Historic England, the Local Planning Authority should rely upon the specialist advice of the Council's Conservation Team as set out above.

15.18 In accordance with local and national policies, as well as sections 66 and 72 of the Listed Buildings and Conservation Areas Act, and section 102 of the Levelling-up and Regeneration Act 2023, special regard must be given to the desirability of preserving listed buildings, including their settings; special attention must be paid to the desirability of preserving or enhancing the character or appearance of conservation areas; and special regard must be given to the desirability of preserving or enhancing registered parks and gardens, including their settings. Therefore, in accordance with paragraph 215 of the NPPF, the less than substantial harm identified to the listed buildings, conservation areas, and the Registered Park and Garden, which is cumulatively considered to be at a moderate level, must be weighed against any public benefits generated by the proposed development. These public benefits form part of the planning balance and are considered in the conclusion to this report.

16.0 Townscape and Visual Impacts

- 16.1 Policy 60 of the CLP states that any proposal for a structure that breaks the existing skyline and/or is significantly taller than the surrounding built form will be considered against certain criteria. These include the need to demonstrate how the proposals fit within the existing landscape and townscape (criteria a), the impact on the historic environment (criteria b), scale massing and architectural quality (criteria c), amenity and microclimate (criteria d), and public realm (criteria e).
- 16.2 Policy 67 of the CLP seeks to protect open spaces of environmental and/or recreational importance from developments that would harm their character or lead to their loss.
- 16.3 A Townscape and Visual Impact Assessment (TVIA), prepared by Bidwells and dated August 2024, has been submitted in support of the revised application and is included in Chapter 10 of the ES. Technical appendices to the TVIA chapter, found at Appendices 10.1 to 10.6A, cover various matters such as methodology, mapping, viewpoint assessment, technical visualisations, correspondence, and amended technical visualisations.
- 16.4 The TVIA has been produced in accordance with current best practice guidance, as set out at paragraph 10.4 of the ES. This includes the 'Guidelines for Landscape and Visual Impact Assessment' (GLVIA3) by the Landscape Institute with the Institute of Environmental Management and Assessment (Third Edition, 2013). The TVIA considers townscape and visual impact effects in the following contexts:
- Townscape Effects: These relate to changes in fabric, character and quality of the urban landscape. They include direct impacts such as loss of vegetation and additional built form, as well as indirect impacts like changes to tranquillity. Townscape effects do not need to be visible.
 - Visual Effects: These pertain to specific changes in views and their effects on visual receptors, such as users of public rights of way or

recreational facilities. Changes to the visual setting of protected cultural heritage features, such as Scheduled Monuments, Listed Buildings, and Conservation Areas, are also considered.

- 16.5 The scope of the TVIA and its study area was agreed between officers and the applicant's appointed specialist consultant prior to the submission of the application. For the townscape effects, a 1km radius was used to capture the local townscape designations of particular relevance to the TVIA, including the Mill Road Conservation Area with its Registered Park and Garden, and Coldhams Common. For visual effects, most receptors are within 1km of the site, although four longer-distance views are taken from receptors further afield at Redmeadow Hill, Worts' Causeway, Little Trees Hill (south-west of Gog Magog hill), and Limekiln Road.
- 16.6 An assessment of the significant townscape and visual effects, as well as any residual effects following mitigation, on identified receptors is based upon the various stages of the development, namely the construction stage, 'Year 1' post-construction, and 'Year 15' post-construction. The assessment is based upon the maximum development proposed under submitted Parameter Plans. Due to the outline nature of the application, an assessment of night-time effects is not feasible at this stage and would instead be conducted at the reserved matters stage, in the event of planning permission being granted, when architectural details are available.
- 16.7 It is important to note that the heritage impacts associated with the proposed development have already been assessed in the preceding section on heritage assets. The conclusions formed on heritage impacts were informed by the TVIA process. This section of the report therefore focuses on the broader changes to the urban landscape and visual receptors, considering the overall character, quality, and visual experience of the area, rather than the significance of specific heritage assets and the impact of the development upon them.

Townscape Effects

- 16.8 During the construction phase, the TVIA outlines that it is conceivable that the townscape impact will be greater due to the introduction of machinery, material stockpiles, and other construction facilities, which will result in a cluttered, noisy environment. However, at this stage in the planning process, without a detailed construction plan, it is not possible to quantify the temporary impact. This notwithstanding, the submitted Outline Construction Environmental Management Plan (CEMP) establishes high-level measures to monitor and mitigate against the construction impacts. Therefore, the construction effects to be at the lower end of the impact scale and temporary
- 16.9 The TVIA identifies one significant adverse effect of a moderate level on the 'Cambridge skyline' receptor at 'Year 1' due to the introduction of a new cluster of tall buildings. While the cluster does not cover the whole site, mitigation includes the grouping of taller elements to prevent multiple

competing elements. Despite this, the proposed development would continue to contrast with the receptor's characterisation, described as spire and towers rising from tree canopies. The TVIA, however, explains that the outline nature of the application forces consideration of the worst-case scenario and contends that the effects will reduce through the achievement of high-quality design at the reserved matters stage.

- 16.10 The TVIA concludes that there would be no adverse effects on the remaining receptors at 'Year 1'. It considers that the proposed regeneration of a negative townscape area will result in minor to moderate beneficial effects on the 'Setting of the Conservation Area' (Mill Road Conservation Area), 'Residential Character Type: Post 1900 Suburb', and 'Industrial – Railway Corridor Cambridge Character Type' receptors. There would still be a contrast in scale with the low-lying surrounding built form, but the proposed development responds by incorporating a stepped approach to massing and a scale similar to existing industrial and commercial uses. Overall, the TVIA asserts that the redevelopment of the site would introduce townscape benefits, notably the provision of publicly accessible, multi-functional green open spaces, that outweigh the contrasting scale.
- 16.11 In terms of the 'Setting of open green spaces and Setting of the Green Belt' (Coldhams Common) and 'Setting of Public Rights of Way' receptors, the TVIA concludes there would be a neutral effect at 'Year 1'. While some visual effects are identified from Coldhams Common, to be discussed further below, the assessment of the townscape effects require consideration of Coldhams Common as a whole. Notably, the setting of the Common is diverse, with a consistent quality of enclosure by residential and industrial built form, as well as tree planting. Therefore, the quality of the townscape setting to the receptors would be unchanged.
- 16.12 At 'Year 15' the framework of landscaping zones shown on the Landscape and Open Space Parameter Plan will be established, breaking up the built form and providing vegetative cover. Subject to a high-quality detailed landscaping scheme, partly addressed through the Design Code, the development would further enhance the townscape character of the site itself. However, in terms of the 'Cambridge skyline receptor', the lack of detail at this stage means it is not possible to comment on the impact of matured planting on the significant adverse effect identified at 'Year 15'.

Visual Effects

- 16.13 A total of 17 viewpoints were agreed upon with officers to represent typical views from potential receptors at varying distances and orientations from the site. Most viewpoints are located within 1km of the site, except for four longer distance views. The viewpoints are as follows:
- Viewpoint 1: Castle Hill Mound
 - Viewpoint 2: Coldhams Common – north
 - Viewpoint 3: Coldhams Common – south
 - Viewpoint 4: York Street

- Viewpoint 5: Mill Road Cemetery
- Viewpoint 6: Elizabeth Way Bridge
- Viewpoint 7: St. Matthew's Gardens
- Viewpoint 8: Mill Road Bridge
- Viewpoint 9: Ditton Meadows and River Towpath
- Viewpoint 10: Redmeadow Hill
- Viewpoint 11: Worts' Causeway
- Viewpoint 12: The Beehive Centre
- Viewpoint 13: Little Trees Hill
- Viewpoint 14A: Limekiln Road Nature Reserve
- Viewpoint 14B: Limekiln Road Layby
- Viewpoint: Church of Saint Mary the Great
- Viewpoint: Grand Arcade Car Park

- 16.14 The above list incorporates all relevant viewpoints set out in Appendix F of the CLP, as required for an assessment of the proposed development against Policy 60.
- 16.15 The TVIA viewpoints assessment is based on site observations, Zone of Theoretical Visibility (ZTV) analysis, and Type 4, Accurate Visual Representation Level 2 (AVR 2) visualisations. The ZTV and Type 4, AVR 2 are detailed visual tools used to accurately depict the scale, form, visibility, and potential visual impact of a proposed development within its existing environment.
- 16.16 During the construction phase, the TVIA considers that the visual impact could be greater due to the presence of cranes in the skyline, disrupting long-distance and local views. However, as highlighted in relation to the townscape effects above, the lack of a detailed construction plan at the outline stage means that it is not possible to quantify the impact of the temporary phase.
- 16.17 At 'Year 1' the TVIA finds that there will be significant adverse effects on receptors represented by viewpoints 1 (Castle Hill Mound), 3 (Coldhams Common South), 11 (Worts' Causeway), 13 (Little Trees Hill), 14b (Limekiln Road Layby), and the Church of St Mary the Great. The majority of the impact is upon the Cambridge skyline, except for viewpoint 3, which relates to the visual amenity of receptors in Coldhams Common and the sense of openness to the setting of the Green Belt. The most significant adverse effect, rated as major-moderate, would be on Castle Hill Mound (viewpoint 1), with the remainder of the adverse effects ranging from moderate to moderate-minor. The adverse effects stem from the competition of the proposal with the historic core of the city and the dominant scale of the development in relation to its surroundings. Minor-negligible adverse effects would be experienced by road users on the Elizabeth Way Bridge (viewpoint 6) due to the introduction of flues to the skyline.
- 16.18 The proposed development would have various degrees of neutral or beneficial effects on the remaining receptors at 'Year 1', including local

residents, ramblers along the river towpath, users of the road network in the Conservation Area, and pedestrians on the Mill Road bridge. Beneficial effects would be particularly evident where the current poor conditions detract from the quality of views experienced by receptors. By achieving a high standard of design, the proposed development would improve visual amenity for these receptors.

- 16.19 At 'Year 15' the landscaping zones outlined in the Landscape and Open Space Parameter Plan will be established, breaking up the built form and providing vegetative cover. Subject to a high-quality detailed landscaping scheme, as partially addressed through the Design Code, the development will enhance the visual experience within the site. However, due to the absence of detail at this stage, it is not possible to comment on the impact of matured planting on the visual effects identified at 'Year 1'. The TVIA also notes that the location of open space and potential planting areas within the layout are not favourable for mitigating the identified adverse visual effects.
- 16.20 Primary mitigation measures, including amendments to the original amount, layout, scale, and massing of development, as detailed in the revised submission, have already been considered in the visual assessment conclusions outline above. The TVIA explains that the residual significant adverse effects, following the implementation of the primary mitigation measures, are largely due to the outline nature of the application and the need to consider the worst-case scenario, which does not account for architectural detailing and flue locations. It also states that secondary mitigation would involve pursuing high-quality architecture in alignment with the DAS and Design Code. The TVIA considers that secondary mitigation would reduce the visual effects to neutral or beneficial. However, as will be discussed further in the conclusion below, the Landscape Team believes that while the scale and massing are within what the site can accommodate, there will be a low level of residual harm.

Conclusion

- 16.21 To conclude, it is uncertain what the townscape and visual effects would be during the construction phase, however, it is conceivable that the effects could be temporarily worse than the 'Year 1' and 'Year 15' scenarios due to the visual presence of cranes, as well as the associated construction machinery and paraphernalia which would result in a noisy cluttered environment, to the temporary detriment of the townscape.
- 16.22 At 'Year 1' there would be a significant adverse townscape effect on the Cambridge skyline receptor, due to the introduction of tall buildings on the site. However, the townscape of the site and its immediate surroundings would experience beneficial effects from the regeneration of a negative townscape area. In terms of visual effects, at 'Year 1' there would be significant adverse visual effects on six receptors represented by viewpoints 1 (Castle Hill Mound), 3 (Coldhams Common – South), 11 (Redmeadow Hill), 13 (Little Trees Hill), 14b (Limekiln Road Layby), and the Church of St

Mary the Great. Minor-negligible adverse effects would be experienced by the receptors of viewpoint 6 at Elizabeth Way Bridge. The remaining receptors would experience effects ranging from neutral to beneficial.

- 16.23 The effects at 'Year 15', similar to the construction phase, are uncertain at this outline stage due to an absence of detail on the landscaping which is a reserved matter.
- 16.24 Secondary mitigation, in the form of high-quality design, would be secured through the Design Code to reduce the remaining residual effects.
- 16.25 The Landscape Team has commented that the revised application successfully addresses the majority of the negative and harmful impacts of the original application proposal. While the development would result in significant change, the Landscape Team is confident that the site can accommodate the proposed increase in scale and massing. Although a state of 'no harm' cannot be achieved by the proposed development, the resulting harm would be at an acceptably low level. The Landscape Team consider the provision of extended public open space, new play areas and opportunities for play, increased tree planting, and other greening measures which improve biodiversity, as well as the ground-floor public offering, will positively offset the low level of harm identified, however, this will be formally considered within the planning balance that concludes this report.
- 16.26 Due to the low level of harm identified regarding the townscape and visual effects of the proposed development, there would be a slight conflict with Policies 60 and 67 of the CLP. The harm will need to be weighed against the benefits of the scheme in the planning balance.

17.0 Carbon Reduction and Sustainable Design

- 17.1 Policy 28 states development should take the available opportunities to integrate the principles of sustainable design and construction into the design of proposals, including issues such as climate change adaptation, carbon reduction and water management. The same policy requires non-residential buildings to achieve 5 credits for Wat 01 of the BREEAM standard for water efficiency and the minimum requirement associated with BREEAM excellent for carbon emissions.
- 17.2 Policy 29 supports proposals which involve the provision of renewable and / or low carbon generation provided adverse impacts on the environment have been minimised as far as possible.
- 17.3 The Council's Sustainable Design and Construction SPD (2020) sets out a framework for proposals to demonstrate they have been designed to minimise their carbon footprint, energy and water consumption and to ensure they are capable of responding to climate change.
- 17.4 The application is supported by an Energy Strategy, prepared by Hoare Lea and dated 16 August 2024, which adopts a 'fabric first' approach to the

energy hierarchy: 'be lean', 'be clean', 'be green', and 'be seen'. This approach ensures that energy savings can be integrated into the intrinsic design of the buildings. Additionally, a Sustainability Strategy, prepared by Hoare Lea and dated 16 August 2024, has been submitted. This strategy outlines the multi-faceted sustainability benefits and value that the proposed development could bring to the site, the community, and future users. The Sustainability Strategy is informed by the Five Capitals Model, providing a comprehensive framework for sustainable development.

- 17.5 The Design Code also sets out measures to mitigate urban heat island effects, enhance water responsiveness, and address other sustainability themes.

Reducing energy consumption and carbon emissions

- 17.6 To limit the overall energy demand and carbon emissions of the proposed development, passive design measures aimed at optimising the fabric of the proposed buildings have been incorporated into the scheme. Each building will be constructed to a high thermal performance standard to minimise heat loss while accommodating cooling demands. The design of facades will also maximise passive measures with the Design Code requiring facades to respond to plot orientation and integrate solar shading design to prevent overheating. It is proposed that office buildings will achieve an Energy Performance Ratio (EPR) of at least 0.6 to meet the minimum requirements for BREEAM 'Outstanding'. Lab buildings will achieve an EPR of at least 0.4 to meet the minimum requirements for BREEAM 'Excellent'.
- 17.7 The development also aims to reduce operational energy consumption by targeting an energy consumption of less than 55 kWh/m²/yr for base build offices, in alignment with the RIBA 2030 Climate Change initiative. The base build research facilities would target an energy consumption of 150kWh/m²/yr. To enable occupants to monitor their energy consumption, the development will incorporate energy metering and smart monitoring technology. An energy efficient lighting strategy will also be implemented. These provisions could be secured by planning condition.
- 17.8 Low and zero carbon (LZC) technologies have been evaluated for the proposed development, and the applicant proposes an all-electric system with on-site electricity generation capacity. As part of the strategy, photovoltaics (PV) will be maximised on flat roof areas where appropriate and feasible, considering other demands for green roofs and plant space. Air Source Heat Pumps (ASHP) will be utilised to provide heating, cooling, and domestic hot water.
- 17.9 Embodied carbon will be assessed throughout the design and construction phases, with material selections maximising recycled content, including opportunities to recycle materials from the existing buildings to be demolished. The proposed development is targeting upfront embodied carbon of less than 600kgCO₂/m² for the office buildings, with a stretch

target of 500kgCO₂/m². For the laboratory buildings, there is an upfront embodied carbon target of 750kgCO₂/m², which aligns with RIBA Climate Change 2030 targets.

- 17.10 Other proposed measures aimed at reducing carbon emission include minimising waste during construction and using sustainable procurement practices. Sustainable modes of transport will also be prioritised as part of the proposed modal shift, as will be discussed in Section 25 on transport considerations.
- 17.11 The Sustainability Team welcomes the proposed measures outlined above and has recommended a condition requiring all reserved matters applications to be accompanied by a Sustainability Statement and an Energy Statement. These statements must demonstrate how the targets and commitments set out in the submitted Sustainability Strategy (August 2024) and Energy Strategy (2024) will be. Furthermore, a condition would be recommended to secure a BREEAM pre-assessment for all future reserved matters applications.

Water demand conservation

- 17.12 The proposed development aims to achieve an exemplary level of water consumption under BREEAM Wat01 by obtaining the additional innovation credit, resulting in a 65% reduction in baseline water consumption. This surpasses the Policy 28 requirement of a minimum of 5 credits under BREEAM Wat01. The targeted efficiency will be achieved through low-flow fittings and rainwater harvesting. Additionally, the BREEAM credits for Wat02 (water monitoring) and Wat03 (leak detection) are also being targeted, along with measures to minimise consumption from unregulated water uses, such as irrigation, to meet Wat04 (water-efficient equipment). The applicant is also reviewing the feasibility of meeting the RIBA Climate Change 2030 target of 10 litres per person per day of potable water. These targets could be secured through appropriately worded conditions.
- 17.13 The Design Code covers site-wide design principles as part of a 'Water Responsive Framework'. This framework encompasses measures related to surface water management, green and blue roofs, water storage, and irrigation.
- 17.14 The Sustainability Team commends the commitment to achieve at least 5 credits under BREEAM Wat01, while also targeting the additional innovation credit. They note that the ES estimates a water demand of 188,130 litres per day for the development. They recommend that further details on water demands associated with individual buildings and irrigation be secured by a condition requiring the submission of Water Conservation Statements for all reserved matters applications for buildings. Recommendation to secure BREEAM pre-assessments, water metering and monitoring, grey water harvesting, and rainwater harvesting by planning conditions have also been noted.

- 17.15 The strategic implications of increased water demand on the environment due to the proposed development is considered in Section 21 of this report.

Urban heat island effects

- 17.16 The applicant acknowledges the importance of addressing Urban Heat Island (UHI) effects in the proposed development and has implemented strategies to mitigate against them. Key measures include green roofs and green landscaping schemes. The applicant has outlined plans to maximise soft landscaping areas, increase tree canopy cover, and incorporate green roofs. Additionally, vertical greening with climbing plants on building elevations is proposed.
- 17.17 The Urban Greening Factor (UGF) is a method for assessing the extent of urban greening in a development. Although not a local policy, a target of 0.3 is recommended for commercial schemes in London under the London Plan. The proposed development will achieve a score of 0.32, based on the following elements:
- Over 4,000m² of semi-natural vegetation, including enhanced boundary planting, ecologically rich planting, species-rich grassland, a dedicated Wildlife Area.
 - A 110m² natural pond within the Wildlife Area.
 - More than 2,500m² of rain gardens.
 - Nearly 2,000m² of flower-rich perennial planting in the public realm.
 - Up to 2,720m² of green roofs.
 - Planting of 290 new trees, resulting in a net increase of 230 trees.
 - Up to 6,690m² of blue roofs under permeable, but unvegetated, roof deck.
- 17.18 In addition to these measures, the Design Code specifies strategies to mitigate urban heat, including the use of light-toned or reflective materials for roofs and hard-landscaping, minimising hard landscaping for vehicle movements, self-shading facades, and integrating shading devices into building designs.
- 17.19 The Sustainability Team supports the proposed approach to mitigating UHI effects through a range of measures, including urban greening. They commend the achievement of a UGF of 0.32, surpassing the Greater London Authority target of 0.3 for this type of development, indicating an improvement over the typical benchmark. The Design Code's requirements for mitigating urban heat through building and landscape design, considering their cumulative impacts, are also endorsed. Planning conditions for external facing building and surfacing materials which can guide the provision of cool materials in the respect of the urban heat island effect has also been noted by officers.

Health and wellbeing

- 17.20 The proposed development aims to create a positive and healthy environment that actively promotes the wellbeing of its users. To achieve this, the scheme is seeking WELL certification and incorporates attractive and inclusive design principles for both buildings and open spaces. It encourages walking and cycling through a reduction in on-site car parking, while providing dedicated cycle parking, end of trip facilities (e.g. changing rooms, showers, and lockers), and enhancing pedestrian and cycle connectivity. Hive Park will serve site users and the local community as a new, multi-functional recreation space. Additionally, there will be opportunities for people to interact with nature through proposed ecology and biodiversity measures, including an aspirational biodiversity net gain (BNG) target of 100%.
- 17.21 The internal environment of the proposed buildings will also be designed to promote health and wellbeing by improving internal air quality and maintaining comfortable temperatures.
- 17.22 Additionally, the application is supported by a Health Impact Assessment (HIA), prepared by Volterra and dated August 2024, which outlines how the positive health impacts of the development could be enhanced, while mitigating against the potential negative health impacts. Overall, the HIA finds there would be some negative construction phase health impacts, relating to construction activities and limited access to healthy food, however, once operational it concludes that the development would have mostly positive health impacts. With regards to the air quality, noise, and neighbourhood amenity health impacts during the occupation phase, despite being categorised as neutral, the HIA recognises that there would be a positive impact on air quality when compared to the existing baseline, due to the proposed reduction in vehicular traffic.
- 17.23 The HIA recommends that mitigation in respect of construction activities, noise, and amenity should be secured through conditions requiring best practice construction management and site operation management. These are matters that are addressed separately under Section 23 (Other Environmental Issues) of this report which covers the public health effects of lighting, air quality, noise, and vibration. Residential amenity, in terms of daylight, sunlight, and overshadowing, in addition to visual enclosure and loss of privacy, is also considered separately under Section 24 of this report.

Conclusion

- 17.24 The proposed development will achieve a high standard of sustainability, complying with and, in some respects, exceeding the requirements of Policies 28 and 29 of the CLP, as well as the Council's Sustainable Design and Construction SPD. Additionally, the proposed development aligns with the relevant objectives contained in the NPPF.

18.0 Biodiversity

- 18.1 The Environment Act 2021 and the Councils' Biodiversity SPD (2022) requires development proposals to deliver measurable net gains in biodiversity following a mitigation hierarchy which is focused on avoiding ecological harm over minimising, rectifying, reducing and lastly off-setting. This approach is embedded within the strategic objectives of the Local Plan. Policies 69 and 70 of the CLP seek broadly to protect priority species, habitats and sites of biodiversity/geodiversity importance and respectively require that development proposals minimise harm, secure achievable mitigation and compensation and where possible enhance the nature conservation value of sites. It is also notable that the Biodiversity SPD sets a vision for achieving a BNG value of 20%.
- 18.2 The application is supported by an Ecological Assessment, prepared by Ecology Solutions and dated August 2024, which assesses the ecological interest of the site and identifies the likely impact of the development on Protected and Priority Habitats and Species, as well as identifying proportionate mitigation where necessary to offset any negative impacts. It also sets out the proposed ecological enhancements to the site and it contains a BNG Assessment.
- 18.3 There are no designated sites of nature conservation or interest within or adjoining the site. The nearest statutory designated sites are the Local Nature Reserves at Coldhams Common and Logan's Meadow, located 0.4km to the east and 0.47km to the north, respectively. The nearest non-statutory site is the Coldhams Common County Wildlife Site (CWS), approximately 0.21km to the east, with the River Cam about 0.52km to the north. The closest Site of Special Scientific Interest (SSSI) is the Cherry Hinton Pit, 3.2km to the southeast. The nearest European Protected Site is the Eversdon and Wimpole Woods Special Area of Conservation (SAC), 13km to the southwest. Given the separation distances and the presence of intervening development and open space between them and the site, the Ecological Assessment concludes that significant adverse effects are highly unlikely. Any potential impacts would be fully mitigated through appropriate construction and engineering practices, in line with best practice and legislative requirements, to be secured through the CEMP.
- 18.4 In terms of the site itself, the Ecological Assessment confirms that it has limited habitat value due to its developed nature and lack of semi-natural habitat with the existing features that hold relatively higher value being the boundary treelines, where they comprise a range of native species. Individual trees and hedgerows also provide some value.
- 18.5 Surveys confirm negligible opportunities for roosting bats and badgers, and no suitable habitats for reptiles or breeding amphibians, including Great Crested Newts. The site does offer some limited opportunities for foraging and commuting bats, though these are highly sub-optimal due to the site's urbanised character and artificial lighting. The site is likely to support common vertebrates, but no protected or notable species were found.

- 18.6 Several bird species, including Woodpigeon, Carrion Crow, Magpie, Robin, Great Tit, Blackbird, and Pied Wagtail, were recorded during the site survey, mostly within the trees around the site boundaries. Background records from 2003 to 2011 also noted other bird species on site, such as Dunnock, House Sparrow, Lesser Redpoll, and Red Kite. Spotted Flycatcher and Redwing were recorded 0.1km east of the site in 2005 and 2006, respectively.
- 18.7 The Ecological Assessment explains that the retention of existing boundary trees and vegetation means that the redevelopment of the site would have no adverse impact on the local bat population. On the contrary, it sets out that the proposals could significantly improve opportunities for bats on the site through new species-rich habitats and the strengthening of boundary vegetation. Moreover, a wildlife friendly lighting strategy will be developed, and six bat roosting boxes will be installed on mature boundary trees in sheltered areas.
- 18.8 All bird species are protected while nesting, so the Ecological Assessment recommends that any clearance of suitable nesting vegetation be undertaken outside of the breeding season (typically March to August) or that checks for nesting birds be made by an ecologist immediately before any removal. The assessment considers that any loss of existing bird nesting habitat will be more than offset by new planting, including fruit and nut-bearing trees. Bird boxes are also proposed, with their number and design to be agreed through a suitably worded planning condition.
- 18.9 The proposed development will include extensive ecological enhancements. These enhancements feature species-rich grassland, wetland, orchard planting, enhanced boundary planting, brown / green roofs, open green space, and woodland planting. Additionally, bird boxes, bat boxes, 'bug hotels', and hibernacula will be installed. These measures will benefit invertebrate species and provide opportunities for other species to colonise post-development, such as reptiles, amphibians, and small mammals. The submitted BNG Assessment indicates that the proposed development will be capable of achieving a significant net gain of 75.52% for habitat units and 143.72% for hedgerow units, based on the Illustrative Masterplan. Consequently, the proposed development would achieve a BNG far exceeding the legislative requirement of 10% and the Council's aspiration for 20%.
- 18.10 The Design Code strengthens the approach by establishing site wide principles for ecology and biodiversity enhancement. This includes specific requirements for habitat creation, green buffers along site boundaries, and public information boards. Additionally, it incorporates the aspirational target of achieving a 100% BNG into the design of the proposals.
- 18.11 The Council's Ecologist has reviewed the application and is satisfied with the submitted survey information and proposed mitigation measures. They are confident that the proposed habitat creation and enhancements will

significantly exceed the Council's 20% BNG aspiration. Overall, the response raises no objections, subject to conditions securing a BNG Plan, Biodiversity Enhancement Scheme, Green Roofs, Landscape and Ecological Management Plan, and an Ecologically Sensitive Lighting Scheme. Natural England has also raised no objections to the proposed development.

- 18.12 To conclude, the proposed development would result in no adverse harm to protected habitats, sites, protected or priority species. It would instead significantly increase the biodiversity value of the site by targeting a 100% BNG, thereby considerably exceeding the Council's 20% BNG aspiration. The proposed development would therefore be in accordance with Policies 69 and 70 of the CLP, in addition to the Biodiversity SPD and the relevant objectives contained within the NPPF.

19.0 Trees

- 19.1 Policies 59 and 71 of the CLP seek to preserve, protect and enhance trees and hedges that have amenity value and contribute to the quality and character of the area and provide sufficient space for trees and other vegetation to mature. Paragraph 136 of the NPPF seeks for existing trees to be retained wherever possible.
- 19.2 In terms of trees, the application is supported by an Arboricultural Impact Assessment (AIA), prepared by Waterman Infrastructure & Environment Limited and dated August 2024, to evaluate the direct and indirect effects of the proposed development on existing trees on and adjacent to the site. The AIA incorporates recommendations for appropriate mitigation and/or compensatory measures where necessary.
- 19.3 The AIA evaluates the direct and indirect impacts of the proposed development on the arboricultural features both on and adjacent to the site. It also recommends mitigation and compensatory measures where necessary. The tree survey completed to inform the assessment has recorded a total of 113 individual trees and six tree groups on the site. Ten of the trees are subject to individual Tree Preservation Orders (TPO). Of the features identified, a total of 60 individual trees and a section one tree group will need to be removed to facilitate the development. In terms of their overall quality and value, 10 of the trees to be removed would be of a moderate quality (Category B) and 51 would be of a low quality (Category C). Two of the trees (T77 and T78) to be removed are subject to a TPO.
- 19.4 The remaining 58 trees, groups of trees, and hedgerows, which includes the vast majority of the vegetation along the western boundary adjacent to Rope Walk, would be retained and protected through measures including site monitoring, protective fencing, non-mechanical dig methods, and construction exclusion zones. Where necessary, some of the retained trees will require pruning, but these works will be undertaken in accordance with best practice and guidance, while avoiding potential impacts on ecology. Precise details of the mitigation measures proposed for the retained trees

will be secured through an Arboricultural Method Statement (AMS) prior to the commencement of any development.

- 19.5 Additionally, the AIA states that to compensate for the proposed tree losses new trees will be planted. The revised landscaping proposals indicate that this will amount to at least 290 new trees, resulting in a net increase of at least 230 trees on the site.
- 19.6 The Design Code outlines a tree strategy that requires the retention of existing trees along the site boundaries. It emphasises the need to compensate for tree losses and sets expectations for the on-site reuse of removed trees, such as creating bark mulch or playable logs, and the transplantation of small, healthy trees into Hive Park. Regarding proposed trees, the Design Code establishes measures to maximise species diversity and the planting of the largest trees possible based on available space. It also mandates the inclusion of a maintenance and management plan which would be secured via condition.
- 19.7 The Council's Tree Officer has responded to the application, noting that they generally value trees more highly than the submitted AIA, notwithstanding their past management. Even so, they recognise that the removal of 60 trees represent an improvement over the 68 trees proposed for removal under the original application. However, an objection is maintained to the removal of TPO trees T77 and T78. Proposed opportunities to increase tree planting, including large tree species, on the site are also welcomed, notably within the proposed Abbey Grove and Hive Park character areas. The Tree Officer also has some reservations regarding the ability to achieve the proposed levels of new tree planting on the site.
- 19.8 To summarise, while objecting to the removal of trees T77 and T78, which are subject to TPOs, the Tree Officer is otherwise broadly supportive of the revised application due to the increased spaces for new strategic tree planting. In summary, whilst officers recognise that trees will be lost, including two TPO'd trees, their removal is necessary to facilitate the proposed development and would be more than adequately compensated through the new tree planting and wider landscaping proposals. The proposed development therefore complies with Policies 59 and 71 of the CLP, in addition to the relevant objectives contained within the NPPF.

20.0 Drainage and Flood Risk Management

- 20.1 Policies 31 and 32 of the CLP require that developments incorporate sustainable foul and surface water drainage systems and minimise flood risk. According to paragraph 181 of the NPPF, flood risk should not be increased elsewhere when determining planning applications. Paragraph 182 of the NPPF requires major developments to include sustainable drainage systems (SuDS) to control flows and reduce volumes of runoff, while considering advice from the Lead Local Flood Authority (LLFA) and providing multi-functional benefits wherever possible.

- 20.2 The application site is located within Flood Zone 1, indicating a low risk of flooding. In terms of surface water flood risk, the EA flood mapping confirms that the majority of the site is designated as being at a 'very low' risk of surface water flooding, albeit some parts of the site do fall within areas of 'low', 'medium', and 'high risk'.
- 20.3 A Flood Risk Assessment & Drainage Strategy (FRA), prepared by Waterman Infrastructure & Environment Limited and dated October 2024, has been submitted in support of the application as Appendix 8.1A to the ES. Due to the presence of underlying made ground with former contaminating uses, together with a relatively shallow groundwater table, the strategy proposes implementing SuDS through techniques such as rainwater harvesting, attenuation features (dry basin and raingardens), creation of a wetland feature, bioretention through tree planting, blue roofs, below-ground storage, and permeable paving. This strategy would significantly reduce the discharge rate of surface water into the existing Anglian Water (AW) drains on Coldhams Lane and York Street. Overall, the FRA demonstrates a material reduction in flow volumes to the existing sewer network and a 98% betterment in flow rates post-development, due to reduced impermeable areas and the use of SuDS.
- 20.4 Foul flows will be discharged into the local public foul sewer system. The FRA explains that the applicant has engaged in pre-application discussions with AW, who anticipate that there will be sufficient capacity within the public sewer network to accommodate the increased flows. New connections to the sewer system would be secured through a Section 106 New Sewer Connection Agreement with AW under the Water Industry Act 1991, subject to planning permission.
- 20.5 Chapter 8 of the ES addresses flood risk and drainage. It concludes that the mitigation and management measures outlined in the FRA will adequately address any potential flood risk and drainage impacts, to the extent that the residual impacts can be considered negligible.
- 20.6 The LLFA has reviewed the latest version of the FRA and raised no objections to the proposed development, subject to conditions. They support the proposed SuDS measures, which restrict surface water discharge rates to 3l/s for the northern catchment and 4.1l/s for the southern catchment and provide amenity and biodiversity benefits. The LLFA is also satisfied that water quality has been adequately addressed through the proposals.
- 20.7 AW have noted in their response that the Cambridge Water Recycling Centre (WRC) currently lacks capacity to treat foul drainage from the proposed development. However, whilst AW is not obligated to accept commercial foul flows from approved developments it has indicated that it will seek to ensure sufficient treatment capacity is available if planning permission is granted. AW has applied to the EA for an interim permit to address capacity exceedance and is planning a new Cambridge WRC as

part of the Cambridge relocation project and Development Consent Order. This new facility will handle all existing and future flows, with AW collaborating with Greater Cambridgeshire to design a WRC that meets future demand based on local plan allocations and planning permissions. AW have subsequently raised no objections to the proposed development, subject to a surface water disposal condition and informatives.

- 20.8 Although AW has not mentioned trade effluent in their response, the submitted FRA indicates that AW has highlighted this issue in their discussions. Trade effluent will need to be considered at a later stage when final tenant information is available to inform AW's capacity assessment. Trade effluent is regulated through a separate consenting regime under the Water Industry Act 1991 which AW will need to satisfy itself that future capacity can be provided.
- 20.9 To conclude, the proposed development is capable of support in respect of foul water and flood risk impacts through the imposition of conditions. No conflict arises with policies 31 and 32 of the CLP or the relevant objectives contained within the NPPF.

21.0 Water Resources

Legislative and planning policy context

- 21.1 Regulation 33 of the Water Environment (Water Framework Directive (England and Wales) Regulations 2017 places a statutory duty on public bodies, including district councils, to have regard to the River Basin Management Plan (RBMP) for that district.
- 21.2 Paragraph 20(b) and (c) of the NPPF sets out that strategic policies should, amongst other things, set out a strategy for and make sufficient provision of infrastructure for water supply, for the conservation and enhancement of the natural environment, climate change mitigation and adaptation.
- 21.3 Paragraph 162 of the NPPF sets out that plans should take a proactive approach to climate change mitigation and adaptation, accounting for the long-term implications to, amongst other things, water supply and biodiversity.
- 21.4 Paragraph 187(e) of the NPPF sets out that policies and decisions should contribute to and enhance the natural and local environment and that "development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as the RBMPs".
- 21.5 The Planning Practice Guidance (PPG) includes guidance on water supply, wastewater, and water quality. The Water Environment Regulations 2017 sets out requirements, amongst other things, to protect, enhance, and restore water bodies to 'good status' (PPG, Paragraph: 001 Reference ID: 34-001-20161116).

- 21.6 The PPG goes on to describe how water supply should be considered through the planning application process, setting out that water supply should normally be addressed through strategic policies, although exceptionally may require water supply to be considered through the planning application process, including whether a plan requires enhanced water efficiency in new developments (PPG, Paragraph: 016 Reference ID: 34-016-20140306).
- 21.7 Policies 28 and 31 of the CLP provide for the water efficiency related exception allowing for water supply to be considered.

Material planning considerations

- 21.8 The strategic risks of environmental deterioration associated with the increased demand for potable water from developments in Greater Cambridge has been the subject of significant discussion and focus.
- 21.9 To address this, a range of Government-led interventions have been announced in the last 9-10 months which were also recently reaffirmed in the 29 January 2025 speech on ‘kickstarting economic growth’ made by Rt Hon Rachel Reeves MP (Chancellor of the Exchequer). These interventions, together with recent key appeal decisions made by the Secretary of State, begin to provide an emerging approach on how the planning decision making process should address the effects and risks of new development proposals on the water environment. These are discussed further below.

Government-led interventions

- 21.10 On 6 March 2024 central Government published two (joint) statements on the issue of water resources in the Greater Cambridge Area:
- [Joint statement on addressing water scarcity in Greater Cambridge - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/joint-statement-on-addressing-water-scarcity-in-greater-cambridge)
 - Written Ministerial Statement: [Addressing water scarcity in Greater Cambridge: update on government measures. - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/addressing-water-scarcity-in-greater-cambridge-update-on-government-measures) (*hyperlinks).
- 21.11 The joint statement on water scarcity in Greater Cambridge details in paragraphs 4 to 6 that:

“A sizeable number of sites remain in the planning process (in the current adopted local plans of both councils) because of concerns raised by the Environment Agency around sustainable water supply to the Cambridge area. Cambridge Water’s previous draft Water Resources Management Plan (WRMP) was not able to satisfactorily demonstrate that there was enough water to supply all of the new properties contained in the emerging joint Local Plan without risk of deterioration of the local water environment, including chalk streams.

Long-term, and in line with statutory requirements, the water needs of the Greater Cambridge area will need to be met by the water company. We expect Cambridge Water to publish and deliver a WRMP to provide a sustainable, safe, sufficient supply of water to meet all of the planned development in the future across the Cambridge area. The water company will need to work closely with other water companies to ensure delivery of major new water resource infrastructure. This includes working with Anglian Water and Affinity Water to develop new transfer of water to Cambridge from Grafham Water, and supporting work from Anglian Water, to develop a new reservoir in the Fens. We are committed to working together to support this longer-term work in our respective roles.

For those sites where environmental concerns have been raised through the planning process, we must continue to explore how to support sustainable development to come forward. To do this, DLUHC and Defra, working with the Environment Agency and local partners, have made a significant commitment, including major investments in water savings measures to offset water usage associated with new development”.

21.12 Paragraphs 10 and 11 of the statement go on to state that:

*“There is now an emerging understanding amongst all partners of the impact of these important schemes, the potential water savings to be generated through government’s additional spending, and the proposals still to be refined and tested alongside the WRMP. The government is confident, based on the scheme set out below, alongside a published WRMP, **that the availability of sustainable water resources need not be an impediment to the consideration of planning permissions for developments envisaged within the adopted local plans.***
(emphasis added)

The scheme is intended to provide greater certainty through:

- a) The delivery of water savings measures in the Cambridge Water operating area, supported by the government’s spending.*
- b) A robust water credit system being in place to assure those water savings and issue credit certificates to developers and housebuilders.*
- c) Application of enforceable planning mechanisms so that planning permissions are linked to water savings measures in a robust way”.*

21.13 The statement highlights that it does not seek to pre-judge planning decisions but that the Local Planning Authority’s role remains to determine planning applications in the normal way, taking account of representations from the Environment Agency who have a duty under the Water Framework Directive Regulations to review schemes and their potential impact on waterbodies accordingly.

21.14 The measures announced in the Joint Statement and associated guidance continue to be progressed by the government, water companies and local partners through the government sponsored local ‘Water Scarcity Group’

(WSG). As a result, there remains continued confidence that measures to address the risk of environmental deterioration arising from water needs of the development raised in earlier correspondence by the Environment Agency will be progressed. This confidence is reflected in the recovered appeal decisions for two other large scale new developments within the CWC WRMP area determined in 2024.

Recovered appeal decisions of Secretary of State

- 21.15 Since the publication of the March Joint Statement, there have been two key appeal decisions ('recovered appeals') made by the Secretary of State (SoS) which are relevant 'material planning considerations' in regard to the issue of water capacity and supply in Greater Cambridge.
- 21.16 The first appeal decision was allowed on 23 April 2024 and relates to a site known as Land to the North of Cambridge North Station ('the Brookgate decision'). The decision can be read in full via the following link: [Recovered appeal: land to the north of Cambridge North Station, Cambridge \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/131442/land-to-the-north-of-cambridge-north-station-cambridge-appeal.pdf) (hyperlink).
- 21.17 The Brookgate decision is a relevant material consideration since it demonstrates how the SoS deals with the aforementioned Government policy statements including the March Joint Statement on addressing water scarcity in Greater Cambridge.
- 21.18 In summary, the Brookgate decision established the following points with regards to water supply and quality:
- The SoS noted the Inspector's judgement that whilst water quality and supply is a material consideration, the proposals would not in itself harm water quality or water resources, but the cumulative impacts of the appeal proposal with other development would add to demand for water.
 - The Inspector acknowledged that a sustainable supply of water for the Cambridge Water area may not be available for several years yet (until after the Grafham Transfer is operational) and left to the SoS the decision as to whether the statutory process and other measures in place in respect of water supply are sufficiently robust to ensure that the appeal proposal, together with other development, would avoid placing an unacceptable demand on water resources and potentially harm ecological interests.
 - The Inspector proposed an optional condition be placed on an approval which would delay the occupation of development until the Grafham Transfer water supply option is operational or the WRMP for Cambridge Water operating area is approved.
 - In context of the publication of the Joint Statement, the SoS considered that the proposals accorded with the development plan, with national

policy on water use and supply, and would not have an unacceptable consequence on water supply or quality. As a result, the SoS considered the optional condition unnecessary and that matters relating to water supply and quality are neutral in the planning balance.

21.19 The second appeal decision was allowed on 25 September 2024 and relates to Land between Huntingdon Road and Histon Road (known as 'Darwin Green Phases Two and Three'). The full decision can be viewed via the following link [Recovered Appeal: Darwin Green Phases Two and Three](#) (hyperlink).

21.20 As with the Brookgate decision (above) this recovered appeal also considered the issue of water capacity and supply in Greater Cambridge and the March Joint Statement. Like the Inspector, the Secretary of State in this decision had given regard to the aforementioned Brookgate decision and its conclusions.

21.21 In summary, both the Inspector and SoS acknowledged in allowing this appeal that:

- A DEFRA agreed and published WRMP is most likely to be in place before development commences in 2027.
- The WRMP process together with the supporting measures announced in the December 2023 WMS and the March Joint Statement indicate that the WRMP process will be sufficiently robust to ensure a sustainable supply of water can be provided, particularly until Grafham Transfer is operational in 2032.
- On the basis above, the appeal development would not have an adverse impact on the demand for potable water use and associate abstraction and therefore would not result in risk of deterioration to waterbodies in the Greater Cambridge area.

21.22 Whilst the two appeal cases cited are different to the current site and its proposals, they have demonstrated that there is a growing confidence that the strategic approach and measures being put in place will address the (short and long term) potential effects of large-scale developments on water supply and quality in Greater Cambridge. Whilst the Beehive site is not currently allocated, unlike Darwin Green or Brookgate, there does not appear to be any absolute exception that it would not benefit from a water credit scheme once developed, particularly as it appears unlikely that the site would remain unallocated as part of any emerging local plan.

The Case for Cambridge 2040, March 2024 - [The Case for Cambridge - GOV.UK](#) (hyperlink)

21.23 This document, published by central Government, outlines their ambitions for the growth of Cambridge. It emphasises the City's potential to become

Europe's science capital, a considerable growth in the provision of new housing and the delivery of infrastructure enhancements.

- 21.24 It is relevant insofar as it considers how the aspirational growth of Cambridge could be supported by plans for a more sustainable water resource, by improving the water efficiency of existing buildings, the creation of a water credits system, a new reservoir in the Fens, and a pipeline to / from Grafham Water.
- 21.25 Whilst this document does not contain significant detail or seek to bring forward planning policies for Cambridge, it has reinforced central government's commitments made (to date) in resolving the issue of water scarcity.

Beehive - Assessment of Effects on Water Resources

- 21.26 Without mitigation, based on the indicative total gross internal floorspace of development (c.157,670 sqm GIA), the Applicant's ES has indicated that the proposed development is estimated (during construction and operational stages) to generate a demand for c.188,130 litres per day. With mitigation measures, which includes achieving all 5 WAT 01 credits under BREEAM including a target to achieve the additional 'exemplar' credit (see paragraphs 17.12-17.15 above), it is estimated water demand would be reduced to c.153,630 litres/day (c.18% reduction compared to without mitigation).
- 21.27 Through its Sustainability Strategy, it has also committed to reviewing feasibility of meeting RIBA Climate Change 2030 target of 10 litres per person per day of potable water. These commitments including other site-wide water management measures are welcomed.
- 21.28 The ES has acknowledged that the proposed development would lead to an increase in potable water demand and has therefore considered the potential effects on water supply and environment in project (alone) and in-combination (cumulative with other developments) terms during both construction and operational stages. The assessment takes account of a wide range of possible 'likely' effects which includes before and after incorporation of project mitigations; the potential for local and strategic groundwater abstraction; and implementation of third-party strategic reinforcement measures.
- 21.29 In summary, the potential impacts following implementation of project mitigations on local water resources and water supply networks is likely to be negligible. In terms of the impacts on strategic water resources and associated ecological and environmental receptors, the assessment predicts that the effects would be partially offset by onsite (project) mitigations resulting in residual impacts of minor adverse in the short term. The implementation of strategic reinforcement measures in the short to medium term is predicted to result in residual impacts that are negligible and is anticipated to remain negligible over the operational lifetime of the

development. The Applicant's full summary of the likely significant effects can be found in Table 8.4, Vol.1 of the ES.

- 21.30 In terms of the cumulative impacts of the proposed development considered in line with other consented developments (at the time of writing the report), qualitative judgements made by an expert environmental assessor are provided in accordance with broad criterion agreed in advance with officers at the EIA scoping process stage.
- 21.31 In summary, the proposed effects of the scheme on the local water supply network and associated ecological and environmental receptors are predicted to be negligible following implementation of mitigations and therefore the cumulative effects attributable to the proposed development are not considered significant. It is notable that the EA does not object to the Beehive application on the basis of its predicted environmental impacts on the wider water environment.
- 21.32 Officers consider the project and cumulative impacts reviewed and its conclusions are sound and there is no reasonable basis to refuse the application on grounds of water impact.
- 21.33 In terms of future development, e.g. under the CLP, the Brookgate and Darwin Green appeal decisions are considered to demonstrate:
- that it is reasonable to expect that there will be some uncertainty in assessing cumulative harm of future development due to the fact that the precise form of those future proposals is unknown at present; and
 - there are now clear proposals which commit to address capacity issues as indicated in Paragraph 11 of the Joint Statement 2024.
- 21.34 As noted above, the Environment Agency has also removed its original holding objection stating that, '*the Cambridge Water Company's (CWC) draft Water Resources Management Plan (WRMP) has improved.*' It recognises that the Joint statement on addressing water scarcity in Cambridge could support the measures in the WRMP and that it will continue to monitor its delivery alongside acknowledgement of the outcomes of the aforementioned appeal cases with a commitment to work with MHCLG, Defra, and the Council to support the delivery of a water credits system, as well as working with the Council on strategic solutions as part of the new local plan. The EA's response is concluded by stating that full credits for category WAT01 for BREEAM should be achieved including encouragement to achieve full credits under categories WAT 02 (water monitoring), 03 (Water leak detection) and 04 (water efficient equipment).
- 21.35 In addition to EA's response, Natural England (NE) has also not objected to the proposals on nature conservation grounds.
- 21.36 As indicated in Section 17 of this report, the Applicant's sustainability strategy confirms that it will seek to achieve all available credits under

BREEAM criteria for water conservation including the exemplary credit. The Council's Sustainability Officer has raised no objections to the proposed approach to water efficiency measures and recommends that these commitments could be secured through requirements for water conservation strategies to be submitted and agreed at future reserved matters stages.

Conclusion

- 21.37 Officers acknowledge that the proposed development (based on the Applicant's current estimates on water usage) would result in a significant increase in water demand which would cumulatively add to the demand placed on water resources in the Cambridge area. However, the anticipated full extent of demand would not arise immediately, not until at least 6 years (if the scheme were to be implemented at an accelerated pace) or likely longer following the issue of a planning permission. For a speculative development of the size proposed, it is therefore likely that, firstly, the site will be allocated in the emerging local plan, that secondly, a water credits scheme may be in operation during the build out of the development that the developer could benefit from, and thirdly, that a strategic connection to Grafham Water is likely to be delivered by approximately 2032 and thus, during the early operational lifetime of a completed development at the Beehive, the water resources catchment / capacity for the Cambridge area would be increased ahead of the intended Fen reservoirs project.
- 21.38 The commitments made in the March 2024 Joint Statement, reaffirmed again in the recent speech of Rt Hon Rachel Reeves MP, provides a positive foundation from which an emerging and evolving approach is being established to tackle the strategic effects of increased water demand on existing supply network and the natural environment. This evolving approach has been given further weight in recent high profile appeal decisions by the SoS which is now acknowledged by key stakeholders including the Environment Agency and Natural England.
- 21.39 Whilst officers note that the delivery of strategic water mitigations remains to be fully resolved, there is a greater confidence that the March 2024 announcements relating to the implementation of water savings scheme will in the short to medium term provide robust assurances that the cumulative risks and harms to water supply and the natural environment can be managed effectively.
- 21.40 In addition to the above, officers are satisfied that the Applicant's strategy to address future water usage/demand in its own proposals (at project level) meets and exceeds the current adopted planning policy requirement in the CLP (2018). This is welcomed by officers.
- 21.41 Therefore, based on the above, it is considered that CLP Policies 28, 31 and 70, the Greater Cambridge Sustainable Design and Construction SPD 2020, the NPPF, PPG and Water Framework Directive (England and Wales) Regulations 2017 have been complied with.

22.0 Ground Contamination and Remediation

- 22.1 Policy 33 of the CLP sets out that developments will be permitted where the applicant can demonstrate that there will be no adverse impacts from ground contamination on future occupiers, neighbours, controlled waters, and the environment, in addition to no gas migration impacts. Where contamination is suspected or known to be present, the policy requires further investigation prior to agreeing remediation and/or mitigation measures. These objectives are reflected in paragraphs 196 to 201 of the NPPF.
- 22.2 The application is supported by the following documents prepared by Waterman Infrastructure & Environment Ltd and submitted under the appendices to Chapter 9 (Ground Conditions and Contamination) of the ES:
- Preliminary Risk Assessment (July 2024) – Appendix 9.1A
 - Preliminary Generic Quantitative Environmental Risk Assessment (February 2023) – Appendix 9.2
 - Ground Investigation Report (February 2023) – Appendix 9.3
- 22.3 The investigations undertaken have identified some potential contaminant sources on the current site, but these are limited to plant rooms. Former uses on the site, including a petrol station, coal yard, a dairy, warehouses, and a builders' yard, have also introduced contamination. Potential pollutants off-site include infilled gravel pits, depots, and the railway line.
- 22.4 The Preliminary Risk Assessment for the proposed redevelopment concludes that the overall risk from contamination is 'medium'. To mitigate this risk, the assessment recommends further liaison with the Environmental Health Team and regulatory bodies, additional targeted investigations, the production of a remediation strategy, and adherence to safety regulations and best practices by construction workers. It also recommends the preparation of a verification report post-completion of the development. With the implementation of these recommendations and mitigation measures, the Preliminary Risk Assessment anticipates the risks to be low.
- 22.5 Chapter 9 of the ES concerns ground conditions and contamination. It concludes that the proposed mitigation, including the use of a Construction Environmental Management Plan, would address the potential ground conditions and contamination impacts, with the residual effects considered to be neutral and not significant.
- 22.6 The Environmental Health Team have reviewed the application and raise no objections to the proposed development with regards to land contamination, subject to a conditions securing a Phase 2 Site Investigation Strategy, a Phase 2 Intrusive Site Investigation Report, and a Phase 3 Remediation Strategy based upon the findings of the Phase 2 Site Investigation Report. A Construction Environmental Management Plan (CEMP) could also be secured through condition.

22.7 In light of the above, and subject to the condition(s) recommended by the Environmental Health Team, the proposed development would be in accordance with Policy 33 of the CLP, in addition to the relevant objectives of the NPPF.

23.0 Other Environmental Issues

Airport Safeguarding

23.1 The site is within a safeguarding zone for Cambridge City Airport for any structure greater than 15 metres above ground level, as set out under Policy 37 of the CLP.

23.2 Cambridge City Airport has confirmed that it does not object to the proposals subject to the inclusion of planning conditions that would safeguard the operational capacity of the airport.

23.3 The proposed development would therefore, subject to conditions, be in accordance with Policy 37 of the CLP.

Public Health Effects (lighting, air quality, noise and vibration)

23.4 Policies 34, 35, 36, and 38 of the CLP collectively seek to minimise, mitigate, and control impacts arising from artificial lighting, noise, vibration, and air quality, including odour and dust. The objectives of these policies are reflected in paragraphs 198 and 199 of the NPPF.

23.5 An External Lighting Strategy, prepared by Hoare Lea and dated October 2024, has been submitted to outline how the development will promote environmentally friendly lighting solutions. The potential effects with on air quality are assessed in an Air Quality Assessment, prepared by Waterman Infrastructure & Environment and dated 2024, which forms Chapter 6 of the ES. The potential effects related to noise and vibration are assessed in Chapter 11 of the ES, prepared by Hoare Lea and dated 2024.

23.6 An Outline Construction Environmental Management Plan (CEMP), prepared by Blue Sky Building and dated July 2024, has also been submitted. It sets out management measures to limit, among other matters, the impacts on air quality, noise, and vibration during the construction phase.

23.7 The documents reviewed conclude that the potential lighting, air quality, noise, and vibration impacts could be effectively mitigated through the implementation of various measures and strategies, including:

- A sensitively designed lighting scheme
- Noise limits for operational plant
- Noise limits for event and patron noise through a Noise Management Plan (NMP)

- Restricting noisy works to less sensitive daytime hours, with no works on Sundays or bank holidays
- Adopting quieter methods of working and equipment
- Careful selection of compound location
- Control over delivery areas and times
- Compliance with a Traffic Management Plan
- Regular maintenance and appropriate operation of equipment, vehicles, and plant
- Installation of noise barriers and hoarding
- Ongoing communication with local residents
- Implementation of a Dust Management Plan
- Monitoring of activities and adherence to mitigation and management measures

- 23.8 Additionally, Chapter 6 of the ES concludes that the proposed reduction in car parking and vehicle movements would have a minor beneficial effect on local air quality compared to the existing baseline. All other air quality residual effects are considered negligible.
- 23.9 Chapter 11 of the ES concludes that there would be temporary negligible to minor adverse residual effects related to noise and vibration from demolition and construction activities, and minor adverse residual effects from new plant and events within the public square. Overall, the assessment finds that the site is suitable for the proposed development.
- 23.10 Officers note that there are local concerns about the potential noise and vibration impacts of the bus and servicing route along the northern boundary of the site. However, the passing of vehicles would generally be brief and not continuous, reducing the likelihood of significant disruption. Moreover, in recognition of the proposed reduction in vehicle trips to the site, which is currently dominated by car parking, Chapter 11 of the ES explains that there will be a lowering of noise levels associated with road traffic when compared to the existing baseline.
- 23.11 The Environmental Health Team have been consulted on the application and have responded raising no objections to the proposed development in relation to lighting, air quality, and noise and vibration, subject to the following conditions:
- Demolition and Construction Environmental Management Plan (DCEMP)
 - Construction Method Statement (CMS)
 - Operational Noise Impact Assessment
 - Noise Management Plan (NMP)
 - Artificial Lighting Scheme
 - Commercial extraction discharge ductwork
 - Delivery Hours
 - Electric Vehicle Charging Points
 - Details of back-up generators

- 23.12 Therefore, subject to the conditions recommended by Environmental Health, the proposed development would be in accordance with Policies 34, 35, 36, and 38 of the CLP, in addition to the relevant objectives contained within the NPPF.

Wind Microclimate

- 23.13 Policy 60 (criterion d) of the CLP outlines criteria for assessing microclimate and amenity impacts of tall buildings. The Applicant has provided a desk-top analysis of future wind comfort levels at building entrances, ground and rooftop amenity spaces for summer and winter periods, carried out in accordance with the Lawson Wind Comfort Criteria.
- 23.14 The analysis acknowledges that height of the scheme in relation to the immediate surrounding space would result in stronger and higher-level winds. It also notes that where the building design could potentially accommodate elevated amenity terraces, these would be exposed from a number of wind directions.
- 23.15 Despite there being isolated areas of the proposals that are potentially likely to experience stronger wind comfort levels, the majority of spaces would be suitable for their intended usage.
- 23.16 In instances where there are identified unsuitable wind conditions for the intended future uses, e.g. rooftop amenity decks, it has recommended a range of design solutions which it expects would adequately reduce the windiness across the Site, e.g. taller tree planting at entrances and amenity decks or use of built/hard diffusion elements. The recommendations made would need to be considered and agreed further at detailed design stage under reserved matters in the event planning permission is given.
- 23.17 Officers consider that an appropriately worded planning condition would satisfactorily secure the consultant's recommendations and therefore no objections in this respect is raised.

24.0 Residential Amenity

- 24.1 Policies 55, 56, and 57 of the CLP require the design of developments to respond positively to their context. Policy 60 of the CLP outlines criteria for assessing tall buildings. Criterion (d) requires applicants to demonstrate that their proposals will not adversely impact neighbouring buildings and open spaces in terms of overlooking and overshadowing, in addition to ensuring there is adequate sunlight and daylight within and around the proposals. The objective of achieving a high standard of amenity is also contained in paragraph 135 of the NPPF.
- 24.2 This section considers daylight, sunlight and overshadowing, as well as loss of privacy and visual enclosure. Matters relating to air quality, noise,

vibration, and artificial lighting effects on residential amenity are addressed in Section 23 of this report (see above).

Daylight, sunlight and overshadowing

- 24.3 The application is supported by the following documents which assess the daylight and sunlight impacts of the proposed development on neighbouring properties:
- Daylight & Sunlight Report (eb7, August 2024)
 - Daylight & Sunlight Addendum (eb7, November 2024)
- 24.4 These documents apply the following technical methods to assess daylight, sunlight, and overshadowing:
- Vertical sky component (VSC): Normally abbreviated as VSC, this is a measure of how much daylight the centre of a window (as measured on the face of the window wall) receives from an overcast sky. A higher VSC indicates that more daylight illuminance is available to enter the room through that window. The maximum theoretical value for VSC is almost 40% for a vertical window.
 - Daylight distribution (NSL): Typically referred to in terms of the 'no sky line' (NSL), it shows the areas within a room that can receive skylight. Areas behind the NSL cannot see / receive direct skylight, whereas areas in front of the NSL can see / receive direct skylight at the working plane, which for a residential use is at 85cm above the floor level.
 - Annual probable sunlight hours (APSH): This measure determines how much sunlight is available to the centre of the window (as measured on the face of the window wall) as a percentage of the probable sunlight hours available during a year. 'Winter hours' are also considered between the 21st September and the 21st March.
 - 2-hour sun contour to amenity: This identifies the areas of amenity space that can receive at least two hours of sunlight on the ground on the 21st March.
- 24.5 The Council has obtained a Daylight & Sunlight Independent Review, prepared by Schroeders Begg LLP and dated January 2025, in relation to the above assessment (from here on 'the independent review'). The independent review can be found in Appendix E.
- 24.6 The independent review raises no concerns regarding the methodology used in the applicant's assessment which refers to the 'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice 2022', published by the Building Research Establishment, from here on referred to as 'the BRE guidance'. This BRE guidance is quite clear from the outset that it is not an instrument of policy, it is an aid, primarily for designers, and provides the following advisory targets:

- VSC: If the VSC is greater than 27% then enough skylight should be reaching the window. If the VSC is both less than 27% and less than 0.8 times its former value (a reduction of 20%), occupants will notice the reduction in daylight, as the room will appear gloomier with electric lighting needed more often.
- NSL: If the NSL is less than 0.8 times its former value, occupants will notice the reduction in direct skylight and more of the room will appear poorly lit.
- APSH: If a room receives 25% of the total annual probable sunlight hours, including at least 5% during the winter months, then it should still receive enough sunlight. If the available sunlight hours are both below these benchmark figures and less than 0.8 times their former value, with the overall annual loss being greater than 4%, then occupants will notice the loss of sunlight.
- Sunlight to gardens / amenity areas (overshadowing): At least half of a garden or amenity area should receive at least two hours of sunlight on the 21st of March and if falling below this, with the reduction being less than 0.8 times the former value, then the reduction will be noticeable.

24.7 There are, however, some additional considerations when interpreting any numerical reductions in daylight, sunlight, or increases in overshadowing. For instance, given the relatively low-rise nature of the existing buildings on the site, some of the surrounding neighbouring properties may benefit from higher levels of daylight and sunlight than ordinarily anticipated for an urban location, meaning that some degree of harm to neighbouring amenity, due to daylight and sunlight reductions, may be inevitable. Accordingly, the BRE guidance incorporates some flexibility for alternative target values to be adopted where they can be justified based on the special requirements of the development or its location. However, this flexibility in the guidance does not imply that a material deterioration can be disregarded if the guidelines indicate it will occur.

24.8 The independent review of the submitted daylight and sunlight documents identifies noticeable reductions in daylight to a significant number of main windows serving habitable rooms in St Matthew's Gardens and Silverwood Close when applying the BRE guidance. Additionally, it notes instances of noticeable reductions in sunlight to living rooms and amenity areas in these locations. While the independent review focusses on the aforementioned locations of particular sensitivity, there are also properties within Sleaford Street, York Street, Hampden Gardens, and The Terrace with habitable rooms that would experience reductions in daylight beyond the BRE targets for VSC and NSL. Where these digressions arise, they are generally, but not always, less adverse than in St Matthew's Gardens and Silverwood Close.

24.9 Therefore, this section of the report will primarily focus on the adversely affected properties in St Matthew's Gardens and Silverwood Close, but it will also highlight divergences from BRE guidelines in Sleaford Street, York Street, Hampden Gardens, and The Terrace. It will consider the daylight, sunlight, and overshadowing effects arising from the maximum parameters scheme, representing the maximum building envelopes sought under the application, as well as the illustrative scheme, which shows one possible way a detailed scheme could be developed at the reserved matters stage.

24.10 Where exceedances of BRE targets occur, the independent review initially considers the extent of the adversity reduction, and it is – in alignment with EIA practice - common practice in the industry to categorise the numerical losses as follows:

- Minor Adverse: Reductions in VSC or NSL of more than 20% to 30%.
- Moderate Adverse: Reductions in VSC or NSL of more than 30% to 40%.
- Major Adverse: Reductions in VSC or NSL of greater than 40%.

Maximum Parameters Scheme

24.11 In terms of daylight, 37 main windows serving habitable rooms in St Matthew's Gardens and 26 main windows serving habitable rooms in Silverwood Close would not meet the BRE targets for VSC in terms of reduction. Of these reductions in daylight to windows, 15 would be major adverse, 29 would be moderate adverse, and 18 would be minor adverse.

24.12 With regards to daylight distribution, 21 habitable rooms in St Matthew's Gardens and 27 habitable rooms in Silverwood Close would not meet the BRE targets for NSL in terms of reduction. Of these reductions in daylight distribution to habitable rooms, 28 would be major adverse, 11 would be moderate adverse, and 9 would be minor adverse.

24.13 Concerning sunlight, four living rooms in St Matthew's Gardens would not meet BRE targets for winter hours. All four sunlight reductions would be major adverse. No material deviations from BRE sunlight targets would occur in Silverwood Close to living rooms.

24.14 Additionally, in terms of overshadowing, two amenity areas in St Matthew's Close and three amenity areas in Silverwood Close would experience reductions in sunlight availability below BRE guidelines. Of these reductions in sunlight, four would be over 40%, and one would be 39%.

24.15 Outside of St Matthew's Gardens and Silverwood Close, there are a further seven windows to habitable rooms in Sleaford Street, York Street, and Hampden Gardens that would not meet BRE target values for daylight (VSC). Two of these reductions in VSC would be major adverse, and the remainder would be minor adverse. Additionally, 27 windows to habitable rooms in Sleaford Street, York Street, Hampden Gardens, and The Terrace

would not meet BRE target values for daylight distribution (NSL). These reductions in NSL would range from minor adverse to major adverse.

- 24.16 A comprehensive breakdown of the reductions in daylight and sunlight to affected properties, along with their retained values, under the maximum parameters scheme, can be found in Tables 1 to 13 in the independent review (Appendix E).
- 24.17 The independent review concludes that the daylight impacts of the maximum parameters may not be supportable. This conclusion is based upon the number of windows with reductions not meeting BRE guidelines, the extent of the reductions (with a number of reductions exceeding 30% and 40%), and the consideration of retained values.
- 24.18 Regarding sunlight, the independent review sets out that for those instances of reductions not meeting the BRE guidelines' default target for winter hours, the majority of retained values to living rooms would be between 3% and 4% during the winter months, with the retained value for one living room in St Matthew's Gardens being significantly low at 1%. Additionally, five amenity areas would not meet the BRE guidelines' default target criteria for sunlight (2-hour test on 21st March), with four having retained values ranging between 46% and 49%, and one having a retained value of 26%, indicating these properties would experience noticeable increases in overshadowing.

Illustrative Scheme

- 24.19 In terms of daylight, 26 main windows serving habitable rooms in St Matthew's Gardens and 17 main windows serving habitable rooms in Silverwood Close would not meet the BRE targets for VSC in terms of reduction. Of these reductions in daylight to windows, two would be major adverse, 25 would be moderate adverse, and 16 would be minor adverse.
- 24.20 With regards to daylight distribution, 17 habitable rooms in St Matthew's Gardens and 17 habitable rooms in Silverwood Close would not meet the BRE targets for NSL in terms of reduction. Of these reductions in daylight distribution to habitable rooms, 5 would be major adverse, 13 would be moderate adverse, and 16 would be minor adverse.
- 24.21 Concerning sunlight, the independent review acknowledges that all reductions in APSH and winter hours to living rooms in St Matthew's Gardens and Silverwood Close would meet the BRE guidelines. Regarding sunlight availability to neighbouring amenity areas, it notes that one amenity area, relating to No. 38 Silverwood Close, would not meet BRE guidelines' default target criteria for sunlight (2-hour test on 21st March) and would experience a noticeable increase in sunlight loss / overshadowing. The reduction in sunlight availability in that instance would be 56% (major adverse) with a retained value of 34%.

- 24.22 Outside of St Matthew's Gardens and Silverwood Close, it is noted that there are a further two windows to habitable rooms in Sleaford Street and Hampden Gardens that would not meet BRE target values for daylight (VSC). Both of these reductions in VSC would be minor adverse. Additionally, four windows to habitable rooms in Sleaford Street and York Street would not meet BRE target values for daylight distribution (NSL). One of these reductions in NSL would be major adverse, two would be moderate adverse, and one would be minor adverse.
- 24.23 A comprehensive breakdown of the reductions in daylight and sunlight to affected properties, along with their retained values, under the illustrative scheme, can be found in Tables 14 to 17 in the independent review (Appendix E).
- 24.24 In concluding its analysis of the illustrative scheme, the independent review recognises that it would perform more favourably when tested against the BRE guidance. However, even under the illustrative scenario, there are still a notable number of windows to neighbouring properties that would experience a noticeable reduction in daylight. In terms of sunlight, all reductions to living rooms would be within BRE guidelines, and one property would experience a noticeable loss of sunlight to their garden.
- 24.25 Whilst the illustrative three-dimensional scheme performs better than the parameter scheme in terms of the number and degree of adverse harms, it can only be afforded limited weight and is informative rather than determinative to the recommendation. Officers are not in receipt of the illustrative three-dimensional model to understand the extent of modelled cutbacks to massing, the illustrative masterplan would not be an approved document and any developer, once an outline parameter is approved, would effectively gain a reserved matters 'right' to build within the permitted parameter envelop. The Design Code that has been developed alongside the parameter plans does not require reductions in height below the parameters and therefore it cannot be assumed that a better daylight / sunlight performing reserved matters scheme would necessarily arise. The illustrative impacts are also, as suggested by the summary impacts described above, not wholly addressed with many notable adverse impacts still arising. Officers consider the unresolved impacts on neighbouring residential amenity would make the illustrative scheme unacceptable, regardless of its comparative performance against the maximum parameters.

Visual Enclosure and Loss of Privacy

- 24.26 While no harmful loss of privacy is anticipated, given safeguards contained within the Design Code which require overlooking to be eliminated through sensitively designed facades and terraces at the reserved matters stage, the proposed development would, by virtue of the scale, height and positioning of the maximum building envelope parameters, result in an oppressive outlook of visual enclosure for the occupiers of properties in St Matthew's Gardens and Silverwood Close. This is evidenced through

cross-sections, the parameters and indicative views contained within the applicant's DAS.

- 24.27 The introduction of a bus and servicing route along the northern edge of the site has resulted in local concerns of overlooking and privacy in Silverwood Close and St Matthew's Gardens. However, views from passing vehicles would be brief and transient, rather than permanent. Additionally, existing landscaping along the northern boundary, alongside a commitment in the Design Code to enhance boundary planting, will help to reduce these temporary impacts which would be outweighed by the advantages of the proposed loop route.

Conclusion

- 24.28 To conclude, while a degree of harm through loss in daylight and sunlight is to be expected, given the context of the existing low-rise site and the opportunity for change and increase in density of building form arising, the maximum parameters of the proposed development indicate extensive adverse reductions - when measured against BRE guidelines - in daylight and sunlight levels to a large number of habitable rooms in St Matthew's Gardens and Silverwood Close. Reductions in daylight and sunlight beyond BRE guidelines would also be experienced in Sleaford Street, York Street, Hampden Gardens, and The Terrace, but officers consider that the fundamental concern relates to properties in St Matthew's Gardens and Silverwood Close where the reductions in daylight and sunlight would be experienced more widely. There would also be a noticeable increase in overshadowing / sunlight reduction, when measured against BRE guidelines, to the amenity areas of neighbouring properties in St Matthew's Gardens and Silverwood Close.
- 24.29 The proposed development subsequently fails to keep potential reductions in daylight and sunlight levels to a minimum in St Matthew's Gardens and Silverwood Close, with the dramatic changes likely to be felt acutely by affected occupants. Many habitable rooms would feel poorly lit, colder, and less cheerful and pleasant as a consequence, particularly where living rooms are concerned. A number of gardens would also feel less pleasant and enjoyable, due to the increase in overshadowing. Additionally, the scale, height and position of the proposed buildings adjacent to St Matthew's Gardens and Silverwood Close would not only result in a harmful loss of daylight and sunlight, but affected occupiers would also experience an overbearing massing of buildings resulting in an oppressively enclosed outlook.
- 24.30 The overall harm to the residential amenity of occupiers in St Matthew's Gardens and Silverwood Close would be both significant and permanent, resulting in major conflict with Policies 55, 56, 57 and 60 of the CLP. It would also be contrary to paragraph 135 of the NPPF which requires planning decisions to achieve a high standard of amenity for existing and future users.

25.0 Transport Impacts, Highway Safety and Parking

- 25.1 Policy 80 supports developments where access via walking, cycling and public transport are prioritised and is accessible for all. Policy 81 states that developments will only be permitted where they do not have an unacceptable transport impact.
- 25.2 Para. 116 of the NPPF advises that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe following mitigation and taking into account all reasonable future scenarios.
- 25.3 The application is supported by the following documents (below) appended to the ES and were respectively prepared by transport consultants Waterman Infrastructure and Environmental Ltd:
- Transport Assessment (TA - ES Appendix 13.1A, August 2024) which has assessed the existing and proposed impacts on site accessibility, parking and servicing arrangements and trip generations amongst other.
 - A Framework Travel Plan (FTP - ES Appendix 13.2A, August 2024) which sets out the strategy for managing travel demand of the proposed development by addressing the travel needs of its future users.
 - A Car Parking Management Plan (CPMP - ES Appendix 13.3A, August 2024) which deals with how site mode access will be managed and how it incentivises non-car uses including monitoring.
 - A Delivery and Servicing Plan (DSP - ES Appendix 13.4A, August 2024) which sets out the strategy for how delivery and servicing will be managed within the site to reduce impacts on site users, pedestrians, cyclists and the surrounding road network.

Existing Site Conditions and Site Accessibility

- 25.4 The Site is bordered to its north by Coldhams Lane and Cambridge Retail Park, the railway line to the east and residential roads of York Street, Sleaford Street, St Matthew's Garden and Silverwood Close to the south and west respectively. The eastern extent of Cambridge City Centre (and its amenities) can be accessed via a 650m walk (c. 6-8 minute walk) from the Site.
- 25.5 Coldhams Lane to the east of the Site is a (marked) primary on-road route, including York Street, Ainsworth Street, Hooper Street and Gwydir Street which provide direct cycle routes from the site to Cambridge Station (1.3 km to the south). The Greater Cambridge Partnership (GCP) is also proposing to enhance walking, cycle and bus routes along Newmarket Road (NmR), between the Elizabeth Way Roundabout and Cambridge Airport. This will include an improved junction at Coldhams Lane with pedestrian crossings over Coldhams Lane and NmR.

- 25.6 The western branch of the Chisholm Trail (Phase 1) currently runs through the Site connecting York Street and Cambridge Station. A new branch of the Chisholm Trail (Phase 2) to the east of the railway line has also been approved by the GCP and will be connected to Phase 1 when completed.
- 25.7 Bus routes 19 and 114 serve the Site but are infrequent and are limited in use at present. Other more frequent bus routes serve Newmarket Road including the NmR Park and Ride service which operates every 10 minutes, and route 3 which is every 15 minutes serving Barnwell, Cambridge Station and Cherry Hinton.
- 25.8 The Site is currently accessed from the southern arm of a four-arm roundabout with Coldhams Lane. The Site provides approximately 885 (free) parking spaces albeit restricted to a four-hour use limit each day.
- 25.9 The most recent accident data notes that there are clusters of collisions at the Site access roundabout (mostly involving cyclists). There are also a number of resident parking schemes in operation within the wider area although parking is uncontrolled in the roads to its immediate west.
- 25.10 Figure 2 below illustrates the existing accessibility of the site by walking, cycling and public transport.

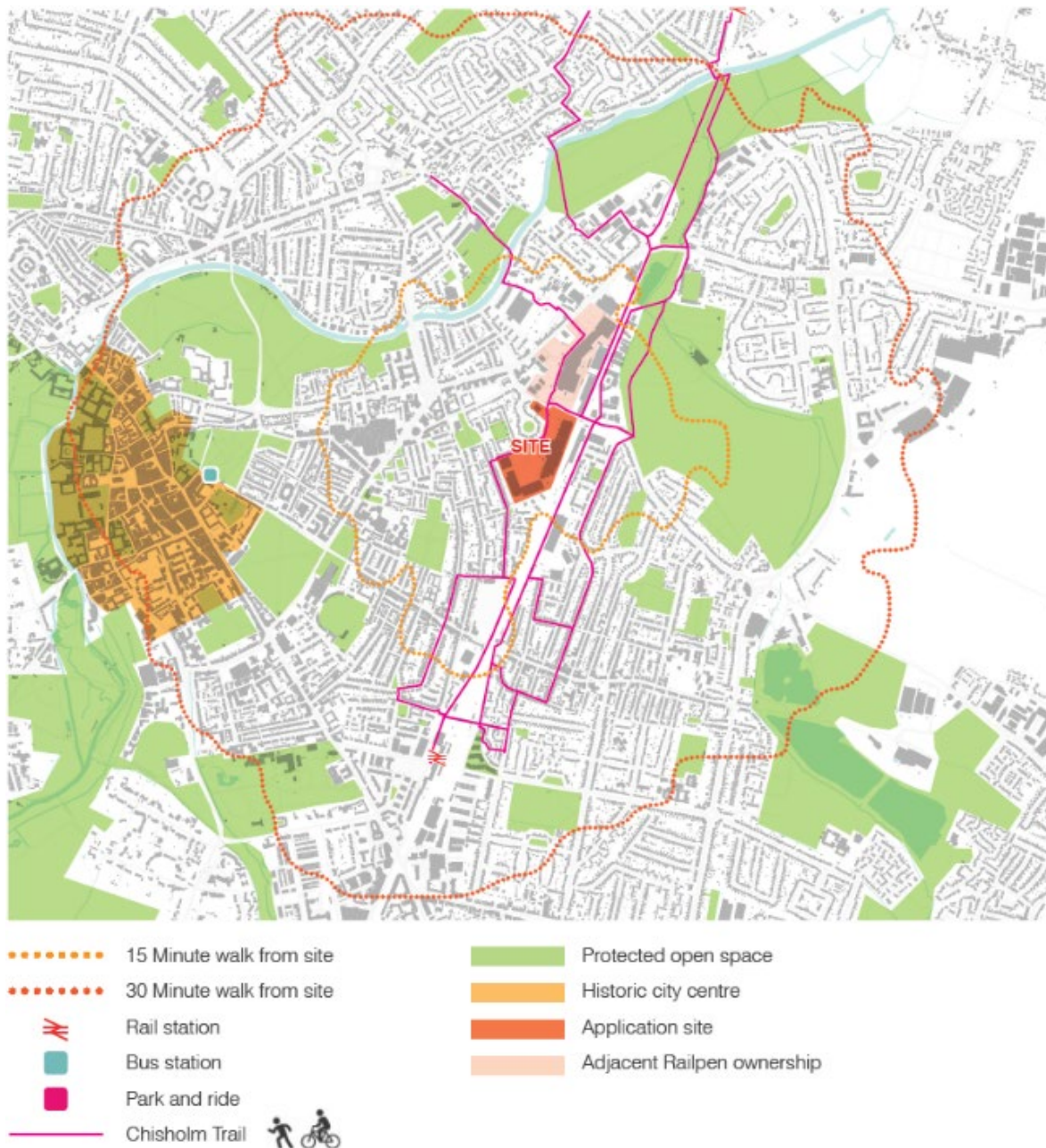


Figure 2: Accessibility of site (Design & Access Statement July 2023, Leonard Design Architects).

Site Access Design

25.11 As noted previously in this report, the site access design is a matter being reserved at this outline stage. Notwithstanding this, and in accordance with its proposals to enhance active travel modes (a core feature of its sustainable transport strategy) it has indicatively shown how a CYCLOPS access arrangement could be accommodated at the existing junction location (refer Figure 3 below). However, members should note that that the design of this type of access will need further review and testing in consultation with the Local Highway Authority (LHA) and other relevant consultees before it can be considered acceptable. It is likely this process

would take place prior to submission of a first reserved matters application being received.

- 25.12 The LHA (Development Management Team) has not objected to the principle of a CYCLOPS junction although it does expect further considerations are given to alternative junction (design) options so that it can be satisfied that the most optimal arrangement in terms of highway safety and convenience can be delivered. Its recommendation to address this particular matter under S106 planning obligation at the appropriate time is considered reasonable by officers.
- 25.13 With regard to pedestrian and cycle access design, the revised masterplan provides a direct cycle route (referred to as the 'Beehive Greenway') through the site and to future building plots. The central cycle route is bidirectional and 4 metres wide and is specified (within the submitted Design Code) that it should (as a minimum) comply with LTN 1/20 spatial standards.
- 25.14 The LHA and Active Travel England are supportive of the direct cycle/pedestrian route proposed in the submitted masterplan and its associated Design Code measures (refer to Chapter 2.5 of the Design Code) that will secure delivery to LTN 1/20 spatial standards.
- 25.15 In terms of bus access arrangements, the masterplan supports provision for a one-way loop from the access junction off Coldhams Lane into the site with a centrally located bus stop/shelter located between Buildings 8 and 9. The LHA is again supportive of the proposed bus route although suggests (subject to design) that additional bus stops could be accommodated within the vicinity of Building 3. It recommends this matter to be secured by S106 planning obligation.
- 25.16 Two-way car access is maintained along the existing road alignment from Coldhams Lane before splitting east and south. The southbound direction provides access to the proposed multi-storey car park (Building 10) and continues beyond to provide the aforementioned single one-way loop which would accommodate buses, small delivery vehicles and dedicated (at grade) disabled parking. The eastbound direction would carry two-way traffic via a priority junction to the service yard where the majority delivery and servicing requirements will take place. An ANPR system would record all vehicles accessing and leaving the site. The LHA supports routing arrangements for both cars and service/delivery vehicle traffic.
- 25.17 Overall, officers consider that the proposed masterplan layout clearly demonstrates how its design would support the core objective of incentivising active and sustainable travel modes whilst also significantly reducing reliance on car mode. Its proposed measures including provision of an optimal junction design off Coldhams Lane together with improvements to walking, cycling and bus infrastructure are expected to be deliverable via agreement of future reserved matters applications. The combined support of the LHA and Active Travel England for the proposed

masterplan layout in transport and access terms is also welcomed by officers.



Figure 3: CYCLOPS Junction (Illustrative Only) (Leonard Design Architects, Design and Access Statement, August 2024).

Impacts on Highway Network

Trip generation and travel modes

- 25.18 The following provides a summary of the proposed number of trips that would be generated by car, cycle and walking modes, their respective distribution and its impacts on the local and strategic highway network.
- 25.19 The Applicant’s TA has based its trip rates using TRICS data from the Cambridge Biomedical Campus and applied to the proposed floor areas for office, lab, retail and community uses. The forecast trip rates (by travel

mode) has also been compared to the existing land use based on travel surveys undertaken in November 2022.

- 25.20 Full details of existing site trip generation and (%) travel mode share information is set out in Tables 15, 16 and 17 of the submitted TA.
- 25.21 Based on the existing mode (%) share values set out in Table 17 of the TA (see Figure 4 below), the Site attracts a high proportion of car/van driver vehicle trips (54% in the weekday and 61% during the weekend) compared to other modes. A relatively high proportion of walking (23% and 26%) and cycle trips (19% and 8%) are also indicated which demonstrates (relatively) a good level of site connectivity to local areas.

Mode	Weekday Mode Share	Saturday Mode Share
Train	0%	0%
Bus / Coach	0%	0%
Taxi	0%	0%
Motorcycle	0%	1%
Car / Van driver	54%	61%
Car / Van passenger	4%	4%
Bicycle	19%	8%
Pedestrian	23%	26%
Other Method of Travel	1%	0%
Total	100%	100%

Figure 4: Existing site trip generation for daily and week by mode (%).

Travel Mode	Two-Way Multimodal Trips				
	Weekday Daily	Saturday Daily	Sunday Daily	5-day Total	7-day Total
Train	0	0	0	0	0
Bus / Coach	0	34	24	0	58
Taxi	0	0	0	0	0
Motorcycle	91	103	71	456	630
Car / Van	10,974	12,510	8,622	54,870	76,002
Car / Van passenger	773	881	607	3,864	5,352
Bicycle	3,778	1,716	1,183	18,939	21,838
Pedestrian	4,617	5,294	3,649	23,084	32,026
Other	124	34	24	622	680
Total	20,367	20,573	14,179	101,834	136,585

Figure 5: Existing site trip generation for daily and week by mode.

- 25.22 Applying the existing mode share above, Figure 5 (Table 16 in the TA) shows that over the typical weekday and Saturday, the Beehive currently generates about 20,000 total trips (each day) of which approximately 12,000 are cars. Bus use within the site is also negligible.
- 25.23 In estimating future trip generation for the proposed development, the TA has assumed the buildings are split between office/dry lab (40,000 sqm) and wet lab/write up space (48,500 sqm) with retail, cafes and community uses on ground floor frontages. Trip rates are based on a combination of using data from TRICS and Cambridge Biomedical Campus. The Site will have approximately a total of 5,755 full time equivalent employees on a given day.
- 25.24 The detailed (proposed) target mode (%) share for car, walking, cycling, bus and rail use in the TA are shown in Figure 6 below (Table 25 in the TA). These have been used in conjunction with floor area and maximum daily employee information (indicated above) in which to determine total forecast trips (by mode) in the AM/PM peaks, daily and weekday total. The LHA has indicated that the proposed target (%) mode share values are reliable and in line with its core objective to achieve significant modal shift from car to active and sustainable travel modes.
- 25.25 Accordingly, the proposed development would in a typical weekday generate a total of 10,442 daily (all mode) trips with 3,567 on a Saturday and Sunday (see Figure 7 below).

Journey to Work Mode	Target Mode Share
Underground / Metro / Light Rail / Tram	0.0%
Train – to Bus	14.0%
Train – to Cycle	2.0%
Bus / Minibus / Coach	8.0%
Car to P&R and use P&R service	8.0%
Taxi	0.5%
Motorcycle / Scooter / Moped	1.1%
Car / Van Driver	4.8%
Car / Van Passenger	4.6%
Bicycle	40.0%
Pedestrian	15.5%
Other method of travel to work	1.5%
Total Person Trips	100%

Figure 6: Target travel mode share for proposed development.

Travel Mode	Two-Way Multimodal Trips				
	Weekday Daily	Saturday Daily	Sunday Daily	5-day Total	7-day Total
Underground / Metro / Light Rail / Tram	0	0	0	0	0
Train – to Bus	1,462	499	499	7,309	8,308
Train – to Cycle	209	71	71	1,044	1,187
Bus / Minibus / Coach	835	285	285	4,177	4,748
Car to P&R and use P&R service	835	285	285	4,177	4,748
Taxi	55	19	19	277	315
Motorcycle / Scooter / Moped	111	38	38	554	630
Car / Van Driver	509	173	173	2,530	2,876
Car / Van Passenger	476	163	163	2,381	2,707
Bicycle	4,177	1,427	1,427	20,884	23,738
Pedestrian	1,619	553	553	8,093	9,198
Other method of travel to work	157	54	54	783	890
Totals	10,442	3,567	3,567	52,210	59,344

Figure 7: Proposed development trip generation for weekday, Saturday, Sunday, 5-day and 7-day periods.

- 25.26 Comparing a typical weekday daily and weekend total trips in the existing (shown in Figure 5) and proposed scheme layouts (shown in Figure 7) would result in the following:
- Weekday – c.9,925 fewer trips of which 10,468 fewer car driver trips, 2,998 fewer pedestrians with 389 additional cyclist, 1,670 additional bus trips and 1,671 additional train trips.
 - Saturday – c.17,000 fewer trips of which 12,337 fewer car trips and 4,741 fewer pedestrian trips with 289 fewer cyclists and approximately 536 additional bus and 570 additional train trips.
- 25.27 In terms of delivery and servicing trips, the proposed development is estimated to reduce its requirements on average by 75 daily trips.
- 25.28 The LHA has not objected to the Applicant's analysis of total trips generated by the proposed development.
- 25.29 One of the core objectives of the proposed development is to achieve a reduction in car-based travel to the site which would likely have direct positive benefits on the existing operation of the local and wider road

network. Its transport strategy would support this objective in the following ways:

- reducing onsite car parking provisions (minus 490 total parking spaces (existing 885 spaces))
- providing/creating a more attractive and convenient environment for active and sustainable travel modes onsite
- further commitments to invest in improving and incentivising walking, cycling and bus travel on and off-site

25.30 The LHA has not objected to Applicant's proposed travel strategy. Active Travel England are also supportive of its proposals to deliver enhanced walking and cycling infrastructure as part of the future development.

Junction Impact Assessment

25.31 The TA includes a junction capacity assessment of the existing and proposed scheme layouts at the Coldhams Lane/Cambridge Retail Park junction using 2022 and 2030 traffic flow scenarios. The LHA has agreed that this would be the only junction most impacted by the development proposals.

25.32 In terms of the existing situation, the TA advises that the base (traffic flow) model shows that the existing roundabout operates with sufficient spare capacity in the AM and PM peaks. The LHA agrees with this conclusion.

25.33 The indicative CYCLOPS junction was also modelled, and its results indicate that it would operate with sufficient spare capacity with potential queuing accommodated in the existing highway. As stated before, the potential for a CYCLOPS junction would be subject to further detailed design and safety testing in future (alongside other junction options) in the event officers were recommending approval.

25.34 The LHA also states that if an alternative access junction to a CYCLOPS arrangement comes forward, it would still expect future vehicle flows to be accommodated given that vehicle trip generation for the proposed development is lower than the existing land uses.

25.35 Overall, the impact of the proposed layout on the capacity of the access junction on Coldhams Lane is acceptable.

Proposed Transport and Highways Mitigations

25.36 The application commits to delivering a broad range of sustainable transport measures (onsite and offsite) that can support its aim to achieve the target mode shift identified in Figure 6 above which (by inference) would enable better and more sustainable travel choices to be made whilst reducing the dependence on car mode.

25.37 In general, the mitigation measures considered in the TA includes:

- Infrastructure improvements on identified travel corridors
- Bus transport improvements
- Travel Plan
- Financial contributions towards enhancing existing local and strategic transport and highways

25.38 The first mitigation would comprise a broad range of highway upgrade proposals with the main aim of improving cycling and pedestrian accessibility to the site. These upgrades focus on key travel corridors/routes including Cambridge North Station, Coldhams Lane towards the Chisholm Trail link on Coldhams common, and towards Cambridge Station and City Centre – these routes are shown in Figure 8 below taken from the TA.

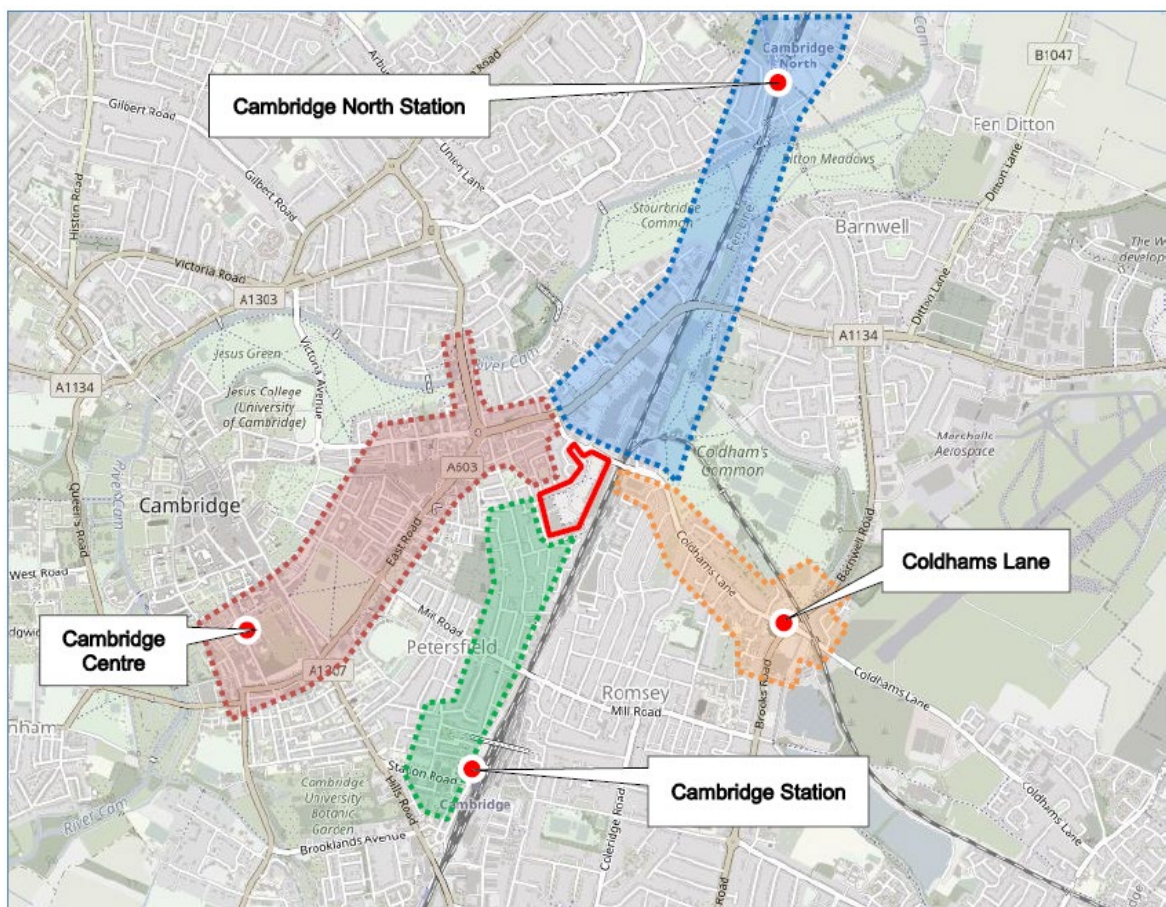


Figure 8: Identified Travel Corridors.

25.39 The improvements in each corridor are detailed as follows:

- **Route between Coldhams Lane towards Chisholm Trail** - Junction and crossing improvements for cyclists at junction with Coldhams Common with Chisholm Trail and route over railway line.
- **Route towards Cambridge North Station** – New site access junction (Coldhams roundabout) and between Coldhams Lane and Newmarket Road to support walking and cycling. Further crossing improvements along section of NmR from Coldhams Lane to Tesco's, enhancements to

connectivity through CRP; and improvements to road and wayfinding signage.

- **Routes toward Cambridge Station and City Centre** – Site access junction improvements to Sleaford Street and York Street. Work in relation to the implementation of the Chisholm Trail west of railway route including improvements to junctions and facilities for cyclists and pedestrians between the section of NmR between Coldhams Lane and Elizabeth Way roundabout. Improvements to cycle lane on Harvest Way to improve accessibility.

- 25.40 The LHA has welcomed the Applicant's proposed measures above and notes that they should be secured and agreed as part of detailed design work in future reserved matters applications or via financial contributions under Section 106 Agreement.
- 25.41 **The second mitigation** involves proposals to provide additional bus services which will make bus travel to the site attractive and convenient for workers and visitors alike.
- 25.42 The Applicant has initially identified two financial packages which will be secured by Section 106 Agreement. Both the LHA and officers are currently exploring (in consultation with the Applicant and Combined Authority) the timings and amounts of contributions to be made in accordance with the relevant phasing and delivery of the future development. The LHA has indicated that it would prefer a flexible approach to securing future contributions at this stage. In practice this could mean that a partial contribution is made towards additional bus services at the outset of development and then any unused funding is either directed towards further additional bus services (as required) or cycle and pedestrian improvements (detailed previously above). These provisions would be captured as part of any S106 negotiations.
- 25.43 With regard to the potential provision of additional onsite and offsite bus stop shelters (in addition to those already indicated), the LHA is content for this to be agreed and delivered via an obligation under Section 106 Agreement.
- 25.44 The third mitigation involves proposals for a Travel Plan (TP) to be promoted and managed by an appointed Travel Plan Coordinator.
- 25.45 The TA includes a Framework Travel Plan (FTP) which sets out targets and measures that will encourage future occupiers and its employees to reduce the need to travel to the Site by car. The LHA has acknowledged that the proposed targets would align with TA's own predicted travel to work targets. Annual TP monitoring in conjunction with surveys by Smart Journeys is also recommended.
- 25.46 The LHA has not objected to the TP targets and measures generally and subject to some minor refinements, it supports the FTP and requests it is secured under obligation via Section 106 Agreement.

- 25.47 The fourth mitigation (in addition to those already identified above) would involve securing further financial contributions towards the costs of implementing additional resident parking scheme; strategic transport schemes including Eastern Access and a potential Monitor and Manage Fund that can be put towards other sustainable transport measures in consultation with the Applicant.
- 25.48 Overall, the proposed mitigation measures identified above are considered comprehensive and would provide adequate mitigation of the effects of the new trips generated by the proposed development on the local and strategic highway network. They also improve accessibility by more sustainable modes, a key objective of the proposed transport strategy.

Cycle Parking Provision

- 25.49 Policy 80 of the CLP requires new developments to comply with the cycle parking standards as set out within Appendix L which for non-residential development states should:
- *reflect the design and dimensions for cycle parking established in the Council's Cycle Parking Guide for New Residential Developments;*
 - *include parking for employees and students in a convenient and covered location, subject to natural surveillance. A proportion of the cycle parking (minimum of 20%) should be provided within a secure location; and*
 - *access to cycle parking should be as close as is practical to staff entrances, and closer than non-disabled staff car parking.*
- 25.50 The prescribed cycle parking standards for a mix office scheme is: 1 space per 30 sqm; and 2 spaces per 5 staff for retail.
- 25.51 In this instance, a functional mixed office use floorspace of 93,757 sqm (GIA) would require c. 3,125 cycle parking spaces. The cycle strategy advises that the Site would provide capacity to accommodate a total of 4,593 cycle parking spaces throughout the Site which is more than the standard requirements for a mixed-use scheme of this nature.
- 25.52 The proposals to overprovide cycle parking in the future development is consistent with its (aforementioned) sustainable transport strategy which is seeking to achieve an increase in cycling mode. The proposed quantum represents a c.71%-80% mode share amongst the 5,755 full-time equivalent or total 6,450 employees, which would be above the 40% target mode share shown in Figure 6 above.
- 25.53 In terms of the distribution of cycle parking, the buildings would accommodate spaces either in basement stores or dedicated nearby cycle storage for each block. All cycle stores are to be designed to be accessible safe and secure. Each of the buildings would provide showers and changing rooms at a ratio of 1 shower/changing room per 25 cycle parking spaces including lockers at a ratio of 1 locker per cycle parking space.

- 25.54 With regard to the type of cycle parking, the proposals would seek to provide these as a mixture of two-tier racks and Sheffield stands - 20% of the total would be Sheffield Stands of which 5% would be assigned for larger and adapted cycles.
- 25.55 A Mobility Hub is proposed to be provided centrally within the Site and would combine as accommodation for a cycle maintenance shop and public transport information office.
- 25.56 Overall, in terms of the location, design, amount and type of cycle parking and associated facilities, the proposals provide sufficient incentives and support for cycling as a key travel mode for future users of the Site. Accordingly, the proposed cycle strategy would comply with Policy 80 of the CLP.

Car Parking Provision

- 25.57 Policy 82 of the CLP requires new developments to comply with, and not exceed, the maximum car parking standards as set out within Appendix L.
- 25.58 The site is not located within an existing Controlled Parking Zone.
- 25.59 The proposed development would provide a total of 395 parking spaces of which 374 spaces will (21 spaces) be located within a multi-storey car park (Building 10) and the remainder assigned as disabled spaces near to building plots. In total there would be a significant reduction in onsite car parking of 490 spaces when compared to the existing situation (885 spaces).
- 25.60 In accordance with the Applicant's sustainable transport strategy, the proposed reduction in car parking is supported.
- 25.61 Access to parking would be managed and controlled by ANPR controls with registration required to access the Site. It is intended that a car club will operate onsite to which would assist future occupiers reduce vehicle trips further. A Car Parking Management Plan has been submitted for the Site, the details of which are satisfactory and therefore can be secured through planning condition in the event planning permission is given.
- 25.62 Overall, the proposed reduction in car parking onsite and its associated measures to dissuade car use as a preferred mode is welcomed by officers. Its approach is considered commensurate with its strategy to encourage greater modal shift towards active and sustainable forms of travel. Accordingly, the proposals are considered to comply with the aims and objectives of Policy 80.

Deliveries and Servicing Management

- 25.63 The submitted Delivery and Servicing Plan (DSP) provides details on how the future development and its uses will accommodate and manage a wide range of delivery and service vehicles (including refuse vehicles) within the Site.
- 25.64 A dedicated service yard is proposed to be located to the eastern boundary of the Site with loading bays arranged along its internal road network. It is intended that HGV's will stop in the service yard where goods will be transferred to smaller electric vehicles to carry deliveries to individual building plots.
- 25.65 All delivery and servicing vehicles will need to pre-register to access the site and could be subject to either out of peak or out of hours deliveries with maximum dwell times of 20 minutes. Site wide consolidation of common goods are also intended to minimise deliveries and servicing trips.
- 25.66 The proposed DSP proposes measures that will ensure the delivery/servicing strategy is safe, efficient and clean. Targets and monitoring are inherent within the implementation of the DSP.
- 25.67 Overall, the DSP is compliant with the aims and objectives of Policy 80, 81 and 82 of the CLP and, in the event that permission were to be granted, officers would recommend it be secured via planning condition.

Environmental Effects of Transport Proposals

- 25.68 The ES has indicated that significant beneficial transport effects are anticipated during the operational phase of the proposed development due in main to the net decrease in traffic generated. Officers do not object to this conclusion.

Conclusion on Transport and Highways Matters

- 25.69 In conclusion, the Applicant's sustainable transport strategy which is proposing a range of improvements to encourage both active and sustainable travel modes is welcomed and supported. Its proposed mitigations are also considered comprehensive and critical to achieving its core transport and sustainability objectives which in turn would support its overarching vision to create a well-connected and innovative new urban quarter in the City.
- 25.70 Both the LHA and ATE have confirmed they do not object to the proposals on transport grounds subject to relevant conditions and obligations.
- 25.71 Accordingly, notwithstanding the formal recommendation to refuse the application, in the event that planning permission is otherwise granted or the scheme appealed, officers would recommend that the transport related planning conditions as referenced, alongside the Section 106 obligations

covered in Section 29 of this report, are secured so that the future transport impacts of the proposed development on the local and strategic highways can be managed effectively.

26.0 Public Art Strategy

- 26.1 Policies 56 and 59 of the CLP encourage proposals to integrate public art within development and in the public realm recognising that it can make an important contribution towards the City's character and visual quality.
- 26.2 The Council's Public Art Supplementary Planning Document (2010) sets out the vision for public art within the context of Cambridge as a centre for culture and learning and how it can support the Council's aspirations towards securing high quality and sustainable new communities.
- 26.3 The Applicant has provided a Public Art Strategy (PAS) which is focussed on delivering permanent and temporary art-based projects with artists engaging existing and new communities in their development at all stages.
- 26.4 The PAS is underpinned by four separate themes for artistic engagement across the development; they are: connectivity; biodiversity, innovation and sustainability. Four of the seven landscape character areas identified will become 'Public Art Zones' within which embedded public art will be focused: they are: Abbey Grove; Garden Walk, Maple Square; and Hive Park.
- 26.5 Public art commissions will be implemented across each of the 'zones' mentioned. There are 3 commissions in total and are defined in the PAS as follows:
- i. Beehive Transformation – a 3-4 year 'lead artist' engagement project working with various stakeholder groups to activate the public realm across the 'zones' with a range of temporary public art projects, e.g. hoardings, street art, exhibitions and events, to be delivered during the first two phases of construction.
 - ii. Creative Greenway – a 3 year commission for an artist to build on the engagement work by designing permanently embedded public art within the design of the Beehive Greenway.
 - iii. Congregating Community – a 3 year commission for an artist to be integrated into the design team for Maple Square which integrates public art to support community and activation and engagement throughout the year.
- 26.6 The above commissions will be implemented by the Applicant and curated and managed by a specialist art consultant for c.6-7 years.
- 26.7 To deliver and manage each of the commissions an indicative budget of £700,000 (ex VAT) has been committed by the Applicant.

- 26.8 The Council's Public Art Officer has welcomed the Applicant's PAS and the principles underpinning each of the commissions. However, they have raised some concerns in that the identified commissions are *'heavily focussed on furniture based outcomes'* and recommends that the PAS is amended to allow for architectural collaborations onsite as well as in the design of landscape elements so that a richer and more varied artistic dialogue is achievable alongside its art installations and public realm design. A further concern is the budget allocated to deliver the PAS.
- 26.9 Officers note the Public Art Officer's concerns and agree that PAS programme of individual commissions could reasonably incorporate further (as suggested) enhancements. However, in officers' view the current proposed budget – which is not insubstantial - is acceptable.
- 26.10 Overall, the PAS provides a positive foundation upon which a high quality and distinctive new location within the City will be created. Whilst there remain some areas of concern relating to the details of the individual public art commitments being made it is considered that these aspects would be capable of resolution.

27.0 Other Matters

- 27.1 In this section, matters relating to Secure by Design, emergency vehicle access and waste management are considered.

Secure-by-Design

- 27.2 With regard to Secure-by-Design, the Design Out Crime Officer (Cambridgeshire Constabulary) has noted the submission of revised proposals although would like to reserve giving its further advice until detailed design of the development phases at reserved matters are submitted.
- 27.3 Should planning permission be given contrary to the officer recommendation, it is recommended that a planning condition is included whereby the Applicant demonstrates at reserved matters stages how its proposals seek to apply the principles of Secured by Design (or its equivalent) for approval.

Emergency Access Infrastructure

- 27.4 Cambridge Fire Authority has confirmed that there are adequate provisions for fire hydrants in the area already and therefore does not recommend securing any additional provision.
- 27.5 The comments of Cambridge Fire Authority (see Section 8) in respect to making provision for hydrants are noted and could be secured by planning condition in the event a planning permission is given contrary to the officer recommendation.

- 27.6 Access and routing for fire tenders (or other emergency vehicles) has not been demonstrated at this stage. However, officers would expect that future detailed proposals under reserved matters (which would include tracking/manoeuvring of emergency vehicles) could be secured by planning condition in the event a planning permission is given contrary to the officer recommendation.
- 27.7 No objections have been raised by the Local Highway Authority in this regard.

Operational Waste Management

- 27.8 In respect to waste management and collection in the operational stages of development, the Applicant's site-wide strategy (Operational Waste Management Strategy (OWMS, Waterman Environmental Ltd, August 2024)) anticipates that storage will be located within the basement or ground floor of each building accessed from a safe and convenient location off the internal road network. It has indicated that all waste generated will be handled by future block facility management. Lab waste in some buildings will be handled on site using approved methods.
- 27.9 In the event that planning permission were to be granted, it would be recommended that a planning condition be included which would require the detailed design stages under reserved matters to demonstrate how waste management and its minimisation in each phase or building would comply with OWMS.
- 27.10 Overall, it is considered that crime prevention measures, emergency infrastructure and waste management requirements could be adequately provided and secured through planning conditions. As such the aims and objectives of policies 56 and 57 of the CLP have been met.

Public Sector Equality Duty

- 27.11 In accordance with the Public Sector Equality Duty (PSED) under Section 149 of the Equality Act 2010, officers have given due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations between individuals with protected characteristics and those without when making a recommendation on this planning application. This consideration ensures that the potential impacts of the proposed development on diverse groups are thoroughly assessed and addressed, promoting fairness and inclusivity.

Human Rights Act

- 27.12 In line with the Human Rights Act 1998, it is unlawful for a public authority to act in a way which is incompatible with a Convention right, as per the European Convention on Human Rights. The human rights impacts have been considered, with particular reference to Article 1 of the First Protocol (Protection of property), Article 8 (Right to respect for private and family life) and Article 14 (Prohibition of discrimination) of the Convention.

27.13 The Human Rights Act 1998 does not impair the right of the state to make decisions and enforce laws as deemed necessary in the public interest. The recommendation is considered appropriate in upholding the council's adopted and emerging policies and is not outweighed by any engaged rights.

28.0 Third Party Representations

28.1 The remaining third-party representations not addressed in the preceding paragraphs are summarised and responded to in Appendix (F).

29.0 Planning Obligations (S106)

29.1 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.

29.1 The applicant has indicated their willingness to enter into a S106 planning obligation in accordance with the requirements of the Council's Local Plan and the NPPF.

29.2 Policy 85 states that planning permission for new developments will only be supported/permitted where there are suitable arrangements for the improvement or provision and phasing of infrastructure, services and facilities necessary to make the scheme acceptable in planning terms.

Heads of Terms

29.3 A complete list of S106 Heads of Terms (HoTs) is set out in the table below:

	Obligation	Contribution
1	Employment & Skills Strategy	To provide a strategy and mechanism that will secure jobs and in-training opportunities that pays Real Living Wage in construction and operational phases of development.
2	Community Outreach Strategy	To secure an agreed range of community-related benefits (other than jobs and employment creation) for the lifetime of development.

3	Start-Up & Scale-Up Space Strategy	To secure a strategy that identifies how start-up and scale-up workspaces can be supported.
4	Community Hub	To secure delivery of onsite dedicated community space for the lifetime of the development.
5	Open Space & Public Realm Management Strategy (OSPRMS)	To provide a strategy that includes details of the delivery of Hive Park and other public realm spaces including long-term access and management provisions for benefit of the local and wider community.
6	Meanwhile Use Strategy (MUS)	A strategy setting out measures and opportunities that identify how meanwhile uses can be deployed during construction and demolition phases of development.
7	Local Centre Strategy (LCS)	To submit an LCS which identifies the location, size and mix of ground floor non-lab and office uses and how these are specifically curated and managed to create day and night-time activation of place.
8	Transport and Highways	<p>To secure following measures:</p> <ul style="list-style-type: none"> • Delivery of new junction(s) to provide safer cycle/pedestrian access to support modal shift; • Delivery of improved accesses at Sleaford Street, York Street and St Matthews Garden; • Financial contributions towards strategic transport schemes (STS): <ul style="list-style-type: none"> - Implementation of additional resident parking schemes (£30,000); - Provision of new bus stop and shelters on Coldhams Lane (£20,000); - GCP Schemes including: Chisholm Trail (£350,000), Eastern Access or new crossing

		<p>over NmR/Coldhams junction (£657,000), and Bottisham Greenway (£30,000).</p> <ul style="list-style-type: none"> - Flexible fund - Restriction on car parking in contra-flow cycle lanes in Harvest Way (£5,000); - Flexible fund towards strategic transport schemes (£866,000); - Monitor and Manage fund (£409,000) to be used in event car mode share targets are exceeded; <ul style="list-style-type: none"> • Transport Review Group to oversee implementation of STS measures; • Off-site wayfinding measures • Travel Plan implementation and monitoring fees including appointment of a Travel Plan Co-ordinator;
9	Public Art Strategy (PAS)	To secure an updated Public Art Strategy and secure a level of commitment no less than 700k. Public Art Delivery Plan required for each phase to be agreed by the LPA.
10	S106 Administration, Monitoring and Compliance	<p>To secure adequate monitoring and compliance fees as follows:</p> <ul style="list-style-type: none"> -S106 Planning Officer (City/GCSP) -S106 Transport (CCC) -Public Art Team (GCSP) -BNG monitoring

29.4 An Employment and Skills Strategy (ESS) and Community Outreach Strategy (COS) is necessary to ensure that local jobs and apprenticeships (in both construction and operational stages) including additional community (non-employment) benefits can be secured throughout the lifetime of the proposals. The Community Outreach Strategy should build upon its initial objectives/recommendations set out in its Social Infrastructure Strategy and in particular demonstrate how its existing engagement process with local and city-wide stakeholders, e.g. Camskate, Make Space for Girls and Cambridge Youth Panel, can be crystallised further to ensure the maximum community value of the proposed development for local and city people is achieved.

29.5 A strategy for incubation, start-up and scale-up space is necessary to demonstrate how the development will contribute to supporting a range of

existing and future business/sector needs within the Cambridge R&D and knowledge ecosystem.

- 29.6 The Community Hub is an integral element of its separate obligation to provide a Community Outreach Strategy. It is necessary to deliver a bespoke and adaptable onsite facility (indicatively shown in the ground floor of Building 10) to accommodate some of the community based programmes which will be delivered through the COS.
- 29.7 A Public Realm and Open Space Management Strategy is necessary to ensure that the benefits of open recreation and play spaces are accessible and maintained for public well-being and enjoyment during the lifetime of development. Delivery of 'Hive Park' which is located to the south of the masterplan should be brought forward in the earliest phases of development (if practicable).
- 29.8 A Meanwhile Use Strategy is necessary to ensure that (temporary) appropriate and enhanced uses of undeveloped phases during demolition and construction phases can be secured for public and environmental benefit.
- 29.9 A Local Centre Strategy is necessary to ensure that an attractive and vibrant new centre is curated which meets the needs of local people, future employees and visitors. The mix and distribution of uses are necessary and will be important to ensure wider its placemaking objectives are realised.
- 29.10 The Transport and Highways obligations which include (amongst others) a Framework Travel Plan and Strategic Transport Infrastructure Contributions are necessary to ensure the significant modal shift towards active and sustainable travel can be realised.
- 29.11 A Public Art Strategy and budget is necessary to secure a high quality and distinctive development within the City and which would be delivered and managed in collaboration with community stakeholders.
- 29.12 S106 administration, monitoring and compliance obligations are necessary to ensure the proposed obligations being committed to by the Applicant are delivered and managed.
- 29.13 The planning obligations are 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 in are in accordance with Policy 85 of the CLP (2018).

30.0 Planning Balance

- 30.1 Planning decisions must be taken in accordance with the development plan unless there are material considerations that indicate otherwise (Section

70(2) of the Town and Country Planning Act 1990 and section 38[6] of the Planning and Compulsory Purchase Act 2004).

- 30.2 The potential benefits arising from the proposal need to be robustly considered and weighed against the potential harm that would arise. In broad terms and in officers' view, the determinative material considerations that weigh heavily in the balance include the significant economic benefit that would arise from the large-scale development of a research and development led scheme, including specifically for lab and office space, on what is an inherently sustainable brownfield site which would contribute towards the Cambridge knowledge cluster. On Wednesday 29 January 2025, the Government, through the Rt Hon Rachel Reeves MP, Chancellor of the Exchequer, has reaffirmed its commitment to driving economic growth in Cambridge with specific reference to the Beehive. The announcement underscores the Government's dedication to making Cambridge a hub for innovation and research and its strategic priorities and support for Cambridge's growth by fostering an environment that attracts global investment and supports the City's role as a leading centre for R&D. The economic benefits arising from the scheme are significant and align with the UK Government's ambitions for growth as set out in the Nov. 2024 Industrial Strategy and paras. 86 and 87 of the NPPF 2024.
- 30.3 The evidenced significant economic benefit must, however, be balanced against two substantive elements of harm arising from the scheme. These are, firstly, the identified heritage harms arising from the significant scale and height of the proposal on the setting of heritage assets, and secondly, by virtue also of the scale, height and positioning of the proposal mainly (but not exclusively) against its northern boundaries to St Matthew's Gardens and Silverwood Close, the perceptible harm to residential amenity that would arise to occupiers of these properties.
- 30.4 As part of the planning balance exercise in respect of the first substantive issue, the extent to which the potential public benefits of the proposal outweigh the less than substantial harm to the significance of heritage assets, as identified in the heritage section of this report, will need to be given special attention / regard and great weight as per sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, S102 of the Levelling Up and Regeneration Act 2023, the NPPF 2024 (paras. 212, 213 and 215) and adopted policies 60, 61 and 62.
- 30.5 In respect of the second substantive issue, a degree of harm to residential amenity on matters of enclosure, loss of daylight, sunlight and overshadowing is inevitable in the context of the existing low-rise buildings and the extent of opportunity and change afforded by this large-scale brownfield site. The BRE guidance in this respect recognises and allows for flexibility in the application and interpretation of daylight and sunlight impacts. The Council's own independent consultant analysis of this issue recognises that for meaningful re-development, it is reasonable that some reductions in daylight and sunlight may not meet the BRE default target criteria. However, as set against the maximum outline building parameters,

the independent analysis on behalf of the Council indicates that the extent of reduction in daylight values across the broad range of affected properties and their associated windows may not be possible to support. Significant adverse impacts on daylight and sunlight to properties and gardens and matters of enclosure to residential outlook arise. Little weight can be given to the illustrative three-dimensional scheme against which the impacts of the proposal are more favourable yet to which a significant number of adverse impacts still arise.

30.6 The economic, heritage and residential amenity impacts of the scheme are therefore the key determinative considerations for the planning balance and they must be carefully considered together with all other benefits and harms identified.

30.7 This part of the planning assessment thus seeks to balance all benefits against the harms identified to form a reasoned conclusion as to the merits of the scheme in forming a recommendation.

30.8 **Achieving Sustainable Development**

30.9 Section 2 of the NPPF lists the three dimensions to sustainable development: economic, social and environmental. These roles are interdependent and need to be pursued in mutually supportive ways to achieve sustainable development. These roles will now be considered in weighing up the benefits and harms of the proposed development, relative to all material considerations discussed in this report.

30.10 **Summary of Benefits**

30.11 **Economic**

30.12 The economic benefits of the proposed development can be summarised as follows:

- **Jobs:** 6,445 estimated direct jobs created, comprising 905 entry level, 1,225 mid-skilled and 4,315 high skilled workers. This is a significant uplift from approximately 855 (670 FTE) existing jobs at the Beehive.
- **Economic Output:** £600m estimated in additional Gross Value Added annually in economic output supported by the new workforce (£60m generated from current site, £660m gross).
- **Tax:** £180-240m estimated in annual tax revenues.
- **Business Rates:** £8.5m estimated in additional annual business rates (£2.9m from current site, £11.4m gross).
- **Expenditure:** £9.6m estimated in additional worker expenditure in the wider economy.
- **Emboldening Economic Cluster:** Significant contribution to the Cambridge knowledge-based R&D cluster with specific large plate flexible laboratory space meeting identified need in this sector at

scale. This key benefit accords with the revised NPPF 2024 chapter 6, 'Building a strong and competitive economy'.

- **Skills:** The implementation of an Employment and Skills Strategy and associated Delivery Plan. The implementation of the Delivery Plan would be through the appointment of an Employment and Skills Coordinator. Together these would:
 - prioritise job opportunities to the local community;
 - include outreach programmes for apprenticeships at construction and operational phases, with 2% 'earn and learn' targets;
 - include targets to improve diversity and inclusion within the R&D sector;
 - provide significant construction employment opportunities with specific targeting and training of local people through apprenticeships; and
 - involve a working programme of partnerships such as with the Marshalls Skills Academy, Abbey People and Form the Future.
- **Equity:** Delivering the Real Living Wage. The applicant has committed to working with tenants to become a Real Living Wage employer.

30.13 The Employment Skills Strategy, its Delivery Plan and commitments to the Real Living Wage would be secured through the S106.

30.14 **Social**

30.15 The social benefits of the proposed development can be summarised as follows:

- **Place:** The provision of a new innovation cluster, local centre and high-quality open spaces of varied character, transforming an outdated retail park dominated by parking into an accessible, inclusive and landscaped public realm with a Greenway (strategic cycle route) connecting through its spine and significant civic spaces provided including Hive Park.
- **Space:** Hive Park (7,000sqm), equivalent to St Matthews Piece delivered in the first phase of the development for leisure and amenity purposes, with 2.6Ha of open space provided across the wider site, including other landscaped areas.
- **Community:** Provision of active ground floor small format retail, service provisions and leisure space and a dedicated youth and community space in the centre of the site, all of which amount to 5,100m². A youth and community space is expected to comprise two activity rooms, studio space, centre management and publicly accessible toilets including a Changing Places facility. The community uses and some external spaces are likely to involve partnerships with local community groups such as, Abbey People, Cambs. Youth Panel,

Romsey Mill and Skate the Streets. They would allow for community events, cultural celebrations and seasonal festivities.

- **Education:** Provision of dedicated STEM education space working with Cambridge Science Centre for local schools, including a commitment from tenants to engage local primary and secondary schools and partners to improve pathways to the life sciences sector. Outreach and training opportunities focused on deprived areas in Cambridge.
- **Cars:** Significant reductions in on-site car parking from 885 to 395, 374 of which would be in a MSCP. 21 Blue Badge surface bays would be provided, with 38 accessible bays in the MSCP. An associated Car Parking Management Plan would control use of the car parking based on need and nature, such as car share priority with the help of ANPR. This a significant reduction in overall quantum of car parking spaces and the spaces themselves would not be regularly turned over in any one day, with longer single use of spaces compared to existing.
- **Buses:** Services to the site are planned to be increased to 15 per hour at peak times, including increased P&R frequencies, extended lines and additional routes proposed.
- **Walking and Cycling:** A LTN 1/20 compliant cycle Greenway is to be provided through the centre spine of the site for cyclists. High quality walking routes would be provided within the site linking to all possible connections to nearby streets.
- **Infrastructure:** Coldhams Lane junction re-designed to reduce its car dominated engineered design in the interests of pedestrians and cyclists. Off-site improvements to local transport infrastructure including contributions to GCP schemes for Newmarket Road and elsewhere.
- **Transport:** Overall targets for modal shares trips are proposed as follows: +12% for buses, +25% for cycles, minus 60% for cars, +9% for walking. There would be estimated reductions in two-way car trips from the site of 10,000 per weekday and 12,000 per weekend day, which represent significant reductions in pressure on the highway network. Financial contributions towards the costs of implementing additional resident parking scheme(s) and strategic transport schemes including Eastern Access and a potential Monitor and Manage Fund.
- **Culture:** Public Art Delivery Plan, including a scope for young people to be involved.
- **Health:** Positive health impacts are anticipated through the provision of open spaces (2.6Ha) including new landscaping and public realm allowing for social interaction, a commitment to WELL certification and Secured by Design principles in the delivery of a managed, high quality public realm. Health impacts would also arise from the use of the leisure and dedicated youth and community spaces.
- **Inclusion:** Inclusive design commitments to be secured through Design Coding / conditions / S106 for the neurodiverse working with partners such as Red2Green and Make Space for Girls.

3.16 The scope of the social infrastructure and supporting uses to be provided would benefit future employees and the wider public. The community infrastructure would be accessible to the wider community to access and secured through the S106.

30.17 Environmental

30.18 The environmental benefits of the proposed development can be summarised as follows:

- **Location / Re-use:** Making the best use of previously developed land in a sustainable location.
- **Biodiversity:** 100% increase.
- **Trees:** Retention of 58 existing trees, removal of 61 trees and planting of 290 new trees. Inclusion of long-term growing tree species, chosen for biodiversity and climate resilience.
- **Ecology:** Benefits through pollen rich planting, brown / green roofs and nesting and roosting boxes for bats and birds.
- **Sustainable Construction including:**
 - Outstanding BREEAM rating for all office buildings, all other buildings achieving a minimum rating of Excellent with a push target to achieve Outstanding;
 - All electric building programme;
 - High performance fabric first building strategy;
 - Embodied carbon targets of less than 600kgCO₂/m² for office and 750kgCO₂/m² for labs. The strategy for embodied carbon is to be captured through condition and reviewed at every RM's stage which would also require Whole Life Carbon assessments;
 - 19 Rapid EV charging bays in the MSCP;
 - Waste management plan;
 - Construction sustainable sourcing strategy; and
 - Limiting water use through securing all 5 credits for BREEAM Wat 01 credits for water consumption, with the inclusion of a push target to achieve Exemplary Performance credits. This would include rainwater harvesting for W/C flushing, low flow fittings, feasibility studies for grey water harvesting and vacuum toilets and water metering for all incoming mains and tenant zones including leak detection.

30.19 In terms of the environmental benefits, these would be captured through a combination of planning conditions and S106 obligation. A comprehensive set of controls concerning construction would be put in place to limit harm from construction activities, including construction environmental management plans and community liaison.

30.20 Summary of Harm

Social

30.21 Residential Amenity

- 30.22 The Council's own independent daylight and sunlight consultant has indicated that the degree of daylight reduction in such values across a broad range of affected properties and windows at St Matthew's Gardens, Silverwood Close and other properties may not be possible to support. Sunlight issues to property rooms and gardens are also raised. There is a high degree of divergence from standard BRE default targets with adverse impacts arising.
- 30.23 The site is not within or adjacent to the identified City Centre, and whilst along its southern extent it adjoins the railway line, its northern interface includes a suburban residential typology, including low rise and low-density homes at Silverwood Close and higher density homes at St Matthews Gardens with limited depth rear gardens. The extent and degree of harm would be both wide ranging, significantly adverse and acutely felt by existing occupants. Many habitable rooms would feel poorly lit, colder, and gloomier, particularly where living rooms are concerned. Multiple gardens would also feel less pleasant and enjoyable, due to the significant increase in overshadowing that would be experienced.
- 30.24 Significant enclosure of residential outlook by virtue of the footprint and scale of development set by the parameter plans would arise. This is evidenced in modelled views within the applicant's DAS and in cross-sections of the proposal. Affected occupiers in Silverwood Close and St Matthew's Gardens would experience an overbearing massing of buildings resulting in an oppressively enclosed outlook.
- 30.25 Little weight can be given to the three-dimensional illustrative scheme against which the impacts of the proposal are more favourable as tested against the BRE guidance. In any event, the three-dimensional illustrative scheme is not an approved document and still shows a considerable number of adverse impacts to residential properties and would not necessarily be supportable. The proposed Design Code would ensure a high quality of design to come forward for building plots 8, 9 and 10, which are those that are due south of the adversely affected properties, but this would not require reductions in height and in officers' view would do little to improve daylight and sunlight values or issues of enclosure.
- 30.26 The harm to residential amenity would be significantly adverse and permanent. Significant conflict with adopted policies 55, 56, 57 and 60, which seek to safeguard residential amenity and for proposals to have a positive impact on their setting, arises. The scheme would not accord with para. 135 (f) of the NPPF (2024).

30.27 Gym and Pool

- 30.28 The scheme would remove the existing gym and associated pool facility from the site and replace this with a broader range of flexible community uses, which would be secured through the S106. The community space proposed is likely to offer a range of leisure and well-being recreational

opportunities. The existing pool facility is well used and affordable, and some loss or displacement of use to other swimming pools would be experienced. There are, however, at least two gyms close to the site, one of which has its own pool. Whilst the lack of like-for-like replacement of leisure facilities presents a partial conflict with policy 73, the alternative community and social benefits put forward by the applicants mitigate this to the extent that the harm arising would be negligible. A contribution towards the improvement of off-site existing public swimming pool facilities is being explored with the applicant.

30.29 Environmental

30.30 The Council's Conservation Team have identified heritage harm arising from the maximum heights and massing proposed in the context and setting of the site to Mill Road Conservation Area and the Mill Road Cemetery (Grade II Registered Park and Garden). Across a wider City context, paragraph 15.10 of this report, cites a range of heritage assets that would be harmed from the proposal, including conservation areas, listed buildings and registered parks and gardens. The harm arises from the maximum heights and massing proposed in the context of the Cambridge skyline which the scheme would compete with. The harm is evidenced in views, including but not limited to, from Castle Mound and Redmeadow Hill. Cumulative harm with the Grafton Centre redevelopment would also occur.

30.31 The harm to these heritage assets in all instances is categorised as less than substantial, with the cumulative harm considered by officers to be less than substantial at a moderate level. The proposed Design Code would partially but not fully mitigate the heritage harm. Conflict with adopted policies 60, 61 and 62 arises. In terms of landscape and visual harm, the revised application has successfully addressed the majority of the negative and harmful impacts of the original application proposal. While the development would result in significant change, officers are of the view that the site could accommodate the proposed increases in scale and massing in townscape terms. Although a state of 'no harm' cannot be achieved by the proposed development, the resulting harm would be at a low level and a slight conflict with Policies 60 and 67 of the CLP would arise.

30.32 Overall

30.33 The proposal would result in a significant range of economic, social and environmental benefits. The development of a research and development cluster, including laboratory and office buildings on the site, would make best use of brownfield land in what is a highly sustainable location. However, the proposal would not just amount to a location for an employment typology directly encouraged and supported through economic focused Government policy, but it would also create a vibrant sense of place in accommodating a broader range of ancillary retail, leisure and community uses that would not ordinarily be found as part of a typical science park. This is a new form of urban employment lab / office typology not currently found within Cambridge and the applicant's vision for the site

is well formed with a strong set of social and environmental components that would help create a strong sense of place and community, not just for the those working on the site, but visitors and residents of Cambridge.

- 30.34 The applicants have taken significant strides in amending the scheme to address masterplan, massing and height issues. This has included reductions in the heights and modulation of buildings, the provision of better defined and larger open spaces and improved walking and cycling routes. This would all be controlled through a well-developed Design Code that would inform and guide reserved matters. These revisions have sought to overcome / mitigate officers' concerns regarding matters of townscape and heritage and whilst these harms remain, it must be recognised that to accommodate the aspirations of Government policy to deliver meaningful growth, particularly in economic terms on brownfield sites such as this, that a significant degree of change and densification of the site is inevitable. To this extent, whilst special attention and great weight must be given to the preservation of the setting of the City's heritage assets and that harm to the City's wider townscape setting must be carefully considered, officers are of the view that the overall public benefits of the scheme outweigh the heritage and townscape harms identified.
- 30.35 Turning to the impacts of the scheme on residential amenity, delivering large format building footprints at significant height and density adjacent to residential boundaries, provides a challenging brief for an outline application of this nature, particularly when the existing site is low density and noticeable changes to received daylight and sunlight levels and enclosure may be expected. The question arises as to what extent of change in the residential environments of occupiers of St Matthew's Gardens, Silverwood Close and other affected properties is reasonable. Regard must be had to the constrained nature of the St Matthew's Gardens properties at present and the low-density suburban feel of Silverwood Close. The acceptability of the residential impacts is a matter of judgement for the decision maker and can be informed with reference to the BRE Guidance.
- 30.36 Whilst it would be an unreasonable proposition to resist any perceptible change or harm to the residential amenity and environments of neighbouring occupants, officers are of the view that the extent and level of harm that would arise in respect of residential amenity (daylight / sunlight / enclosure) is significantly adverse to the point that the scheme should not be supported. Intrinsicly, the proposal does not appear have appropriately interfaced with its residential context in a manner befitting its location and constraints. It is directly south of many residential properties yet proposes large uncompromising buildings at great scale near rear facing gardens and habitable rooms. The parameters of the proposal do not appear to have evolved with residential amenity as a key consideration.
- 30.37 Whilst the applicants seek to provide a degree of comfort in their analysis of residential impacts through an illustrative three-dimensional scheme, this is not before members for approval, and it would be difficult to reasonably

negotiate downwards from an upper parameter if this has been accepted at outline stage. Neither is it possible to identify and address this issue through the imposition of a planning condition(s) to further restrict the height and massing of the scheme because of the wide range of properties affected and the unknown impacts of so doing; the Council is not in possession of the three-dimensional model and is not in a position to unilaterally understand the reasonableness of any reduced residential impacts in redefining the outer parameters of the proposal. A detailed letter of response from officers to the use of a condition drafted by the applicants to address daylight and sunlight issues has been sent, concluding that the suggestion lacks precision and enforceability amongst other issues.

30.38 Taking all matters into consideration, the balance of the harm arising from the proposal against the benefits of the scheme in the circumstances of this application weighs towards a refusal of planning permission.

31.0 Recommendation

31.1 **REFUSE** planning permission for the following reason:

- By virtue of the scale, massing, and positioning of the maximum building parameters, the proposed development fails to keep potential reductions in daylight and sunlight to a minimum in St Matthew's Gardens, Silverwood Close and other adjacent properties and gardens. The extent and degree of harm would be both wide ranging, significantly adverse and acutely felt by existing occupants. Many habitable rooms would feel poorly lit, colder, and gloomier, particularly where living rooms are concerned. Multiple gardens would also feel less pleasant and enjoyable, due to the significant increase in overshadowing that would be experienced. Moreover, the proposed development would be overly dominant and imposing on neighbouring properties, particularly in St Matthew's Gardens and Silverwood Close, resulting in an oppressively enclosed outlook. The overall harm to residential amenity would be significantly adverse and permanent, contrary to policies 55, 56, 57 and 60 of the Cambridge Local Plan (2018) and paragraph 135 (f) of the National Planning Policy Framework (2024).

31.2 Delegated authority is sought from members, in the event of an appeal and on a without prejudice basis, for officers to negotiate and agree the terms of any S106 agreement, to negotiate and agree the final wording of the draft planning conditions (refer to Appendix G) and to amend / revise the terms of the refusal subject to additional evidence put forward and/or expert advice received.